

Strategic Environmental Assessment (SEA) of the Copdock and Washbrook Neighbourhood Plan

Scoping Report

July 2020

Quality information

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Revision	Revision date	Details	Name	Position
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1. Introduction

Background

- 1.1 AECOM has been commissioned to undertake an independent Strategic Environmental Assessment (SEA) in support of the emerging Copdock and Washbrook Neighbourhood Plan.
- 1.2 The Copdock and Washbrook Neighbourhood Plan (C&WNP) is currently being prepared as a Neighbourhood Development Plan under the Localism Act 2011 and the Neighbourhood Planning (General) Regulations 2012. The Neighbourhood Plan is being prepared in the context of the adopted Babergh Local Plan (2006) and the emerging Babergh and Mid Suffolk Joint Local Plan.
- 1.3 The Neighbourhood Plan area was designated in September 2018, and the key information relating to the emerging C&WNP is presented below in **Table 1.1** below.

Table 1.1: Key facts relating to the emerging C&WNP

Name of Responsible Authority	Copdock and Washbrook Parish Council
Title of Plan	Copdock and Washbrook Neighbourhood Plan (C&WNP)
Subject	Neighbourhood Planning
Purpose	The C&WNP is being prepared as a Neighbourhood Development Plan under the Localism Act 2011 and Neighbourhood Planning (General) Regulations 2012. The plan will be in general conformity with Babergh District Council and Mid Suffolk District Council's emerging Joint Local Plan. The C&WNP will be used to guide and shape development within the Plan area.
Timescale	2018- 2036
Area covered by the plan	The Neighbourhood Plan area shares the same boundaries as Copdock and Washbrook Parish (Figure 1.1 overleaf)
Summary of content	The C&WNP will set out a vision, objectives, strategy and range of policies to guide future development within the designated Neighbourhood Plan area.
Plan contact point	Laura Butters, Copdock and Washbrook Parish Council laurahbutters@gmail.com

Planning policy context

- 1.4 The C&WNP 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 Core Strategy (2008)
 - Suffolk Waste Core Strategy (2011)
- 1.5 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. Babergh District Council's most recent Local Development Scheme (LDS), dated July 2018, sets a timetable for the preparation of the emerging Joint Local Plan, with adoption currently scheduled for early 2020 although an updated timetable is anticipated at the time of writing.
- 1.6 The Copdock & Washbrook Neighbourhood Plan 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. Whilst the emerging Joint Local Plan is not yet adopted, it underwent Regulation 18 consultation between July 22nd and September 30th, 2019 and contributes to the strategic context of the Copdock & Washbrook Neighbourhood Plan.
- 1.7 The settlement hierarchy set out in the adopted Core Strategy identifies Copdock and Washbrook as 'hinterland villages' within the 'functional clusters' of both Capel St Mary and Ipswich, albeit that the village looks towards Ipswich as the main service centre for employment, retail and services. The Core Strategy particularly noted, at paragraph 2.8.3.3, that *"The A14 and A12 are important communication routes essential to the local economy, and congestion at the Copdock junction should not be exacerbated by development in this area." This has particular relevance to planning for any growth in the Neighbourhood Area*.
- 1.8 Within the emerging Joint Local Plan, Copdock and Washbrook remains categorised as a Hinterland Village but is also categorised as being within the "Ipswich Fringe".
- 1.9 Draft Policy SP03 states that Ipswich Fringe settlements *"will act as a focus for development, which will be delivered through site allocations in the Joint Local Plan and/or in Neighbourhood Plans, and windfall development in accordance with the relevant policies."* For Hinterland Villages it states that *"development will be permitted within settlement boundaries where:*
- *Design is sympathetic to its rural surrounding and demonstrates high-quality design by having regard to the relevant policies of the [local] plan;*
 - *A high standard of hard and soft landscaping, appropriate for the location is used;*
 - *Hedgerows and treelines which make an important contribution to the wider context and setting are protected, particularly in edge of settlement locations; and*
 - *The cumulative impact of proposals will be a major consideration."*

SEA explained

- 1.10 The C&WNP has been screened in by LUC on behalf of Babergh and Mid Suffolk District Councils as requiring a Strategic Environmental Assessment (SEA). SEA is a mechanism for considering and communicating the potential impacts of an emerging plan, and potential alternatives in terms of key environmental issues. The aim of SEA is to inform and influence the plan-making process with a view to avoiding and mitigating potential negative impacts.

Through this approach, the SEA for the C&WNP seeks to maximise the emerging plan's contribution to sustainable development.

- 1.11 SEA is undertaken to meet specific requirements prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations).
- 1.12 Two key procedural requirements of the SEA Regulations are that:
- When deciding on 'the scope and level of detail of the information' which must be included in the Environmental Report there is a consultation with nationally designated authorities concerned with environmental issues; and
 - A report (the 'Environmental Report') is published for consultation alongside the Draft Plan (i.e. the draft C&WNP) that presents outcomes from the environmental assessment (i.e. discusses 'likely significant effects' that would result from plan implementation) and reasonable alternatives.

SEA scoping explained

- 1.13 This 'Scoping Report' is concerned with item 1 above. It presents a suggested scope for the SEA so that the designated authorities (Historic England, Natural England and the Environment Agency) can provide timely comment.
- 1.14 Developing the draft scope for the SEA as presented in this report has involved the following steps:
1. Defining the broader context for the C&WNP and associated SEA (i.e. EU, UK Government and local policy and commitments), to summarise the regulatory and legislative landscape;
 2. Establishing the baseline for the SEA, (i.e. the current and future situation in the area in the absence of the C&WNP, in order to help identify the plan's likely significant effects;
 3. Identifying particular problems or opportunities ('issues') that should be a particular focus of the SEA; and
 4. Developing a SEA Framework comprising objectives and appraisal questions on the basis of these issues which can then be used to appraise the draft plan.

Structure of this report

- 1.15 The outcomes of the scoping elements introduced through steps 1–4 above have been presented under a series of key environmental themes, as follows:
- Air quality
 - Biodiversity
 - Climate change (including flood risk)
 - Historic environment
 - Landscape
 - Land, soil and water resources
 - Population and community
 - Health and wellbeing
 - Transport
- 1.16 The selected environmental themes incorporate the 'SEA topics' suggested by Annex I (f) of the SEA Directive¹. These were refined to reflect a broad understanding of the anticipated scope of plan effects.
- 1.17 It is intended that presenting the scoping information under these themes will help enable the reader to easily locate the information of greatest interest to them. Once agreed (i.e. subsequent to consultation on this Scoping Report), the suggested scope presented under nine

¹ The SEA Directive is 'of a procedural nature' (para 9 of the Directive preamble) and does not set out to prescribe particular issues that should and should not be a focus, beyond requiring a focus on 'the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors'

themes will provide a methodological 'framework' for the environmental assessment of the draft plan and reasonable alternatives. The discussion of the scoping information for each theme is presented in **Chapters 2 to 10**.

SEA framework

- 1.18 The SEA Framework provides a way in which environmental effects can be defined and subsequently analysed based on standard tests. Each proposal within the emerging C&WNP will be assessed consistently using the framework.
- 1.19 The SEA objectives and appraisal questions proposed for the C&WNP SEA are presented under each of the themes in **Chapters 2 to 10**, and brought together to form one framework table in **Appendix A**.

2. Air quality

Focus of theme

- Air pollution
- Air quality hotspots
- Air quality management

Policy context

National

- 2.1 The UK's Air Quality Strategy² 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.
- 2.2 Key messages from the National Planning Policy Framework³ (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 or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement. So far as possible these opportunities should be considered at the plan-making stage, to ensure a strategic approach and limit the need for issues to be reconsidered when determining individual applications. Planning decisions should ensure that any new development in Air Quality Management Areas and Clean Air Zones is consistent with the local air quality action plan.
 - Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions and improve air quality and public health.
 - New and existing developments should be prevented from contributing to, being put at unacceptable risk from, or being adversely affected by unacceptable levels of air pollution.
- 2.3 The Air Quality Standards Regulations 2010 transpose into UK law the Ambient Air Quality Directive (2008/50/EC) which sets legally binding limits for outdoor concentrations of major air pollutants which impact public health.
- 2.4 The Clean Air Strategy 2019⁴ 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'.

² 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

³ 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

⁴ DEFRA et al. (2019) Clean Air Strategy 2019 [online] available from: <https://www.gov.uk/government/publications/clean-air-strategy-2019>

- 2.5 The government published the 'UK plan for tackling roadside nitrogen dioxide concentrations' in July 2017.⁵ This is the air quality plan for bringing nitrogen dioxide within statutory limits in the shortest possible time. The plan identifies that "the link between improving air quality and reducing carbon emissions is particularly important" and that consequently the UK government is determined to be at the forefront of vehicle innovation by making motoring cleaner.
- 2.6 Published in January 2018 by the UK Government, 'A Green Future: Our 25 Year Plan to Improve the Environment'⁶ sets out a number of goals and policies in order to help the natural world regain and retain good health. In this context, Goal 1 'Clean Air' and the policies contained within 'Chapter 4: Increasing resource efficiency and reducing pollution and waste' within the 25 year plan directly relate to the air quality SEA theme.

Local

- 2.7 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 (NO₂), 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 Copdock and Washbrook 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)⁷ 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.

- 2.8 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.

Baseline summary

Current baseline

- 2.9 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.
- 2.10 There are no Air Quality Management Areas (AQMAs) within Copdock and Washbrook Parish. However, there are four AQMAs within 5km of the parish boundaries to the north-east within Ipswich. Declared by Ipswich Borough Council, these are listed below and set out in **Figure 2.1** overleaf. All AQMAs have been designated as a result of NO₂ exceedances.⁸

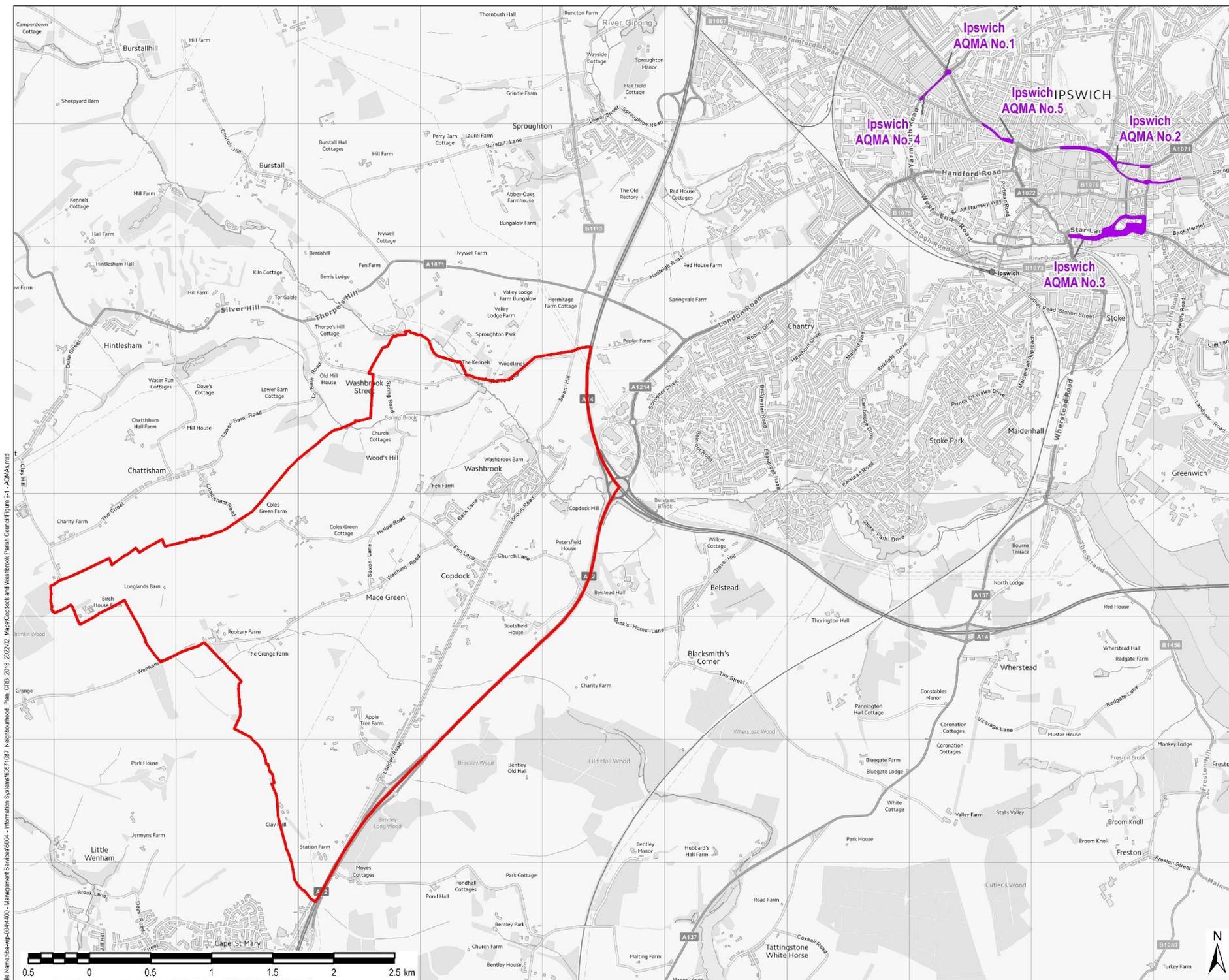
⁵ DEFRA (2017) 'UK plan for tackling nitrogen dioxide concentrations' [online], available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/633269/air-quality-plan-overview.pdf

⁶ 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

⁷ 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

⁸ 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

- 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
- 2.11 While outside of the Parish, it is considered that a high proportion of residents will travel into Ipswich for access to services, facilities, employment and the train station given the increased offer to that of Copdock and Washbrook. New development in the Plan area has the potential to increase congestion, which could therefore lead to increased NO₂ levels within the AQMAs.



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

LEGEND

- Copdock and Washbrook Neighbourhood Plan Area
- Air Quality Management Area (AQMA)

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Purpose of Issue **DRAFT**

Client **COPDOCK AND WASHBROOK PARISH COUNCIL**

Project Title **SEA FOR THE COPDOCK AND WASHBROOK NEIGHBOURHOOD PLAN**

Drawing Title **AIR QUALITY MANAGEMENT AREAS**

Drawn CN	Checked JW	Approved RC	Date 08/07/2020
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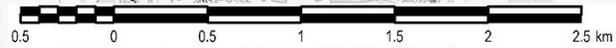
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Drawing Number **FIGURE 2.1**

Rev **01**

File Name: sea-wp-0041400 - Management Services6004 - Information Systems6571087 - Neighbourhood Plan CRB 2018 202020 - MapsCopdock and Washbrook Parish Council June 2021 - AQMAs.mxd



Future baseline

- 2.12 New housing and/ or employment provision within the Plan area has the potential for adverse effects on air quality through increasing congestion and associated levels of pollutants such as NO₂. This is a particular concern with regards to the five AQMAs present in Ipswich to the north-east of the Plan area.
- 2.13 However, new development may also present opportunities to place increased focus on sustainable transport connections, particularly active travel opportunities within and outside of the Plan area. The C&WNP can also ensure that the location of new development minimises and/ or suitably mitigates the effects of increased congestion on local roads to avoid/ reduce impacts on local air quality.

Key issues and opportunities

- 2.14 The following key issues emerge from the context and baseline review:
- Although there are no AQMAs within the Neighbourhood Plan area, there are five AQMAs located nearby within Ipswich which could be affected by further growth within the Plan area. Congestion and air quality impacts will thus need to be considered in the location of new development, and mitigation may be required.
 - Development should seek to maximise active travel opportunities and integrate with the existing public transport network to serve new residents with more sustainable transport options.

SEA objective(s) and assessment questions

- 2.15 Considering the key issues discussed above it is proposed that the SEA should include the following objective:

SEA objective	Assessment questions (will the option/ proposal help to...)
Improve air quality within and surrounding the Neighbourhood Plan area and minimise all sources of environmental pollution	<ul style="list-style-type: none"> • Promote and encourage more sustainable transport options? • Enable sustainable transport infrastructure enhancements? • Encourage development which reduces the need to travel outside of the Neighbourhood Plan area? • Locate and design development so that current and future residents will not regularly be exposed to poor air quality? • Implement measures (such as appropriate planting and provision of green infrastructure) which will help support good air quality in an around the Neighbourhood Plan area? • Ensure development connects to the existing road network, promoting ease of access and suitably mitigating any potential increases in local congestion?

3. Biodiversity

Focus of theme

- Nature conservation designations
- Habitats
- Species
- Geodiversity

Policy context

National

- 3.1 The EU Biodiversity Strategy⁹ was adopted in May 2011 in order to deliver an established new Europe-wide target to '*halt the loss of biodiversity and the degradation of ecosystem services in the EU by 2020*'.
- 3.2 Key messages from the National Planning Policy Framework¹⁰ (NPPF) include:
- One of the three overarching objectives of the NPPF is an environmental objective to 'contribute to protecting and enhancing our natural, built and historic environment' including by 'helping to improve biodiversity.'
 - Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value [...], take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.
 - Planning policies and decisions should contribute to and enhance the natural and local environment by: protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with the statutory status or identified quality in the development plan); and minimising impacts on and providing net gains for biodiversity, including establishing coherent ecological networks that are more resilient to current and future pressures.
 - To protect and enhance biodiversity and geodiversity, plans should:
 - 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
 - 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.

⁹ European Commission (2011) Our life insurance, our natural capital: an EU biodiversity strategy to 2020 [online] available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52011DC0244&from=EN> [accessed 07/12/18]

¹⁰ 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

- 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.
- 3.3 The Natural Environment White Paper (NEWP)¹¹ sets out the importance of a healthy, functioning natural environment to sustained economic growth, prospering communities and personal wellbeing. It was in part a response to the UK's failure to halt and reverse the decline of biodiversity by 2010, and it signalled a move away from the traditional approach of protecting biodiversity in nature reserves to adopting a landscape approach to protecting and enhancing biodiversity. The NEWP also aims to create a green economy in which economic growth and the health of our natural resources sustain each other, and markets, business and Government better reflect the value of nature. It includes commitments to:
- Halve biodiversity loss, support functioning ecosystems and establish coherent ecological networks by 2020;
 - Establish a new voluntary approach to biodiversity offsetting to be tested in pilot areas;
 - Enable partnerships of local authorities, local communities and landowners, the private sector and conservation organisations to establish new Nature Improvement Areas; and
 - Address barriers to using green infrastructure to promote sustainable growth.
- 3.4 Biodiversity 2020: A strategy for England's wildlife and ecosystem services¹² aims to '*halt overall biodiversity loss, support healthy well-functioning ecosystems and establish coherent ecological networks, with more and better places for nature for the benefit of wildlife and people*'.
- 3.5 The 25 Year Environment Plan¹³ sets out the Government's environmental plan of action over the next quarter century, in the context of Brexit. The Plan aims to tackle the growing problems of waste and soil degradation, improving social justice through tackling pollution and promoting the mental and physical health benefits of the natural world. It also sets out how the Government will address the effects of climate change. These aims are supported by a range of policies which are focused on the following six key areas:
- Using and managing land sustainably;
 - Recovering nature and enhancing the beauty of landscapes;
 - Connecting people with the environment to improve health and wellbeing;
 - Increasing resource efficiency, and reducing pollution and waste;
 - Securing clean, productive and biologically diverse seas and oceans; and
 - Protecting and improving the global environment
- 3.6 In this context, Goal 3 'Thriving plants and wildlife' and the policies contained within Chapter 2 'Recovering nature and enhancing the beauty of landscapes' and Chapter 5 'Securing clean, productive and biologically diverse seas and oceans' directly relate to the Biodiversity SEA theme.

Local

- 3.7 The Suffolk Coast Recreational disturbance Avoidance and Mitigation Strategy (RAMS)¹⁴. The Suffolk Coast Recreation Disturbance Avoidance and Mitigation Strategy (RAMS) is a partnership between East Suffolk Council, Ipswich Borough Council and Babergh and Mid

¹¹ HM Gov (2011) The Natural Choice: securing the value of nature [online] available at:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/228842/8082.pdf

¹² DEFRA (2011) Biodiversity 2020: A strategy for England's wildlife and ecosystem services [online] available at:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/69446/pb13583-biodiversity-strategy-2020-111111.pdf

¹³ 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

¹⁴ Footprint Ecology (2019) Recreational Disturbance Avoidance and Mitigation Strategy for Ipswich Borough, Babergh District, Mid Suffolk District and East Suffolk Councils – Technical Report [online] available at:

<https://www.eastsuffolk.gov.uk/assets/Planning/Section-106/Habitat-mitigation/Suffolk-HRA-RAMS-Strategy.pdf>

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.

- 3.8 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.

Baseline summary

Current baseline

European designated sites

- 3.9 There are no internationally designated nature conservation sites within Copdock and Washbrook Parish. However, the Neighbourhood Plan area is located within the 13km “Zone of Influence” (discussed further in **Section 3.13**) of the Stour and Orwell Estuaries Special Protection Area (SPA) and Ramsar site, located to the east of the Plan area (see **Figure 3.1** overleaf).
- 3.10 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 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.¹⁵
- 3.11 **Table 3.1** overleaf contains information about the SPA/ SAC, including key characteristics and vulnerabilities.

