

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

Environmental Report

Copdock & Washbrook Parish Council

December 2020

Quality information

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Non-Technical Summary

What is Strategic Environmental Assessment?

A strategic environmental assessment (SEA) has been undertaken to inform the Copdock & Washbrook Neighbourhood Plan (C&WNP). This process is required by the SEA Regulations.

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

What is the Copdock & Washbrook Neighbourhood Plan?

The C&WNP presents a plan for Copdock & Washbrook for the period to 2036. The Designated Area, for the purpose of the C&WNP, covers the Parish of Copdock & Washbrook in Babergh (**Figure 1.1**).

The C&WNP is being prepared in the context of the adopted Babergh Local Plan (2006) and the emerging Babergh and Mid Suffolk Joint Local Plan. The draft C&WNP sets out a vision and a range of policies for the C&WNP area, relating to a range of topics, including creating a diverse and resilient economy which is supported by attractive, healthy and affordable places to live, and improving and protecting the area's natural, built and historic environment.

It is currently anticipated that the C&WNP will undergo referendum in May 2021. This is in line with the newly revised PPG which sets out changes that have been introduced to neighbourhood planning in response to the coronavirus (COVID-19) pandemic.¹ New paragraph 107 states that referendums will be postponed in line with the Local Government and Police and Crime Commissioner (Coronavirus) (Postponement of Elections and Referendums) (England and Wales) Regulations 2020 until 6 May 2021.

Purpose of this Environmental Report

This Environmental Report, which accompanies the Regulation 14 version of the C&WNP, is the latest document to be produced as part of the SEA process. The first document was the SEA Scoping Report (August 2020), which includes information about the C&WNP area's environment and community.

The purpose of this Environmental Report is to:

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

The Environmental Report contains:

- An outline of the contents and main objectives of the C&WNP and its relationship with other relevant policies, plans and programmes;
- Relevant aspects of the current and future state of the environment and key sustainability issues;
- The SEA Framework of objectives against which the C&WNP has been assessed;

¹ Ministry of Housing, Communities and Local Government (MHCLG) (2020) Planning Practice Guidance: Neighbourhood Planning [online] available at: <https://www.gov.uk/guidance/neighbourhood-planning--2#coronavirus>

- The appraisal of alternative approaches for the C&WNP;
- The likely significant environmental effects of the C&WNP;
- The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects as a result of the C&WNP; and
- The next steps for the C&WNP and accompanying SEA process.

Assessment of reasonable alternatives for the C&WNP

A key element of the SEA process is the appraisal of ‘reasonable alternatives’ for the C&WNP. The SEA Regulations are not prescriptive as to what constitutes a reasonable alternative, stating only that the Environmental Report should present an appraisal of the ‘*plan and reasonable alternatives taking into account the objectives and geographical scope of the plan*’.

As the delivery of new housing development through the C&WNP is what is most likely to have a significant effect on SEA objectives, it was determined that this issue should be the primary focus of the consideration of alternatives through the SEA process.

Housing numbers

As set out in **Chapter 2**, the Joint Local Plan preferred options consultation document provides a housing target of 274 for the Neighbourhood Plan area between 2018 and 2036. Once outstanding plan permissions have been taken into account (as of December 2019) the residual need in the period to 2036 is 229 new homes.

Site options

In 2019, the Parish Council asked AECOM to undertake an independent and objective assessment of the sites that have been identified as potential candidates for housing in the Neighbourhood Plan.² A total of 15 sites were identified for potential development within Copdock and Washbrook through the Babergh and Mid Suffolk Strategic Housing and Economic Land Availability Assessment (SHELAA) (August 2017), with a further three sites put forward as a result of the consultation on the emerging Joint Local Plan.

Of the 18 sites initially assessed, seven were considered suitable, available and achievable for residential use.

AECOM subsequently undertook a second stage of assessment to identify which are relatively the most and least constrained and applying a three tiered ranking system to ensure that all the sites were assessed using a similar metric, enabling a fair comparison of sites. The assessment criteria for each tier can be found at **Table 4.2** of this report.

Table A.1 overleaf sets out the seven sites by their indicative tier. The full AECOM Site Options Assessment Report can be found as a separate document of the NP evidence base.³

² AECOM (2019) Copdock & Washbrook Neighbourhood Plan Site Options Assessment

³ AECOM (2019) Copdock and Washbrook Neighbourhood Plan SOA

Table A.1 AECOM Stage 2 assessment summary

Site by tier	Size (ha)	Indicative capacity
Tier 1		
Land North East of Folly Lane	1.92	7
Land to the north of Back Lane and east of Elm Lane	0.75	15
Tier 2		
Land south east of Back Lane	13	226
Land south west of London Road	0.8	12
Land east of London Road	30.26	100
Land west of London Road	10.5	15
Tier 3		
Jubilee Meadow	10.54	250

Site selection

In light of the conclusions of the AECOM SOA (2019), the seven sites were further considered and reviewed by Parish Council as potential Neighbourhood Plan allocations for housing. The results of the AECOM SOA were fed back to the community during a drop-in event in June 2019.

In terms of the **Tier 1** sites:

- **Land North East of Folly Lane** has been granted planning permission for 7 dwellings (DC/17/06054) and is therefore no longer considered in contention for allocation through the C&WNP.
- **Land to the north of Back Lane and east of Elm Lane, Washbrook** will be allocated through the C&WNP for 15 dwellings.

It is considered that there are insufficient opportunities for the full 229 homes to be provided through infill plots or small groups of housing within the existing settlement boundaries. Therefore, in terms of the remaining **Tier 2** and **Tier 3** sites, the Parish Council have decided to concentrate growth at one large site in order to meet local needs.

Of the Tier 2 and 3 sites, only two sites are of size and scale to meet the remainder of the housing need in full:

- Tier 2 site **Land south east of Back Lane** (13ha – indicative capacity of 226 dwellings)
- Tier 3 site **Jubilee Meadow** (10.54ha – indicative capacity of 250 dwellings)

In the interim the Joint Local Plan has progressed, with Regulation 19 consultation currently taking place (12th November – 24th December 2020). As set out in **Chapter 2** of this report, the Pre-Submission Joint Local Plan Policy LA008 proposes the allocation of Land south-east of Back Lane for approximately 226 dwellings with associated infrastructure.

Alongside the development of the Neighbourhood Plan, the Joint Local Plan (JLP) has progressed, with Regulation 19 'Pre-Submission' consultation on the JLP taking place between 12th November and 24th December 2020. As set out in **Chapter 2**, Policy LA008 of the Pre-Submission JLP proposes the allocation of Land south-east of Back Lane for approximately 226 dwellings with associated infrastructure.

In addition to the JLP taking forward the site, the Parish Council had independently arrived at the Land south-east of Back Lane site as the choice for allocation for the Neighbourhood Plan in light of the SOA and the feedback from the June 2019 local consultation event. While there is no longer a choice to be made, given the JLP sets the strategic context for the Neighbourhood Plan, and the Neighbourhood Plan needs to be in general conformity with the JLP, the Parish Council seek to use the Neighbourhood Plan to add detail to strategic Policy LA008.

Preparation of the Neighbourhood Plan has allowed access to further, government funded support to provide a more detailed assessment as to how this site could be developed. The Copdock and Washbrook Design Guidelines Report (December 2019) was prepared for the Parish Council by AECOM, which outlines masterplanning principles and a high level concept plan for the site. This supporting evidence has enabled the development of a more detailed policy for the development of the site than that proposed in the Joint Local Plan. However, no choices or 'options' which could give rise to potential significant effects have been identified in relation to the masterplanning of the site.

In light of the above, no alternative options have been identified for the Neighbourhood Plan which can be assessed through the SEA process.

Assessment of the current version of the C&WNP

Utilising the SEA Framework of objectives and assessment questions developed during the earlier scoping stage of the SEA, the SEA process has assessed the 21 policies put forward through the current version of the C&WNP for guiding development in the Neighbourhood Plan area. The Environmental Report has presented the findings of the assessment under nine SEA themes.

Conclusions and recommendations

Conclusions

The assessment has determined that the current version of the C&WNP is likely to lead to a combination of positive, negative, and uncertain effects. **Significant long term positive effects** are anticipated in relation to population and communities through delivering housing to meet local needs; and ensuring the type of housing being developed is likely to support the various needs of the local community. Further to this the C&WNP supports the vitality and viability of the Neighbourhood area through facilitating growth that is sustainable in the long term, protecting and enhancing local services, facilities and businesses, while maintaining the village identity and feel.

Once proposed recommendations have been adopted, **minor positive effects** relate to biodiversity and climate change, in light of the opportunities capitalised upon through the C&WNP policy framework which support local and national climate change objectives/ targets. Notably the premise for net gain embedded through the C&WNP policy framework will lead to positive effects directly and indirectly for biodiversity and climate change respectively.

Minor negative effects relate to transportation and air quality in light of the increase in vehicle use on local roads and the presence of the dual carriageway roads with the parish/ along parish boundaries. Also in this context, **uncertain effects** are concluded in relation to health and wellbeing in light of the noise and air pollution associated with the A12. It is however recognised that the Copdock and Washbrook Preliminary Highways Scheme identifies a possible solution to the dual carriageway issues and, together with other options, is being discussed with Suffolk County Council Highways Department. This, combined with further mitigation proposed through the C&WNP (and informed by the Design Guidelines (2020)) is considered likely to be suitable to mitigate against significant adverse effects.

Minor negative effects are also predicted in relation to landscape and land, soil and water resources given the strategic scale loss of greenfield, BMV agricultural land at 'Land south-east of Back Lane'. However, it is noted that this loss would take place with or without the C&WNP through the emerging Joint Local Plan strategic allocation (LA008). The C&WNP positively supplements the Joint Local Plan allocation, providing a basis for the conservation and enhancement of local landscape character and setting; and providing support for green infrastructure and soil enhancement.

Recommendations

The following **three recommendations** are made through the assessment of the Neighbourhood Plan:

1. While it is recognised that surface water flood risk at Land south-east of Back Lane is currently only minor, climate change has the potential to increase the occurrence of extreme weather events such as enhanced precipitation, which can increase surface water runoff. As such, it is considered that recognising the site specific need for flood risk mitigation within Policy C&W4 (Land south-east of Back Lane) itself would further strengthen the Neighbourhood Plan in terms

of “[Ensuring] that development does not result in a detrimental impact on infrastructure including sewers and surface water and watercourse flooding” (Neighbourhood Plan Objective 13).

2. Policy C&W18 (Sustainable Construction Practices) could be revised to include support development where it seeks ways to improve attenuation, delivering net-positive effects rather than simply avoid further negative effects.
3. It is recommended that the site allocation policies recognise the potential sensitivity of the sites in terms of the Listed Buildings close by. Specifically, policy requirements can ensure that new development provides the necessary screening to reduce impacts on adjacent heritage assets.

What are the next steps?

Subsequent to the current consultation on the draft Copdock and Washbrook Neighbourhood Plan, the plan will be updated by the Parish Council to reflect comments received. This Environmental Report will be updated to reflect the changes made to the plan.

The Neighbourhood Plan and Environmental Report will then be submitted to Babergh District Council for their consideration. Babergh District Council will consider whether the plan is suitable to go forward to Independent Examination in terms of the Copdock and Washbrook Neighbourhood Plan meeting legal requirements and its compatibility with the Babergh Core Strategy (2014) and emerging Joint Local.

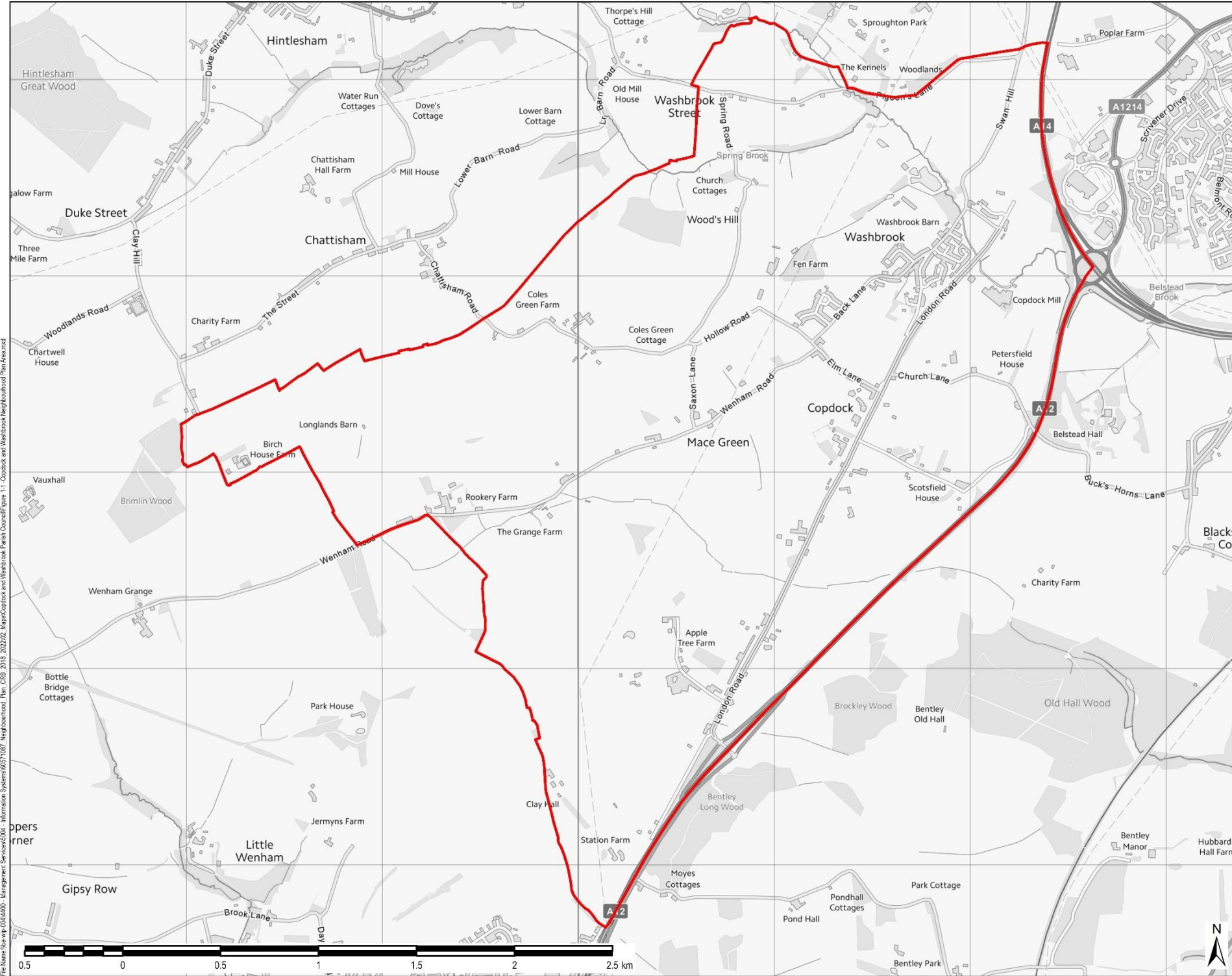
If the subsequent Independent Examination is favourable, the Neighbourhood Plan will be subject to a referendum, organised by Babergh District Council. If more than 50% of those who vote agree with the Neighbourhood Plan, then the Neighbourhood Plan will be ‘made’. Once made, the Copdock and Washbrook Neighbourhood Plan will become part of the Development Plan for Copdock and Washbrook Parish.