¹⁵ Place Services (2020)

Table 3.1 Stour and Orwell SPA/ SAC key information

Site	Area (ha)	Qualifying features	Conservation objectives	Key vulnerabilities/ pressures affecting site integrity
Stour and Orwell Estuaries SPA	3676.92	<p>Annex I species: Over winter:</p> <ul style="list-style-type: none"> • Hen Harrier <i>Circus cyaneus</i> • Black-tailed Godwit <i>Limosa islandica</i> • Dunlin <i>Calidris alpina</i> • Grey Plover <i>Pluvialis squatarola</i> • Pintail <i>Anas acuta</i> • Redshank <i>Tringa totanus</i> • Ringed Plover <i>Charadrius hiaticula</i> • Shelduck <i>Tadorna</i> • Turnstone <i>Arenaria Interpres</i> <p>Waterbird assemblages:</p> <ul style="list-style-type: none"> • Cormorant <i>Phalacrocorax carbo</i> • Pintail <i>Anas acuta</i> • Ringed Plover <i>Charadrius hiaticula</i> • Grey Plover <i>Pluvialis squatarola</i> • Dunlin <i>Calidris alpina alpina</i> • Black-tailed Godwit <i>Limosa limosa islandica</i> • Redshank <i>Tringa tetanus</i> • Shelduck <i>Tadorna</i> • Great Crested Grebe <i>Podiceps cristatus</i> • Curlew <i>Numenius arquata</i> • Dark-bellied Brent Goose <i>Branta bernicla</i> • Wigeon <i>Anas Penelope</i> 	<p>With regard to the individual species and/or assemblage of species for which the site has been classified (“the Qualifying Features”):</p> <p>Avoid the deterioration of the Habitats of the qualifying features, and the significant disturbance of the qualifying features, ensuring the integrity of the site is maintained and the site makes a full contribution to achieving the aims of the Birds Directive.</p> <p>Subject to natural change, to maintain or restore: The extent and distribution of the Habitats of the qualifying features; The structure and function of the Habitats of the qualifying features; The supporting processes on which the Habitats of the qualifying features rely; The populations of the qualifying features; The distribution of the qualifying features within the site.</p>	<p>Coastal squeeze: Coastal defences are present along most of the Orwell coastline to mitigate for impacts from climate change, such as rising sea level. Unless changes are made to the management of the coastline, Habitats supporting qualifying SPA birds will be lost or degraded through coastal squeeze, sedimentation and reduced exposure.</p> <p>Public access/ disturbance: Stour and Orwell Estuaries is subject to land- and water-based activities, including boating and water sports; walking; bait-digging; fishing; wildfowling; and military overflight training. These activities are likely to impact Habitats supporting breeding and overwintering water birds. A better understanding of which species and Habitats are most susceptible; which types of activity are most disturbing; and which locations and times of year are most sensitive is required to ensure the Estuaries are appropriately managed.</p> <p>Changes in species distribution: Declines in the number of bird species present at Orwell coastline have occurred. This is likely to be the result of changes in population and distribution on an international scale, due to climate change.</p> <p>Invasive species: An increase in <i>Spartina anglica</i> may be affecting the growth of <i>Spartina maritima</i>, a key habitat feature for qualifying bird roosting and feeding areas of saltmarsh and mudflat.</p> <p>Planning permission- general: The issue of development in combination with other factors is not fully understood. To ensure</p>

- Goldeneye *Bucephala clangula*
- Oystercatcher *Haematopus ostralegus*
- Lapwing *Vanellus*
- Knot *Calidris canutus*
- Turnstone *Arenaria interpres*.

management is appropriate to the SPA a better understanding of the sensitivities relating to each habitat, species and location to different types of development is required. Difficult issues highlighted by the SIP include;

- a) Assessing the cumulative effects of numerous, small and often 'non- standard' developments.
- b) Development outside the SPA boundary can have negative impacts, particularly on the estuaries' birds.
- c) Assessing the indirect, 'knock-on' effects of proposals.
- d) Pressure to relax planning conditions on existing developments.

Air pollution (impact from atmospheric nitrogen deposition):

Atmospheric nitrogen deposition exceeds the relevant critical loads for coastal dune Habitats used by breeding terns and hence there is a risk of harmful effects.

Inappropriate coastal management:

Due to the presence of existing hard sea defences, such as sea walls there is little scope for adaptation to rising sea levels. Any freshwater Habitats behind failing seawalls are likely to be inundated by seawater, which would result in the loss of this habitat within the SPA.

Fisheries- Commercial and estuarine:

Commercial fishing activities can be very damaging to inshore marine Habitats and the bird species dependent on the communities they support. Any 'amber or green' categorised commercial fishing activities in Habitats Marine Sites are assessed by Kent and Essex Inshore Fisheries Conservation Authority (IFCA). This assessment takes into account any in-combination effects of amber activities and/or appropriate plans or projects.

Stour and Orwell Estuaries Ramsar site

3676.92 **Ramsar criterion 2**

Contains seven nationally scarce plants:

- Stiff saltmarsh-grass *Puccinellia rupestris*
- Small cord-grass *Spartina maritime*
- Perennial glasswort *Sarcocornia perennis*
- Lax-flowered sea lavender *Limonium humile*
Eelgrasses Zostera angustifolia, Z. marina and Z. noltei.

Ramsar criterion 5

Assemblages of international importance; species with peak counts in winter; 63,017 waterfowl.

Ramsar criterion 6

Species/ populations occurring at levels of international importance.

Species with peak counts in spring/ autumn:

- Common redshank *Tringa totanus*

Species with peak counts in winter:

- Dark-bellied brent goose, *Branta bernicla*
- Northern pintail *Anas Acuta*

None available.

Similar to Stour and Orwell Estuaries SPA (See above).

A key threat identified by RIS was erosion.

Erosion:

Natural coastal processes exacerbated by fixed sea defences, port development and maintenance dredging. Erosion is being tackled through sediment replacement for additional erosion that can be attributed to port development and maintenance dredging. A realignment site has been created on-site to make up for the loss of habitat due to capital dredging. General background erosion has not been tackled although a Flood Management Strategy for the site is being produced.

- Grey plover *Pluvialis squatarola*
- Red knot *Calidris canutus islandica*
- Dunlin *Calidris alpina alpina*
- Black-tailed godwit *Limosa limosa islandica*
- Common redshank *Tringa totanus tetanus*

Suffolk Coast Recreational disturbance Avoidance and Mitigation Strategy (RAMS)

- 3.12 In 2016, Natural England identified the Suffolk coast as a priority for strategic and proactive planning engagement and mitigation.
- 3.13 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.¹⁶
- 3.14 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).
- 3.15 Increased recreation without mitigation would result in the significant features of the sites being degraded, or lost. In turn, these internationally important areas would lose their birds and habitat, (and therefore their designations), and the Suffolk Coast would lose significant important areas for birds, plants and wildlife generally.
- 3.16 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.¹⁷ 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.¹⁸

Nationally designated sites

- 3.17 There are no nationally designated nature conservation sites within Copdock and Washbrook Parish, however Hintlesham Woods is a large Site of Special Scientific Interest (SSSI) located approximately 2km west of the parish, and Bobbitshole Belstead SSSI is a geological site located 2.3km east.
- 3.18 The parish falls within Impact Risk Zones (IRZs) for both SSSIs where residential development of 50 dwellings or more will require further consultation with Natural England.
- 3.19 **Hintlesham Woods SSSI** was notified in May 1986 and is 118ha in size. Based on the most recent condition assessment the SSSI is classified as:
- 32.52% in 'Favourable' condition;
 - 65.86% in an 'Unfavourable – recovering' condition; and
 - 1.61% in an 'Unfavourable – no change' condition.
- 3.20 The citation statement for the SSSI states:

“These woods are one of the largest remaining areas of ancient coppice-with-standards woodland in Suffolk. Historical and archaeological evidence show the woods to have been in existence at least since the 12th century. Ramsey Wood is an intact ancient wood, linked to

¹⁶ Footprint Ecology (2019) Recreational Disturbance Avoidance and Mitigation Strategy for Ipswich Borough, Babergh District, Mid Suffolk District and East Suffolk Councils – Technical Report [online] available at: <https://www.eastsuffolk.gov.uk/assets/Planning/Section-106/Habitat-mitigation/Suffolk-HRA-RAMS-Strategy.pdf>

¹⁷ Ibid.

¹⁸ East Suffolk Council (date unknown) Suffolk Coast RAMS Habitat Regulation Assessment (HRA) Record [online] available at: <https://www.eastsuffolk.gov.uk/assets/Planning/Section-106/Habitat-mitigation/Suffolk-Coast-RAMS-HRA-Record.pdf>

Hintlesham Wood by secondary woodland established between the 16th and 19th centuries. Other secondary extensions occurred during this time including Keebles Grove.”

- 3.21 **Bobbitshole Belstead SSSI** was notified in August 1987 and is 1.7ha in size. Based on the most recent condition assessment the whole SSSI is classified as in ‘Favourable’ condition. The citation statement for the SSSI states:
- 3.22 *“This geological site is the type locality for the Ipswichian (Last) Interglacial, where during the excavation of the sewage works, organic lacustrine deposits provided a continuous record of sedimentation, vegetational history, and non-marine mollusca from the Wolstonian late-glacial to the end of Ipswichian – Interglacial (subzone Ip IIb). A nationally important Pleistocene reference site.”*

Locally designated sites

- 3.23 There are a number of County Wildlife Sites (CWSs) within 200m of the parish boundaries (see **Figure 3.2**). To the north of the parish is **Sproughton Park**, to the southwest is **Brimlin Wood and Wenham Thicks** (also designated as Ancient Woodland), to the south is **Bentley Long Wood** (also designated as Ancient Woodland) and to the southeast is Brockley Wood (also designated as Ancient Woodland).
- 3.24 There are two further CWSs within 500m of the parish boundaries - **Old Hall Wood** is located to the south-east (also designated as Ancient Woodland), and to the northeast is **Belstead Brook Woodland**.

Biodiversity Action Plan Priority Habitats (BAPs)

- 3.25 The Priority Habitats are depicted in **Figure 3.2** overleaf. Notably, there are multiple areas of Deciduous Woodland distributed throughout the parish, with several of these being located adjacent to the built-up areas of Copdock and Washbrook. The streams (Spring and Belstead Brook) to the north-west of Washbrook contribute to creating ecological corridors within the parish

Future baseline

- 3.26 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.
- 3.27 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.
- 3.28 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).
- 3.29 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

- 3.30 The following key issues emerge from the context and baseline review:
- The Neighbourhood Plan area falls within the 13km 'Zone of Influence' for the Stour and Orwell Estuaries SPA and Ramsar site. In accordance with the Suffolk Coast RAMS (and Natural England), relevant residential development in Babergh & Mid Suffolk Districts 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 Neighbourhood Plan Area falls within a SSSI IRZ where development of 50 dwellings or more will require further consultation with Natural England, given the presence of Hintlesham Woods SSSI (2km west of the parish), and Bobbitshole Belstead SSSI (2.3km east of the parish).
 - The vast County Wildlife Sites, Ancient Woodland and priority habitats within the Plan area host a variety of plant and animal species (including bats) that contribute to biodiversity and support ecological connectivity. These areas should be retained and enhanced in development.
 - The Neighbourhood Plan can also maximise opportunities to support multiple benefits from biodiversity, such as climate resilience.

SEA objective(s) and assessment questions

3.31 Considering the key issues discussed above it is proposed that the SEA should include the following objectives:

SEA objective	Assessment questions (will the option/ proposal help to...)
Protect and enhance biodiversity and ecological connections within and surrounding the Neighbourhood Plan area.	<ul style="list-style-type: none">• Avoid adverse impacts on the integrity of the Stour and Orwell Estuaries Special Protection Area (SPA) and Ramsar site?• Protect and enhance County Wildlife Sites, including supporting habitats and mobile species that are important to the integrity of the site?• Protect and enhance priority habitats and species, particularly the extensive areas of Ancient Woodland?• Achieve a net gain in biodiversity?• Support enhancements to multifunctional green infrastructure networks?• Avoid habitat fragmentation or loss?

4. Climate change

Focus of theme

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

Context review

National

4.1 Key messages from the National Planning Policy Framework¹⁹ (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.
- 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.

4.2 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.

4.3 The Flood and Water Management Act (2010)²⁰ 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).

¹⁹ 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

²⁰ Flood and Water Management Act (2010) [online] available at: <http://www.legislation.gov.uk/ukpga/2010/29/contents>

- 4.4 The UK Climate Change Act²¹ 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.
- 4.5 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.
- 4.6 The Committee of Climate Change published a 2012 report entitled 'How Local Authorities Can Reduce Emissions and Manage Climate Change Risk'²² 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.
- 4.7 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 report²³ 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

²¹ HM Government (2008): 'Climate Change Act 2008' [online] available at:

<http://www.legislation.gov.uk/ukpga/2008/27/contents>

²² 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/>

²³ 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>

- 4.8 The Clean Air Strategy²⁴ released in 2019 sets out the Government plans for dealing with all sources of air pollution. The strategy sets out proposals in detail and indicates how devolved administrations intend to make their share of emissions reductions, and complements the Industrial Strategy, Clean Growth Strategy and 25 Year Environment Plan.
- 4.9 The Committee of Climate Change published a 2012 report entitled 'How Local Authorities Can Reduce Emissions and Manage Climate Change Risk'²⁵ 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.
- 4.10 Department for Transport (2020) Decarbonising Transport: Setting the Challenge (2020)²⁶ 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.
- 4.11 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.²⁷ 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.
- 4.12 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

- 4.13 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.²⁸
- 4.14 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.

Baseline summary

Current baseline

Climate change mitigation

- 4.15 Reducing greenhouse gas (GhG) emissions is widely acknowledged as a key element of climate change mitigation. CO₂ 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 July 2019. The Council also pledged to

²⁴ 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

²⁵ CCC (2012) 'How local authorities can reduce emissions and manage climate risks' [online] available at:

<https://www.thecc.org.uk/publication/how-local-authorities-can-reduce-emissions-and-manage-climate-risks/>

²⁶ 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

²⁷ 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>

²⁸ Suffolk Climate Action Plan, available at: <http://www.greensuffolk.org/assets/Greenest-County/SCCP/Climate-Change/Suffolk-Climate-Action-Plan-2-FINAL.pdf>

set up a Task Force examine ways in which Babergh & Mid Suffolk Councils will respond to the climate change challenge on a spend to save basis, with the ambition to make Babergh & Mid Suffolk Councils carbon neutral by 2030.²⁹

- 4.16 CO₂ emissions from the built environment are monitored and recorded at Local Authority level.³⁰ **Figure 4.1** shows that CO₂ emissions for Babergh have steadily declined over the period of 2005- 2017, in line with regional and national statistics. Data also shows that Babergh has slightly higher emissions per capita than the East of England as a whole.

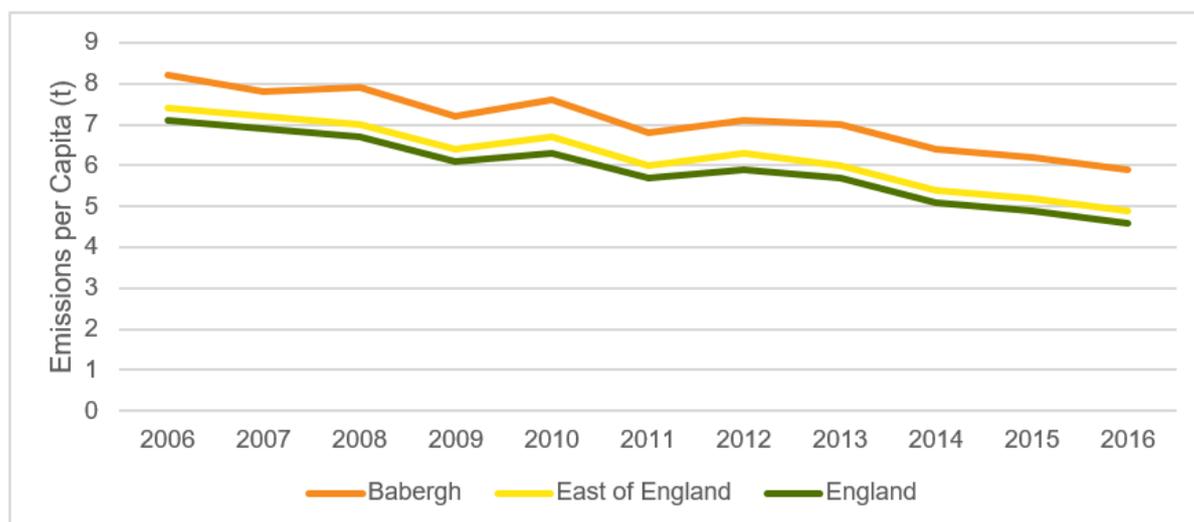


Figure 4.1 Per capita CO₂ emissions (t) 2006 – 2016

- 4.17 Emissions estimates by sector over the ten-year period are set out in **Table 3.1**. The table shows that the transport sector is responsible for the greatest share of emissions in Babergh, which could be related to the lack of rail links in the district.

Table 4.1: Per capita local CO₂ emission estimates; industry, domestic and transport sectors³¹

	Industrial and Commercial (t CO ₂)	Domestic (t CO ₂)	Transport (t CO ₂)	Total (t CO ₂)
Babergh				
2006	2.6	2.7	2.9	8.2
2007	2.4	2.6	2.9	7.8
2008	2.6	2.5	2.8	7.9
2009	2.3	2.3	2.6	7.2
2010	2.4	2.5	2.6	7.6
2011	2.1	2.2	2.6	6.8
2012	2.3	2.3	2.5	7.1

²⁹ ClimateEmergency (2019) Declare a Climate Emergency – Full list of Councils [online] available at: <https://www.climateemergency.uk/blog/babergh/>

³⁰ Department of Energy and Climate Change (2011) 2005 to 2016 UK local and regional CO₂ emissions: Per capital local CO₂ emissions estimates; industry, domestic, and transport sectors [online] available at: <https://www.gov.uk/government/statistics/local-authority-emissions-estimates>

³¹ Department of Energy and Climate Change (2011) 2005 to 2016 UK local and regional CO₂ emissions: Per capital local CO₂ emissions estimates; industry, domestic, and transport sectors [online] available at: <https://www.gov.uk/government/statistics/local-authority-emissions-estimates>

	Industrial and Commercial (t CO₂)	Domestic (t CO₂)	Transport (t CO₂)	Total (t CO₂)
2013	2.2	2.2	2.5	7.0
2014	2.0	1.9	2.5	6.4
2015	1.8	1.8	2.6	6.2
2016	1.6	1.7	2.7	5.9
East				
2006	2.8	2.5	2.1	7.4
2007	2.6	2.4	2.1	7.2
2008	2.6	2.4	2.0	7.0
2009	2.3	2.2	1.9	6.4
2010	2.5	2.3	1.9	6.7
2011	2.1	2.0	1.8	6.0
2012	2.3	2.1	1.8	6.3
2013	2.2	2.1	1.8	6.0
2014	1.9	1.7	1.8	5.4
2015	1.8	1.7	1.8	5.2
2016	1.5	1.6	1.9	4.9
England				
2006	2.9	2.5	1.7	7.1
2007	2.8	2.4	1.7	6.9
2008	2.7	2.4	1.6	6.7
2009	2.4	2.1	1.5	6.1
2010	2.5	2.3	1.5	6.3
2011	2.2	2.0	1.5	5.7
2012	2.4	2.1	1.4	5.9
2013	2.3	2.0	1.4	5.7
2014	1.9	1.7	1.4	5.1
2015	1.8	1.6	1.4	4.9
2016	1.6	1.5	1.4	4.6

Emissions from transport

- 4.18 Road transport is the largest emitter of GHG, with cars contributing 55% of UK domestic transport emissions (68 Metric tonnes CO₂ equivalent (MtCO₂e)) in 2018. Within Suffolk County, almost all transport emissions come from road transport, with a small proportion coming from diesel railways. Of all road transport emissions, the majority is from activity on A roads with a smaller proportion originating from activity on minor roads.³² Emissions can be further broken down into the districts within Suffolk. As shown in **Figure 4.2** below, transport emissions for Babergh and Mid Suffolk are significantly higher than that of Ipswich and East Suffolk, and lower than that of West Suffolk.³³

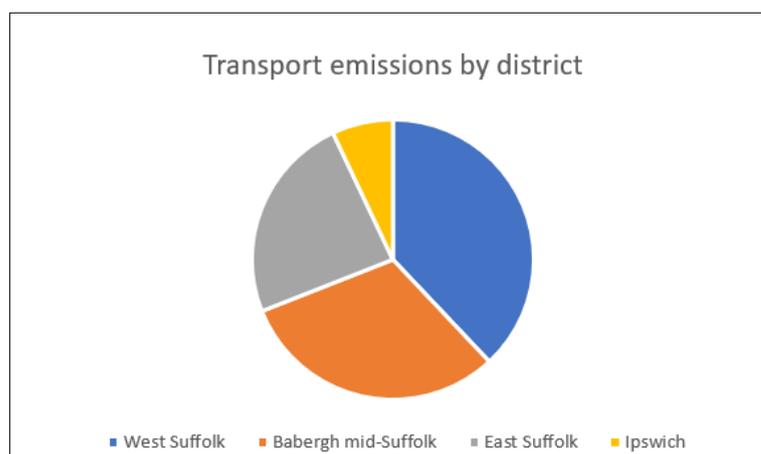


Figure 4.2 Suffolk transport emissions by district³⁴

- 4.19 Babergh district, and Copdock & Washbrook specifically, have high car ownership levels and a large proportion of the population commute by car (see **Chapter 10**). Babergh's high levels of car usage is partly explained by its geography. Babergh is largely rural, characterised by large swathes of countryside, dotted with a few densely populated urban areas and many smaller settlements (such as Copdock and Washbrook Parish). Private transport is therefore important for those living in smaller settlements; in order to access services in larger centres such as Ipswich.
- 4.20 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.
- 4.21 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.³⁵ In terms of the Neighbourhood Plan area, **Figure 4.3** overleaf shows that the Plan area has reasonable access to EV charge points. There are a number of charge points located to the north east of the Plan area within Ipswich, and two 'rapid' chargepoints just south of the Plan area within Capel St Mary.

³² 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>

³³ 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>

³⁴ Ibid.

³⁵ Ibid.

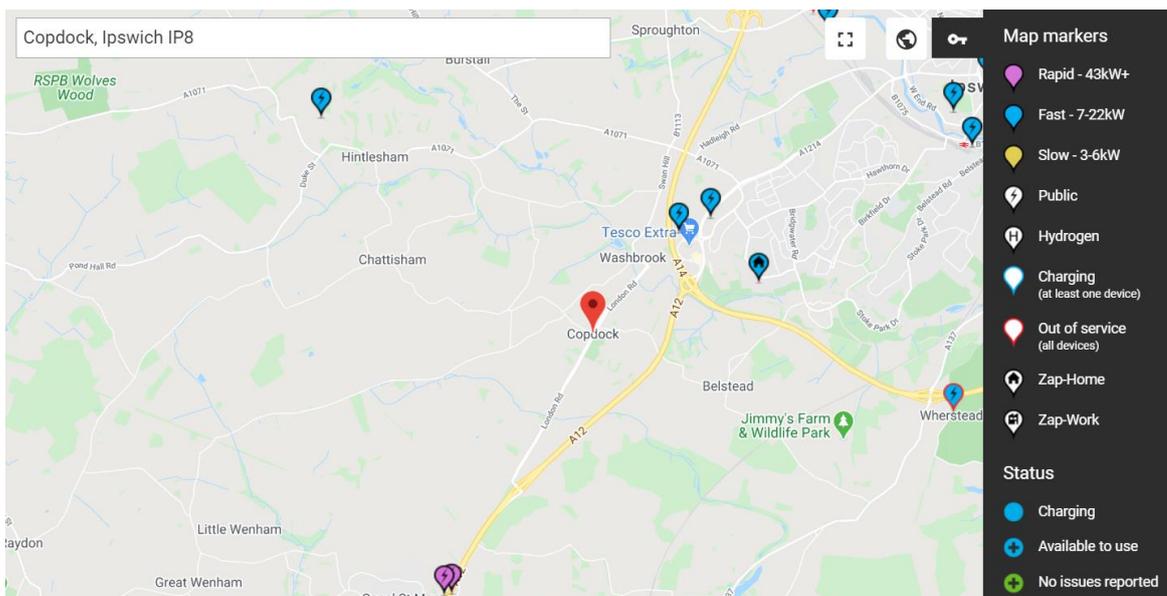


Figure 4.3 EV charge points³⁶

4.22 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.³⁷

Renewable energy

4.23 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 4.2**). 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.

Table 4.2 Renewable energy installed capacity (MW) in Babergh district (2014 - 2018)³⁸

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

Potential effects of climate change

4.24 Following the success of the UK Climate Projections released in 2009 (UKCP09), the Met Office recently released the UK Climate Projections for 2018 (UKCP18).³⁹ UKCP18 provides the most up to date climate observations and projections out to 2100, using cutting-edge climate science. 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.

³⁶ Zapmap (2020) Zap Map [online] available at: <https://www.zap-map.com/live/>

³⁷ 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>

³⁸ DBEIS (2018), Regional Renewable Statistics [online] available at: <https://www.gov.uk/government/statistics/regional-renewable-statistics>

³⁹ Data released 26th November 2018 [online] available at: <https://www.metoffice.gov.uk/research/collaboration/ukcp>

4.25 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%.

4.26 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, flooding of roads, 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

Climate change mitigation

Flood risk

4.27 As shown in **Figure 4.4** overleaf, there is land adjacent to the north of the built-up area of Washbrook that is located within Flood Zone 3 due to the presence of Belstead Brook. There is also land in the southernmost part of the parish that is located within Flood Zone 3. Flood Zone 3 comprises land assessed as having a 1 in 100 or greater annual probability of river flooding (>1%), or a 1 in 200 or greater annual probability of flooding from the sea (>0.5%) in any year.

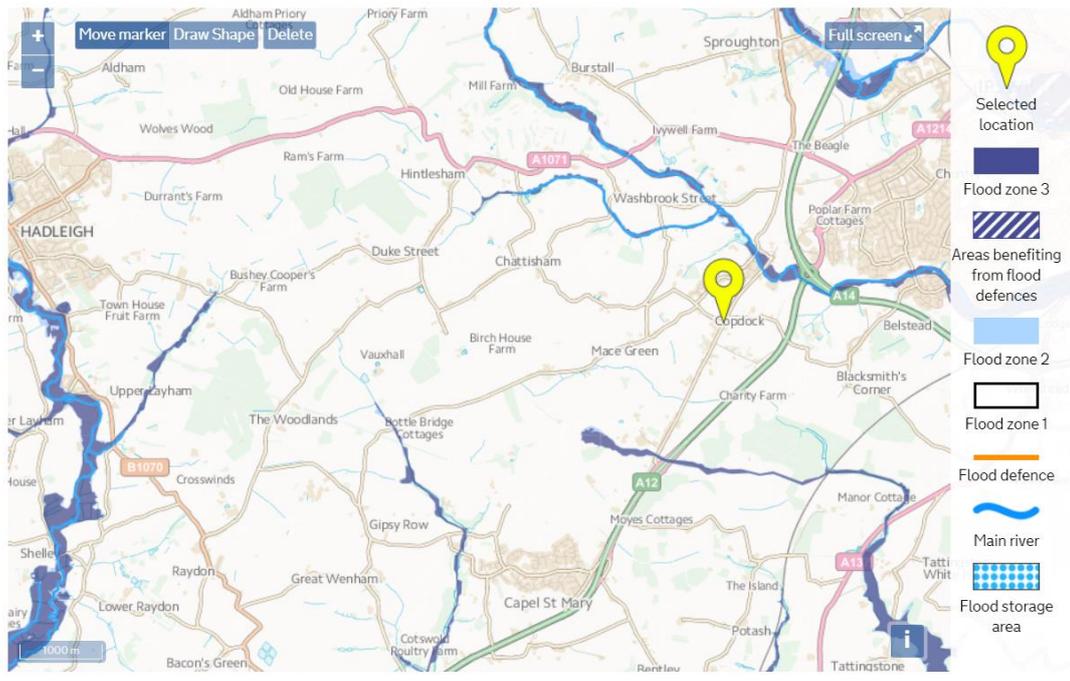


Figure 4.4: Fluvial flood risk in the C&W Neighbourhood Plan area

4.28 Surface water drainage and sewer flooding is also a risk for some parts of the Neighbourhood Plan area. Again, this is largely concentrated around watercourses to the north and south of the parish, as per **Figure 4.5** below. While surface water flood risk largely aligns with that of fluvial flooding (**Figure 4.4** above) surface water drainage is a problem in many parts of the village including on The Street and in parts of London Road.

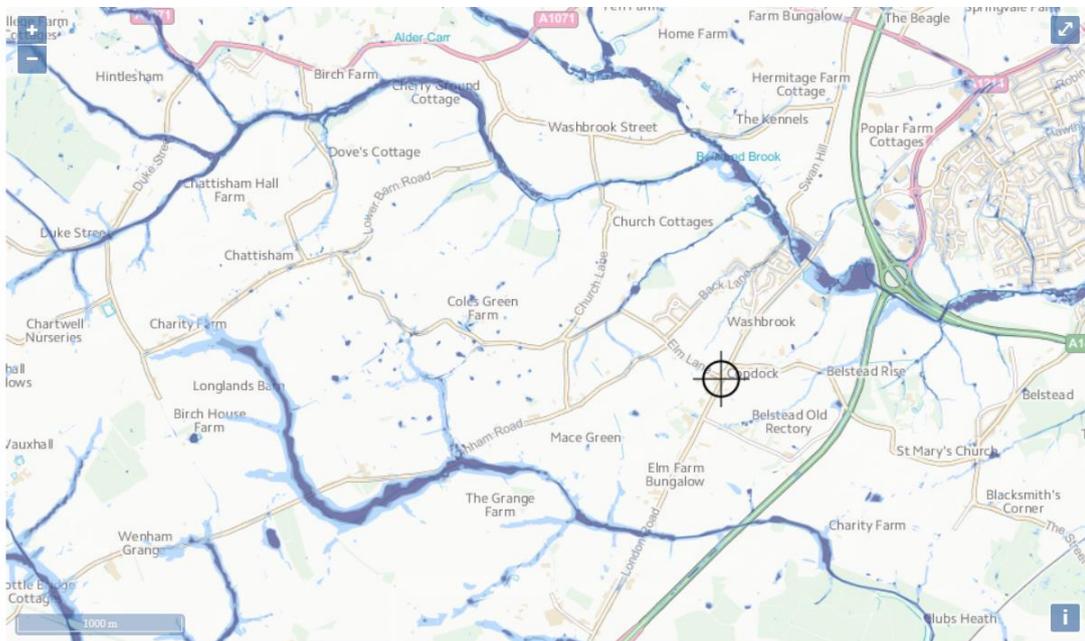


Figure 4.5: Surface water flood risk in the C&W Neighbourhood Plan area

Ecosystem services

- 4.29 The Neighbourhood Plan area falls within the South Suffolk and North Essex Clayland National Character Area (NCA) (further discussed under the Landscape SEA theme in **Chapter 5**). The South Suffolk and North Essex Clayland NCA provides a wide range of benefits to society, each derived from the attributes and processes (both natural and cultural features) within the area. These benefits are known collectively as 'ecosystem services'. Of these ecosystem services, the following regulating services (water purification, air quality maintenance and climate regulation) have been identified for the South Suffolk and North Essex Clayland area:⁴⁰
- 4.30 **Regulating water quality:** Water quality is important for biodiversity, agriculture and public drinking water. The quality of groundwater and surface water is critically dependent on land management in the NCA. Woodlands, hedgerows, grasslands, riparian vegetation and the filtering qualities of the underground sand and gravel and chalk deposits all contribute to the service. The chemical status of groundwater is, however, generally good, as is that of the surface waters. Only 33 per cent of surface waters achieve at least good biological status. The ecological status of the rivers is generally moderate, although the status is poor in the Gipping, Cam, Blackwater, Chelmer, Ter and Quin. The highest priority catchments in terms of water pollution control are the Stour, the Colne and the Gipping. The Little Ouse (Thetford Ouse) and the Gipping and Orwell catchments are priority catchments under the Catchment Sensitive Farming Project.
- 4.31 **Regulating water flow:** A large number of rivers drain the clay plateau, their natural flows increased by flood plain drainage and increasing amounts of non-permeable surfacing within settlements. During low flow conditions, the rivers Stour and Pant/Blackwater can have their flows recharged through the Ely Ouse to Essex Transfer Scheme. The River Stour is further supported by the Stour Augmentation Groundwater Scheme. Woodlands, hedgerows, flood plain wet fen-type habitats, grazing marsh and riparian vegetation all contribute to this service by holding water within the system. Chelmsford is currently at a high risk from flooding, although some protection is provided by its ageing flood alleviation scheme. Braintree, Great Dunmow and Bocking are at risk from the rivers Blackwater and Chelmer. The Mid Colne and River Stour present a flood risk in villages including Bures, Bures St Mary, White Colne and Chappel. A combination of flood banks, a bypass channel on the River Stour and a flood storage area upstream of Halstead has reduced the flood risk.⁴¹ Meldham Washlands flood alleviation scheme on the River Stour provides a high standard of protection to Haverhill, and the creation of flood storage lagoons as at Sible Hedingham eases flood risk further downstream. The River Gipping has the potential to flood parts of western Ipswich, although a flood alleviation scheme at Stowmarket helps to reduce the risk both in Stowmarket and Ipswich.⁴²

Future baseline

- 4.32 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 later in 2020.
- 4.33 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

⁴⁰ Natural England (2015) NCA Profile: 86 [online] available at:
<http://publications.naturalengland.org.uk/publication/5095677797335040#:~:text=The%20South%20Suffolk%20and%20North,road%20through%20the%20Gipping%20Valley>.

⁴¹ Environment Agency (December 2009) North Essex Catchment Flood Management Plan Summary Report

⁴² Environment Agency (December 2009) East Suffolk Catchment Abstraction Management Plan Summary Report

surface water runoff, for example from Belstead Brook. This has the potential to put residents, property and development at a high risk of flood exposure.

- 4.34 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

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

- The Plan area is partially affected by areas of high fluvial flood risk, particularly north of Washbrook coinciding with Belstead Brook. Surface water flood risk affects a slightly broader extent of the Plan area and development proposals will need to deliver sufficient mitigation to minimise the risk of flooding from all sources.
- CO₂ emissions for Babergh have steadily declined over the period of 2005- 2017, in line with regional and national statistics. Data also shows that Babergh has slightly higher emissions per capita than the East of England as a whole, and transport is a significant 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.
- Climate change may have many impacts on water; while some may be beneficial or easily managed, others require careful planning to avoid unacceptable consequences. 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 4.2** above).

SEA objective(s) and appraisal questions

4.36 Considering the key issues discussed above it is proposed that the SEA should include the following objectives:

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

5. Landscape

Focus of theme

- Internationally and nationally protected landscapes
- Landscape character and quality
- Visual amenity

Policy context

National

5.1 Key messages from the National Planning Policy Framework⁴³ (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 Belts is established and can only be altered in exceptional circumstances through preparation or review of a Local Plan.

5.2 The national design guide (2019)⁴⁴ 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.

5.3 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

⁴³ 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

⁴⁴ MHCLG (2019) National Design Guide [online] available at: <https://www.gov.uk/government/publications/national-design-guide>

and economic characteristics.⁴⁵ 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.

- 5.4 The Government's 25 Year Environment Plan⁴⁶ 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

- 5.5 The Suffolk Landscape Character Assessment (2011) identifies landscape typologies across the County at a highly localised scale.⁴⁷
- 5.6 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.⁴⁸
- 5.7 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

Baseline summary

Current baseline

- 5.8 Copdock and Washbrook Neighbourhood Plan area covers the same area as the Parish and stretches from the A14 in the north east, and southwards following the A12 from the Copdock Interchange which forms its boundary. Capel St Mary to the south lies just outside the Parish, as does Chattisham to the north west. The main settlements within the Parish are Washbrook, positioned on the valley sides of Belstead Brook and Copdock holding an elevated position on the plateau. A further cluster of development is found in the south of the Parish close to the A12 junction. Elsewhere the pattern of settlement is dispersed, comprising small hamlets at Mace Green and Washbrook Street and farms.
- 5.9 The village maintains a generally rural environment even though it is close to the outskirts of Ipswich. The village is located approximately 1km to the south-west of Ipswich, with the A14 providing a degree of separation.

Nationally designated landscapes

- 5.10 The closest landscape designation to the parish is the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB), which is located approximately 3.5km to the east of the Plan area.
- 5.11 The Suffolk Coast and Heaths AONB covers an area of around 155 square miles (403 square kilometres) stretching from Kessingland near Lowestoft in the north, to the River Stour in the south. To the east the boundary is formed by the North Sea and the western boundary

⁴⁵ Natural England (2012) 'National Character Area profiles' [online] <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making>

⁴⁶ 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

⁴⁷ Suffolk County Council (2011), 'Suffolk Landscape Character Assessment' [online], available from: http://www.suffolklandscape.org.uk/landscape_typology.aspx

⁴⁸ 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>

encompasses the length of the Suffolk estuaries. The character of the AONB is a product of the underlying geology and its associated natural habitats. It is shaped by the effects of the sea and the interaction with people on the landscape. It is a gently rolling landscape, with the estuaries a common and dominant feature. Where the land does rise, commanding views across the landscape are rewarding.

- 5.12 Farmland dominates much of the AONB, interspersed with picturesque villages and the occasional small seaside town. There are forestry plantations, low lying freshwater marshes and extensive tracts of heathland. The coastal fringe is dominated by estuaries, grazing marshes and lowland heath.
- 5.13 The special qualities of the AONB are set out in the publication on Natural Beauty and Special Quality Indicators⁴⁹ and are summarised below:
- Repetitive pattern of east west estuaries penetrating the coastal farmlands and heaths;
 - Close knit interrelationship of semi-natural and cultural landscapes and built heritage features creating attractive compositions;
 - Important areas of heath and acid grassland and coastal habitats highly valued for biodiversity;
 - Enigmatic built structures and features including Sizewell and Orford Ness which sit within an open large-scale coastal setting;
 - Sea cliffs and shingle beaches contrast with gently rolling sandland heaths and farmland;
 - Long distant and panoramic views and large skies;
 - Villages and small towns which high concentration of built heritage assets and local vernacular connected by network of hedged rural lanes;
 - Designed parkland landscapes overlooking estuaries and high concentration of veteran trees;
 - Associations with writers and poets; and
 - A sense of relative tranquillity.
- 5.14 While the Neighbourhood Plan area is not located within the AONB boundary itself, the rural nature of the parish and its topographic context contributes towards the overall character and setting of the area.
- 5.15 The AONB Management Plan (2018) states that *“where existing development, be that housing or business, is expanded the impacts of incremental developments need to be considered against the purposes of the AONB.⁵⁰ This could include negative impacts on tranquillity, such as increased traffic movements, lighting etc and need to be judged against the cumulative impacts on the designated landscapes. A similar impact is possible from developments within the setting of the AONB.”*
- 5.16 *“Future development must recognise the essential value of tranquillity and should build in solutions that respect this special quality and allow it to be retained. This may include low level/directional/timed lighting, traffic calming and alternative transport options, and further exploring how tranquil areas can be mapped and retained.”*

⁴⁹ LDA Design (2016) Suffolk Coast & Heaths Area of Outstanding Natural Beauty, Natural Beauty and Special Qualities Indicators

⁵⁰ AONB Partnership (2018) Suffolk Coast & Heaths AONB Management Plan 2018 – 2023 [online] available at: <https://www.suffolkcoastandheaths.org/managing/>

National Character Areas

5.17 Copdock and Washbrook Parish lies within the South Suffolk and North Essex Clayland National Character Area (NCA)⁵¹, with the A12 forming the boundary to Suffolk Coast and Heaths NCA.⁵² The boundaries between these character areas are not abrupt but transitional, and although both are relevant to the Parish, the South Suffolk and North Essex Clayland NCA is most strongly expressed.

5.18 Key characteristics relating to the Parish include:⁵³

- *'The area's open yet wooded character is sufficiently endowed with copses and small woods to have wooded horizons, which give a large, distinctly wooded character to the landscape'.*
- *'It is ancient countryside and appears in many areas to have undergone little 20th-century rationalisation to excessively large fields. Close-grained irregular medieval enclosures, bounded by ancient, species-rich high hedgerows'*
- *'The strong sense of history is reinforced by the dispersed settlement pattern of scattered farmsteads and small villages near the top of the valley slopes. They are often located around 'tyes' (commons) or strip greens, with isolated hamlets linked by an intricate maze of narrow, often sunken lanes with wide verges, deep ditches and strong hedgerows'.*

Locally designated landscapes

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

5.20 Land in the north of the Parish is associated with the Belstead Brook valley and was formerly designated a SLA (see **Figure 5.1** overleaf). There is a strong correlation between the valley slopes and the extent of the former SLA. 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.

5.21 The former SLA, where it falls within Copdock and Washbrook Parish, was reviewed in the Copdock and Washbrook landscape assessment (2019) (discussed further below). The landscape was tested against the relevant criteria set out in the Guidelines for Landscape and Visual Impact Assessment (GLVIA 3rd Edition). The results of this assessment are set out in **Table 5.1** below:

Table 5.1 Former SLA assessment

Criteria	Assessment findings
Landscape Quality (condition) - <i>A measure of the physical state of the landscape.</i>	The landscape of the Belstead Brook is in good condition with an intact pattern of historic enclosures defining small to medium scale fields on the valley sides. The pattern of rural lanes and valley floor pastures also remain intact and legible. There is some loss of landscape quality where

⁵¹ Natural England (2015) NCA Profile: 86 [online] available at: <http://publications.naturalengland.org.uk/publication/5095677797335040#:~:text=The%20South%20Suffolk%20and%20North,road%20through%20the%20Gipping%20Valley>.

⁵² Natural England (2015) NCA Profile: 82 [online] available at: <http://publications.naturalengland.org.uk/publication/5626055104659456>

⁵³ Natural England (2015) NCA Profile: 86 [online] available at: <http://publications.naturalengland.org.uk/publication/5095677797335040#:~:text=The%20South%20Suffolk%20and%20North,road%20through%20the%20Gipping%20Valley>.

arable land uses have come close to the valley floor or where there has been more extensive hedgerow removal.