1. Introduction

- 1.1 AECOM has been commissioned to undertake an independent Strategic Environmental Assessment (SEA) in support of the emerging Copdock and Washbrook Neighbourhood Plan (C&WNP).
- 1.2 The 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.
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LEGEND

- Copdock and Washbrook Neighbourhood Plan Area

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SEA FOR THE COPDOCK AND WASHBROOK NEIGHBOURHOOD PLAN

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COPDOCK AND WASHBROOK NEIGHBOURHOOD PLAN AREA

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FIGURE 1.1

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File Name: \\a-wp-004-040 - Management Services\004 - Information Systems\60571087 - Neighbourhood Plan_CFB_2019_2022\02_Maps\Copdock and Washbrook Parish Council\Figure 1.1 - Copdock and Washbrook Neighbourhood Plan Area.rxd



SEA explained

- 1.4 SEA is a mechanism for considering and communicating the impacts of an emerging plan, and potential alternatives in terms of key sustainability issues. The aim of SEA is to inform and influence the plan-making process with a view to avoiding and mitigating negative impacts. Through this approach, the SEA for the C&WNP seeks to maximise the developing plan's contribution to sustainable development.
- 1.5 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). In March 2020, LUC determined that the Neighbourhood Plan will require a full SEA, concluding:⁴
- 1.6 *“The residential development allocated through the NDP could have a range of environmental effects during the construction period and afterwards, in particular in relation to additional traffic generation (e.g. increasing pollution in the AQMAs in Ipswich) and demand for water treatment.*
- 1.7 *The two housing allocations in the Copdock and Washbrook NDP lie within close proximity of sensitive features including an AONB and a number of listed buildings. Of particular significance is the fact that they both fall within IRZs associated with national biodiversity designations in the area, which flag residential development of 50 dwellings or more as a potential risk, and are both within the 13km ‘Zone of Influence’ for recreation around the Stour and Orwell SPA/SAC.*
- 1.8 *There are policies in the NDP and in the adopted Babergh Core Strategy that may provide mitigation, and mitigation may also be provided by the policies in the emerging Babergh and Mid Suffolk Joint Local Plan, although it is noted that, given its current stage of development, emerging policies may change. However, given the scale of the allocated site that does not have existing planning permission and the sensitivity of the area in which it is located, it is considered that the Copdock and Washbrook NDP has the potential to have significant environmental effects and that SEA is therefore required.”*

The SEA Regulations

- 1.9 The SEA has been undertaken to meet specific requirements prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations).
- 1.10 The SEA Regulations require that a report is published for consultation alongside the draft plan that ‘identifies, describes and evaluates’ the likely significant effects of implementing ‘the plan, and reasonable alternatives’. The report must then be taken into account, alongside consultation responses, when finalising the plan.
- 1.11 In line with the SEA Regulations this Environmental Report must essentially answer four questions:
 1. What’s the scope of the SEA?
 2. What has Plan-making / SEA involved up to this point?
 - ‘Reasonable alternatives’ must have been appraised for the plan.
 3. What are the appraisal findings at this current stage?
 - i.e. in relation to the draft plan.
 4. What happens next?
- 1.12 These questions are derived from Schedule 2 of the SEA Regulations, which present the information to be provided within the report’. **Table 1.2** presents the linkages between the regulatory requirements and the four SEA questions.

⁴ Land Use Consultants (2020) Babergh & Mid Suffolk District Councils Copdock & Washbrook Parish Council Neighbourhood Development Plan SEA Screening Opinion

This Environmental Report

1.13 This document is the Environmental Report for the C&WNP and hence needs to answer all four of the questions listed above with a view to providing the information required by the SEA Regulations. Each of the four questions is answered in turn within this report, as presented in **Table 1.2**.

Table 1.2: Questions that must be answered by the Environmental Report in order to meet regulatory⁵ requirements

Environmental Report question	In line with the SEA Regulations, the report must include... ⁶
What is the plan seeking to achieve?	<ul style="list-style-type: none"> An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes
What is the sustainability 'context'?	<ul style="list-style-type: none"> The relevant environmental protection objectives, established at international or national level Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
What's the scope of the SEA?	<ul style="list-style-type: none"> The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan The environmental characteristics of areas likely to be significantly affected Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
What is the sustainability 'baseline'?	<ul style="list-style-type: none"> Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
What are the key issues & objectives?	<ul style="list-style-type: none"> Key problems/issues and objectives that should be a focus of (i.e. provide a 'framework' for) assessment
What has plan-making/SEA involved up to this point?	<ul style="list-style-type: none"> Outline reasons for selecting the alternatives dealt with (and thus an explanation of the 'reasonableness' of the approach) The likely significant effects associated with alternatives Outline reasons for selecting the preferred approach in-light of alternatives appraisal/a description of how environmental objectives and considerations are reflected in the draft plan.
What are the assessment findings at this stage?	<ul style="list-style-type: none"> The likely significant effects associated with the Pre-submission version of the plan The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the Pre-submission version of the plan
What happens next?	<ul style="list-style-type: none"> The next steps for plan making/ SEA process.

1.14 However, before answering Q1, two initial questions are answered to further set the scene; what is the plan seeking to achieve? And what is the scope of the SEA?

⁵ Environmental Assessment of Plans and Programmes Regulations 2004

⁶ NB this column does not quote directly from Schedule II of the Regulations. Rather, it reflects a degree of interpretation.

2. Local plan context and vision for the C&WNP

2.1 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 Babergh Development Plan

2.2 The adopted Babergh 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)

2.3 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).

2.4 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".

The new Babergh and Mid Suffolk Joint Local Plan

2.5 Early in 2015 Babergh District Council announced their intention to produce a new Joint Local Plan with Mid Suffolk District Council. The new Joint Local Plan will replace the Local Plan (saved policies) and the Core Strategy, providing a planning framework to guide development until 2037 and beyond.

2.6 The Joint Plan will identify the level and location of growth in terms of new homes, jobs, community facilities and other supporting infrastructure. The Joint Plan takes account of strategic County issues which require collaboration and, where appropriate, will be prepared through coordinated working with partners to inform and enable delivery.

2.7 The emerging Babergh and Mid Suffolk Joint Local Plan will provide a framework for development to 2037 and will replace the saved policies of the adopted 2006 Local Plan and the adopted Babergh Core Strategy. 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 is at a late stage. The Regulation 19 Pre-submission consultation opened 12th November 2020, and will close 24th December 2020.⁷ The emerging Joint Plan contributes to the strategic context of the Copdock & Washbrook Neighbourhood Plan, providing in an ever-changing policy environment, more up-to-date forecasting for future needs than that of the adopted Core Strategy.

2.8 The Pre-submission Joint Local Plan document (2020) identifies a hierarchy of settlements according to their level of services and facilities within the District. Copdock and Washbrook remains categorised as a Hinterland Village but is also categorised as being within the "Ipswich Fringe". Policy SP03 (Settlement Hierarchy) states that Ipswich Fringe settlements *"will act as a focus for development, which will be delivered through site allocations in the Joint Local Plan"*

⁷ Babergh District Council and Mid Suffolk District Council (2020) Babergh and Mid Suffolk Joint Local Plan - Pre-submission (Regulation 19) Consultation (November 2020) [online] available at: <https://www.midsuffolk.gov.uk/planning/planning-policy/new-joint-local-plan/joint-local-plan-r19-pre-submission/>

and/or in Neighbourhood Plans, and windfall development in accordance with the relevant policies.”

Housing numbers

- 2.9 Policy SP01 (Housing Needs) within the Pre-Submission Joint Local Plan document (2020) states that the Joint Local Plan will seek to deliver a minimum of 7,904 additional dwellings (416 dwellings per annum) within the Babergh district over the plan period (2018 – 2037).
- 2.10 Policy SP04 (Housing Spatial Distribution) proposes that 21% of the housing would be built in the Ipswich Fringe, which includes Copdock and Washbrook. However Policy SP04 also states that 9% of the housing would be built in Hinterland Villages; which also includes Copdock and Washbrook. Table 04 of the Pre-Submission plan further sets out the minimum housing requirement for Neighbourhood Plan areas, proposing 274 new homes, including outstanding planning permissions, in Copdock and Washbrook between 2018 and 2037.
- 2.11 It is noted that at 1 April 2018 there were already permissions for 36 homes in the parish that had not been completed. A further planning permission for nine dwellings to the rear of the Ipswich Hotel on Old London Road was granted planning permission in December 2019, leaving a requirement to identify sites to deliver at least 229 new homes in the period to 2037.
- 2.12 Given the scale of housing need across Babergh and the level of services and facilities in Copdock and Washbrook, this scale of growth is considered by the Parish Council to be realistic. Furthermore, given that the Neighbourhood Plan seeks to align with the strategic policies and Plan period of the emerging Local Plan, the C&WNP has been prepared to take account of the emerging Joint Local Plan housing numbers. The C&WNP further provides the opportunity to set out more detail on how this housing should be provided based on the particular circumstances of Copdock and Washbrook.

Joint Local Plan allocations

- 2.13 The new Joint Local Plan Pre-Submission consultation document (2020) allocates two sites for development within Copdock and Washbrook Parish, to address future needs:
- **LA008 – Allocation: Land south east of Back Lane** approximately 226 dwellings (with associated infrastructure)
 - **LA008 – Allocation: Land south west of London Road** approximately 12 dwellings (with associated infrastructure)
- 2.14 The Councils have prepared a wide range of evidence studies which have been published alongside the Pre-submission version of the plan; notably relating to Sustainability Appraisal, Habitats Regulations Assessment, Equalities Impact Assessment, development viability, Town and Retail Study, Infrastructure Delivery Plan, Flood Risk Assessment, Green Infrastructure Study, Heritage and Settlement Sensitivity Assessment and Transport Modelling.
- 2.15 Following the current Regulation 19 consultation on the Joint Local Plan the next regulatory stage will be submission (Regulation 22), where the Councils will submit the Joint Local Plan to the Secretary of State along with the public representations received.
- 2.16 Babergh District Council's most recent Local Development Scheme (LDS), dated July 2018, set a timetable for each stage of the emerging Joint Local Plan however this is currently being reviewed. An updated timetable for plan progress is anticipated soon.

Long term vision for the C&WNP

2.17 The long-term vision for the C&WNP, which was established during earlier stages of plan development, is as follows:

“Copdock and Washbrook will maintain its distinct and separate village character and accommodate new development appropriate to its location, level of services and infrastructure and importance of the landscape and historic characteristics of the parish”

2.18 The following objectives of the C&WNP have been developed in order to deliver the long-term vision. Each objective has informed and guided the content of the planning policies and subsequent community actions:

Housing

1. *Provide housing that meets the local needs of Copdock and Washbrook*
2. *Enable opportunities for the provision of affordable housing that meets the needs of those with a connection with the village*
3. *Encourage the incorporation of energy saving measures in new homes*
4. *Provide new homes that meet the accessibility and space requirements for the lifetime of residents*

Business and Employment

5. *Maintain and improve employment opportunities that do not result in detrimental impacts on local infrastructure, the environment and residents’ amenity*
6. *Improve opportunities for home working*

Natural Environment

7. *Protect and enhance the local landscape and significant views*
8. *Maintain and improve the biodiversity assets of the parish*
9. *Mitigate the impact of development on designated habitats including the Stour and Orwell estuaries.*

Built Environment and Design

10. *Protect and enhance designated heritage assets*
11. *Ensure new development is of a high-quality design and of a scale and design that reflects local character.*

Infrastructure and Services

12. *Protect and enhance community facilities and services that meet the day to day needs of residents*
13. *Ensure that development does not result in a detrimental impact on infrastructure including sewers and surface water and watercourse flooding*

Highways and Movement

14. *Reduce the impact of traffic passing through the village*
15. *Improve road safety*
16. *Protect and enhance the village public rights of way network*

3. The scope of the SEA

- 3.1 The SEA Regulations require that: “*When deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies*”. In England, the consultation bodies are Natural England, the Environment Agency and Historic England.⁸ These authorities were consulted on the scope of the SEA for the C&WNP in August 2020.
- 3.2 The purpose of scoping was to outline the ‘scope’ of the SEA through setting out:
- A context review of the key environmental and sustainability objectives of national, regional and local plans and strategies relevant to the C&WNP;
 - Baseline data against which the C&WNP can be assessed;
 - The key sustainability issues and opportunities for the C&WNP; and
 - An ‘SEA Framework’ of objectives against which the C&WNP can be assessed.
- 3.3 Scoping information (including the context review and baseline data) is presented in **Appendix A**. Comments received on the Scoping Report, and how they have been considered and addressed, are presented in **Table 3.1** below.

Table 3.1: Consultation responses received on the SEA Scoping Report

Consultation response	How the response was considered and addressed
Natural England Dawn Kinrade, Consultations Team	
<p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.</p> <p>Natural England is not able to fully assess the potential impacts of this proposal on statutory nature conservation sites or protected landscapes or, provide detailed advice on the application. If you consider there are significant risks to statutory nature conservation sites or protected landscapes, please set out the specific areas on which you require advice.</p> <p>The lack of detailed advice from Natural England does not imply that there are no impacts on the natural environment. It is for the local planning authority to determine whether or not the proposal is consistent with national and local environmental policies. Other bodies and individuals may provide information and advice on the environmental value of this site and the impacts of the proposal on the natural environment to assist the decision making process. Generic advice is provided in the Annex attached.</p> <p>For any further consultations on your plan, please contact consultations@naturalengland.org.uk.</p>	<p>Response noted.</p>

⁸ In-line with Article 6(3).of the SA Directive, these consultation bodies were selected because ‘by reason of their specific environmental responsibilities,[they] are likely to be concerned by the environmental effects of implementing plans and programme.’

Consultation response	How the response was considered and addressed
<p>Historic England Edward James, Historic Places Advisor</p>	
<p>Having reviewed the Scoping Report, we are pleased to see that, although there are relatively few designated heritage assets within the parish, the Scoping Report includes them for consideration, alongside non-designated built heritage assets. We are also pleased to note, in lieu of any conservation area designation, that the local landscape area information has been included to provide a broader context, but note that the information regarding archaeology in the parish has not, at this stage, been analysed to consider what potential there is for further archaeological remains of significance to be found. We would expect that, for any site allocations under assessment, a desk based assessment of archaeological potential to an appropriate level of detail is undertaken to inform the conclusions of the SEA.</p>	<p>Comment noted.</p>
<p>We note that the Scoping Report suggests there might be opportunities for enhancement, despite the lack of any assets on the Heritage at Risk Register. This is not specifically an issue, as we appreciate this is a Scoping exercise, but we recommend that the SEA should be clear about whether there are indeed any opportunities, and highlight them if necessary. However, as sometimes is the case, the SEA should avoid making the assumption that such opportunities exist if there is no evidence on which to base it.</p>	<p>Comment noted.</p>
<p>Historic England strongly advises that the conservation and archaeological staff of the relevant local planning authorities are closely involved throughout the preparation of the plan and its assessment. They are best placed to advise on; local historic environment issues and priorities, including access to data held in the Historic Environment Record (HER), which should be consulted as part of the SEA process. In addition, they will be able to advise how any site allocation, policy or proposal can be tailored to minimise potential adverse impacts on the historic environment; the nature and design of any required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of heritage assets.</p> <p>To avoid any doubt, this does not reflect our obligation to provide further advice on later stages of the SA/SEA process and, potentially, object to specific proposals which may subsequently arise (either as a result of this consultation or in later versions of the plan/guidance) where we consider that, despite the SA/SEA, these would have an adverse effect upon the environment.</p>	<p>Comment noted.</p>
<p>Environment Agency Mark Macdonald, Planning Advisor</p>	
<p>We have inspected the information submitted and consider that the neighbourhood plan is unlikely to have significant effects on the aspects of the environment which we oversee. We have reviewed the environmental constraints of the proposed housing sites and can identify no issues within our remit which cause us concerns: Although the report identifies the environmental constraint of the Source Protection Zone (SPZ3) this would usually not be a concern for us in the case of housing developments. We also found the comments relating to water resources and water treatment of note as these issues will be of greater importance within the plan period.</p> <p>We note the conclusion of the report and accept that the Strategic Environmental Assessment has been 'screened in' due to other considerations (as described by table 2.2).</p>	<p>Comment noted.</p>
<p>In our response to the Regulation 14 consultation we commented on the main environmental issues in the plan area, within our remit, and note that the proposed housing allocations have been sequentially sited in flood zone 1. We also commented on the Washbrook and Belstead Brook; however this is a significant distance from the</p>	<p>Comment noted.</p>

Consultation response

How the response was considered and addressed

housing allocation. The issue relating to recreational disturbance mitigation on other important sites is also outside of our role within neighbourhood planning.

Should you require any additional information or wish to discuss these matters further, please do not hesitate to contact me on the number below.

Key sustainability issues

3.4 Drawing on the review of the sustainability context and baseline, the SEA Scoping Report was able to identify a range of sustainability issues and opportunities that should be a particular focus of SEA. These are as follows, presented by each of the nine SEA themes.

Air quality

- Although there are no Air Quality Management Areas (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.

Biodiversity

- The Neighbourhood Plan area falls within the 13km 'Zone of Influence' for the Stour and Orwell Estuaries Special Protection Area (SPA) and Ramsar site. In accordance with the Suffolk Coast Recreational Disturbance Avoidance and Mitigation Strategy (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 Site of Special Scientific Interest (SSSI) Impact Risk Zone (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 Neighbourhood Plan can also maximise opportunities to support multiple benefits from biodiversity, such as climate resilience.

Climate change

- 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

Landscape

- Land in the north of the Parish is associated with the Belstead Brook valley and was formerly designated a Special Landscape Area (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.

Historic environment

- 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.

Land, soil and water resources

- 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 Water Resource Management Plan (WRMP) states that even with the proposed demand management strategy, the Essex Suffolk Water Resource Zone (WRZ) will be in a deficit by 2044-2055. However it is recognised that the WRMP identifies measures to address this deficit.

Population and community

- 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 Lower Super Output Areas (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.

Health and wellbeing

- 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.

Transportation

- 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.

SEA framework

- 3.5 The issues and opportunities were then translated into an 'SEA Framework'. This SEA Framework provides a methodological framework for the assessment of likely significant effects on the baseline. The SEA framework for the C&WNP is presented overleaf in **Table 3.1**.

Table 3.1 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? 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? 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?

SEA theme	SEA objective	Assessment questions (will the proposal help to...)
		<ul style="list-style-type: none"> • 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? • Protect groundwater and surface water resources from pollution? • Maximise water efficiency and opportunities for water harvesting and/ or water recycling?

SEA theme	SEA objective	Assessment questions (will the proposal help to...)
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? • Improve parking facilities?

4. What has plan making/ SEA involved to this point?

- 4.1 In accordance with the SEA Regulations the Environmental Report must include:
- An outline of the reasons for selecting the alternatives dealt with; and
 - The likely significant effects on the environment associated with alternatives/ an outline of the reasons for selecting the preferred approach in light of alternatives appraised.
- 4.2 The 'narrative' of plan-making / SEA up to this point is told within this part of the Environmental Report. Specifically, this section explains how alternatives have been considered through plan-making and the SEA to inform the preparation of the current version of the C&WNP.

Developing reasonable alternatives

- 4.3 As the delivery of new housing development through the C&WNP is what is most likely to have a significant effect on SEA objectives, it was determined that this issue should be the primary focus of the consideration of alternatives through the SEA process.⁹

Housing numbers

- 4.4 As set out in **Chapter 2**, the Joint Local Plan preferred options consultation document provides a housing target of 274 for the Neighbourhood Plan area between 2018 and 2036. Once outstanding plan permissions have been taken into account (as of December 2019) the residual need in the period to 2036 is 229 new homes.

Site options

- 4.5 In 2019, the Parish Council asked AECOM to undertake an independent and objective assessment of the sites that have been identified as potential candidates for housing in the Neighbourhood Plan.¹⁰ A total of 15 sites were identified for potential development within Copdock and Washbrook through the Babergh and Mid Suffolk Strategic Housing and Economic Land Availability Assessment (SHELAA) (August 2017), with a further three sites put forward as a result of the consultation on the emerging Joint Local Plan.
- 4.6 Of the 18 sites initially assessed, the following seven were considered suitable, available and achievable for residential use:
- Land west of London Road, Copdock;
 - Land east of London Road;
 - Jubilee Meadow;
 - Land to the north of Back Lane and east of Elm Lane;
 - Land south east of Back Lane;
 - Land south west of London Road; and
 - Land North East of Folly Lane.
- 4.7 AECOM subsequently undertook a second stage of assessment to identify which are relatively the most and least constrained. A three tiered ranking system was then applied to ensure that all the sites were assessed using a similar metric, enabling a fair comparison of sites. **Table 4.2** below sets out the stage 2 assessment criteria.

⁹ Case-law (most notably Friends of the Earth Vs. Welsh Ministers, 2015) has established that planning authorities may apply discretion and planning judgement when determining what should reasonably be the focus of alternatives appraisal, recognising the need to apply a proportionate approach and ensure an SEA process/ report that is focused and accessible.

¹⁰ AECOM (2019) Copdock & Washbrook Neighbourhood Plan Site Options Assessment

Table 4.2: AECOM (2019) Site Options Assessment (SOA) Stage 2 - Assessment matrix for sites

Tier	Criteria
Tier 1	<ul style="list-style-type: none"> • Within the settlement boundary • Mitigation of environmental impacts minor • Walking distance to services with pedestrian footpaths or easy access to bus services
Tier 2	<ul style="list-style-type: none"> • Adjacent to settlement boundary • Mitigation of environmental impacts moderate • Walking distance to services but no footpath currently
Tier 3	<ul style="list-style-type: none"> • Removed from settlement boundary • Mitigation of environmental impacts difficult • Not within walking distance of services and no safe access/route

4.8 **Table 4.3** below sets out the seven sites by their indicative tier. The full AECOM Site Options Assessment Report can be found as a separate document of the NP evidence base.¹¹

Table 4.3 AECOM Stage 2 assessment summary

Site by tier	Size (ha)	Indicative capacity
Tier 1		
Land North East of Folly Lane	1.92	7
Land to the north of Back Lane and east of Elm Lane	0.75	15
Tier 2		
Land south east of Back Lane	13	226
Land south west of London Road	0.8	12
Land east of London Road	30.26	100
Land west of London Road	10.5	15
Tier 3		
Jubilee Meadow	10.54	250

Site selection

4.9 In light of the conclusions of the AECOM SOA (2019), the seven sites were further considered and reviewed by the Parish Council as potential Neighbourhood Plan allocations for housing. The results of the AECOM SOA were fed back to the community during a drop-in event in June 2019.

4.10 In terms of the **Tier 1** sites:

- **Land North East of Folly Lane** has been granted planning permission for 7 dwellings (DC/17/06054) and is therefore no longer considered in contention for allocation through the C&WNP.
- **Land to the north of Back Lane and east of Elm Lane, Washbrook** will be allocated through the C&WNP for 15 dwellings.

4.11 It is considered that there are insufficient opportunities for the full 229 homes to be provided through infill plots or small groups of housing within the existing settlement boundaries.

¹¹ AECOM (2019) Copdock and Washbrook Neighbourhood Plan Site Options Appraisal

Therefore, in terms of the remaining **Tier 2** and **Tier 3** sites, the Parish Council have decided to concentrate growth at one large site in order to meet local needs.

- 4.12 Of the Tier 2 and 3 sites, only two sites are of size and scale to meet the remainder of the housing need in full:
- Tier 2 site **Land south east of Back Lane** (13ha – indicative capacity of 226 dwellings)
 - Tier 3 site **Jubilee Meadow** (10.54ha – indicative capacity of 250 dwellings)
- 4.13 Alongside the development of the Neighbourhood Plan, the Joint Local Plan (JLP) has progressed, with Regulation 19 ‘Pre-Submission’ consultation on the JLP taking place between 12th November and 24th December 2020. As set out in **Chapter 2**, Policy LA008 of the Pre-Submission JLP proposes the allocation of Land south-east of Back Lane for approximately 226 dwellings with associated infrastructure.
- 4.14 In addition to the JLP taking forward the site, the Parish Council had independently arrived at the Land south-east of Back Lane site as the choice for allocation for the Neighbourhood Plan in light of the SOA and the feedback from the June 2019 local consultation event. While there is no longer a choice to be made, given the JLP sets the strategic context for the Neighbourhood Plan, and the Neighbourhood Plan needs to be in general conformity with the JLP, the Parish Council seek to use the Neighbourhood Plan to add detail to strategic Policy LA008.
- 4.15 Preparation of the Neighbourhood Plan has allowed access to further, government funded support to provide a more detailed assessment as to how this site could be developed. The Copdock and Washbrook Design Guidelines Report (December 2019) was prepared for the Parish Council by AECOM, which outlines masterplanning principles and a high level concept plan for the site. This supporting evidence has enabled the development of a more detailed policy for the development of the site than that proposed in the Joint Local Plan. However, no choices or ‘options’ which could give rise to potential significant effects have been identified in relation to the masterplanning of the site.
- 4.16 In light of the above, no alternative options have been identified for the Neighbourhood Plan which can be assessed through the SEA process.

Current approach in the C&WNP and the C&WNP policy framework

- 4.17 To support the implementation of the vision for the Neighbourhood Plan discussed in **Section 2.18**, the current version of the C&WNP puts forward 21 policies to guide development in the Neighbourhood Plan area.
- 4.18 The policies, which were developed following extensive community consultation and evidence gathering, are set out in **Table 4.1** overleaf.

Table 4.1 Copdock & Washbrook Neighbourhood Plan policies

Policy no.	Policy title
Policy C&W1	Spatial Strategy
Policy C&W2	Housing Development
Policy C&W3	Land north-east of Elm Lane
Policy C&W4	Land south-east of Back Lane
Policy C&W5	Affordable Housing on Rural Exception Sites
Policy C&W6	Housing Mix
Policy C&W7	Measures for New Housing Development
Policy C&W8	Employment Sites
Policy C&W9	New Businesses and Employment
Policy C&W10	Farm Diversification
Policy C&W11	Area of Local Landscape Sensitivity
Policy C&W12	Local Green Space
Policy C&W13	Biodiversity
Policy C&W14	Recreational Disturbance Avoidance and Mitigation
Policy C&W15	Protection of Important Views and Landscape Character
Policy C&W16	Heritage Assets
Policy C&W17	Design Considerations
Policy C&W18	Sustainable Construction Practices
Policy C&W19	Protecting Existing Services and Facilities
Policy C&W20	Open Space, Sport and Recreation Facilities
Policy C&W21	Public Rights of Way

5. What are the appraisal findings at this current stage?

Introduction

- 5.1 The aim of this chapter is to present appraisal findings and recommendations in relation to the current Regulation 14 version of the C&WNP. This chapter presents:
- An appraisal of the current version of the C&WNP under the nine SEA theme headings; and
 - The overall conclusions at this current stage and recommendations for the next stage of plan-making.