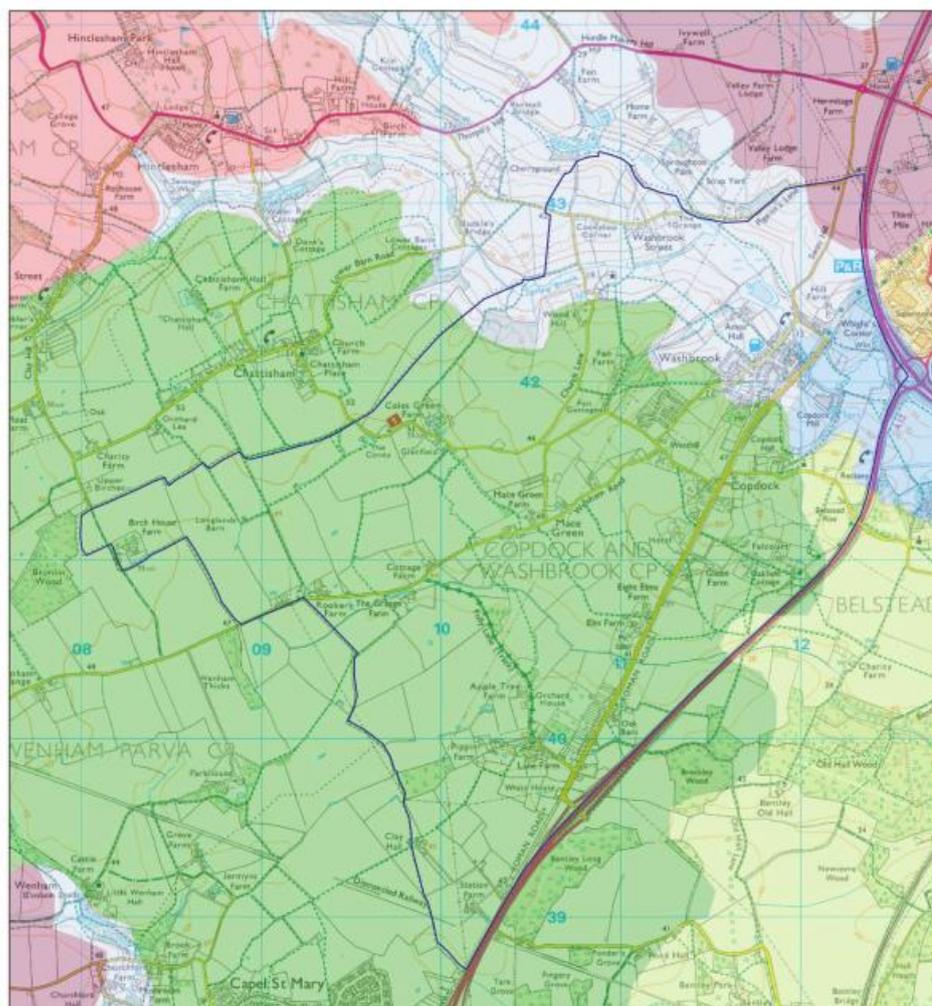
<p>Scenic Quality - <i>The term used to describe landscapes that appeal primarily to the senses.</i></p>	<p>This landscape has a high scenic quality derived from its valley topography and the undulations created by small tributary stream valleys that cut into the valley sides.</p> <p>These changes in landform coupled with landuse, woodland and historic features of interest give rise to views and vistas which are pleasing to the senses. In the northwest part of the former SLA the landscape is in transition rising up onto the plateau landscape. Here the landscape becomes more open with larger scale arable fields and there is evidence of some hedgerow loss and fewer features of interest. As a result landscape quality is declining.</p>
<p>Rarity - <i>The presence of rare elements or features in the landscape or the presence of a rare landscape type.</i></p>	<p>This landscape contains a number of habitats namely wet pastures and wet woodlands as well as veteran trees and old coppiced hazel which are rare in the context of the Parish. The high concentration of designated and non-designated heritage assets in this area and their tangible interrelationships is also rare.</p>
<p>Representativeness - <i>Whether the landscape contains a particular character and/or features or elements which are considered particularly important.</i></p>	<p>This landscape is typical of the river valley landscape found within Suffolk where the key characteristics of the Rolling Valley Farmlands landscape type are well represented.</p>
<p>Conservation Interest - <i>The presence of features of wildlife, earth science or archaeological or historical and cultural interest can add to the value of the landscape.</i></p>	<p>The natural and cultural heritage found in this landscape is highly valued. The area also has high potential for archaeological sites and finds. Upstanding built heritage and the pattern of semi natural habitats are tangible and make a particular contribution to the qualities of the area. Listed buildings include the churches of St Mary and St Peter, Copdock Hall, Coles Green Farm moated manor house, Amor Hall and many other rural vernacular buildings. Wet pastures can be found along Spring Brook and Belstead Brook and add visual and biodiversity interest. Incised lanes can be found at Church Lane and Hollow Lane.</p>
<p>Recreational Value - <i>Evidence that the landscape is valued for recreational activity where experience of the landscape is important.</i></p>	<p>This landscape is highly valued by the local community for informal outdoor recreation. There are a high concentration of public rights of way and rural quiet lanes through this area. Many publicised circular routes pass through this landscape and are enjoyed by local residents. This area includes National Cycle Route 1 which passes along Chattisham Road.</p>
<p>Perceptual aspects - <i>A landscape may be valued for its perceptual qualities, notably wildness and or tranquillity.</i></p>	<p>Away from the A14 and A12 and the centre of Washbrook this landscape has a rural and tranquil character with many factors present which contribute to tranquillity including running water, birdsong, lack of built development and closeness to nature. This landscape often has a small scale and intimate character in places feeling secretive and unchanged.</p>
<p>Associations - <i>Some landscapes are associated with particular people, such as artists or writers or events in history that contribute to perceptions of the natural beauty of the area.</i></p>	<p>There are no known associations with this landscape.</p>

5.22 In addition to the above criteria this landscape is also valued for its function as a setting to the settlement of Washbrook and in maintaining a sense of separation from Ipswich despite its close proximity.

5.23 The majority of the former SLA is considered to constitute a valued landscape and is recommended for designation as Area of Local Landscape Sensitivity within the Neighbourhood Plan.

Suffolk County Landscape Assessment (2011)

- 5.24 The landscape of Copdock and Washbrook Parish is also described in the Suffolk County Assessment (2011) which identified four character types, as shown within **Figure 5.2** overleaf. The assessment identifies landscape typologies across the County at a highly localised scale.⁵⁴
- 5.25 The two predominate landscape types in the Parish are **Rolling Valley Farmlands** along the Belstead Valley and **Ancient Estate Claylands** which forms the higher plateau landscape in the central and southern parts of the Parish.



Copdock and Washbrook Neighbourhood Plan
Landscape Assessment
Figure 1: Landscape Character



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Figure 5.2 Suffolk landscape character types covering the Plan area⁵⁵

- 5.26 Key characteristics and management guidelines of relevance are set out in **Table 5.2** overleaf.

⁵⁴ Suffolk County Council (2011), 'Suffolk Landscape Character Assessment' [online], available from: http://www.suffolklandscape.org.uk/landscape_typology.aspx

⁵⁵ Alison Farmer Associates (2019) Copdock and Washbrook Neighbourhood Plan Landscape Appraisal [online] available at: <http://www.cwnpsg.onesuffolk.net/home/consultation-documentation/>

Table 5.2 Suffolk landscape character types – characteristics and guidance⁵⁶

Landscape type	Key characteristics	Management guidelines
Rolling Valley Farmlands	<ul style="list-style-type: none"> • <i>‘This landscape has small and medium sized fields on the valley sides with an organic form which was created by the piecemeal enclosure of common arable and pasture lands... the field size tends to increase on the upper sides and plateau edges of these valleys. The overall impression in the landscape is of sinuous and organic boundaries around the anciently enclosed fields’.</i> • <i>‘This is a rich and varied landscape with its concentration of prosperous mediaeval towns and villages, contrasting with the smaller and less glamorous settlements of the surrounding plateaux. The steeper valleys and sunken lanes contrast clearly to most of the other valley networks in the county.’</i> • <i>‘Much of this landscape retains its historic patterns, of both the agricultural and built environment.’</i> 	<p>Management guidelines for the landscape type note that this landscape is particularly sensitive due to its topography and rich cultural heritage. More specifically:</p> <ul style="list-style-type: none"> • <i>‘In these valley side landscapes, the visual impact of new vertical elements is increased by the landform. Therefore, new buildings are likely to have a significant impact on both the character and visual amenity of valley floor and valley side landscape types. The setting of specific features and elements of these landscapes, such as small-scale enclosure patterns or historic buildings and monuments, can also be significantly damaged’</i> • <i>‘Valley side landscapes have historically been a focus for settlement. However, large-scale expansion should be confined to the adjacent plateau. In this location the landscape and visual impact can be more easily mitigated with effective planting and design’.</i> • <i>‘Settlement extension in a valley side landscape is likely to have a significant visual impact and adversely affect the character of the landscape, including that of the adjoining valley floor. These developments tend to create a highly visible new “roofscape” on the sides of valleys. The effect of this can be partially mitigated by planting within the development as well as on the perimeter and offsite’.</i> <p>In relation to large scale buildings on or near the valley sides, guidelines state:</p> <ul style="list-style-type: none"> • <i>‘The siting, form, orientation and colour of these buildings make a considerable contribution to mitigating their impact. However, in a valley side situation, especially if located on the skyline, they will have a considerable visual impact. It is preferable to seek a location outside the valley where the visual impact of this type of development can be mitigated much more effectively’.</i>
Ancient Estate Claylands	<ul style="list-style-type: none"> • <i>‘The enclosure pattern is generally ancient and organic in appearance’</i> • <i>‘The settlement pattern consists of occasional villages and numerous dispersed hamlets and farmsteads. Many of the farmsteads are medieval in origin and some are surrounded by moats’</i> • <i>‘Blocks of ancient semi-natural woodland are scattered throughout the area, made up of oak, ash, field maple, hornbeam and small-leaved lime. Hedgerow trees are</i> 	<p>Management guidelines for the landscape type note that:</p> <ul style="list-style-type: none"> • <i>‘Parishes in this landscape tend to consist of multiple clusters of varying sizes. The release of land for development should, if at all possible, reflect the local pattern.</i> • <i>Ribbon development destroys this pattern and can have a considerable impact on the wider landscape’</i>

⁵⁶ Alison Farmer Associates (2019) Copdock and Washbrook Neighbourhood Plan Landscape Appraisal [online] available at: <http://www.cwnpsg.onesuffolk.net/home/consultation-documentation/>

*ubiquitous and in many places this
landscape can feel well wooded'*

- *'Despite the reasonably well-wooded landscape, the plateau landform means that the views are open and can be long. However, the comprehensive network of winding lanes and tall hedges means that other areas can be much more intimate'*
- *'These landscapes are subject to considerable change which is promoted by their relationship to the A12 trunk road. There is considerable intrusion of suburbanisation with horse paddocks, barn conversions and ranch-style fencing. As on other parts of the plateau claylands, industrial agricultural buildings make a significant impact, especially where there is inadequate screening'*

Settlement Sensitivity Assessment (2018) – Landscape fringes of Ipswich

5.27 In 2018, a Settlement Sensitivity Assessment was undertaken which included Copdock and Washbrook as part of an assessment of the fringes of Ipswich.⁵⁷ Although the whole of the Parish was not assessed this study identified a number of sensitivities in relation to the landscape which surrounds the existing settlement pattern. In particular; it highlighted:

- The visual sensitivity of the valley slopes relating to the Belstead Brook;
- The importance of land in forming a physical and perceptual separation between the settlement of the Parish and Ipswich; and
- The sensitivity of heritage assets.

5.28 The land to the south and west of Copdock was considered to have greatest capacity to accommodate development although a number of sensitive features were nonetheless identified in this area also.

Copdock and Washbrook Neighbourhood Plan Landscape Appraisal (2019)

5.29 Alison Farmer Associates was appointed by Copdock and Washbrook Neighbourhood Plan Group to undertake a landscape appraisal of the Parish, in order to provide a robust evidence base to support the development of policy within the emerging Neighbourhood Plan.⁵⁸ 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.

5.30 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:

- Woods Hill – distinctive hillside and woodland;
- Church Lane, sunken lane;
- Hollow Road, sunken lane;
- Lime avenue associated with Felcourt;
- Folly Lane ancient track; and
- Pigeon Lane, sunken lane.

⁵⁷ Babergh, Mid Suffolk, Suffolk Coastal District Councils and Ipswich Borough Council (2018) Settlement Sensitivity Assessment Volume 1: Landscape Fringes of Ipswich [online] available at: <https://www.babergh.gov.uk/assets/Strategic-Planning/Current-Evidence-Base/Settlement-Sensitivity-Assessment-July2018.pdf>

⁵⁸ Alison Farmer Associates (2019) Copdock and Washbrook Neighbourhood Plan Landscape Appraisal [online] available at: <http://www.cwnpsg.onesuffolk.net/home/consultation-documentation/>

Important views

- 5.31 Views are critical in defining and reinforcing sense of place and local distinctiveness, connecting places where people live with the wider environment, providing opportunities to appreciate special qualities and connecting to local landmarks which can aid orientation.
- 5.32 Key views are set out within **Figure 5.3** below and described in **Table 5.3** overleaf.

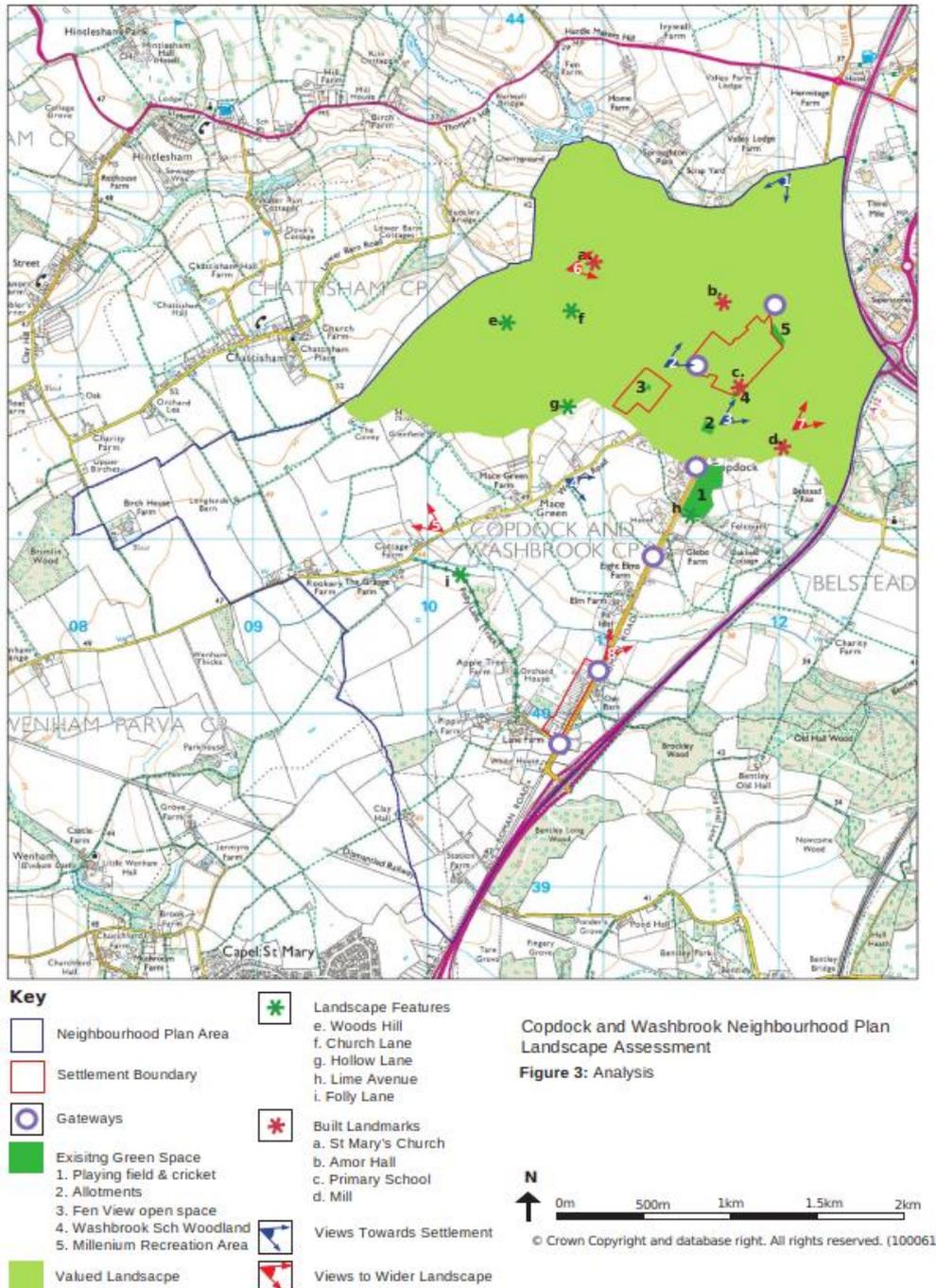


Figure 5.3 Copdock and Washbrook Neighbourhood Plan Landscape Assessment - Landscape analysis⁵⁹

⁵⁹ Alison Farmer Associates (2019) Copdock and Washbrook Neighbourhood Plan Landscape Appraisal [online] available at: <http://www.cwnpsg.onesuffolk.net/home/consultation-documentation/>

Table 5.3 key views within the Neighbourhood Plan area⁶⁰

Viewpoint 1 - Views from the north looking towards Washbrook



This view is representative of views from the northern slopes of the Belstead Valley looking south towards Washbrook. In these views the settlement appears heavily vegetated on the lower slopes with veteran oaks and mature mixed species hedgerows. Fields on the mid and upper valley sides define and embrace the settlement and in general include land above of the 35m contour. These open valley slopes form a setting or backdrop to historic assets such as St Peter's Church and Amor Hall.

Viewpoint 2: Views from the west towards Washbrook



This view is representative of elevated views looking north across Belstead Brook and over Washbrook. Mid-century housing developments on the edge of the settlement at Charlotte's form an abrupt edge to the village. Beyond, the fields on Whight's Corner and Swan Hill define the valley and setting to Washbrook and provide physical separation from the visual influences of commercial development on the edge of Ipswich.

Viewpoint 3: Views from London Road Looking North



This view is representative of the approach towards Washbrook. Only development at Wright's Corner can be seen as the main village is screened by topography and mature vegetation. Views are elevated on the slopes of the Belstead Valley. The width of London Road, road markings, lighting columns and signage have an urbanising influence. Nevertheless, views across to the undeveloped northern valley slopes provide a rural context and sense of separation from Ipswich.

Viewpoint 4: Views from Wenham Road looking east



This view looks towards the western edge of Copdock across relatively flat agricultural land. The edge of the settlement is not visually obvious in the landscape concealed by mature vegetation in property boundaries and hedgerows. As a result, there are only glimpsed views to individual properties. Field sizes close to the settlement edge are medium/small scale and increase in size towards Wenham Road.

⁶⁰ Alison Farmer Associates (2019) Copdock and Washbrook Neighbourhood Plan Landscape Appraisal [online] available at: <http://www.cwnpsg.onesuffolk.net/home/consultation-documentation/>

Viewpoint 5: Views from Wenham Road looking north



This view is representative of views across the plateau farmland around 45-50m. Views north are across open agricultural land to a treed horizon formed by overlapping lines of hedgerows and hedgerow trees. The landscape is broad and rural, development comprising isolated dwellings or farms.

Viewpoint 6: Views from Church Lane looking east



This viewpoint is representative of views across the intimate tributary valley of Spring Brook from Church Lane. Here land use is predominately pastoral in small to medium scale enclosures defined by mature hedges and areas of woodland including alder carr. There are glimpsed views to rural cottages or the Church of St Mary. Along the lane are mature lime trees and former coppiced hazel stools which add to the sense of history in this landscape.

Viewpoint 7: Views from the east towards Ipswich



This viewpoint is representative of northerly views from the elevated slopes of Belstead Brook in the vicinity of a number of heritage assets such as Copdock Hall, St Peter's Church and Copdock Mill. The foreground emphasises the small to medium scale enclosure supporting pasture and defined by mature hedgerows/oaks.

Viewpoint 8: Views along London Road Looking Northeast



This viewpoint is representative of views on leaving the cluster of development in the southern part of the Parish and on approaching Copdock. The gentle depression created by the tributary stream is readily perceived. The edge of Copdock is not apparent in views and those buildings that exist appear clustered around farmsteads or as isolated cottages on the road, set in a wider agricultural context. In places views open up across the wider rural landscape, to the east and west, over medium scale arable fields defined by thick hedgerows.

Assessment of local landscape areas

5.33 The landscape appraisal defines five Local Landscape Areas in terms of its capacity to accommodate development (see **Figure 5.4** below).

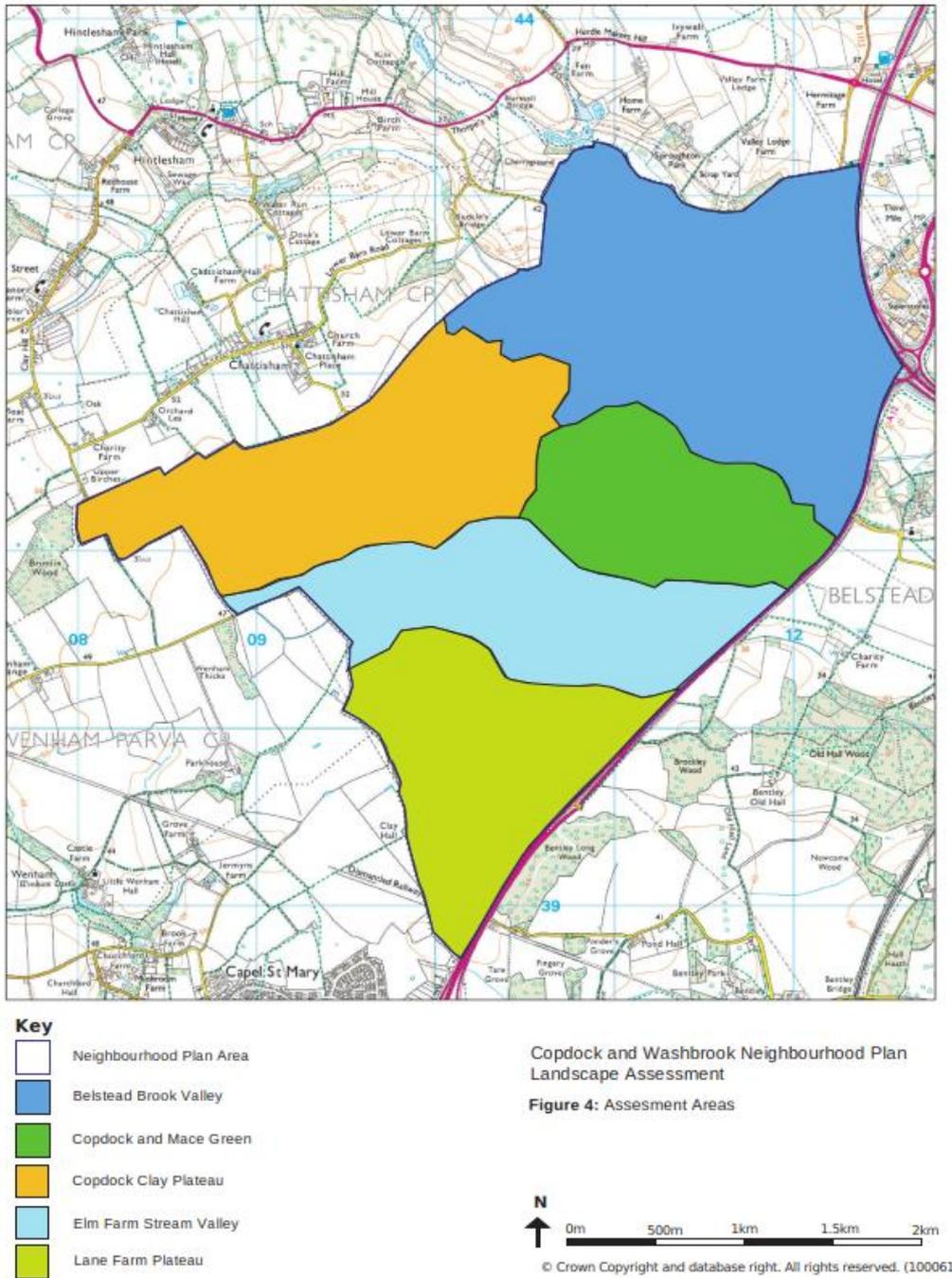


Figure 5.4 Local Landscape character areas⁶¹

5.34 **Table 5.4** overleaf provides a summary of character and context for each Local Landscape Areas, followed by sensitivity and capacity to accommodate housing/employment growth in the context of the existing settlement and its setting.