Appraisal method

- 5.2 The appraisal is structured under the nine SEA themes taken forward for the purposes of the SEA and that are linked to the SEA objectives, see **Table 3.2**.
- 5.3 For each theme 'significant effects' of the current version of the plan on the baseline are predicted and evaluated. Account is taken of the criteria presented within Schedule 2 of the Regulations. So, for example, account is taken of the probability, duration, frequency and reversibility of effects as far as possible. These effect 'characteristics' are described within the appraisal as appropriate.
- 5.4 Every effort is made to identify/ evaluate effects accurately; however, this is inherently challenging given the high-level nature of the plan. The ability to predict effects accurately is also limited by understanding of the baseline and the nature of future planning applications. Because of the uncertainties involved, there is a need to exercise caution when identifying and evaluating significant effects and ensure all assumptions are explained. In many instances it is not possible to predict significant effects, but it is possible to comment on merits (or otherwise) in more general terms.

Appraisal of the Neighbourhood Plan

Air quality

- 5.5 There are no Air Quality Management Areas (AQMAS) within Copdock and Washbrook Parish. However, the SEA screening opinion carried out for the C&WNP identified the potential for significant effects in relation to the four Ipswich AQMAS; located within 5km of the parish boundaries to the north-east.¹² In terms of the strategic transport network, the Old London Road (former A12 trunk road) which connects the Parish with Ipswich city centre, has a major impact on the village. Specific concerns for residents relate to the road being a dual carriageway with 50mph speed limit despite dwellings and businesses having direct access onto the road. The road is often congested and blocked which leads to traffic diverting through the village, adjoining with the A14 along the eastern parish boundary.
- 5.6 The C&WNP allocates two sites, one being strategic in nature, although it is noted that this site will be allocated for development irrespective of the C&WNP through the emerging Babergh and Mid Suffolk Joint Local Plan (Policy LA008). In light of the level of growth proposed at Land south-east of Back Lane (226 homes), and the sensitive location of the site (adjacent to the Old London Road and in close proximity to the A12/A14 roundabout junction to the east of Washbrook), there is the potential for residual indirect negative effects on local air quality.
- 5.7 It is recognised that access to public transport is less than satisfactory in the Plan area, with high car ownership and large percentage of residents driving to work (many to Ipswich). Public

¹² Land Use Consultants (2020) Babergh & Mid Suffolk District Councils Copdock & Washbrook Parish Council Neighbourhood Development Plan SEA Screening Opinion

transport use is therefore likely to remain low compared with private car use, leading to increase congestion on the A12/ A14 and subsequent increased levels of pollutants such as NO₂ within the Plan area. Any exacerbation of pollution within the Plan area as a direct or indirect result of development could, in turn, increase NO₂ levels within the Ipswich AQMAs, delivering long term minor negative effects.

- 5.8 Whilst strategic interventions are outside of the scope of the Neighbourhood Plan, the C&WNP seeks to address local highways issues; requiring that *“locations of development respect the potential for detrimental noise and air quality impacts on new development arising from the presence of the A12 and A14, which are utilised by residents commuting to their places of work”*. This is reflected through the emerging Local Plan Policy LA008, which requires proposals to include *“a traffic management scheme.”*
- 5.9 It is noted that work undertaken in the preparation of the Neighbourhood Plan included a study of potential improvements to Old London Road that would reduce the impact of the road and the speed of its users. The Copdock and Washbrook Design Guidelines (2020) sets out a number of traffic management/ calming measures to be introduced at key locations part of new development; stating that *“Within the settlement boundaries, streets must not be built to maximise vehicle speed or capacity. Streets and junctions must be designed with the safety and accessibility of vulnerable groups such as children and wheelchair users in mind and may introduce a range of traffic calming measures”*. Specific measures are currently being discussed with Suffolk County Council Highways Department, some of which will be delivered as part of the development of the land south-east of Back Lane, identified through Policy C&W4.
- 5.10 In light of supporting evidence, the C&WNP policy framework sets numerous development criteria to ensure that any proposal minimises and/ or suitably mitigates the effects of increased congestion on local roads, which can reduce local air quality. Policy C&W4 (Land south-east of Back Lane) states that proposals should take place in accordance with the illustrative masterplan and provide:
- *“new and improved pedestrian and cycle links towards the Primary School, the Village Hall and Recreation Fields and Back Lane”*; and
 - *“a single vehicular access from Old London Road with commensurate speed restriction measures and the provision for right-turn movements into and out of the site”*.
- 5.11 In terms of the illustrative masterplan, this includes *“traffic calming measures appropriate to residential areas”*, *“pedestrian and cycle link through the central open space”*, and *“screening plantation to reduce development impact”*. Delivering a high quality public realm and improving connectivity and sustainable transport opportunities, has the potential for long term minor positive effects on air quality, supporting the overall viability and vitality of the village.
- 5.12 The movement of pedestrians will be further facilitated through the wider C&WNP policy framework, notably Policy C&W12 (Local Green Space), Policy C&W13 (Biodiversity), Policy C&W20 (Open Space, Sport and Recreation Facilities) and Policy C&W21 (Public Rights of Way). Protecting and enhancing the area’s most valued green infrastructure resource will likely encourage active travel opportunities along scenic routes, with further minor positive effects anticipated.
- 5.13 Parking is a key constraint for the area, which in turn causes congestion and subsequent reduced air quality. Parking is specifically addressed through Policy C&W17 (Design Considerations), which supports proposals where they *“produce designs, in accordance with standards, that maintain or enhance the safety of the highway network ensuring that all vehicle parking is provided within the plot and seek always to ensure permeability through new housing areas, connecting any new development into the heart of the existing settlement”*. Supporting off street parking is likely to maintain traffic flow through the village and contribute positively towards addressing existing capacity issues at peak times. Ensuring cycle parking provision through Policy C&W7, and supporting improvements/ extensions to the existing Public Rights of Way (PRoW) network through Policy C&W21 may also assist in reducing the number of vehicle movements in the village; facilitating the uptake of active travel.

- 5.14 The C&WNP further addresses air quality issues locally through incentivising and enabling a modal shift away from high emission vehicles. Policy C&W 17 (Design Considerations) requires that proposals “provide one electric vehicle charging point per new off-street parking place created”, which will contribute positively towards meeting the UK and Babergh and Mid Suffolk’s commitment to achieving net zero carbon emissions by 2050 and 2030 respectively.^{13,14} Furthermore, it is noted that a ban on selling new petrol, diesel or hybrid cars in the UK will be brought forward from 2035 to 2040 at the latest, under government plans.¹⁵
- 5.15 Overall, the C&WNP seeks to improve active travel opportunities and reduce congestion in the village, though the allocation of 226 new homes adjacent to the A12 and A14 dual carriageway is likely to lead to increased congestion on the strategic road network to some degree. Additionally, given access to sustainable transport is less than satisfactory, it is considered that a reliance on the private vehicle is likely to continue with the potential for negative effects for air quality.
- 5.16 However, it is recognised that the Copdock and Washbrook Preliminary Highways Scheme identifies a possible solution to the dual carriageway issues and, together with other options, is being discussed with Suffolk County Council Highways Department. This, combined with further mitigation proposed through the C&WNP (and informed by the Design Guidelines (2020)) is likely to ensure no significant effects, however the increase in vehicle use on local roads is likely to lead to **minor negative effects** in the long-term.

Biodiversity

- 5.17 There are no internationally designated nature conservation sites within Copdock and Washbrook Parish. However, at the Habitats Regulations Assessment (HRA) (2020) ‘Screening’ stage, the Stour and Orwell Estuaries SPA and Ramsar were listed as having the potential for Likely Significant Effects as a result of recreational disturbance in combination with other plans and projects. Further consideration was therefore required at the Appropriate Assessment (AA) stage to determine whether the C&WNP either alone or in-combination with other plans and projects, would adversely affect the integrity of sites as a result of various potential impact pathways, i.e. changes in water quality and quantity and recreational disturbance.
- 5.18 The Suffolk Recreational Disturbance Avoidance Mitigation Strategy (RAMS)¹⁶ is a key consideration in the context of the HRA for development proposals, and is reflected through the C&WNP policy framework. In line with Policy C&W14 (Recreational Disturbance Avoidance and Mitigation) “All residential development within the zones of influence of European sites will be required to make a financial contribution towards mitigation measures, as detailed in the Suffolk RAMS, to avoid adverse in-combination recreational disturbance effects on European sites.”
- 5.19 The AA concludes that “the Copdock and Washbrook Neighbourhood Plan Regulation 14 Pre-Submission Draft is not predicted to result in any Adverse Effect on the Integrity of the Habitats sites in scope, either alone or in combination with other plans and projects.” The AA does however recommend a number of wording amendments to the draft Plan, including the following types of changes:
- Recommended policy wording changes.

¹³ In June 2019 legislation passed to commit the UK to a legally binding target of net zero emissions by 2050
<https://www.gov.uk/government/news/uk-becomes-first-major-economy-to-pass-net-zero-emissions-law>

¹⁴ In September 2019 Babergh & Mid Suffolk Councils set up a Task Force to 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
<https://www.climateemergency.uk/blog/babergh/>

¹⁵ Department for Transport and Office for Low Emission Vehicles (2020) Consultation on ending the sale of new petrol, diesel and hybrid cars and vans [online] available at: <<https://www.gov.uk/government/consultations/consulting-on-ending-the-sale-of-new-petrol-diesel-and-hybrid-cars-and-vans>>

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>

- Recommend strategic mitigation is required (e.g. Suffolk Coast RAMS) for residential allocation policies for sites within the 13km Zone of Influence as well as site based mitigation.
 - The need for project level HRAs at application stage e.g. to cover construction impacts and good practice in relation to run off, air quality during construction, on site silt management etc. to secure a Construction Environmental Management Plan (CEMP) (Biodiversity) as a condition of any consent issued.
- 5.20 The SEA supports the conclusions and recommendations of the HRA, which should be incorporated to mitigate against potential residual negative effects.
- 5.21 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. 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. Given the scale of growth proposed at Land south-east of Back Lane, development has the potential to lead to negative effects, for example through changing recreational pressures and disturbance.
- 5.22 However it is considered that, in line with development principles set out in the Copdock and Washbrook Design Guidelines report (AECOM, 2019), proposals for the site will “*enhance and conserve*” the network of species rich woodland in the area. This is further reflected through the illustrative masterplan proposed for the site, which seeks to “*retain*” and “*integrate*” mature trees, hedgerows and open spaces; and sets out site-specific plantation. This is likely to limit adverse effects both in the short term (during construction phases) and the long-term of increased disturbance, noise, air and light pollution.
- 5.23 In terms of the local biodiversity resource, existing woodland, hedgerows, ponds and streams play an important role in providing habitats and wildlife corridors across the parish. There are also a number of County Wildlife Sites (CWS) present just outside the Plan area; within 200m of the parish boundaries. The C&WNP sets out a number of provisions to help limit potential effects of new development on the local green infrastructure network, including features and areas of biodiversity interest in and surrounding the Plan area, and support enhancements. Policies C&W12 (Local Green Spaces) and C&W13 (Biodiversity) are notable in this respect. Specifically, Policy C&W13 expects development to be “*landscape-led and appropriate in relation to its setting, context and ongoing management.*”
- 5.24 The Land north-east of Elm Lane site allocation is a small greenfield site, previously in use as a sports area, with limited biodiversity value on site. Conversely, the strategic site Land south-east of Back Lane is likely to be of considerable ecological value given the allotments present. Policy C&W4 (Land south-east of Back Lane) recognises this, reinforcing that “*allotments will be retained on their current site*”, supporting provisions set out in Local Plan Policy LP 008 (Allocation: Land south east of Back Lane, Copdock and Washbrook).
- 5.25 Policy requirements for the strategic site also include the enhancement of linkages between local habitats and green spaces; with the ambition of “*achieving a net biodiversity gain, particularly given the proximity of the site to the open countryside to the north and east.*” It is considered that committing to net gain within site allocation Policy C&W4 has the potential to lead to long term positive effects on biodiversity. Capitalising upon strategic opportunities of the site in this respect will both extend and improve the Parish’s valued green infrastructure network and support ecological connectivity throughout the new development and wider surrounds. The embedded principle for biodiversity ‘net gain’ is further supported through Policy C&W13 (Biodiversity). Securing net gain as part of new development will deliver measurable resilience to current and future pressures; as identified through the NPPF (2019), and the Governments 25-year Environment Plan (2018).
- 5.26 Overall, assuming the recommendations set through the HRA are adopted alongside the policy mitigation provided, the premise for net gain embedded through the C&WNP policy framework is considered to lead to **minor positive effects** overall.