⁶¹ Alison Farmer Associates (2019) Copdock and Washbrook Neighbourhood Plan Landscape Appraisal [online] available at: <http://www.cwnpsg.onesuffolk.net/home/consultation-documentation/>

Table 5.4 Local Landscape Areas Sensitivity Assessment summary⁶²

Local character area	Physical character	Views/ visibility	Sensitivity/ capacity	Mitigation	Guidance
LCA1: Upper Belstead Brook	This character area lies in the north of the Parish and forms the valley sides of Belstead Brook. It plays a valued role in providing a rural pastoral setting to Washbrook, the rounded upper slopes reinforcing the position and small-scale character of the village and the treed horizon providing visual containment and definition to the crest of the valley slopes.	There are elevated views northwards from London Road across the cluster of development at Whight's Corner to the open valley slopes beyond. In these views the top of Tesco and other commercial development on the edge of Ipswich visually intrudes. In views from the northern valley slopes looking south across the valley, Washbrook is visible on the mid and lower slopes. Where development has extended onto higher slopes it is broken up by mature vegetation, appearing small in scale and does not break the skyline. There are still notable areas of open valley slope above the village which reinforces its mid slope location and provide a rural setting. The village appears small in scale and rural in character.	This area has a high sensitivity to residential and employment development due to its visibility and high quality and also because it performs a particular function as a setting and gap between Washbrook and Ipswich. For this reason, development in this area is very constrained. This area is unlikely to accommodate more than small scale infill developments which strengthen gateways. Due to the visual sensitivity of the valley slopes and rural character of the settlement further employment development in this area is not considered in keeping with landscape or settlement character or quality.	Particular care will need to be taken to avoid development breaking the skyline, appearing to extend the village and erode its position on the lower/middle valley slopes and giving rise to development with prominent roofscapes. This will require careful siting of development and avoidance of materials which are light or bright in colour and or reflective, as well as the creation of well vegetated urban edges.	Seek to screen views towards commercial development on the edge of Ipswich and reduce noise and air pollution through carefully sited woodland planting. Seek to link existing footpaths along the urban edge adjacent to housing development at Charlotte's and to reinstate hedgerow boundaries and the creation of small woodland copses at the corner of fields to soften the existing urban edge. Seek to reduce the urbanising influence of London Road and improve the junction with Chapel Lane to create a stronger gateway and arrival at the village of Washbrook and Wright's Corner. Manage woodland in and around key historic buildings and retain reinstate views to and from these landmarks.
LCA2: Copdock Clay Plateau	This character area lies to the west and south west of the Parish. It comprises open elevated plateau.	This landscape offers open views sometimes to areas beyond the Parish. Due to the nature of the topography and field enclosure pattern views are predominately focused in a northerly direction. To the south of this area the enclosure pattern is smaller scale and the plateau is dissected by a small	This landscape is sensitive to development which has an urbanising influence on the rural character of the lanes as a result of new buildings which do not reflect the scale and character of local vernacular or are associated with curtilage	Mitigation of new development should include careful siting and consideration of mass, form, scale, colour and character of new development ensuring that it relates	Seek to avoid residential and employment development in this landscape and retain its rural character. Manage existing in-field ponds and create new ones where feasible.

⁶² Alison Farmer Associates (2019) Copdock and Washbrook Neighbourhood Plan Landscape Appraisal [online] available at: <http://www.cwnpsg.onesuffolk.net/home/consultation-documentation/>

Local character area	Physical character	Views/ visibility	Sensitivity/ capacity	Mitigation	Guidance
		stream valley which restricts views (see Elm Farm Stream Valley).	treatments which adversely affects the lane verge or hedgerow character. This landscape is also sensitive to large scale farm buildings which may be visible on the skyline over considerable distances. On this basis this landscape has little to no capacity for residential development except single dwellings which are small scale and rural in character. Similarly, there is little capacity for employment development except small scale enterprises associated with existing farm business/ farmsteads.	to traditional styles typically found in the area.	Undertake a veteran tree survey and plant new hedgerow oaks to continue this characteristic feature. Improve habitat networks through the planting of new woodland copses and hedgerows especially where they have been lost along rural lanes. Take care to avoid visual clutter from ancillary development associated with horses. Avoid urban curtilage treatment to properties such as close board fencing, brick walls/gateposts and conifer planting.
LCA3: Copdock and Mace Green	This character area straddles London Road including Elm Lane and Wenham Road and forms the immediate setting to Copdock and the hamlet at Mace Green. It forms an area of raised land above and adjacent to the Belstead Brook.	There are views out from the edges of settlement to the wider rural landscape. Views are generally elevated across Belstead Brook to Ipswich to the north and across the undulating plateau landscape to the west. To the south views are across the gentle depression associated with the stream course and to the east are cut short by vegetation along the existing A12. From Wenham Road there are more open views to the north over wider countryside.	Land in the vicinity of Wenham Road and Elm Road is physically linked to the settlement but is open to the wider landscape and visually sensitive to housing or employment development. It could however accommodate open space or playing fields. This landscape has capacity to accommodate small scale residential development and some small-scale commercial development related to local community facilities. Care will need to be taken to avoid new development breaking the skyline and appearing to intrude on the Belstead Brook or wider rural landscape to the	Any development should form part of a broader master plan which seeks to consider positive changes to the settlement as a whole, reinforcing sense of place and community.	Avoid large scale employment development which is out of keeping with the settlement character and gives rise to increased HGV movements. Avoid large scale residential estates which are out of character with the settlement form and pattern. Avoid development which sits on the upper slopes of the Belstead Valley and is visually intrusive on the valley landscape. Mitigate any development with strong landscape buffers to

Local character area	Physical character	Views/ visibility	Sensitivity/ capacity	Mitigation	Guidance
LCA4: Elm Farm Stream Valley	This character area straddles London Road and is associated with a small west-east stream valley which forms a gentle and shallow depression in the plateau landscape.	The gentle change in topography associated with the stream valley enables views from the upper slopes at the southern edge of Copdock across open countryside. There are also important views across open countryside just north of Oak Barn. Within the lower parts of the valley views out are contained by vegetation and topography such that development is not evident and the valley appear rural and remote from settlement.	This landscape currently forms a valuable break in development along London Road and is therefore sensitive to residential and employment development along London Road which elongates existing loose clusters of development and reduces perceptions of rural gaps between them. Whilst the lowest lying areas are visually more contained with greater capacity to accommodate development, any development here is likely to give rise to a linear pattern of development from the junction of the A12 northwards as far as Elm Lane. Existing development and small scale employment sites have already started to undermine the rural character including the introduction of urban style access, signage and conifer planting. There may be	Ensure any development reflects the rural character of the area and local vernacular styles and avoids urbanising rural lanes or creating linear corridors of development along London Road.	<p>retain the typical wooded skyline of the valley.</p> <p>Retain the small-scale narrow character of the rural lanes in the area especially Elm Road, Wenham Road and Church Lane.</p> <p>Ensure the sensitive management of areas of wet pasture.</p> <p>Strengthen the line of the water course through linear waterside tree planting of species such as alder and willow.</p> <p>Encourage the creation of a wider nature conservation strip along the course of the stream, improving biodiversity and ecological corridors.</p> <p>Protect the character and appearance of the historic route of Folly Lane as a valued recreational route.</p> <p>Seek the removal of non-native conifer planting and reinstatement of native hedgerows.</p>

Local character area	Physical character	Views/ visibility	Sensitivity/ capacity	Mitigation	Guidance
LCA5: Lane Farm Plateau	This character area lies in the southern part of the Parish close to the junction with the A12.	From the wider landscape views are open and across relatively flat medium scale fields defined by hedgerows. The skyline often appears wooded/vegetated such that views are contained. South of this area beyond the Parish there is a higher concentration of woodland many of which are ancient and local wildlife sites.	some scope for further development if set back from the road and if arranged in a farmstead layout and associated with existing clusters at Glebe Farm (close to Copdock) or Red House Farm in the south.	Any development should form part of a broader master plan for the whole of the area which seeks to consider positive changes to this cluster of settlement as a whole, reinforcing sense of place and community.	Manage existing in-field ponds and the creation of new waterbodies where feasible. Undertake a veteran tree survey and plant new hedgerow oaks to continue this characteristic feature. Improve habitat networks through the planting of new woodland copses and hedgerows especially where they have been lost. Protect the rural character of Folly Lane.

5.35 The assessment concludes that the Parish of Copdock and Washbrook has inherited a number of key issues, including:

- Washbrook has limited scope for further housing development as a result of its location on the slopes of the Belstead Brook, which have a high landscape quality, and which are visually sensitive and form a rural and distinctive setting to the village and to Amor Farm.
- The surrounding landscape to the village performs a valued function in maintaining a physical and perceptual separation from Ipswich. Development on the edges of Ipswich has already started to visually intrude into the valley and any further encroachment should be avoided.
- From a landscape perspective the flatter land in the south of the Parish close to the junction with the existing A12 has greatest capacity to accommodate employment development and some residential.
- There is a need to address the current character of London Road and the negative influence it has on sense of place and cohesiveness of existing settlement clusters.

Future baseline

5.36 New development, including infrastructure development, has the potential to lead to incremental changes in landscape quality in and around the Neighbourhood Plan area.

5.37 This may impact upon the landscape features which contribute to the distinctive character, special qualities and setting of the AONB, SLA and LCAs discussed above, which define the Neighbourhood Plan area.

5.38 However, the identification of 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

- Land in the north of the Parish is associated with the Belstead Brook valley and was formerly designated a SLA. New development should consider special qualities, character and important views at this location.
- The Copdock and Washbrook Neighbourhood Plan Landscape Assessment (2019) has generated five Character Areas covering the parish. This identifies that sensitivity and capacity for change varies across the parish; notably Washbrook has limited scope for further housing development as a result of its location on the slopes of the Belstead Brook. Conversely, flatter land in the south of the Parish close to the junction with the existing A12 has greatest capacity to accommodate change.
- The potential effects of development proposed through the Neighbourhood Plan may have implications for the overall character and appearance of the landscape in the future. The C&WNP can seek to ensure that any impacts are minimised through an appropriate spatial strategy and enhanced policy mitigation.
- New development should maximise opportunities to support landscape character through regeneration and brownfield development that improves village settings, high-quality design, green infrastructure improvements and enhanced framing of key views.

SEA objectives and appraisal questions

5.39 Considering the key issues discussed above it is proposed that the SEA should include the following objective:

SEA objective	Assessment questions (will the option/ proposal help to...)
Protect and enhance the character and quality of landscapes and villagescapes.	<ul style="list-style-type: none">• Conserve and enhance the integrity of the Suffolk Coast and Heaths AONB and its setting?• Support Maintain and enhance the special qualities of the landscape character areas covering the Neighbourhood Plan area?• Protect local diversity and settlement identity?• Protect locally important viewpoints contributing to the sense of place and visual amenity of the Neighbourhood Plan area?

6. Historic environment

Focus of theme

- Designated and non-designated sites and areas
- Setting of cultural heritage assets
- Archaeological assets

Policy context

National

6.1 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.

6.2 These messages are supported by the national Planning Practice Guidance (PPG)⁶⁴ 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.

6.3 The national design guide (2019)⁶⁵ 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.

6.4 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

⁶⁴ Ministry of Housing, Communities and Local Government (2016), Planning Practice Guidance [online], available from: <https://www.gov.uk/government/collections/planning-practice-guidance>

⁶⁵ MHCLG (2019) National Design Guide [online] available at: <https://www.gov.uk/government/publications/national-design-guide>

environment' of the Government's 'A Green Future: Our 25 Year Plan to Improve the Environment'⁶⁶ directly relates to the Historic Environment.

- 6.5 Historic England is the statutory body that helps people care for, enjoy and celebrate England's spectacular historic environment. Guidance and advice notes provide essential information for local planning authorities, neighbourhood groups, developers, consultants, landowners and other interested parties on historic environment considerations, and are regularly reviewed and updated in light of legislative changes. The following guidance and advice notes are particularly relevant and should be read in conjunction with the others.
- 6.6 Conservation Area Designation, Appraisal and Management: Historic England Advice Note 1 (February 2019)⁶⁷ 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.
- 6.7 Sustainability Appraisal (SA) and Strategic Environment Assessment (SEA): Historic England Advice Note 8 (December 2016)⁶⁸ provides support to all stakeholders involved in assessing the effects of certain plans and programmes on the historic environment. It offers advice on heritage considerations during each stage of the SA/SEA process and helps to establish the basis for robust and comprehensive assessments.
- 6.8 Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets (2nd Edition) (December 2017)⁶⁹ 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.
- 6.9 Neighbourhood Planning and the Historic Environment: Historic England Advice Note 11 (October 2018)⁷⁰ outlines the importance of considering the historic environment whilst preparing the plan (section 1), which culminates in a checklist of relevant of issues to consider, followed by an overview of what this means in terms of evidence gathering (section 2).

⁶⁶ 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

⁶⁷ 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/>

⁶⁸ 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/>

⁶⁹ Historic England (2017): 'Setting of Heritage Assets: 2nd Edition' [online] available at: <https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/>

⁷⁰ 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/>

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

- 6.10 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

Baseline summary

Current baseline

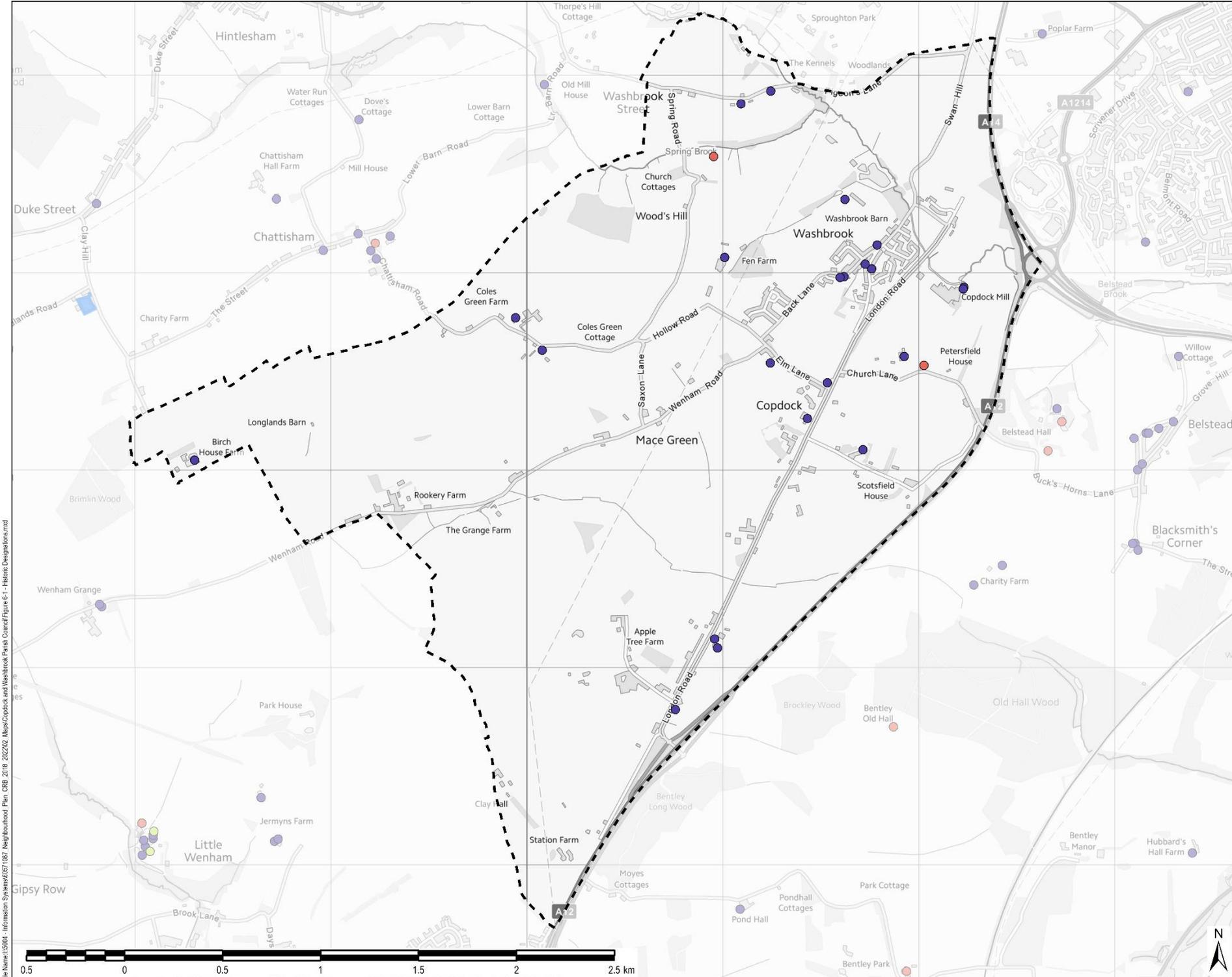
Settlement pattern

- 6.11 Settlement pattern has been significantly influenced by transport routes. London Road and The Street (running through Washbrook) was the route of a Roman Road and crossing point of the Belstead Brook. In the Medieval Period the route connected Ipswich with London. Domesday records the village (Washbrook) as consisting of the Church of St Mary's, located to the east of the settlement on a tributary stream (Spring Brook), a manor house (Amor Hall - also to the west of the village), dwellings around the crossing both sides of the Brook, as well as a dispersed pattern of farmsteads (e.g. Fen Farm), and a mill (Copdock Mill). Early maps also show the establishment of settlement around Felcourt, a smithy at the junction with Elm Lane and St Peter's church to the north.⁷¹

Designated heritage assets

- 6.12 Historic England is the statutory consultee for certain categories of listed building consent and all applications for scheduled monument consent. The historic environment is protected through the planning system, via planning policy, conditions imposed on developers, and other mechanisms.
- 6.13 The Neighbourhood Plan area is relatively limited in terms of designated assets, however there are a number of listed buildings present. These are identified in **Figure 6.1** overleaf and explored further in the subsequent sections.

⁷¹ Alison Farmer Associates (2019) Copdock and Washbrook Neighbourhood Plan Landscape Appraisal [online] available at: <http://www.cwnpsg.onesuffolk.net/home/consultation-documentation/>



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

- LEGEND**
- Copdock and Washbrook
 - Neighbourhood Plan Area
 - Scheduled Monument
- Listed Building**
- Grade I
 - Grade II*
 - Grade II

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Purpose of Issue: **DRAFT**

Client: **COPDOCK AND WASHBROOK PARISH COUNCIL**

Project Title: **SEA FOR THE COPDOCK AND WASHBROOK NEIGHBOURHOOD PLAN**

Drawing Title: **HISTORIC ENVIRONMENT AND LANDSCAPE DESIGNATIONS**

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File Name: I:\5014 - Information Systems\6571087 Neighbourhood Plan_CFB_2018_2020\2 Maps\Copdock and Washbrook Parish Council\Figure 6.1 - Historic Designations.mxd

Listed Buildings

6.14 As set out in **Figure 6.1** above, the Neighbourhood Plan area contains 24 listed buildings, two of which are Grade II* listed. A full list is set out below:

6.15 **Grade II*:**

- Church of St Peter, Pound Lane
- Church of St Mary, Church Lane

6.16 **Grade II:**

- Copdock Lodge, London Road
- Woodsend and No 1 Woodsend, London Road
- Mill House, Mill Lane
- Rosemary Cottage and Hillside, The Street
- The Orchards
- Fen Farmhouse, Hollow Lane
- Chaloners Cottage, The Street
- Dakons, Washbrook Street
- Birch House Farmhouse, Wenham Road
- Tudor Cottage, Elm Lane
- Felcourt, The Avenue
- Belldown, London Road
- Gainsborough, Chelmesis & Inglenook, Back Lane
- Amor Hall, The Street
- The Grange, Washbrook Street
- Coles Green Farmhouse, Chattisham Road
- Huntley House, The Street
- Copdock Mill, Mill Lane
- Barns at Redhouse Farm, London Road
- Redhouse Farmhouse, London Road
- Barn at Copdock Hall, Pound Lane
- Cherry Orchard and Cherry Cottage, Back Lane

6.17 The Parish is limited otherwise in terms of designated assets. There are no Scheduled Monuments, Conservation Areas, or Registered Parks and Gardens within or near to the Plan area.

6.18 The Landscape Appraisal carried out for the Plan area (2019) identifies the following key built landmarks (predominately Listed Buildings) which contribute to sense of place and orientation of the village.⁷² Note the location of these key built landmarks are shown on **Figure 5.3** within **Chapter 5** above:

- Washbrook Church of St Mary, Grade II*
- Amor Hall, Grade II, located off The Street Washbrook
- Copdock Primary School, a Victorian red brick school located on The Street, Washbrook

⁷² Alison Farmer Associates (2019) Copdock and Washbrook Neighbourhood Plan Landscape Appraisal [online] available at: <http://www.cwnpsg.onesuffolk.net/home/consultation-documentation/>

- Copdock Mill and Mill House, both Grade II
- Copdock Church of St Peter, Grade II* and Tithe Barn (16th Century), Grade II

Archaeology

6.19 The parish is known to be rich in archaeological finds and records. Suffolk County Council Archaeological Service's Historic Environment Record (HER) provides details of finds.⁷³ The Suffolk HER lists 28 records of archaeology within the Parish, including Medieval pottery, a Neolithic axehead, Roman coins and Bronze age Pits. These assets provide an important element to the historic interest of a plan area and should be preserved where possible.