Climate change

- 5.27 The climate change SEA objectives have a dual focus of reducing the contribution of the Neighbourhood Plan area to climate change and supporting resilience to the potential effects of climate change, particularly flooding. In practice, development plans can contribute to mitigating the effects of climate change by minimising greenhouse gas emissions from the built environment. Adapting to the effects of climate change includes ensuring development is directed away from areas at greatest risk of flooding and limiting effects of extreme weather.
- 5.28 In terms of adapting to climate change, the C&WNP performs well overall; focussing growth away from areas of fluvial flood risk. It is however noted that there is an area of low/ medium surface water flood risk extending through the centre of the strategic site allocation (Land south-east of Back Lane). The C&WNP recognises that surface water drainage is a problem in many parts of the village including on The Street and in parts of London Road. In line with Policy C&W18 (Sustainable Construction Practices) new development will be required, where appropriate, to make provision for the attenuation and recycling of surface water and rainwater in order to reduce the potential for making the situation worse. It is however considered that Policy C&W18 could be revised to include support development where it seeks ways to improve attenuation, delivering net-positive effects rather than simply avoid further negative effects.
- 5.29 While it is recognised that surface water flood risk at Land south-east of Back Lane is currently only minor, climate change has the potential to increase the occurrence of extreme weather events such as enhanced precipitation, which can increase surface water runoff. As such, it is considered that recognising the site specific need for flood risk mitigation within Policy C&W4 (Land south-east of Back Lane) itself would further strengthen the Neighbourhood Plan in terms of *“[Ensuring] that development does not result in a detrimental impact on infrastructure including sewers and surface water and watercourse flooding”* (Neighbourhood Plan Objective 13).
- 5.30 Well planned green infrastructure can help an area adapt to and manage the risks of climate change (including flood risk). Enabling and providing for green infrastructure within the Parish is therefore a key opportunity in which the Plan can help to promote climate change adaptation measures. Policies C&W12 and C&W13 perform positively in this respect, supporting proposals *“where they provide a net gain in biodiversity through, for example:*
- *the creation of new natural habitats including ponds;*
 - *the planting of additional trees and hedgerows (reflecting the character of the areas traditional hedgerows), and;*
 - *restoring and repairing fragmented biodiversity networks.”* (Policy C&W13)
- 5.31 As set out under the Biodiversity SEA theme above, there is opportunity for strategic growth at Land south-east of Back Lane to deliver biodiversity and environmental net gains. This central principle of the government’s 25 Year Environment Plan is an important climate change adaptation consideration, as delivering gains now will result in ecosystems and landscapes more resilient to climate change.¹⁷ This is considered through the Copdock and Washbrook Design Guidelines (AECOM, 2020), and reflected through Policy C&W4 (Land south-east of Back Lane). Notably, the site will be required to provide amenity open spaces and screening plantation; in addition to retaining and enhancing existing biodiversity features, delivering positive effects for climate adaptation.
- 5.32 Strategic growth at Land south-east of Back Lane (Policy C&W4) also has the potential to deliver positive effects from a climate change mitigation perspective. Large scale development presents an opportunity to achieve ambitious building emissions standards, deliver low carbon heat and power supply infrastructure and take a wide range of other steps in support of decarbonisation. As a broad generalisation, as the level of growth increases, so does the potential for delivering positive effects; i.e. the delivery of upgraded or new infrastructure (transport, community (including schools), low carbon heat/ power, green, etc.) can contribute

¹⁷ Department for Environment, Food and Rural Affairs (2018) 25 Year Environment Plan [online] available at: <https://www.gov.uk/government/publications/25-year-environment-plan>

towards meeting local climate change mitigation objectives. The Copdock & Washbrook Design Guidelines (AECOM, 2020) introduces a number of energy efficient technologies and strategies that could be incorporated at Land south-east of Back Lane. The Design Guidelines highlight that “*Starting from the design stage, passive solar heating, cooling, and energy efficient strategies can be informed by local climate and site condition*”. This is reflected through Policy C&W18 (Sustainable Construction Practices), which provides support for sustainable design and construction measures and energy efficiency measures, including ground/ air source heat pumps and solar panels where feasible. Furthermore, Policy C&W18 states that “*Proposals that incorporate current best practice in energy conservation will be supported where such measures are designed to be integral to the building design and minimise any detrimental impact on the building or its surroundings.*” Incorporating interventions early in the design process is considered likely to lead to long term positive effects for climate change, achieving cost-effective, sustainable solutions.

- 5.33 Provisions set out in Policy C&W17 (Design Considerations) and Policy C&W21 (Public Rights of Way) are likely to be effective at reducing emissions from transport; targeting local improvements that can support sustainable transport, and supporting a modal shift and active travel opportunities. In this respect, there is little to add to the discussion presented below, under the ‘Transportation’ SEA theme. Notably in terms of support for lower-emission vehicles (i.e. Electric Vehicles), Policy C&W17 requires that new development “*provide one electric vehicle charging point per new off-street parking place created.*”
- 5.34 Overall, it is considered that once the above recommendations have been adopted, the C&WNP will likely deliver **minor positive effects** overall; capitalising upon opportunities to support local and national climate change objectives/ targets.

Landscape

- 5.35 As emphasised though the C&WNP, the local landscape and village setting holds unique characteristics that require protection and enhancement, particularly given forthcoming development and the parish’s location. The C&WNP vision states that “*Copdock and Washbrook will maintain its distinct and separate village character*”, which reflects the need to prevent any further unconstrained spread of Ipswich into the parish. Currently the A14 and A12 create a physical barrier between the two areas and the landscape qualities of the land to the west of the A14 and A12 plays an important role in maintaining the distinct separation of the built-up area of the village from Ipswich.
- 5.36 In order to manage the potential impacts of growth, (Policy C&W1 (Spatial Strategy)) states that new development will be focused within the designated Settlement Boundaries, which have been redefined in light of the Landscape Appraisal (2019) findings. This will ensure that the undeveloped rural countryside is preserved and remains largely undeveloped, limiting the potential for coalescence of the village with Ipswich. Furthermore, proposals for development located outside the Settlement Boundaries will only be permitted where it “*would not have a detrimental impact on heritage and landscape designations*” and “*would not result in ribbon development along Old London Road or undermine the important gaps between settlements as identified on the Policies Map*”.
- 5.37 The Landscape Appraisal also identified important views into and out of the built-up area of the village. These are protected through Policy C&W15 (Protection of Important Views and Landscape Character), stating that “*any proposed development should not detract from the key landscape features or these views*”. The scenic beauty of the area is further protected through the Design Checklist prepared for the village (AECOM, 2020). In line with Policy C&W17 (Design Considerations), “*planning applications should demonstrate how they satisfy the requirements of the Development Design Checklist*”, which has been prepared as part of the AECOM Design Guidelines.
- 5.38 In terms of landscape designations present, land at the northern end of the parish, around the Belstead Brook, is currently designated as a Special Landscape Area (SLA) in the adopted Local Plan; however the Preferred Options Joint Local Plan (July 2019) does not propose the continuation of this designation. The Landscape Appraisal (2019) produced in support of the Neighbourhood Plan highlights that “*There is a strong correlation between the valley slopes and*

the boundary of the SLA, the combination of topography, vegetation and historic features contributing strongly to the area's scenic and perceptual qualities." The Landscape Appraisal concludes that the majority of the SLA be considered to constitute a valued landscape and is therefore carried forward as an Area of Local Landscape Sensitivity in the C&WNP (with minor boundary changes). This is reflected through the draft Plan; which states that (Policy C&W11 (Area of Local Landscape Sensitivity) "*proposals within the area will only be permitted where they protect and enhance the special landscape qualities of the area, as identified in the Landscape Appraisal*".

- 5.39 Both site allocations fall within the SLA and it is considered that proposals will need to be carefully designed to mitigate any potential impacts on the landscape. In terms of the strategic site allocation Land south-east of Back Lane, the site is located in a relatively prominent location which may have a visual impact on the skyline depending on the scale and design of the development of the site. Furthermore, the site's sloped topography is likely to need careful consideration in regard to the scale and layout of development to respond to landscape effects. The sensitivity of the site is recognised through emerging Local Plan Policy LA008, which requires that "*Landscaping reflects the sensitivity of the surrounding landscape*". This is supplemented through the C&WNP and supporting evidence; notably, the Landscape Appraisal (2019), which sets important aspects to be enhanced, conserved and avoided through new development. Specific consideration is given to the "*Deeply rural high quality countryside surrounding the settled area*" and "*views across the wider countryside*". The scheme should also avoid "*Creating abrupt edges to development with little vegetation or landscape on the edge of settlement*".
- 5.40 The Landscape Appraisal has further informed the illustrative masterplan for the strategic site, prepared as part of the Copdock & Washbrook Design Guidelines (2020). Policy C&W4 (Land south-east of Back Lane) "*requires that proposals take place in accordance with the illustrative masterplan*". This will enable new development to "*Respond to the existing views and use vegetation to mediate the impact of the development on the existing landscape.*" As discussed under the 'Biodiversity' SEA theme, specific provision includes screening plantation, open spaces, and retaining of hedgerows and mature trees.
- 5.41 In terms of the smaller site allocation, 'Land north-east of Elm Lane', while a greenfield site, is a disused and redundant football pitch, located off Back Lane and Elm Lane. The site relates well to the settlement, adjoining existing residential development and being in line with the principal development pattern seen. It is also noted that planning permission has been granted at the site for the development proposed through the C&WNP (15 dwellings).
- 5.42 Taking the above into consideration, the C&WNP is predicted to have residual **minor long-term negative effects** for landscape; predominantly through the loss of greenfield land at 'Land south-east of Back Lane'. However, it is recognised that these effects are anticipated as part of the future baseline with or without the C&WNP, through the emerging Joint Local Plan strategic allocation.
- 5.43 The C&WNP policies supplement the proposal set out in the emerging Local Plan, providing a basis for the conservation and enhancement of local landscape character and setting. Notably this is achieved through the protection of views and open countryside surrounding the settlement; supplemented by the Landscape Appraisal, Design Guidelines and masterplanning which will inform the proposed site allocation. While being located within a particularly sensitive landscape area, the Design Guidelines and masterplanning seek to ensure that the delivery of the strategic site and associated infrastructure does not affect the rural setting of the village, and therefore no significant negative effects are considered likely overall.

Historic environment

- 5.44 The Neighbourhood Plan area has a rich historic environment; with several important buildings across the village that are designated as being of architectural or historic interest. The two parish churches are Grade II* Listed and the remaining buildings are Grade II. There is no conservation area within the parish, however the parish is known to be rich in archaeological finds and records, particularly given the Old London Road follows the line of a Roman Road.

- 5.45 In order to manage the potential impacts of growth, new development will be focused within the designated Settlement Boundaries, thereby ensuring that the rural countryside and pattern of the settlement is preserved. In line with Policy C&W1 (Spatial Strategy) proposals for development located outside the Settlement Boundaries will only be permitted where it *“would not have a detrimental impact on heritage and landscape designations”*.
- 5.46 Policy C&W16 (Heritage Assets) seeks to ensure that development proposals affecting heritage assets in the parish are given appropriate consideration. Policy C&W16 sets out a number of criteria for proposals to adhere to, including *“contribute to the village’s local distinctiveness, built form and scale of its heritage assets, as described in the Landscape Appraisal and Built Character Assessment, through the use of appropriate design and materials.”* Furthermore, in line with Policy C&W17 (Design Considerations) *“taking mitigation measures into account, proposals will be supported where they do not affect adversely any historic character, architectural or archaeological heritage assets of the site and its surroundings.”*
- 5.47 Policy C&W16 and Policy C&W17 also provide support for proposals that deliver enhancements to heritage assets and their settings within the Plan area. Policy C&W17 places particular focus on public realm and local distinctiveness; supporting development where it *“does not involve the loss of gardens, important open, green or landscaped areas, which make a significant contribution to the character and appearance of that part of the village.”* This complements wider C&WNP policies, including green infrastructure policies (Policy C&W12 and C&W20) and Policy C&W11 and C&W15 which seek to maintain and enhance the local character of the area, and protect valued local views. It is noted that site specific requirements at ‘Land south-east of Back Lane’ are included in the Copdock & Washbrook Design Guidelines (AECOM, 2020).
- 5.48 In terms of the strategic site allocation, Belldown Grade II Listed Building is located adjacent to the site to the south, and there are further Grade II Listed Buildings (Cherry Cottage and Cherry Orchard, and Chelmesis Gainsborough Inglenook) 40m to the north of the site. Site allocation Land north-east of Elm Lane is also constrained in this respect, with Tudor Cottage Grade II Listed Building situated approximately 150m to the south of the site. Both sites have the potential to affect the views and setting of Grade II listed buildings, and therefore design requirements have been prepared for the village (AECOM, 2020) to ensure that new development is of high quality and has regards to its surroundings; minimising potential for residual adverse effects. Criteria set out through Policy C&W16 and C&W17, as discussed above, will provide a level of protection for assets.
- 5.49 As discussed under the Landscape SEA theme, the AECOM Design Guidelines (2020) set out specific masterplanning for strategic site allocation Land south-east of Back Lane. A key development principal set out includes that *“Design, layout, and landscaping are sympathetic to the close setting of heritage assets”*. This is reiterated through Local Plan Policy LA008, and translated within the concept diagram set out in the C&WNP. The diagram shows landscaping (areas of open space, trees and hedgerows) to the north of the site, and a linear row of trees to the south of the site, which will likely screen development from Grade II Listed Buildings to the south and north; mitigating adverse effects. It is recommended that the site allocation policies themselves recognise the potential sensitivity of the sites in terms of the Listed Buildings close by. Specifically, policy requirements can ensure that new development provides the necessary screening to reduce impacts on adjacent heritage assets.
- 5.50 Overall, it is considered that the Neighbourhood Plan and its supporting evidence, alongside the higher-level policy suite, provides a robust framework for the protection and enhancement of the historic environment. Residual **neutral effects** are anticipated overall.

Land, soil and water resources

- 5.51 In line with emerging Local Plan strategic site allocation Policy LA008 (Land south-east of Back Lane), the C&WNP sets out further detailed policy (Policy C&W4) for the development of the site. Delivering homes over a large site has enabled infrastructure delivery, however this in turn has resulted in the significant loss of greenfield land. This is given that options were limited due to the rural nature of the village, and the strategic scale of growth required. Ultimately, the loss of 13ha of greenfield land through the allocation of Land south-east of Back Lane will lead to

- long-term negative effects in relation to this SEA theme; however it is recognised that with or without the C&WNP these effects will arise through the Joint Local Plan strategic allocation. It is also noted that Land north-east of Elm Lane is a greenfield site, and will also lead to negative effects; although the site is considerably smaller at 0.77 ha.
- 5.52 In terms of Best and Most Versatile (BMV) agricultural land, the Site Options Assessment (SOA) carried out for the sites (AECOM, 2019) identified that both sites are located on Grade 2 agricultural land; which is acknowledged as BMV land within the NPPF (2019). As such it is considered likely that development at both sites would lead to loss of areas of this valuable resource. This would lead to long term negative effects in terms of the land, soil and water SEA theme.
- 5.53 Supporting biodiversity and facilitating enhancements to green infrastructure provision in the Neighbourhood Plan area will likely improve the quality of land and water resources. This will promote the ability of natural processes to support soil and water quality. Key policies in this regard includes Policy C&W12 (Local Green Space), Policy C&W13 (Biodiversity) and Policy C&W20 (Open Space, Sport and Recreation Facilities).
- 5.54 It is considered that any issues surrounding water resources, including wastewater treatment, will be a matter for Anglian Water. The Water Resources Management Plan (WRMP) (2019) sets out how water supply and demand will be balanced over the next 25 years; ensuring adequate supply to homes whilst also protecting the environment.¹⁸ It is noted that specific design opportunities for the strategic site allocation are touched upon in the Copdock & Washbrook Design Guidelines (2020), for example rainwater harvesting could be utilised to capture and store rainwater.
- 5.55 In summary, it is considered that significant negative effects resulting from the permeant loss of greenfield high quality land at Land south-east of Back Lane are unavoidable. These effects are anticipated as part of the future baseline with or without the C&WNP, through the emerging Joint Local Plan strategic allocation. Furthermore, the additional support provided through the C&WNP for green infrastructure and soil enhancement can provide positive effects in other parts of the plan area. In terms of the other C&WNP site allocation it is considered that any loss of greenfield, high quality land would not be significant given the size of the site. **Minor negative effects** are therefore concluded overall.

Population and community

- 5.56 Copdock and Washbrook lie south of Ipswich, and are classified as Hinterland Villages, within the Ipswich Fringe. Within the emerging Joint Local Plan, 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*”. Furthermore, Policy SP04 (Housing Spatial Distribution) proposes that 10% of the housing need for the joint plan area would be built in Hinterland Villages such as Copdock and Washbrook.
- 5.57 Joint Local Plan Policy LA008 allocates Land south east of Back Lane, Copdock and Washbrook as a strategic development site for approximately 226 dwellings and associated infrastructure. To conform with the emerging Local Plan, Policy C&W4 (Land south-east of Back Lane) also allocates the strategic site, requiring that proposals take place in accordance with the illustrative Masterplan (Figure 6 of the C&WNP), which “*provides for an exemplar residential development for 226 dwellings comprised of mixed housing typologies*”. It is considered that this provision will lead to significant long term positive effects in terms of meeting the local housing needs of the joint plan area in the period to 2036. Additionally, the delivery of associated infrastructure is considered to support sustainable growth of the village.
- 5.58 The C&WNP also allocates Land north-east of Elm Lane for “*approximately 15 dwellings including 35% affordable dwellings*” (Policy C&W3). It is considered that the affordability of housing remains a significant barrier for many seeking their own homes in the parish. Both site allocations (Policies C&W3 and C&W4) will lead to positive effects in this respect through delivering 35% affordable housing schemes. For Land south-east of Back Lane, further specific

¹⁸ Anglian Water (2019) Water Resource Management Plan 2019 [online] available at: <https://www.anglianwater.co.uk/siteassets/household/about-us/wrmp-report-2019.pdf>

requirements are set to optimise strategic opportunities for affordable housing delivery, with Policy C&W4 stating that *“The affordable housing provision should be designed so that it is “tenure blind” (so that it is indistinguishable from open market housing), to be distributed around the site and not concentrated in any one area.”*

- 5.59 Outside of the site allocations, in line with Policy C&W5 (Affordable Housing on Rural Exception Sites) *“proposals for the development of small-scale affordable housing schemes, including entry level homes for purchase on rural exception sites outside the Settlement Boundaries, where housing would not normally be permitted by other policies, will be supported where there is a proven local need.”* Furthermore, in terms of meeting local housing needs, Policy C&W6 (Housing Mix) states that *“In all housing developments of ten or more homes, there shall be an emphasis on providing a higher proportion of three-bedroomed homes within the scheme”*. This reflects the findings of the Housing Needs Assessment (HNA) carried out for the Parish Council (AECOM, 2020).
- 5.60 High-quality design is also promoted throughout the C&WNP; including Policy C&W7 (Measures for New Housing Development) and C&W17 (Design Considerations), which requires applications to *“demonstrate how they satisfy the requirements of the Development Design Checklist”*, which has been developed through the Copdock and Washbrook Design Guidelines (2020). In addition, proposals will be supported through Policy C&W17 where they *“maintain or create the village’s sense of place and/or local character”*. As a result, long-term positive effects are anticipated for population and community in respect of providing new high-quality and appropriate homes.
- 5.61 Growth proposed through the Neighbourhood Plan will provide the opportunity for those with a local connection to remain in the village in a home more suited to their needs. Additionally, opportunities will be provided for new young families and others wishing to join the community, helping to support local facilities, businesses and the overall vitality of the parish. Policy C&W9 (New Business and Employment) supports the creation of additional jobs, while Policy C&W8 (Employment Sites) and Policy C&W19 (Protecting Existing Services and Facilities)) support the retention and development of existing employment, other business uses, and local facilities and services. This is likely to lead to positive effects overall, supporting the livelihood of the village and helping to reduce rural isolation and social exclusion.
- 5.62 In terms of accessibility to services and facilities, it is considered that both site allocations are in close proximity to the centre of the village and short walking distance from local amenities and services including schools, supporting sustainable growth in the parish. The Copdock and Washbrook Design Guidelines (AECOM, 2020) will further ensure that development proposals are appropriately planned and capitalise upon enhanced access to the village centre. Notably, a key feature of the development at Land south-east of Back Lane is *“Pedestrian and cycle network linking the site with the surrounding built up area, the primary school, village hall and cricket club”*.
- 5.63 Setting design requirements such as requiring suitable connectivity between the strategic site and the village centre, will likely increase the uptake of sustainable travel, and may reduce the impact of additional private cars on the public realm. Notably, the Design Guidelines (2020) state that *“It is essential that the design of new developments includes streets and junctions that incorporate the needs of pedestrians, cyclists, and if applicable public transport users.”* This is particularly important given the existing issues along London Road, and potential for increased congestion at peak times if active travel and traffic management is not facilitated. To further ensure this issue is addressed, Policy C&W4 (Land south-east of Back Lane) requires that *“Development should also deliver measures for the reduction of traffic speeds on London Road and improved pedestrian and cycle crossing points on London Road towards Church Lane and the Village Hall.”*
- 5.64 Improved accessibility will also be supported through Policy C&W21 (Public Rights of Way) which seeks to deliver enhanced pedestrian and cycle access and subsequently improve traffic flow.
- 5.65 Overall, it is considered that the C&WNP is likely to deliver **significant long term positive effects** in terms of delivering housing to meet local needs; and that the type of housing being developed is likely to support the various needs of the local community. Further to this the

C&WNP supports the vitality and viability of the Neighbourhood area through facilitating growth that is sustainable in the long term, protecting and enhancing local services, facilities and businesses, while maintaining the village identity and feel.

Health and wellbeing

- 5.66 Green spaces within the village, and access to the wider countryside are important to promote a healthy lifestyle and retain the rural setting of Copdock and Washbrook. The Neighbourhood Plan seeks to protect existing green spaces; notably through designating the play area off Mill Lane and the open space and play area at Fen View as Local Green Space (Policy C&W12). This restricts development to that which is essential to the site. Protection is further provided to existing amenity, sport or recreation open space or facilities in the parish through Policy C&W20 (Open Space, Sport and Recreation Facilities). Policy C&W20 precludes loss unless *“it can be demonstrated that the space or facility is surplus to requirement”* or *“replacement for the space or facilities lost is made available”*.
- 5.67 Proposals for the provision, enhancement and/or expansion of amenity, sport or recreation open space or facilities is broadly encouraged by Policy C&W12; promoting accessibility for residents and visitors alike. Positive effects in this respect are also anticipated through Policy C&W13 (Biodiversity), through providing support for biodiversity net-gain (including, for example, *“new natural habitats including ponds”*). This will contribute positively towards ensuring the village’s wide range of open space, including natural green and blue infrastructure, is maintained and enhanced for a variety of uses; including recreation and relaxation.
- 5.68 In terms of the site allocations, the strategic nature of Land south-east of Back Lane (Policy C&W4) provides an opportunity to plan holistically for green infrastructure. This is reflected through the Design Guidelines (2020) which state that *“opportunities to include green infrastructure must be maximised”*. Furthermore, the draft Plan states that it will be key for development to *“Retain existing mature trees and hedgerows wherever practical to be integrated in the open spaces”*.
- 5.69 An important feature of the strategic site is the allotment space present. Its significance is reflected through the emerging Local Plan Policy LA008, which requires that *“An alternative provision of equal or greater quality, accessibility and quantity of allotments space is provided as part of the scheme”*. Neighbourhood Plan Policy C&W4 however seeks to maintain the existing green resource, stating that proposals should provide *“the retention of the allotments on their current site”*, recognising the community value the space holds for local residents.
- 5.70 The Parish has a number of sports facilities in the area; including the Cricket Club and Tennis Club and Bowls Club, which are utilised by residents and visitors alike. Policy C&W19 (Protecting existing services and facilities) and Policy C&W20 (Open Space, Sport and Recreation Facilities) supports the retention and improvement of these important facilities in order to support healthy lifestyles in future years.
- 5.71 The Public Rights of Way (PRoW) network in the parish links various parts of the village, serving a variety of needs; and it is therefore important that they remain accessible to all. The paths are generally in good condition, however Policy C&W21 (Public Rights of Way) states that *“Measures to improve and extend the existing network of public rights of way will be supported”*. This is anticipated to lead to positive effects on health and wellbeing; promoting sustainable movement and connectivity through the village and the surrounding countryside.
- 5.72 Connectivity is a key consideration for development at Land south-east of Back Lane with Policy C&W4 requiring that proposals provide *“new and improved pedestrian and cycle links towards the Primary School, the Village Hall and Recreation Fields and Back Lane”*. Additionally, development should deliver *“improved pedestrian and cycle crossing points on London Road towards Church Lane and the Village Hall.”* Protecting and enhancing opportunities for walking and cycling with the local area will positively impact residents’ health and wellbeing through improved accessibility and opportunities for leisure, recreation and active travel.

- 5.73 Supplementary to the discussion under the 'air quality' SEA theme, it is noted that there is the potential for noise and air quality issues to arise from the dual carriageway adjacent to the strategic site allocation. The C&WNP therefore requires that *"locations of development must respect the potential for detrimental noise and air quality impacts on new development arising from the presence of the A12 and A14."* It is further considered that the illustrative masterplan for the site includes *"Screening plantation to reduce the development impact"*, which will contribute towards mitigating and reducing such issues. However given the level of growth proposed, residual effects are uncertain in this respect.
- 5.74 In terms of access to health services and facilities, a key issue for the parish is that there are no health facilities in the village with residents having to travel to Capel St Mary or Pinewood (Ipswich) for doctors and dentist facilities. This is recognised through the Joint Local Plan, which highlights that in order to accommodate planned growth and existing commitments, an expansion of Pinewood Surgery will be required. Specifically, Joint Local Plan Policy LA008 (Allocation: Land south east of Back Lane, Copdock and Washbrook) states that *"development will be expected to [provide] contributions, to the satisfaction of the LPA, towards healthcare provision"*.
- 5.75 Finally, it is noted that the C&WNP will support health indicators relating to housing by providing high-quality new homes that meet identified local housing needs. Policies C&W3 – C&W6 support the delivery of new housing of differing types and tenures, ensuring access to decent and affordable homes.
- 5.76 Overall, the delivery of significant new housing, infrastructure improvements, landscaping and accessibility enhancements are considered likely to lead to significant positive effects with regards to health and wellbeing. However, given the potential for residual adverse effects on human health through noise and air pollution associated with the A12 and A14, **uncertain effects** are concluded overall.

Transportation

- 5.77 Office for National Statistics (ONS) figures show 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%). Residents utilise the private vehicle notably as a means to reach key services and employment. Travel to work figures show residents driving by car or van is significantly higher than comparative figures for Babergh, East of England, and England as a whole.¹⁹ The Neighbourhood Plan area is connected to the strategic road network via the A14 and A12. The A12 (Old London Road) extends through the Plan area, to the south east, while the A14 extends along the eastern parish boundary. These roads are important communication routes, however congestion at the Copdock junction (further along the parish boundary) has the potential to be exacerbated by development in the area.
- 5.78 Given the issues surrounding the Old London Road dual carriageway and the level of growth proposed at Land south-east of Back Lane, Policy LA008 requires *"provision of new footway link between the site and Copdock and a traffic management scheme."* Work undertaken in the preparation of the Neighbourhood Plan included a study of potential improvements to Old London Road that would reduce the impact of the road and the speed of its users. Measures are currently being discussed with Suffolk County Council Highways Department, some of which will be delivered as part of the development of the land south-east of Back Lane, identified through Policy C&W4. For example, it is considered that the presence of the new 'more urban' development frontage onto London Road (as set out in the illustrative masterplan) would mandate appropriate traffic calming measures on the adjacent carriageway.
- 5.79 In addition to highways improvements along London Road (set out in Policy C&W4), proposed Community Actions include Capel St Mary to Ipswich Cycle Route 1; although it is recognised that this is to be further agreed with the County Council. Nonetheless, setting aspirations for improved active travel opportunities in the parish is anticipated to lead to lead to positive effects in the long term.