Local Landscape Areas and the historic environment

6.20 As discussed within **Chapter 5** above, the Copdock and Washbrook Neighbourhood Plan Landscape Appraisal defines five Local Landscape Areas (LLAs). The appraisal provides a description of character and context followed by an evaluation of sensitivity and capacity to accommodate housing/employment growth in the context of the existing settlement and its setting (summarised in **Table 5.3**). Given the interrelationship between the landscape and historic environment, appraisal findings of relevance to this SEA theme are set out below.

6.21 **LLA1: Upper Belstead Brook:**

- Key characteristics relevant to this area include notable isolated historic buildings such as Copdock Hall, St Mary's Church, St Peter's Church, and Copdock Mill. Additionally Washbrook comprises a mix of building ages and styles with some small scale infill/housing estates.
- The northwestern edge of Washbrook includes a number of mid-late 20th century housing comprising single and two storey detached housing. The edge of these housing estates is generally open with no strong boundary vegetation. As a result, the urban edge can appear abrupt in places when viewed from the surrounding landscape. Elsewhere the settlement edge of Washbrook is well contained by mature vegetation and topography. The north facing and south facing open rural valley sides are important in providing a setting to the settlement.
- The buildings of St Peter's Church (14-15th century) and Copdock Hall a 16th century threshing barn form an exceptional group overlooking the valley and Ipswich. The landscape also has a high archaeological potential particularly to the west of the village.

6.22 **LLA2: Copdock Clay Plateau:**

- Key characteristics relevant to this area include sparse dispersed settlement, consisting of farmsteads and red brick Victorian detached cottages and a historic moated manor site at Coles Green Farm.
- There are no distinct settlements within this area. Farms and isolated cottages are associated with boundary vegetation and appear as isolated features in a wider rural landscape.

6.23 **LLA3: Copdock and Mace Green:**

- Key characteristics relevant to this area include the loose cluster of development at Copdock and associated with Felcourt often comprising large scale properties set within grounds; brick walls along lanes and defining property boundaries; built form focused along London Road including hotel with some areas of development set back from the road e.g. Felcourt and Glebe Farm; and London Road is a strong, linear feature which has an urbanising influence on the settlement.
- Development is mixed and includes a hotel. The area lacks a central focus. There are often smaller scale enclosures and pastures at the back of development which reinforce the rural character of the settlement and form a transition to the wider agricultural landscape.

⁷³ Suffolk County Council (date unknown) Suffolk Historic Environment Record [online] available via: https://www.heritagegateway.org.uk/Gateway/Results_Application.aspx?resourceID=1017

- There are a mix of building types and ages. This, along with the informal layout of dwellings and the trunk road character of London Road, give rise to a lack of visual and physical cohesiveness. This area contains a high concentration of mature and veteran trees which add an established character especially to the east of London Road where a number of the trees are likely to be remnants from the former parkland associated with Felcourt. This area contains a number of listed buildings.
- This part of Copdock is distinct from Washbrook and from other linear development to the south around the junction with the A12. Nevertheless, as noted above, it lacks a strong sense of place in part due to organic form and eclectic mix of buildings but also due to fragmentation caused by the scale of London Road relative to the built character. The village hall and playing fields associated with mature trees reflecting former association with Felcourt give this part of the village a more distinct character. To the east the landscape has a strong historic character comprising remnant parkland landscape associated with Felcourt and the historic lane of Oakfield Road.
- The landscapes forms a setting to the settlement, listed buildings and Belstead Valley.
- Any development should form part of a broader master plan which seeks to consider positive changes to the settlement as a whole, reinforcing sense of place and community.

6.24 **LLA4: Elm Farm Stream Valley**

- Key characteristics relevant to this area include gently undulating topography ranging from c.40-45m AOD; historic lanes and tracks including Folly Lane (bridleway); dispersed pattern of farms including Rookery Farm, The Grange and Elm Farm; small scale enclosure pattern in western half of area reflecting earlier field pattern defined by mature hedgerows and trees giving rise to an intimate landscape with strong time depth; London Road is a strong, linear feature which has an urbanising influence on the area.
- This area contains a dispersed pattern of farmsteads, namely Elm Farm and Tomcat Farm on London Road (the latter being a caravan and camping site) and Cottage Farm, The Grange Farm and Rookery Farm on Wenham Road. As a result, it has a strongly rural character. Some linear housing development along London Road has extended into this area onto the north facing valley slopes and coupled with associated development at Elm Farm, has started to undermine the more rural character of this subtle valley.
- There are no listed buildings or nature conservation sites within this area. However, the course of the river is a valuable ecological corridor. This area contains the historic track Folly Lane which is a valued heritage asset and bridleway. The enclosure patterns in the western part of the area along Wenham Road are small in scale and comprise semi-improved pastures defined by mature hedges with veteran trees.
- Ensure any development reflects the rural character of the area and local vernacular styles and avoids urbanising rural lanes or creating linear corridors of development along London Road.
- Protect the character and appearance of the historic route of Folly Lane as a valued recreational route.

6.25 **LLA5: Lane Farm Plateau**

- Key characteristics relevant to this area include linear housing development dating to latter half of 20th century along London Road; and historic farmsteads at Apple Tree Farm, Oak Barn, Pipin Farm and Lane Farm.
- The settlement has a loose arrangement, and save for the 20th century development along London Road, is focused on historic farmstead clusters.
- There are listed buildings at Oak Barn and White House. There are a number of in field ponds through this area which have a nature conservation value. Folly Lane is suffering from verge erosion and urbanisation from infill development and signage.
- The cluster of development in this area has an organic character, and whilst linear along London Road, it also forms a loose arrangement along Folly Lane reflecting rural origins as a collection of farms.

- The southern parts of this area form a setting to Capel St Mary which lies beyond the Parish to the south.
- Any development should form part of a broader master plan for the whole of the area which seeks to consider positive changes to this cluster of settlement as a whole, reinforcing sense of place and community. Mitigation may include substantial improvements to the gateway and sense of arrival through reconfiguration of London Road and development at key junctions and vistas which help to create definition and local distinctiveness.
- Protect the rural character of Folly Lane.

Heritage at risk

6.26 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, the Heritage at Risk Register, does not identified any designated heritage asset in the Plan area at risk.⁷⁴

Future baseline

6.27 Copdock and Washbrook's rural high-quality countryside and elevated expansive views across 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. Additionally, the 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.

6.28 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

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

- There are 24 listed buildings within the Neighbourhood Plan area, two 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.
- The Landscape Appraisal carried out for the Plan area identifies the five key built landmarks (predominately Listed Buildings) which contribute to sense of place and orientation of the village. These should be protected alongside future growth of the village.
- The parish is known to be rich in archaeological finds and records. The Suffolk Historic Environment Record indicates the presence of 28 assets within the plan area, indicating a high level of undesignated assets which may be at greater risk of harm through insensitive development. Mitigation in the form of appropriate archaeological investigation prior to development may be required.

⁷⁴ Historic England (2018): 'Heritage at Risk Register' [online] available at: <https://historicengland.org.uk/advice/heritage-at-risk/>

SEA objectives and appraisal questions

6.29 Considering the key issues discussed above it is proposed that the SEA should include the following objective:

SEA objective	Assessment questions (Will the option/ proposal help to...)
Protect, conserve and enhance the historic environment within and surrounding the Neighbourhood Plan area	<ul style="list-style-type: none">• Conserve and enhance buildings and structures of architectural or historic interest, both designated and non-designated, and their setting?• Conserve and enhance the special interest, character and appearance of locally important features and their settings?• Support the integrity of the historic setting of key buildings of cultural heritage interest as listed on the Suffolk HER?• Support access to, interpretation and understanding of the historic evolution and character of the environment?• Conserve and enhance archaeological remains, including historic landscapes?• Support the undertaking of archaeological investigations and, where appropriate, recommend mitigation strategies?

7. Land, soil and water resources

Focus of theme

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

Context review

National

7.1 Key messages from the National Planning Policy Framework⁷⁵ (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.

⁷⁵ 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

- 7.2 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.⁷⁶ 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.⁷⁷
- 7.3 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'.⁷⁸ 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.
- 7.4 Safeguarding our Soils: A strategy for England⁷⁹ 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.
- 7.5 The Water Framework Directive⁸⁰ (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.
- 7.6 The Water White Paper 2011⁸¹ sets out the Government's vision for a more resilient water sector. It states the measures that will be taken to tackle issues such as poorly performing ecosystems, and the combined impacts of climate change and population growth on stressed water resources.
- 7.7 The Government's Water Strategy for England⁸² (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;

⁷⁶ MHCLG (2017) Guidance: Brownfield Land Registers [online] available at: <https://www.gov.uk/guidance/brownfield-land-registers>

⁷⁷ Department for Communities and Local Government (2012) National Planning Practice Guidance [online] available at: <http://planningguidance.communities.gov.uk/>

⁷⁸ DEFRA (2018) 25 Year Environment Plan [online] available at: <https://www.gov.uk/government/publications/25-year-environment-plan>

⁷⁹ 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>

⁸⁰ 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.

⁸¹ Defra (2011) Water for life (The Water White Paper) [online] available at: <http://www.official-documents.gov.uk/document/cm82/8230/8230.pdf>

⁸² 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>

- Charging for water; and
 - Regulatory framework, competition and innovation.
- 7.8 Water for life⁸³ (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.
- 7.9 The National Waste Management Plan⁸⁴ 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 Directive⁸⁵. This includes an assessment of the need for new collection schemes, additional waste infrastructure and investment channels, as well as providing general or strategic waste management policies.
- 7.10 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

- 7.11 The Babergh Water Cycle Study (2011)⁸⁶ 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.
- 7.12 The Anglian Water Services (AWS) Water Resource Management Plan (WRMP) (2019)⁸⁷ 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.

⁸³ Defra (2011) Water for life [online] available at: <http://www.official-documents.gov.uk/document/cm82/8230/8230.pdf>

⁸⁴ 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

⁸⁵ Directive 2008/98/EC

⁸⁶ 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>

⁸⁷ Anglian Water (2019) Water Resource Management Plan 2019 [online] available at: <https://www.anglianwater.co.uk/siteassets/household/about-us/wrmp-report-2019.pdf>

- 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.
- 7.13 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.

Baseline summary

Current baseline

Early origins of the Parish

- 7.14 The early origins of settlement within the Parish have been influenced by the underlying geology and drainage system. The higher parts of the Parish have an underlying geology of Red Crag Formation giving rise to sandy light draining soils. These become heavier clay soils to the west where the geology changes to the Thames Group. The valley sides of the Belstead Brook are mainly sand and gravel deposits associated with the Red Crag Group.
- 7.15 The primary watercourse is the Belstead Brook in the north of the Parish which flows through well-defined valley sides. There are a couple of tributary streams which feed into the Brook – one south of Washbrook Street (Spring Brook) which forms a tributary valley, and the other at Amor Hall, which forms gentle undulations in the valley sides. To the south and cutting across the Parish in a west-east direction is a further small stream which create a gentle but notable depression in the more elevated farmland plateau.

Agricultural land quality

- 7.16 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.
- 7.17 The national dataset indicates that agricultural land in the Neighbourhood Plan area is a majority of the parish is comprised of Grade 2 agricultural land. The northern region of the parish around Washbrook appears to be comprised of Grade 3 land, although the subdivision of Grade 3 into 3a and 3b has not been undertaken on a national scale and therefore it is not clear if it is Grade 3a (classed as high quality) or the lower quality Grade 3b. The national dataset also indicates there is Grade 3 agricultural land present in the south-west of the parish.
- 7.18 Natural England (2017) have produced a series of maps showing the 'likelihood of BMV agricultural Land'. Each map forms part of a series at 1:250 000 scale predicting the likelihood of BMV agricultural land (Grades 1, 2 and 3a). The predictions use soil associations which are the mapping unit of the published 1:250 000 scale national soil map as the main basis of the assessment. The map is intended for strategic planning purposes and is not suitable for the definitive classification of any local area or site. Three categories (high, moderate, low) illustrate the likely occurrence of BMV agricultural land. **Figure 7.1** below shows that there is a high and moderate likelihood of BMV land within the Plan area.

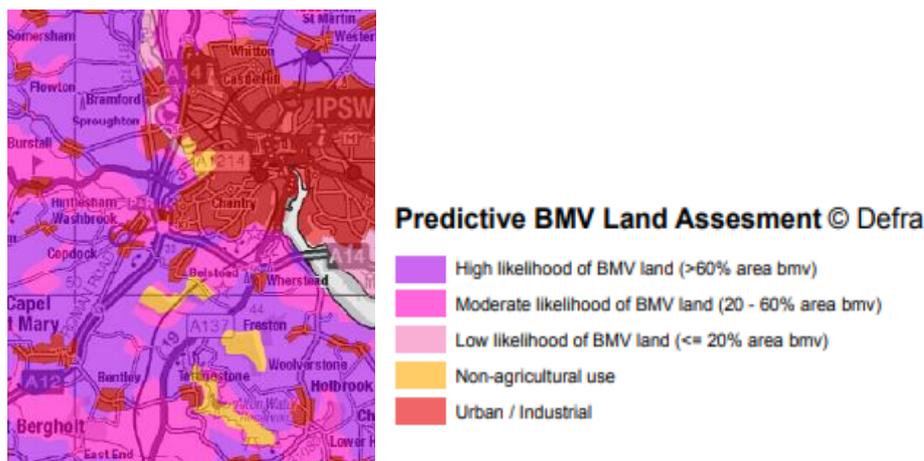


Figure 7.1 Predictive BMV Land Assessment⁸⁸

Minerals

7.19 There is some land in the south of the parish to the east of London road that is located within a 250m mineral safeguarding buffer due to the presence of a Proposed Mineral Extraction Site. Additionally, the majority of the parish is located within a Mineral Consultation Area and there is a further safeguard area approximately 200m to the north-west of the built-up area of Washbrook.

Water management

7.20 The Water Framework Directive (WFD) drives a catchment-based approach to water management with a view to improving the overall water quality of watercourses in any given catchment. Copdock and Washbrook Parish is located within the Anglian River Basin District, specifically, the Suffolk East Management Catchment and Gipping Operational Catchment. The Gipping Operational catchment contains twelve water bodies.

7.21 The ecological and chemical classification of these water bodies is shown in **Table 7.1** below. All twelve of these bodies demonstrate 'Good' chemical status. However, eleven out of twelve of these water bodies do not demonstrate at least 'good' ecological status or potential. The reasons for the deterioration of these bodies are:

- Agriculture and rural land management;
- Urban and transport;
- Industry; and
- Water industry.

Table 7.1. Ecological and chemical classification for surface waters⁸⁹

Number of water bodies	Ecological status or potential					Chemical status	
	Bad	Poor	Moderate	Good	High	Fail	Good
12	0	2	9	1	0	0	12

⁸⁸ Defra (2017) Predictive BMV Land Assessment [online] available at: <http://publications.naturalengland.org.uk/category/5208993007403008>

⁸⁹ Environment Agency (2019) Catchment Data Explorer [online] available at: <https://environment.data.gov.uk/catchment-planning/OperationalCatchment/3199/Summary>

Watercourses

- 7.22 The main water course in the Neighbourhood Plan area is the Belstead Brook which runs down the Street, forming the dividing boundary between the two villages of Copdock and Washbrook.
- 7.23 The whole Neighbourhood Area is affected by a groundwater Source Protection Zone (SPZ). SPZs are declared by the Environment Agency to protect groundwater sources such as wells, boreholes and springs that are used for public drinking water supply. The zones show the risk of contamination from activities that might cause groundwater pollution in the area and are divided in three categories; SPZ1 is defined as the 50-day travel time from any point below the water table to the source. SPZ2 is defined by a 400-day travel time from a point below the water table. SPZ3 is defined as the area around a source within which all groundwater recharge is presumed to be discharged at the source. The entire Neighbourhood Plan area fall within SPZ3.
- 7.24 Much of the east of England is considered to be a Nitrate Vulnerable Zone (NVZ), including the whole Neighbourhood Plan area. Nitrate Vulnerable Zones (NVZs) denote areas at risk from agricultural nitrate pollution.⁹⁰ Whilst the plan area lies within a NVZ, the land uses being proposed through the Neighbourhood Plan are unlikely to increase the risk of pollution.

Water resources

- 7.25 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.⁹¹
- 7.26 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.⁹² Babergh District is served by the East Suffolk WRZ.⁹³ The growth impacts in each WRZ are shown in **Figure 7.2** below. In terms of East Suffolk, demand is predicted to increase by 5-10% between 2017 to 2045.
- 7.27 The WRMP further states that even with the proposed demand management strategy, the Essex Suffolk WRZ will be in a resource deficit by 2044-2055.⁹⁴ It is considered that the WRMP will have outlined measures required to address the predicted shortfalls and investment priorities in this respect.

⁹⁰ Environment Agency and Defra (2018) Nitrate Vulnerable Zones [online] available at: <https://www.gov.uk/government/collections/nitrate-vulnerable-zones>

⁹¹ 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>

⁹² Babergh District Council (2011) Babergh Water Cycle Study [online] available at: <https://www.babergh.gov.uk/assets/Strategic-Planning/Babergh-CoreStrategy/CoreStrategyCoreDocList/BDCWaterCycleStudyFinalv2Report.pdf>

⁹³ Anglian Water (2019) Water Resource Management Plan 2019 [online] available at: <https://www.anglianwater.co.uk/siteassets/household/about-us/wrmp-report-2019.pdf>

⁹⁴ Ibid.

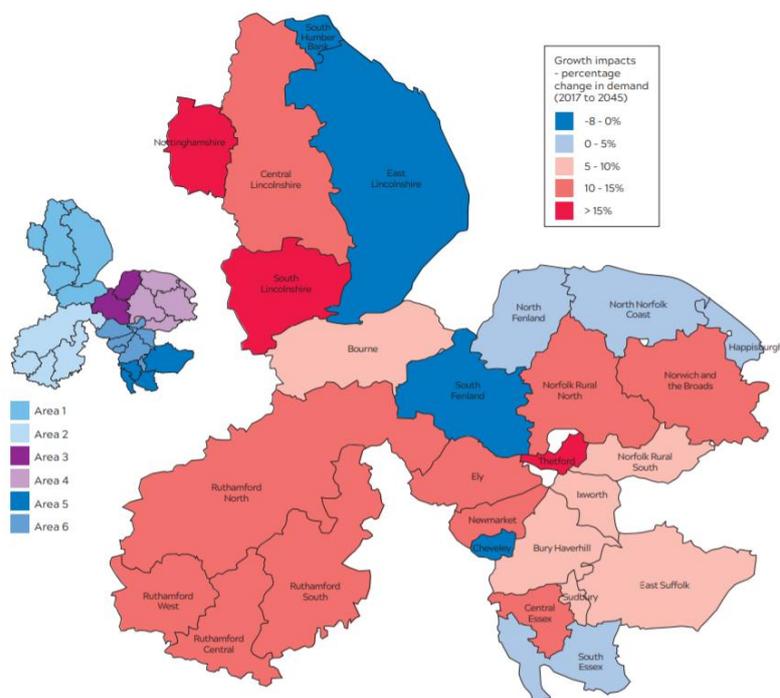


Figure 7.2 Population growth impacts on demand between 2017 to 2045 (DYAA)

Future baseline

- 7.28 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.
- 7.29 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 have the potential to impact areas of BMV land. However there may be opportunities to develop brownfield sites within the existing urban area, or avoid developing the higher quality Grade 2 agricultural land, by directing development toward areas of Grade 3 instead.
- 7.30 It is considered unlikely that limited development in the Neighbourhood Plan area will have a significant impact on the wider area’s Nitrate Vulnerable Zone designation given the strategic scale of the overall NVZ.

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. As a finite resource this should be retained where possible in future growth
- In terms of water resources, the 2019 WRMP states that even with the proposed demand management strategy, the Essex Suffolk WRZ will be in a deficit by 2044-2055. However it is recognised that the WRMP identifies measures to address this deficit.

What are the SEA objectives and appraisal questions for the land, soil and water theme?

7.31 Considering the key issue discussed above it is proposed that the SEA should include the following objective:

SEA objective	Assessment questions (will the proposal help to...)
Ensure the efficient and effective use of land.	<ul style="list-style-type: none"> Promote the use of previously developed land? Promote the use of vacant & derelict brownfield land opportunities?
Protect and enhance water quality and use and manage water resources in a sustainable manner.	<ul style="list-style-type: none"> Support improvements to water quality? Ensure the timely provision of wastewater infrastructure? Ensure appropriate drainage and mitigation is delivered alongside development? Protect groundwater and surface water resources from pollution? Maximise water efficiency and opportunities for water harvesting and/ or water recycling?

8. Population and community

Focus of theme

- Population
- Age structure
- Deprivation
- Household tenures
- Education and skills
- Local services and facilities

Policy context

National

8.1 Key messages from the National Planning Policy Framework⁹⁵ (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 health 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'.

8.2 National Planning Practice Guidance (NPPG)⁹⁶ 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

⁹⁵ 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

⁹⁶ Department for Communities and Local Government (2012) National Planning Practice Guidance [online] available at: <http://planningguidance.communities.gov.uk/>

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.

- 8.3 The Select Committee on Public Service and Demographic Change report *Ready for Ageing?* (2013)⁹⁷ 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

- 8.4 The Babergh & Mid Suffolk District Councils Joint Homelessness Reduction and Rough Sleeping Strategy Homelessness Strategy 2019-2024 sets out the homelessness strategy in the area⁹⁸. 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.
- 8.5 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.
- 8.6 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.

⁹⁷ 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/>

⁹⁸ 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 summary

Current baseline

Population

Table 8.1: Population Change between 2001- 2011⁹⁹

	Copdock and Washbrook	Babergh	East	England
2001	1,104	83,461	5,388,140	49,138,831
2011	1,114	87,740	5,846,965	53,012,456
Population change 2001-2011	0.9%	5.1%	8.5%	7.9%

8.7 **Table 8.1** indicates the change in resident population for the Plan area between the period of 2001- 2011. The population of Copdock and Washbrook increased by 0.9% during this period, at a comparatively slower rate than for Babergh (5.1%), the East (8.5%) and England (7.9%) as a whole.

Age structure

Table 8.2: Age Band (% of total)¹⁰⁰

	Copdock and Washbrook	Babergh	East	England
0-15	17.8%	18.1%	19%	18.9%
16-24	7.4%	9.1%	10.9%	11.9%
25-44	19.8%	22.4%	26.5%	27.5%
45-59	24.2%	21.1%	19.8%	19.4%
60+	30.8%	29.3%	23.9%	22.3%
Total Population	1,114	87,740	5,846,965	53,012,456

8.8 **Table 8.2** shows the age distribution within the Plan area, presented as age bands. The proportion of residents in the Plan area over the age of 60 (30.8%) is comparatively larger than figures for Babergh (29.3%), the East (23.9%) and England as a whole (22.3%). This is the largest group of the resident population. Statistics for residents under the age of 44 is comparatively lower than district-level, regional and national averages.

⁹⁹ ONS (no date): Census 2011: Population Density 201; Population Density 2001

¹⁰⁰ ONS (no date): Census 2011: Age Structure 2011

Deprivation

Table 8.3: Household Deprivation¹⁰¹

	Copdock and Washbrook	Babergh	East	England
Not Deprived				
Deprived in no dimensions	50.9%	47.5%	44.8%	42.5%
Deprived				
Deprived in 1 dimension	30.5%	33.2%	33%	32.7%
Deprived in 2 dimensions	14.8%	16.5%	17.9%	19.1%
Deprived in 3 dimensions	3.8%	2.7%	4%	5.1%
Deprived in 4 dimensions	0.0%	0.2%	0.4%	0.5%
Total deprived	49.2%	52.5%	55.2%	57.4%

- 8.9 **Table 8.3** shows relative household deprivation within Copdock and Washbrook. A high number of residents' households are deprived in no dimensions (50.9%) when compared to Babergh (47.5%), the East region (44.8%) and England as a whole (42.5%).
- 8.10 Lower Super Output Areas (LSOAs) are a geographic hierarchy designed to improve the reporting of small area statistics in England and Wales. They are standardized geographies designed to be as consistent in population as possible. Copdock and Washbrook falls within two LSOAs; Babergh 005C and Babergh 005A.
- 8.11 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. The East Northamptonshire 004A comprises one of the 50% least deprived overall IMD areas in the Country. The results of the 2019 IMD for the Babergh 005C and Babergh 005A LSOAs are presented in **Table 8.4** (overleaf).

Table 8.4: IMD 2019 Indices for Copdock and Washbrook¹⁰²

IMD Indices	005A	005C
Overall IMD	50% least deprived	50% least deprived
Income Deprivation	30% less deprived	40% least deprived
Employment Deprivation	30% least deprived	30% least deprived
Education, Skills and Training	20% least deprived	40% least deprived
Health Deprivation and Disability	20% least deprived	30% least deprived
Crime	40% least deprived	40% most deprived
Barriers to Housing and Services	10% most deprived	20% most deprived
Living Environment Deprivation	40% most deprived	30% most deprived
Income Deprivation Affecting Children	10% least deprived	50% least deprived
Income Deprivation Affecting Older People	40% least deprived	30% least deprived

- 8.12 As shown in **Table 8.4** above, levels of deprivation in the Plan area for the two LSOAs are predominantly low in comparison to other areas in the country. However, areas of comparatively higher levels of deprivation are crime (for 005C), barriers to housing and services and living environment deprivation.

¹⁰¹ ONS (2011) Table QS119EW

¹⁰² IMD 2019 Viewer [online] available from: http://dclgapps.communities.gov.uk/imd/iod_index.html#

Household tenures

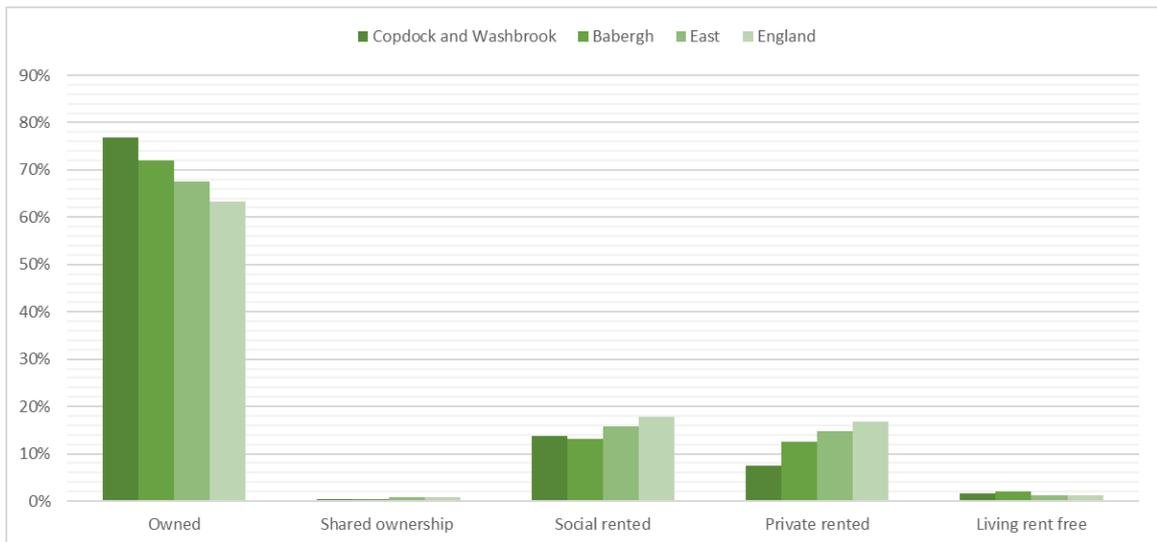


Figure 8.1: Household tenure¹⁰³

8.13 **Figure 8.1** shows the household tenure within the Plan area. A large proportion of residents in Copdock and Washbrook own their own homes (76.8%), higher than comparative figures for the district (71.9%), region (67.6%) and nation as a whole (63.3%). A relatively low proportion of residents rent accommodation within the Plan area (21.2%) in comparison to Babergh (25.7%), the East (30.4%) and country as a whole (34.5%).

Education and skills



Figure 8.2: Highest Level of Qualification¹⁰⁴

8.14 As shown in **Figure 8.2**, a relatively high proportion of residents in the Plan area don't have any qualifications (76.7%) in comparison to the district (77.2%), region (77.5%) and country as a whole (80.6%). Of those with qualifications, the majority have at least Level 4 qualifications and above (5.2%), however this lower than comparative figures for Babergh (77.2%), the East (77.5%) and the country as a whole (80.6%).

¹⁰³ ONS (2011) Table QS119EW

¹⁰⁴ ONS (2011) Table QS501EW

Employment

8.15 There are many employment sites and businesses in Copdock and Washbrook, predominantly located along London Road. The largest of these is Copdock Mill, manufacturers of retail and wholesale animal feed for over 100 years, sold locally at Gladwell Pet and Country Stores as well as distributed across the south-east of England. In addition, the Ipswich Hotel, also on London Road, currently has 83 rooms as well as conference facilities and is a popular destination for business and leisure stays. Nearby is The Lodge, a 43-bed residential care home.

8.16 The existing businesses in the parish play an important role in the economy of both the local and wider area.

8.17 **Figure 8.3** below shows occupations within the Plan area as a percentage of those employed. The most representative occupational bands of residents in Copdock and Washbrook are:

- Associate professional & technical occupations (15.3%)
- Managers, directors, senior officials (15.1%)
- Skilled trades occupations (14.4%)

8.18 In comparison to figures for the district, region and nation as a whole, a comparatively large proportion of residents are within the following occupational bands:

- Managers, directors, senior officials
- Associate professional & technical occupations

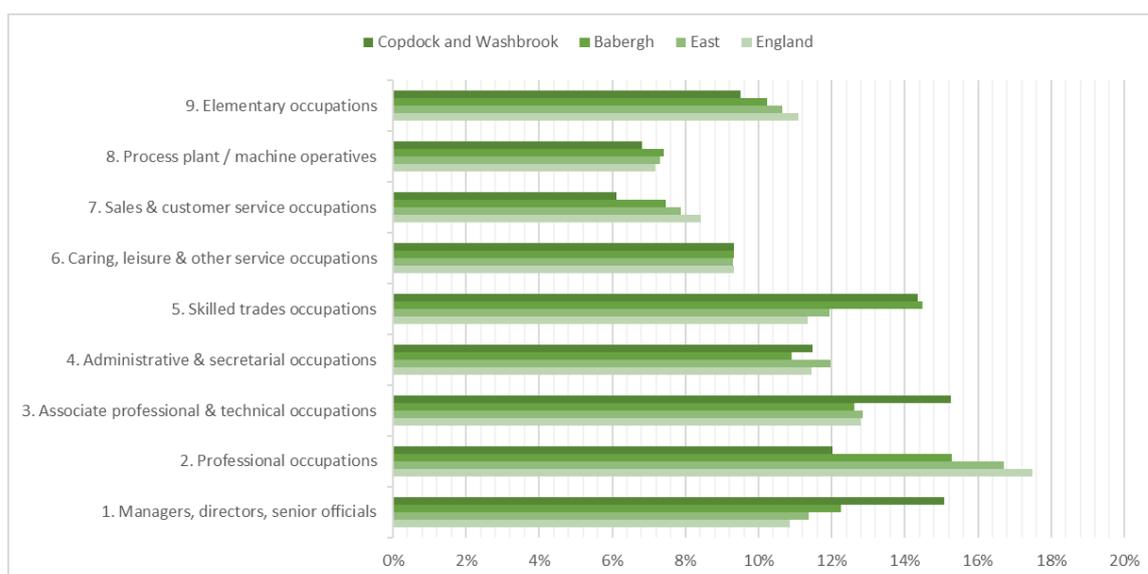


Figure 8.3: Occupation of usual residents aged 16 to 74 in employment¹⁰⁵

Local services and facilities

8.19 With regards to local facilities, the village offer includes a large village hall, a sports pavilion, and allotments. The sports and recreation facilities are all on one site albeit not in the centre of the main residential area. There are many clubs in the village which serve most age groups for both sports and recreation run by volunteers. These include cricket, outdoor & indoor bowls, tennis and badminton. The full list is set out below:

- The Village Hall
- The School
- The Brook Inn Pub

¹⁰⁵ ONS (no date): Census 2011: 'Occupation 2011' (Table KS608EW)

- Cricket Field
 - Play Area
 - Allotments
 - Bowls Club
 - Tennis Club
 - Church Room
 - Pre-School
 - St Peter's Church
 - St Mary's Church
- 8.20 Copdock Primary School is located within the main built up settlement area, providing residents with suitable access to education. However, local evidence suggests it is operating over capacity and further growth in the village will require adjustments to intake from the wider catchment area.
- 8.21 The out-of-town retail and service area at Copdock provides an important service facility (petrol filling station, food and rest area facilities) for motorists, park and ride to Ipswich town centre, employment and shopping. Ipswich Borough Council's Retail Position Update Statement (2019)¹⁰⁶ acknowledges that the Copdock retail service area primarily serves residents within Ipswich Borough rather than residents in the immediate area.

Future baseline

- 8.22 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.
- 8.23 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.
- 8.24 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.
- 8.25 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.

¹⁰⁶ WRG (2019) Ipswich Borough Council's Retail Position Update Statement [online] available from: https://www.ipswich.gov.uk/sites/default/files/ipswich_retail_position_update_statement_-_02-08-19.pdf

Key issues and opportunities

- The population of Copdock and Washbrook increased by 0.9% during the period of 2001-2011. It is considered that the population is likely to continue to grow; albeit at a slow rate.
- The proportion of residents in the Plan area over the age of 60 (30.8%) is comparatively larger than figures for Babergh (29.3%), the East (23.9%) and England as a whole (22.3%). As the population continues to age, demand for adequate care and other suitable services, such as healthcare and homecare will increase.
- A high number of residents' households are deprived in no dimensions (50.9%) when compared to Babergh (47.5%), the East region (44.8%) and England as a whole (42.5%). Opportunities should be sought to continue this trend as the Parish continues to grow; supporting a prosperous community.
- There are a good number of local facilities within the Plan area, including a large village hall, a sports pavilion, and allotments. New development should seek to protect and enhance local facilities where possible; supporting sustainable growth.
- The Plan area falls within the Babergh 005C AND Babergh 005A LSOAs. Levels of deprivation in the Plan area for the two LSOAs are predominantly low in comparison to other areas in the country. However, this does not preclude the fact that certain areas demonstrate relatively high levels of deprivation in areas such as crime, barriers to housing and services and living environment deprivation.

What are the SEA objectives and appraisal questions for the population and community theme?

8.26 Considering the key issues discussed above it is proposed that the SEA should include the following objectives:

SEA objective	Assessment questions (will the proposal help to...)
Cater for existing and future residents' needs as well as the needs of different groups in the community, and improve access to local, high-quality community services and facilities.	<ul style="list-style-type: none"> • Support the delivery of new and improved community facilities and amenities? • Maintain and enhance economic and social links within and beyond the Plan area? • Support and contribute to the improvement of employment offer and associated infrastructure within the Plan area, such as high-quality broadband for remote working? • Encourage and promote social cohesion and encourage active involvement of local people in community activities? • Maintain or enhance the quality of life of existing residents, including residents with specialist needs? • Support the retention and improvement of community facilities?
Provide everyone with the opportunity to live in good quality, affordable housing, and ensure an appropriate mix of dwelling sizes, types and tenures.	<ul style="list-style-type: none"> • Support the provision of a range of house types and sizes? • Support enhancements to the current housing stock? • Meet the needs of all sectors of the community? • Promote the use of sustainable building techniques, including use of sustainable building materials in construction? • Provide housing in sustainable locations that allow easy access to a range of local services and facilities?

9. Health and wellbeing

Focus of theme

- Health indicators and deprivation
- Influences on health and well-being
- Healthcare provision

Context review

National

- 9.1 Key messages from the National Planning Policy Framework¹⁰⁷ (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.
 - 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.
- 9.2 National Planning Practice Guidance (NPPG)¹⁰⁸ 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.
- 9.3 The increasing role that local level authorities are expected to play in providing health outcomes is demonstrated by recent government legislation. The Health and Social Care Act 2012 transferred responsibility for public health from the NHS to local government, giving local authorities a duty to improve the health of the people who live in their areas. This will require a more holistic approach to health across all local government functions.
- 9.4 The Fair Society, Healthy Lives ('The Marmot Review')¹⁰⁹ investigated health inequalities in England and the actions needed in order to tackle them. Subsequently, a supplementary report was prepared providing additional evidence relating to spatial planning and health on the basis that there is: "*overwhelming evidence that health and environmental inequalities are inexorably linked and that poor environments contribute significantly to poor health and health inequalities*".
- 9.5 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).¹¹⁰ The report highlights that:

¹⁰⁷ 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

¹⁰⁸ Department for Communities and Local Government (2012) National Planning Practice Guidance [online] available at:
<http://planningguidance.communities.gov.uk/>

¹⁰⁹ 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>

¹¹⁰ Health Equity in England: The Marmot Review 10 Years on (2020) <https://www.health.org.uk/publications/reports/the-marmot-review-10-years-on>

- 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

9.6 The Joint Strategic Plan Refresh 2016-2020¹¹¹ provides an assessment of the current and future health and wellbeing needs of the people of Babergh and Mid Suffolk until 2020.

9.7 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.

Baseline summary

Current baseline

Health indicators

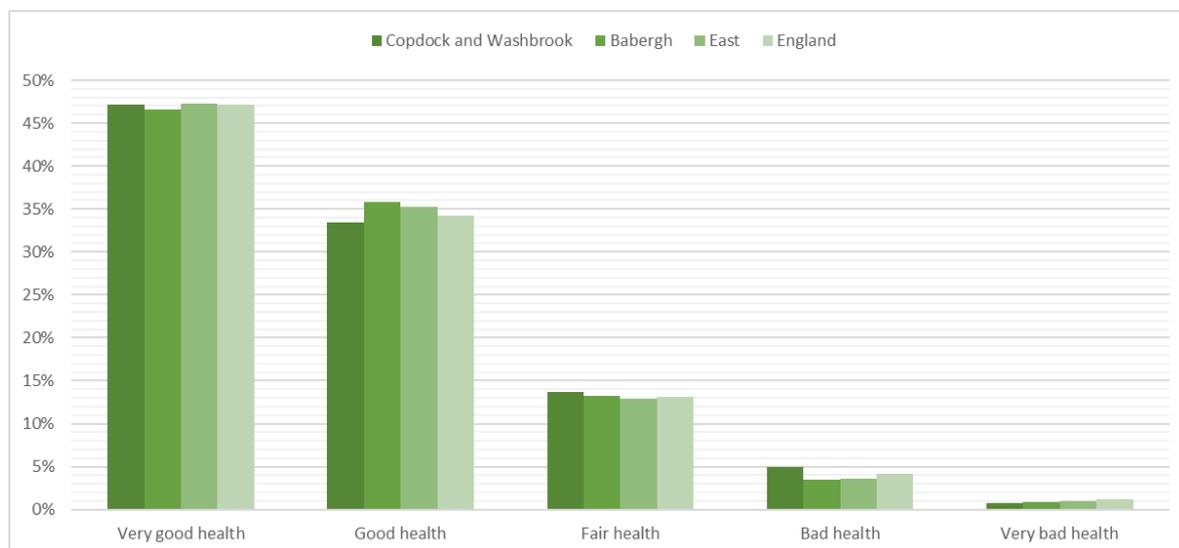


Figure 9.1: General Health¹¹²

9.8 **Figure 9.1** (above) shows general health within the Plan area. The majority of residents (80.65%) demonstrate 'good' health or above, in line with figures for the district (82.4%), region (82.5%) and country as a whole (81.4%). However, the proportion of residents reporting 'bad' health (4.9%) is higher than comparative figures for Babergh (3.5%), the East (3.6%) and England as a whole (4.2%).

¹¹¹ Joint Strategic Plan Refresh 2016-2020 available at: <https://www.babergh.gov.uk/assets/The-Council/Performance/Joint-Strategic-Plan-2016-2020.pdf>

¹¹² ONS (2011) Table KS301EW

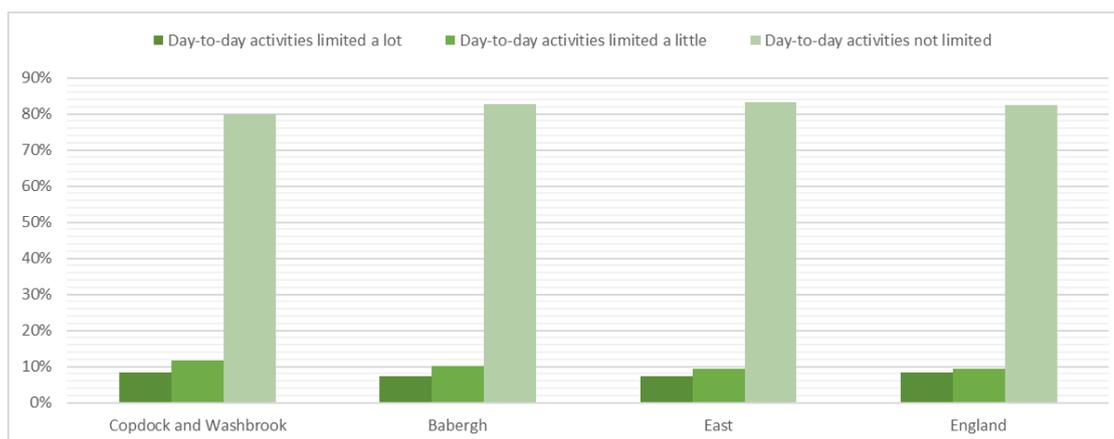


Figure 9.2: Long term health category¹¹³

9.9 **Figure 9.2** shows the long-term health of residents in the Plan area and how this influences their daily activities. Although the majority of residents in the Plan area are not limited in their day to day activities by 'a lot' (79.8%), this is comparatively lower than averages for Babergh (82.6%), the East (83.3%) and England as a whole (82.4%).

9.10 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 include¹¹⁴:

- low paid work;
- fuel poverty;
- high housing costs;
- unemployment among young people;
- social isolation, especially among older people;
- difficulty accessing healthcare services such as GPs and dentists;
- lack of suitable public transport options; and
- poor broadband and mobile phone network availability.

9.11 The State of Suffolk Report (2019)¹¹⁵ outlines key issues from the Joint Strategic Needs Assessment for Suffolk. Trends prevalent within the County identified in the JSNA are listed below:

- 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.

¹¹³ ONS (2011) Table KS301EW

¹¹⁴ 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>

¹¹⁵ 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

- 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 severe mental illness.
- 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

- 9.12 With regards to local healthcare provision, there are no health facilities in the village with residents having to travel to Capel St Mary or Pinewood (Pinewood Surgery) for doctors and dentist facilities (~4 miles by car).
- 9.13 Leisure centres and sports facilities contribute to the physical and mental wellbeing of Suffolk residents by promoting physical activity and giving individuals a place to meet and partake in sports, activities and other events. In this regard, the Plan area has a good offering of recreational assets for residents to enjoy, including the Cricket Club, which has over 100 members providing matches for those of school age upwards. Additionally, the adjoining Tennis Club is also a popular facility and Copdock Bowls Club has a membership of over 30 people. The Neighbourhood Plan supports the retention and improvement of these important facilities in order to support healthy lifestyles in future years.

Open spaces

- 9.14 The Parish contains a number of areas of open space (see **Figure 5.3** in **Chapter 5**). This includes:
- Playing field and cricket pitches east of London Road;
 - Allotments west of London Road;
 - Open space at Fen View housing;
 - Woodland associated with Washbrook Primary School; and
 - Linear area of woodland along Belstead Brook west of the A12.