¹⁹ 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>

- 5.80 Support for improvements to the local footpath and cycle network, and encouragement for active travel uptake, is further seen through the wider C&WNP policy framework. Policy C&W7 (Measures for New Housing Development) requires that *“dwellings should also make adequate provision for the covered storage of all wheelie bins and cycles. Cycle parking provision shall be in accordance with the adopted cycle parking standards.”* Further to this, Policy C&W21 (Public Rights of Way Network) states that *“measures to improve and extend the existing network of public rights of way will be supported.”*
- 5.81 Both site allocations have good access to local services and facilities, being in close proximity to the centre of the village and short walking distance from local amenities and services including schools. Furthermore, the Residents’ Survey found that 17% of respondents worked in the village. It is therefore considered that growth proposed through the C&WNP is likely to support sustainable, connected communities, encouraging active travel uptake for localised journeys, including local employment.
- 5.82 In terms of addressing local parking issues and improving pedestrian safety, the Copdock and Washbrook Design Guidelines (2020) state that *“within the settlement boundaries, streets must not be built to maximise vehicle speed or capacity. Streets and junctions must be designed with the safety and accessibility of vulnerable groups such as children and wheelchair users in mind and may introduce a range of traffic calming measures.”* This will ensure the long-term sustainability of new development, and is therefore reflected through Policy C&W17 (Design Considerations). Policy C&W17 supports proposals where they *“maintain or enhance the safety of the highway network ensuring that all vehicle parking is provided within the plot and seek always to ensure permeability through new housing areas, connecting any new development into the heart of the existing settlement”*.
- 5.83 Policy 4 (Local Green Space) and Policy 8 (Open Space and Recreation) are also considered to lead to minor positive effects in relation to transportation. This is on the basis that enhancements to the green infrastructure and active travel network can play an important role in encouraging more journeys to be made on foot or by bicycle.
- 5.84 Finally, it is considered that designing green infrastructure features within new development will likely enhance connectivity across development sites and to the wider area, further supporting active travel. The development of Land to the south-east of Back Lane is considered to lead to positive effects in this respect, given key features include *“Provision of continuous active frontages along all public spaces including open spaces and roads”* and *“Retaining existing mature trees and hedgerows wherever practical to be integrated in the open spaces”*. This supplements wider CNP policies C&W12 (Local Green Space), Policy C&W13 (Biodiversity), Policy C&W20 (Open Space, Sport and Recreation Facilities), and Policy C&W21 (Public Rights of Way). Notably Policy C&W13 states that *“Development proposals will be supported where they provide a net gain in biodiversity through, for example, restoring and repairing fragmented biodiversity networks.”* There is the potential for minor long term positive effects in this respect.
- 5.85 Overall, the C&WNP seeks to improve active travel opportunities and reduce congestion in the village, though the allocation of 226 new homes adjacent to the A12 and A14 dual carriageway is likely to lead to increased congestion on the strategic road network to some degree. Additionally, given access to sustainable transport is relatively difficult, it is considered that existing trends which indicate a reliance on the private vehicle are likely to continue.
- 5.86 However, it is recognised that the Copdock and Washbrook Preliminary Highways Scheme identifies a possible solution to the dual carriageway issues and, together with other options, is being discussed with Suffolk County Council Highways Department. This, combined with further mitigation proposed through the C&WNP (and informed by the Design Guidelines (2020)) is considered likely to be suitable to mitigate against significant adverse effects. However, the additional growth in road users is still considered likely to lead to **minor long-term negative effects** overall.

Conclusions and recommendations

Conclusions

- 5.87 The assessment has determined that the current version of the C&WNP is likely to lead to a combination of positive, negative, and uncertain effects. **Significant long term positive effects** are anticipated in relation to population and communities through delivering housing to meet local needs; and ensuring the type of housing being developed is likely to support the various needs of the local community. Further to this the C&WNP supports the vitality and viability of the Neighbourhood area through facilitating growth that is sustainable in the long term, protecting and enhancing local services, facilities and businesses, while maintaining the village identity and feel.
- 5.88 Once proposed recommendations have been adopted, **minor positive effects** relate to biodiversity and climate change, in light of the opportunities capitalised upon through the C&WNP policy framework which support local and national climate change objectives/ targets. Notably the premise for net gain embedded through the C&WNP policy framework will lead to positive effects directly and indirectly for biodiversity and climate change respectively.
- 5.89 **Minor negative effects** relate to transportation and air quality in light of the increase in vehicle use on local roads and the presence of the dual carriageway roads with the parish/ along parish boundaries. Also in this context, **uncertain effects** are concluded in relation to health and wellbeing in light of the noise and air pollution associated with the A12. It is however recognised that the Copdock and Washbrook Preliminary Highways Scheme identifies a possible solution to the dual carriageway issues and, together with other options, is being discussed with Suffolk County Council Highways Department. This, combined with further mitigation proposed through the C&WNP (and informed by the Design Guidelines (2020)) is considered likely to be suitable to mitigate against significant adverse effects.
- 5.90 **Minor negative effects** are also predicted in relation to landscape and land, soil and water resources given the strategic scale loss of greenfield, BMV agricultural land at 'Land south-east of Back Lane'. However, it is noted that this loss would take place with or without the C&WNP through the emerging Joint Local Plan strategic allocation (LA008). The C&WNP supplements the Joint Local Plan allocation, providing a basis for the conservation and enhancement of local landscape character and setting; and providing support provided through the C&WNP for green infrastructure and soil enhancement.

Recommendations

- 5.91 The following **three recommendations** are made through the assessment of the Neighbourhood Plan:
1. While it is recognised that surface water flood risk at Land south-east of Back Lane is currently only minor, climate change has the potential to increase the occurrence of extreme weather events such as enhanced precipitation, which can increase surface water runoff. As such, it is considered that recognising the site specific need for flood risk mitigation within Policy C&W4 (Land south-east of Back Lane) itself would further strengthen the Neighbourhood Plan in terms of “[Ensuring] that development does not result in a detrimental impact on infrastructure including sewers and surface water and watercourse flooding” (Neighbourhood Plan Objective 13).
 2. Policy C&W18 (Sustainable Construction Practices) could be revised to include support development where it seeks ways to improve attenuation, delivering net-positive effects rather than simply avoid further negative effects.
 3. It is recommended that the site allocation policies recognise the potential sensitivity of the sites in terms of the Listed Buildings close by. Specifically, policy requirements can ensure that new development provides the necessary screening to reduce impacts on adjacent heritage assets.

6. Next steps

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

Plan finalisation

- 6.2 Subsequent to the current consultation on the draft Copdock and Washbrook Neighbourhood Plan, the plan will be updated by the Parish Council to reflect comments received. This Environmental Report will be updated to reflect the changes made to the plan.
- 6.3 The Neighbourhood Plan and Environmental Report will then be submitted to Babergh District Council for their consideration. Babergh District Council will consider whether the plan is suitable to go forward to Independent Examination in terms of the Copdock and Washbrook Neighbourhood Plan meeting legal requirements and its compatibility with the Babergh Core Strategy (2014) and emerging Joint Local.
- 6.4 If the subsequent Independent Examination is favourable, the Neighbourhood Plan will be subject to a referendum, organised by Babergh District Council. If more than 50% of those who vote agree with the Neighbourhood Plan, then the Neighbourhood Plan will be 'made'. Once made, the Copdock and Washbrook Neighbourhood Plan will become part of the Development Plan for Copdock and Washbrook Parish.

Monitoring

- 6.5 The SEA regulations require 'measures envisaged concerning monitoring' to be outlined in this report. This refers to the monitoring of likely significant effects of the Neighbourhood Plan to identify any unforeseen effects early and take remedial action as appropriate.
- 6.6 It is anticipated that monitoring of effects of the Neighbourhood Plan will be undertaken by Babergh and Mid Suffolk as part of the process of preparing their Joint Annual Monitoring Report (JAMR).
- 6.7 Given the potential for significant negative effects highlighted through the assessment, **Table 6.1** identifies suggested monitoring indicators (which are largely covered by the JAMR and existing monitoring sources) in relation to those SEA themes where the potential for significant effects have been identified.

Table 6.1: Suggested monitoring indicators

SEA theme	Monitoring indicator(s)
Air quality	Emissions data from point source recordings
Biodiversity	% net gain Total area of habitat lost to development Total area of habitat subject to improvement/ enhancement
Climate change	Domestic emissions data Transport emissions data (Ha) development within Fluvial Flood Zone 2 (Ha) development within Fluvial Flood Zone 3 Sustainable drainage system coverage Renewables development
Landscape	(Ha) greenfield development Additional views designated/ protected Designated views affected by development
Historic environment	Changes in record of 'heritage at risk'

SEA theme	Monitoring indicator(s)
	(Ha) open space lost in heritage settings
Land, soil and water resources	(Ha) greenfield loss Changes in recorded water quality
Population and communities	Number of new homes delivered in the plan area Number of affordable homes delivered in the plan area
Health and wellbeing	(Ha) new green/ open space (formal) (Ha) new green/ open space (informal)
Transportation	Emissions data from point source recordings (m) extensions to existing cycle routes (m) new pedestrian routes/ cyclepaths % bus service coverage in settlement area Travel to work data

Appendix A Context review

Air quality

Context review

National

The UK's Air Quality Strategy²⁰ details a long-term vision for improving air quality in the UK, which involves objectives and policies for the different pollutants and the environmental implications associated with these.

Key messages from the National Planning Policy Framework²¹ (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.

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

The Clean Air Strategy 2019²² identifies how government will tackle all sources of air pollution and is aimed at complementing the Industrial Strategy, Clean Growth Strategy and 25 Year Environment Plan. The strategy proposes new goals to cut public exposure to particulate matter pollution and sets out the comprehensive action that is required from across all parts of government and society to meet these goals. The proposed measures include new legislation and new local powers to take action in areas with an air pollution problem, including through the creation of 'Clean Air Zones'.

The government published the 'UK plan for tackling roadside nitrogen dioxide concentrations' in July 2017.²³ 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.

²⁰ 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

²¹ 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

²² DEFRA et al. (2019) Clean Air Strategy 2019 [online] available from: <https://www.gov.uk/government/publications/clean-air-strategy-2019>

²³ 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

Published in January 2018 by the UK Government, 'A Green Future: Our 25 Year Plan to Improve the Environment'²⁴ sets out a number of goals and policies in order to help the natural world regain and retain good health. In this context, Goal 1 'Clean Air' and the policies contained within 'Chapter 4: Increasing resource efficiency and reducing pollution and waste' within the 25 year plan directly relate to the air quality SEA theme.

Local

Local Planning Authorities are required to monitor air quality across their administrative area under Section 82 of the Environment Act (1995), report regularly to Defra and take action where nationally set levels are likely to be exceeded. Monitoring is undertaken to assess levels of nitrogen dioxide (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)²⁵ identifies as a key measure, the need to coordinate the delivery of green travel plans between Suffolk County Council, Mid Suffolk and Babergh District Council. This is with the intention of promoting travel alternatives and reducing the need to travel every day.

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

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

Current baseline summary

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

There are no Air Quality Management Areas (AQMAs) within 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. All AQMAs have been designated as a result of NO₂ exceedances.²⁶

- 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

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.

²⁴ 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

²⁵ 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

²⁶ 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

Future baseline summary

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.

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.

Biodiversity

Context review

National

Key messages from the National Planning Policy Framework²⁷ (NPPF) include:

- One of the three overarching objectives of the NPPF to ‘contribute to protecting and enhancing our natural, built and historic environment’ including by ‘helping to improve biodiversity’.
- Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value [...], take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.
- Planning policies and decisions should contribute to and enhance the natural and local environment by: protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with the statutory status or identified quality in the development plan); and minimising impacts on and providing net gains for biodiversity, including establishing coherent ecological networks that are more resilient to current and future pressures.
- To protect and enhance biodiversity and geodiversity, plans should:
 - Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and
 - Promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.
- Take a proactive approach to mitigating and adapting to climate change, considering the long-term implications for biodiversity.
- The presumption in favour of sustainable development does not apply where development requiring appropriate assessment because of its potential impact on a habitats site is being planned or determined.

The Government’s 25 Year Environment Plan²⁸ (2018) sets out a strategy for managing and enhancing the natural environment, embedding ‘net gain’ principles as key to environmental considerations. These aims are supported by a range of policies which are focused on six key areas. In this context, Goal 3 ‘Thriving plants and wildlife’ and the policies contained within Chapter 2

²⁷ 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

²⁸ HM Government (2018) A Green Future: Our 25 Year Plan to Improve the Environment [online] available at:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/673203/25-year-environment-plan.pdf

'Recovering nature and enhancing the beauty of landscapes' and Chapter 5 'Securing clean, productive and biologically diverse seas and oceans' directly relate to biodiversity and geodiversity.

The Biodiversity 2020 Strategy²⁹ (2011) presents a strategy for England's wildlife and ecosystem services which builds on the Natural Environment White Paper³⁰ and sets out the "strategic direction for biodiversity for the next decade". The strategy aims to halt biodiversity loss and improve ecological networks and ecosystems for all people.

The UK Biodiversity Action Plan³¹ (BAP) identifies priority species and habitats requiring conservation action. Although the UK BAP has been superseded, BAP priority species and habitats have been used to draw up statutory lists of priority species and habitats in England.

Local

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

The RAMS project allows for a strategic approach to mitigating the in-combination effects of development on these designated areas and allows mitigation to be delivered across the project area. Babergh Local Plan Core Strategy policy CS14 Green Infrastructure relates directly to the biodiversity theme.

Current baseline summary

European designated sites

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" of the Stour and Orwell Estuaries Special Protection Area (SPA) and Ramsar site, located to the east of the Plan area.

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.³²

Suffolk Coast Recreational disturbance Avoidance and Mitigation Strategy (RAMS)

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

The Suffolk Coast Recreation disturbance Avoidance and Mitigation Strategy (RAMS) partnership (East Suffolk Council, Ipswich Borough Council and Babergh and Mid Suffolk District Councils) was subsequently formed with the aim of reducing the impact of increased levels of recreational use on European Sites due to new residential development in the Suffolk Coast area, and to provide a simple, coordinated way for developers to deliver mitigation for their developments.³³

²⁹ Defra (2011) Biodiversity 2020: A strategy for England's wildlife and ecosystem services [online] available at:

<https://www.gov.uk/government/publications/biodiversity-2020-a-strategy-for-england-s-wildlife-and-ecosystem-services>

³⁰ Defra (2012) The Natural Choice: securing the value of nature (Natural Environment White Paper) [online] available at: <http://www.official-documents.gov.uk/document/cm80/8082/8082.pdf>

³¹ JNCC (2007) UK BAP priority species [online] <http://archive.jncc.gov.uk/page-5717>

³² Place Services (2020)

³³ Footprint Ecology (2019) Recreational Disturbance Avoidance and Mitigation Strategy for Ipswich Borough, Babergh District,

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

Increased recreation without mitigation 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.

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.³⁴ 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.³⁵

Nationally designated sites

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.

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.

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.

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

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:

“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

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

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>

³⁴ Ibid.

³⁵ 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>

designated as Ancient Woodland) and to the southeast is Brockley Wood (also designated as Ancient Woodland).

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)

Notably within the Plan area, 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

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.

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

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

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

Climate change

Context review

National

Key messages from the National Planning Policy Framework³⁶ (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).