Future baseline

- 9.15 The lack of direct healthcare services within the Plan area coupled with the ageing population of Copdock and Washbrook (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 identified within the Local Plan, in order to support healthy lifestyles in future years.
- 9.16 With ongoing advances in technology, healthcare and lifestyles, people are tending to live longer than before. This means that the balance of older people relative to the working age population is increasing. 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.
- 9.17 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. The Neighbourhood Plan provides the opportunity to improve access to supportive facilities such as community hubs and sports services in order to promote general physical and mental health and wellbeing.

Key issues and opportunities

- The majority of residents (80.65%) demonstrate 'good' health or above, however the proportion of residents reporting 'bad' health (4.9%) is higher than comparative figures for Babergh (3.5%), the East (3.6%) and England as a whole (4.2%). Additionally, although the majority of residents in the Plan area are not limited in their day to day activities by 'a lot' (79.8%), this is comparatively lower than averages for Babergh (82.6%), the East (83.3%) and England as a whole (82.4%). Facilitating high levels of accessibility, including to health facilities and open space can support the health and wellbeing of residents; as well as long-term health goals such as reducing obesity.
- There are no health facilities in the village with residents having to travel to Capel St Mary or Pinewood (Pinewood Surgery) for doctors and dentist facilities (~4 miles by car). Where possible, new development should support the provision of services and facilities to meet local needs, while also improving accessibility to facilities in neighbouring centres.
- The Plan area has a good offering of recreational assets for residents to enjoy, including the Cricket and Tennis Club. New development should seek to utilise assets where possible, recognising the importance of access to open space and regular exercise to support healthy lifestyles.

What are the SEA objectives and appraisal questions for the health and wellbeing theme?

9.18 Considering the key issues discussed above it is proposed that the SEA should include the following objective:

SEA objective	Assessment questions (will the proposal help to...)
Improve the health and wellbeing of residents within the Neighbourhood Plan Area.	<ul style="list-style-type: none"> • Promote accessibility to a range of leisure, health and community facilities, for all age groups? • Provide and enhance community access to open green spaces? • Promote the use of healthier modes of travel, including active travel networks? • Improve access to the countryside for recreational use? • Avoiding any negative impacts to the quality and extent of existing recreational assets, such as formal or informal footpaths?

10. Transportation

Focus of theme

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

Context review

National

10.1 Key messages from the National Planning Policy Framework¹¹⁶ (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.

10.2 National Planning Practice Guidance (NPPG)¹¹⁷ 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.

10.3 The Transport Investment Strategy - Moving Britain Ahead (2017)¹¹⁸ 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.

¹¹⁶ 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

¹¹⁷ Department for Communities and Local Government (2012) National Planning Practice Guidance [online] available at: <http://planningguidance.communities.gov.uk/>

¹¹⁸ Department for Transport (2017) Transport Investment Strategy - Moving Britain Ahead [online] available at: <https://www.gov.uk/government/publications/transport-investment-strategy>

10.4 The Cycling and Walking Investment Strategy (2016)¹¹⁹ 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"

10.5 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.

10.6 Department for Transport (2020) Decarbonising Transport: Setting the Challenge (2020)¹²⁰ 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.

10.7 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.¹²¹ 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

10.8 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.

10.9 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

¹¹⁹ 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

¹²⁰ 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

¹²¹ 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>

Baseline summary

Current baseline

Local transport infrastructure

10.10 There is no direct connection to the national rail network from the plan area. The nearest railway station is located around 3.5km to the north east of the parish in Ipswich.

10.11 There are several bus stops within Copdock and Washbrook and also in the south of the parish on London Road. It has been suggested that the existing dual carriageway within the parish deters the use of buses due to having to cross the busy road. The 93 bus provides a regular service from the village to Ipswich and Colchester.

Strategic road network

10.12 The Neighbourhood Plan area is connected to the strategic road networks via the A14 and A12. These roads are important communication routes, however congestion at the Copdock junction to the east of the parish has the potential to be exacerbated by development in the area.

10.13 Local knowledge suggests the presence of Old London Road, the former A12, has a major impact on the environment of the village and the lifestyle of residents. This is especially the case when the A12 or A14 are blocked by accidents or breakdowns which leads to traffic diverting through the village. Old London Road is currently a dual-carriageway road with a 50mph speed limit despite dwellings and businesses having direct access onto the road.

10.14 Work undertaken in the preparation of the Neighbourhood Plan has included a study of potential improvements to Old London Road that would reduce the impact of the road and the speed of its users.¹²² The following key issues have been identified:

- The existing dual carriageway constitutes a barrier to pedestrian movement, in particular between the village of Washbrook and a number of village facilities located on the opposite side of London Road;
- The dual carriageway encourages some drivers to travel at excessive speeds with adverse safety and environmental implications;
- The route, being relatively unconstrained, provides a rat-run for some drivers seeking to avoid delays at the A12/A14 roundabout junction to the east of Washbrook;
- The uniformity of the existing road provides little or no 'sense of place' in those areas where residential development and pedestrian movement is concentrated;
- The existing dual carriageway deters movement on foot and by bicycle;
- The current speed limit along most of London Road (50mph) makes it impossible for the Parish Council to take any responsibility for maintaining the existing central verges.

Footpaths and cycle network

10.15 The parish contains multiple Public Rights of Way that link various parts of the village, providing access to the surrounding countryside and into Ipswich to the north-east. All except one are designated public footpaths. Folly Lane leading though to Wenham Road is a designated byway which is used by vehicles, bikes and horses alike. Local knowledge suggests the paths are generally in good condition and waymarked. Gaps in the network are not immediately apparent, albeit that use of village roads is sometimes necessary to complete a circular walk.

10.16 There is a cycle route that passes from west to east through the parish and there is also a further cycle route north of Washbrook that provides access to Ipswich.

¹²²Railton TPC Ltd (2019) Copdock and Washbrook Preliminary Highways Scheme [online] available at:
<http://www.cwnpsg.onesuffolk.net/home/consultation-documentation/>

Car and van ownership

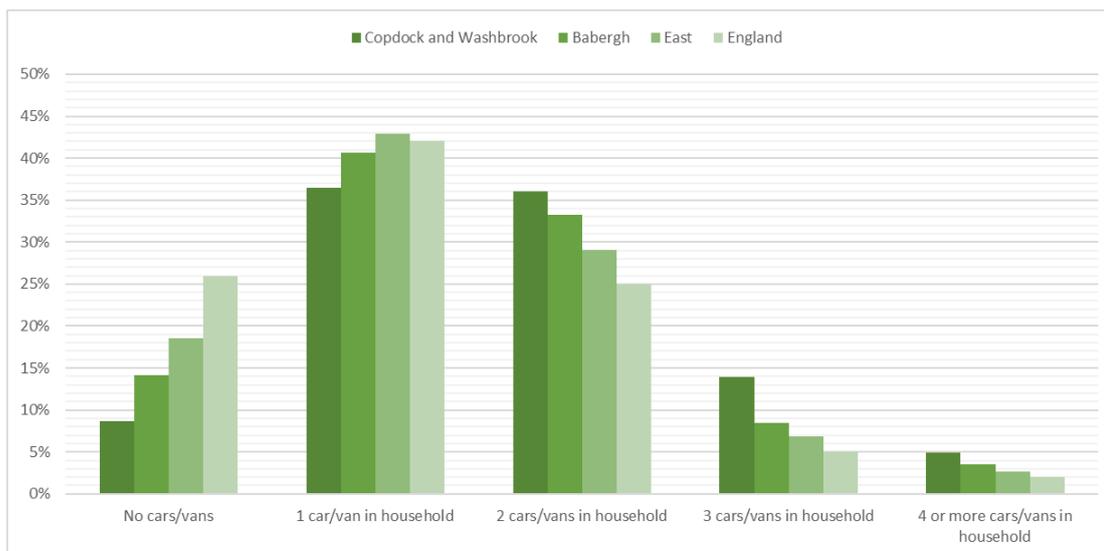


Figure 10.1 Car and Van Ownership¹²³

10.17 **Figure 10.1** shows that car and van ownership in the Plan area is high (91.4%), and comparatively higher than figures for Babergh (85.9%), the East (81.5%) and England as a whole (74.0%). Notably, a comparatively large number of residents own 3 cars and/or vans (13.9%).

Travel to work

10.18 According to the 2011 Census, 642 people work at premises in the parish while, at the same time, 557 residents were in employment. The C&WNP Residents’ Survey found that 17% of respondents worked in the village, demonstrating that many people commute into the village for work. The average distance that residents travel to work is just under 20 kilometres, albeit that most travel up to 10 kilometres. At the district scale, **Figure 10.2** below shows that more residents commute out of Babergh than in for employment.

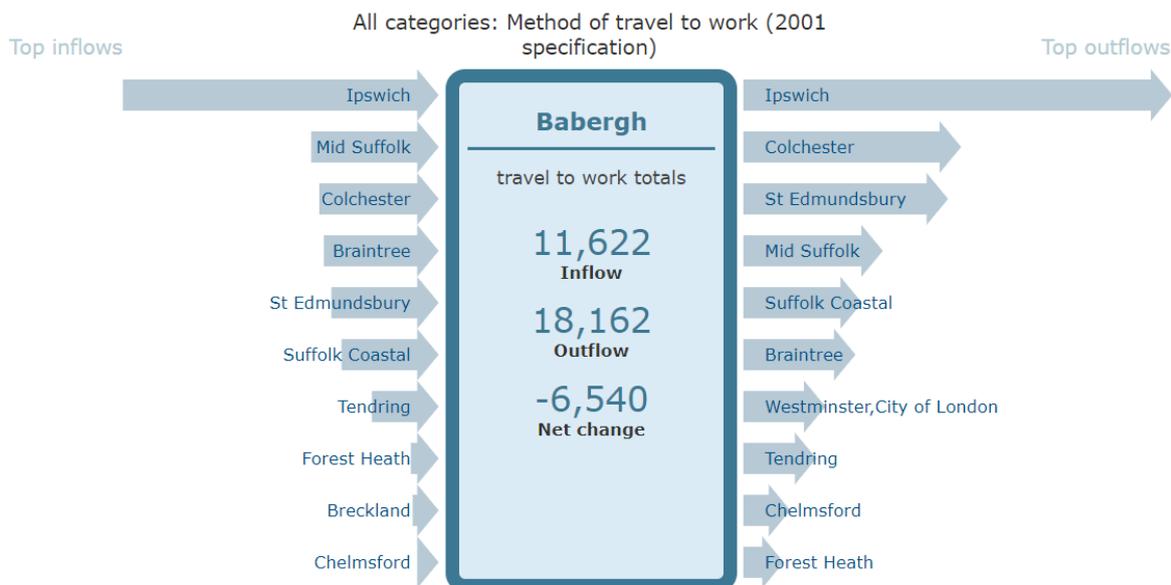


Figure 10.2 Babergh District - Travel to work¹²⁴

10.19 In terms of method of travel to work, **Figure 10.3** below shows that the majority of residents commute into work via driving a car or van (51.2%). This is higher than averages for Babergh

¹²³ Source: ONS (2011) Table KS404EW, AECOM calculations

¹²⁴ Nomis (2011) Location of usual residence and place of work by method of travel to work [online] available at: <https://www.nomisweb.co.uk/census/2011/WU03UK/chart/1132462301>

(45.6%), the East (41.4%) and England as a whole (37.0%). Further, a comparatively large proportion of residents in the Plan area work mainly from home (6.3%) when considered in light of averages for the district (5.2%), region (3.8%) and country as a whole (3.0%).

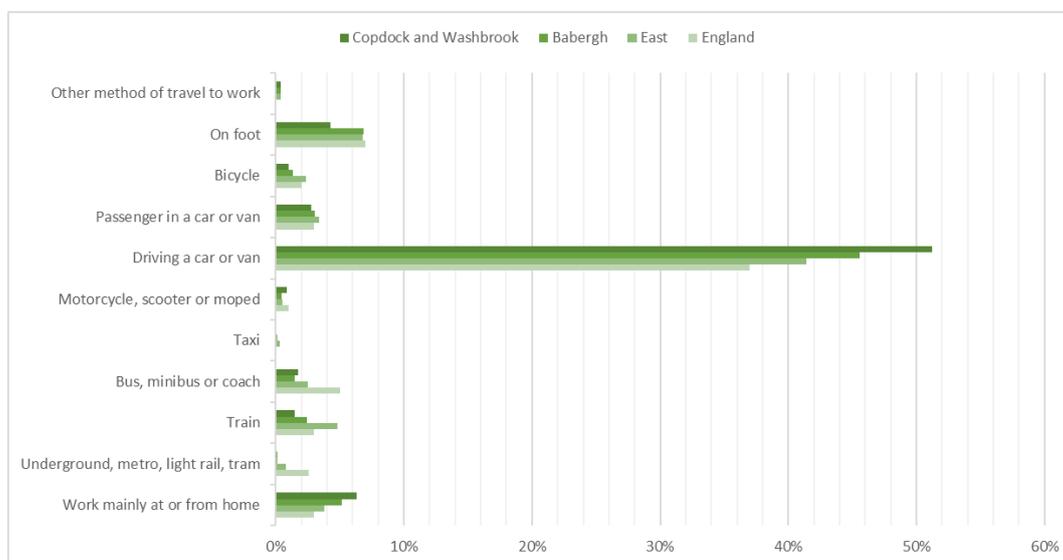


Figure 10.3: Method of travel to work¹²⁵

Future baseline

10.20 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 'rat run'. 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.

10.21 Whilst the Suffolk Local Transport Plan (LTP) (2011-2031) provides policies which will improve the efficiency/ sustainability of the transport network, there will likely be a continuing need for development to be situated in accessible locations; supporting the higher than average proportion of residents that drive to work. The Neighbourhood Plan can support small-scale infrastructure improvements and active travel opportunities that seeks to maximise opportunities for pedestrian movement.

Key issues and opportunities

- The existing dual carriageway constitutes a barrier to pedestrian movement and encourages drivers to travel at excessive speeds (creating a 'rat-run' for drivers) leading to safety implications for pedestrians/ cyclists.
- Access to public transport (bus and train services) is limited in the Parish. The nearest train station is located 3.5km to the north east of the parish in Ipswich. Therefore, 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.
- Higher than average percentages of residents in the Plan area work from home when compared to the district, region and nation as a whole. Opportunities to capitalise on this positive trend should be maximised.

¹²⁵ ONS (2011) Table QS701EW, AECOM calculations

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

10.22 Considering the key issues discussed above it is proposed that the SEA should include the following objective:

SEA objective	Assessment questions (will the proposal help to...)
Promote sustainable transport use and reduce the need to travel.	<ul style="list-style-type: none">• Support the key objectives within the Suffolk Local Transport Plan to encourage more sustainable transport?• Enable sustainable transport infrastructure enhancements?• Ensure sufficient road capacity to accommodate new development?• Promote improved local connectivity and pedestrian movement?• Facilitate home and remote working?• Improve road safety?• Reduce the impact on residents from the road network?• Improve parking facilities?

11. Next steps

Subsequent stages for the SEA process

- 11.1 Scoping (the current stage) is the second stage of the SEA process, which comprises:
- i. Screening;
 - ii. Scoping;
 - iii. Assess reasonable alternatives, with a view to informing preparation of the draft plan;
 - iv. Assess the draft plan and prepare the Environmental Report with a view to informing consultation and plan finalisation; and
 - v. Publish a 'statement' at the time of plan adoption in order to 'tell the story' of plan-making / SEA (and present 'measures decided concerning monitoring').
- 11.2 The next stage will involve appraising reasonable alternatives for the Copdock & Washbrook Neighbourhood Plan. This will consider alternative spatial strategy and policy approaches for the Neighbourhood Plan. The findings of the appraisal of these alternatives will be fed back to the Neighbourhood Plan Steering Group so that they might be considered when preparing the draft plan.
- 11.3 Once the draft ('pre-submission version') plan has been prepared by the Steering Group it will be subjected to SEA and the Environmental Report prepared for consultation alongside it.
- 11.4 Following consultation on the draft Neighbourhood Plan and the Environmental Report, the Neighbourhood Plan will be finalised and submitted to the Babergh District Council for subsequent Independent Examination.

Consultation on the Scoping Report

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

Appendix A Proposed SEA framework

Table A.1 Proposed SEA framework

SEA theme	SEA objective	Assessment questions (will the proposal help to...)
Air quality	Improve air quality within and surrounding the Neighbourhood Plan area and minimise all sources of environmental pollution	<ul style="list-style-type: none"> Promote and encourage more sustainable transport options? Enable sustainable transport infrastructure enhancements? Encourage development which reduces the need to travel outside of the Neighbourhood Plan area? Locate and design development so that current and future residents will not regularly be exposed to poor air quality? Implement measures (such as appropriate planting and provision of green infrastructure) which will help support good air quality in an around the Neighbourhood Plan area? Ensure development connects to the existing road network, promoting ease of access and suitably mitigating any potential increases in local congestion?
Biodiversity	Protect and enhance biodiversity and ecological connections within and surrounding the Neighbourhood Plan area.	<ul style="list-style-type: none"> Avoid adverse impacts on the integrity of the Stour and Orwell Estuaries Special Protection Area (SPA) and Ramsar site? Protect and enhance County Wildlife Sites, including supporting habitats and mobile species that are important to the integrity of the site? Protect and enhance priority habitats and species, particularly the extensive areas of Ancient Woodland? Achieve a net gain in biodiversity? Support enhancements to multifunctional green infrastructure networks? Avoid habitat fragmentation or loss?
Climate change	Reduce the contribution to climate change made by activities within the Neighbourhood Plan Area	<ul style="list-style-type: none"> Reduce the number of journeys made? Promote the use of sustainable modes of transport including walking, cycling and public transport? Increase the number of new developments meeting or exceeding sustainable design criteria? Generate energy from low or zero carbon sources? Reduce energy consumption from non-renewable resources?
	Support the resilience of the Neighbourhood Plan Area to the potential effects of climate change, including flooding	<ul style="list-style-type: none"> Ensure that inappropriate development does not take place in areas at higher risk of flooding, considering the likely future effects of climate change?

SEA theme	SEA objective	Assessment questions (will the proposal help to...)
		<ul style="list-style-type: none"> • Improve and extend green infrastructure networks in the plan area to support adaptation to the potential effects of climate change? • Sustainably manage water runoff, reducing surface water runoff (either within the plan area or downstream)? • Ensure the potential risks associated with climate change are considered through new development in the Neighbourhood Plan Area? • Increase the resilience of biodiversity in the area to the effects of climate change, including through enhancements to ecological networks?
Landscape	Protect and enhance the character and quality of landscapes and villagescapes.	<ul style="list-style-type: none"> • Conserve and enhance the integrity of the Suffolk Coast and Heaths AONB and its setting? • Support Maintain and enhance the special qualities of the landscape character areas covering the Neighbourhood Plan area? • Protect local diversity and settlement identity? • Protect locally important viewpoints contributing to the sense of place and visual amenity of the Neighbourhood Plan area?
Historic environment	Protect, conserve and enhance the historic environment within and surrounding the Neighbourhood Plan Area	<ul style="list-style-type: none"> • Conserve and enhance buildings and structures of architectural or historic interest, both designated and non-designated, and their setting? • Conserve and enhance the special interest, character and appearance of locally important features and their settings? • Support the integrity of the historic setting of key buildings of cultural heritage interest as listed on the Suffolk HER? • Support access to, interpretation and understanding of the historic evolution and character of the environment? • Conserve and enhance archaeological remains, including historic landscapes? • Support the undertaking of archaeological investigations and, where appropriate, recommend mitigation strategies?
Land, soil and water resources	Ensure the efficient and effective use of land.	<ul style="list-style-type: none"> • Promote the use of previously developed land? • Promote the use of vacant & derelict brownfield land opportunities?
	Protect and enhance water quality and use and manage water resources in a sustainable manner.	<ul style="list-style-type: none"> • Support improvements to water quality? • Ensure the timely provision of wastewater infrastructure? • Ensure appropriate drainage and mitigation is delivered alongside development?

SEA theme	SEA objective	Assessment questions (will the proposal help to...)
		<ul style="list-style-type: none"> Protect groundwater and surface water resources from pollution? Maximise water efficiency and opportunities for water harvesting and/ or water recycling?
Population and community	Cater for existing and future residents' needs as well as the needs of different groups in the community, and improve access to local, high-quality community services and facilities.	<ul style="list-style-type: none"> Support the delivery of new and improved community facilities and amenities? Maintain and enhance economic and social interlinkages between the three core residential areas within the Plan area? Support and contribute to the improvement of employment offer and associated infrastructure within the Plan area, such as high quality broadband for remote working? Encourage and promote social cohesion and encourage active involvement of local people in community activities? Maintain or enhance the quality of life of existing residents, including residents with specialist needs? Support the retention and improvement of community facilities?
	Provide everyone with the opportunity to live in good quality, affordable housing, and ensure an appropriate mix of dwelling sizes, types and tenures.	<ul style="list-style-type: none"> Support the provision of a range of house types and sizes? Support enhancements to the current housing stock? Meet the needs of all sectors of the community? Promote the use of sustainable building techniques, including use of sustainable building materials in construction? Provide housing in sustainable locations that allow easy access to a range of local services and facilities?
Health and wellbeing	Improve the health and wellbeing of residents within the Neighbourhood Plan Area.	<ul style="list-style-type: none"> Promote accessibility to a range of leisure, health and community facilities, for all age groups? Provide and enhance community access to open green spaces? Promote the use of healthier modes of travel, including active travel networks? Improve access to the countryside for recreational use? Avoiding any negative impacts to the quality and extent of existing recreational assets, such as formal or informal footpaths?
Transportation	Promote sustainable transport use and reduce the need to travel.	<ul style="list-style-type: none"> Support the key objectives within the Suffolk Local Transport Plan to encourage more sustainable transport? Enable sustainable transport infrastructure enhancements? Ensure sufficient road capacity to accommodate new development? Promote improved local connectivity and pedestrian movement? Facilitate home and remote working? Improve road safety? Reduce the impact on residents from the road network?

SEA theme	SEA objective	Assessment questions (will the proposal help to...)
		<ul style="list-style-type: none">• Improve parking facilities?