³⁶ 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

- 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.

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

The Flood and Water Management Act (2010)³⁷ sets out measures to ensure that risk from all sources of flooding, not just rivers and seas, are managed more effectively. This includes: incorporating greater resilience measures into the design of new buildings; utilising the environment in order to reduce flooding; identifying areas suitable for inundation and water storage to reduce the risk of flooding elsewhere; roll back development in coastal areas to avoid damage from flooding or coastal erosion; and creating sustainable drainage systems (SuDS).

The UK Climate Change Act³⁸ was passed in 2008 and established a framework to develop an economically credible emissions reduction path. It also highlighted the role it would take in contributing to collective action to tackle climate change under the Kyoto Protocol, and more recently as part of the UN-led Paris Agreement.

The Climate Change Act includes the following:

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

The Committee of Climate Change published a 2012 report entitled ‘How Local Authorities Can Reduce Emissions and Manage Climate Change Risk’³⁹ which emphasises the crucial role councils have in helping the UK meet its carbon targets and preparing for the impacts of climate change. It

³⁷ Flood and Water Management Act (2010) [online] available at: <http://www.legislation.gov.uk/ukpga/2010/29/contents>

³⁸ HM Government (2008): ‘Climate Change Act 2008’ [online] available at: <http://www.legislation.gov.uk/ukpga/2008/27/contents>

³⁹ CCC (2012) ‘How local authorities can reduce emissions and manage climate risks’ [online] available at: <https://www.theccc.org.uk/publication/how-local-authorities-can-reduce-emissions-and-manage-climate-risks/>

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

The UK Climate Change Risk Assessment is published on a 5-yearly cycle in accordance with the requirements of the Climate Change Act 2008. It required the Government to compile an assessment of the risks for the UK arising from climate change, and then to develop an adaptation programme to address those risks and deliver resilience to climate change on the ground. For both the 2012 and the 2017 UK Climate Change Risk Assessment, the Adaptation Sub-Committee commissioned an evidence report⁴⁰ containing six priority risk areas requiring additional action in the next five years:

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

The Clean Air Strategy⁴¹ released in 2019 sets out the Government plans for dealing with all sources of air pollution. The strategy sets out proposals in detail and indicates how devolved administrations intend to make their share of emissions reductions, and complements the Industrial Strategy, Clean Growth Strategy and 25 Year Environment Plan.

The Committee of Climate Change published a 2012 report entitled 'How Local Authorities Can Reduce Emissions and Manage Climate Change Risk'⁴² which emphasises the crucial role councils have in helping the UK meet its carbon targets and preparing for the impacts of climate change. It outlines specific opportunities for reducing emissions and highlights good practice examples from Local Authorities.

Department for Transport (2020) Decarbonising Transport: Setting the Challenge (2020)⁴³ sets out in detail what government, business and society will need to do to deliver the significant emissions reduction needed across all modes of transport, putting us on a pathway to achieving carbon budgets and net zero emissions across every single mode of transport by 2050.

In February 2020, the government announced a new £5 billion 5-year funding package to overhaul bus and cycle links for every region outside London.⁴⁴ 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.

⁴⁰ 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>

⁴¹ 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

⁴² 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/>

⁴³ 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

⁴⁴ Department for Transport (2020) Major boost for bus services as PM outlines new vision for local transport [online] available at: <https://www.gov.uk/government/news/major-boost-for-bus-services-as-pm-outlines-new-vision-for-local-transport>

Local

The Suffolk Climate Action Plan sets out the ambition to continue working towards a target of reducing carbon emissions by 60% by 2025, alongside strategies for a “credible pathway” for doing so.⁴⁵

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.

Current baseline summary

Climate change mitigation

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 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 2030.⁴⁶

CO₂ emissions from the built environment are monitored and recorded at Local Authority level.⁴⁷ 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.

Emissions estimates by sector over the ten-year period 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.⁴⁸

Emissions from transport

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.⁴⁹ Emissions can be further broken down into the districts within Suffolk. Transport emissions for Babergh and Mid Suffolk are significantly higher than that of Ipswich and East Suffolk, and lower than that of West Suffolk.⁵⁰

Babergh district, and Copdock & Washbrook specifically, have high car ownership levels and a large proportion of the population commute by car. 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.

⁴⁵ Suffolk Climate Action Plan, available at: <http://www.greensuffolk.org/assets/Greenest-County/SCCP/Climate-Change/Suffolk-Climate-Action-Plan-2-FINAL.pdf>

⁴⁶ ClimateEmergency (2019) Declare a Climate Emergency – Full list of Councils [online] available at: <https://www.climateemergency.uk/blog/babergh/>

⁴⁷ 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>

⁴⁸ 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>

⁴⁹ 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>

⁵⁰ 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>

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

Electric vehicles (EVs) do not burn fuel and create almost no noise. They are battery powered and have the potential to be 'zero-emission vehicles' (ZEVs) if powered by renewable electricity. As of May 2020, 0.16% of vehicles in Suffolk County are fully electric and there are 120 charging points across the County.⁵¹ 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.

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.⁵²

Renewable energy

The Department for Business, Energy and Industrial Strategy publishes annual statistics on renewable energy generation, disaggregated by Local Authority. The most recently published data is for 2018 and shows that Babergh has a total renewable energy installed capacity of 14.0 megawatts. 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.

Potential effects of climate change

Following the success of the UK Climate Projections released in 2009 (UKCP09), the Met Office recently released the UK Climate Projections for 2018 (UKCP18).⁵³ 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.

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%.

6.8 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

⁵¹ 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>

⁵² Ibid.

⁵³ Data released 26th November 2018 [online] available at: <https://www.metoffice.gov.uk/research/collaboration/ukcp>

- 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

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.

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. While surface water flood risk largely aligns with that of fluvial flooding surface water drainage is a problem in many parts of the village including on The Street and in parts of London Road. Local knowledge suggests that over the course of time, many ditches and verges have been lost to property infill, hard landscaping and ditch infill.

Future baseline

In line with UK trends and national commitments, emissions are likely to continue to fall as energy efficiency measures, renewable energy take-up and new technologies, such as EVs and solar PV, become more widely adopted. Notably, the Government has consulted on changes to England's Building Regulations introducing a 'Future Homes Standard' and the Department for

Transport recently published 'Decarbonising Transport; setting the challenge' a first step towards publishing a full transport decarbonisation plan later in 2020.

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. Surface water drainage is likely to continue to be a problem in many parts of the village. Where appropriate new development should to make provision for the attenuation and recycling of surface water and rainwater in order to reduce the potential for exacerbating existing issues.

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

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

Landscape

Context review

National

Key messages from the National Planning Policy Framework⁵⁴ (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

⁵⁴ 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

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.

The national design guide (2019)⁵⁵ sets out the characteristics of well-designed places and demonstrates what good design means in practice. It is based on national planning policy, practice guidance and objectives for good design as set out in the National Planning Policy Framework. Specific, detailed and measurable criteria for good design are most appropriately set out at the local level.

National Character Area (NCA) profiles are published by Natural England and divide England in 159 distinct natural areas based on their landscape, biodiversity, geodiversity, historic, cultural and economic characteristics.⁵⁶ NCAs follow natural features in the landscape and are not aligned with administrative boundaries. NCA profiles describe the features which shape each of these landscapes, providing a broad context to its character.

The Government’s 25 Year Environment Plan⁵⁷ states the intention to work with relevant authorities to deliver environmental enhancements within all 159 NCAs across England. Along with the policies contained within Chapter 2 ‘Recovering nature and enhancing the beauty of landscapes’, Goal 6 ‘Enhanced beauty, heritage and engagement with the natural environment’ of the Government’s ‘A Green Future: Our 25 Year Plan to Improve the Environment’ directly relates to the Landscape.

Local

The Suffolk Landscape Character Assessment (2011) identifies landscape typologies across the County at a highly localised scale.⁵⁸

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.⁵⁹

⁵⁵ MHCLG (2019) National Design Guide [online] available at: <https://www.gov.uk/government/publications/national-design-guide>

⁵⁶ Natural England (2012) ‘National Character Area profiles’ [online] <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making>

⁵⁷ 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

⁵⁸ Suffolk County Council (2011), ‘Suffolk Landscape Character Assessment’ [online], available from: http://www.suffolklandscape.org.uk/landscape_typology.aspx

⁵⁹ 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>

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

Current baseline summary

Current baseline

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.

The village maintains a generally rural environment even though it is close to the outskirts of Ipswich. The village is located approximately 5km to the south-west of Ipswich (centre to centre), with the A14 providing a degree of separation.

Nationally designated landscapes

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.

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 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.

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.

The special qualities of the AONB are set out in the publication on Natural Beauty and Special Quality Indicators⁶⁰ 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;

⁶⁰ LDA Design (2016) Suffolk Coast & Heaths Area of Outstanding Natural Beauty, Natural Beauty and Special Qualities Indicators

- Associations with writers and poets; and
- A sense of relative tranquillity.

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.

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.*⁶¹ 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.”

“*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.*”

National Character Areas

Copdock and Washbrook Parish lies within the South Suffolk and North Essex Clayland National Character Area (NCA)⁶², with the A12 forming the boundary to Suffolk Coast and Heaths NCA.⁶³ 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.

Key characteristics relating to the Parish include:⁶⁴

- ‘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

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

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 lead 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

⁶¹ AONB Partnership (2018) Suffolk Coast & Heaths AONB Management Plan 2018 – 2023 [online] available at:

<https://www.suffolkcoastandheaths.org/managing/>

⁶² Natural England (2015) NCA Profile: 86 [online] available at:

<http://publications.naturalengland.org.uk/publication/5095677797335040#:~:text=The%20South%20Suffolk%20and%20North,r oad%20through%20the%20Gipping%20Valley.>

⁶³ Natural England (2015) NCA Profile: 82 [online] available at:

<http://publications.naturalengland.org.uk/publication/5626055104659456>

⁶⁴ Natural England (2015) NCA Profile: 86 [online] available at:

<http://publications.naturalengland.org.uk/publication/5095677797335040#:~:text=The%20South%20Suffolk%20and%20North,r oad%20through%20the%20Gipping%20Valley.>

- Other areas of countryside where undulating topography and natural vegetation, particularly broadleaved woodland, combine to produce an area of special landscape quality and character.

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).

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.

Suffolk County Landscape Assessment (2011)

The landscape of Copdock and Washbrook Parish is also described in the Suffolk County Assessment (2011) which identified four character types. The assessment identifies landscape typologies across the County at a highly localised scale.⁶⁵

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.

Settlement Sensitivity Assessment (2018) – Landscape fringes of Ipswich

In 2018, a Settlement Sensitivity Assessment was undertaken which included Copdock and Washbrook as part of an assessment of the fringes of Ipswich.⁶⁶ 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.

The land to the south and east 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)

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.⁶⁷ The appraisal builds on evidence discussed above, and seeks to establish more detailed baseline data on settlement character and landscape context, in addition to assessing sensitivity and capacity of areas to accommodate change.

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

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

⁶⁵ Suffolk County Council (2011), 'Suffolk Landscape Character Assessment' [online], available from: http://www.suffolklandscape.org.uk/landscape_typology.aspx

⁶⁶ 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>

⁶⁷ Alison Farmer Associates (2019) Copdock and Washbrook Neighbourhood Plan Landscape Appraisal [online] available at: <http://www.cwnpsg.onesuffolk.net/home/consultation-documentation/>

- Folly Lane ancient track; and
- Pigeon Lane, sunken lane.

Important views

- 6.9 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.
- 6.10 Key views are set out within the Copdock and Washbrook Neighbourhood Plan Landscape Appraisal.⁶⁸

Assessment of local landscape areas

The landscape appraisal defines five Local Landscape Areas in terms of its capacity to accommodate development.⁶⁹

The appraisal 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.

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

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

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.

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.

⁶⁸ Alison Farmer Associates (2019) Copdock and Washbrook Neighbourhood Plan Landscape Appraisal [online] available at: <http://www.cwnpsg.onesuffolk.net/home/consultation-documentation/>

⁶⁹ Alison Farmer Associates (2019) Copdock and Washbrook Neighbourhood Plan Landscape Appraisal [online] available at: <http://www.cwnpsg.onesuffolk.net/home/consultation-documentation/>

Historic Environment

Context review

National

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

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

These messages are supported by the national Planning Practice Guidance (PPG)⁷⁰ which itself includes the key message that local authorities should set out in their Local Plans a positive strategy for the conservation and enjoyment of the historic environment which recognises that conservation is not a passive exercise and that identifies specific opportunities for the conservation and enhancement of heritage assets.

The national design guide (2019)⁷¹ 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.

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'⁷² directly relates to the Historic Environment.

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

Conservation Area Designation, Appraisal and Management: Historic England Advice Note 1 (February 2019)⁷³ 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

⁷⁰ Ministry of Housing, Communities and Local Government (2016), Planning Practice Guidance [online], available from:

<https://www.gov.uk/government/collections/planning-practice-guidance>

⁷¹ MHCLG (2019) National Design Guide [online] available at: <https://www.gov.uk/government/publications/national-design-guide>

⁷² 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

⁷³ 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/>

with local and neighbourhood plans and policies. Principally, the advice note emphasises the importance of:

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

Sustainability Appraisal (SA) and Strategic Environment Assessment (SEA): Historic England Advice Note 8 (December 2016)⁷⁴ provides support to all stakeholders involved in assessing the effects of certain plans and programmes on the historic environment. It offers advice on heritage considerations during each stage of the SA/SEA process and helps to establish the basis for robust and comprehensive assessments.

Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets (2nd Edition) (December 2017)⁷⁵ provides general advice on understanding setting, and how it may contribute to the significance of heritage assets and allow that significance to be appreciated, as well as advice on how views can contribute to setting. Specifically, Part 2 of the advice note outlines a five stepped approach to conducting a broad assessment of setting:

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

Neighbourhood Planning and the Historic Environment: Historic England Advice Note 11 (October 2018)⁷⁶ outlines the importance of considering the historic environment whilst preparing the plan (section 1), which culminates in a checklist of relevant issues to consider, followed by an overview of what this means in terms of evidence gathering (section 2). Sections 3 to 5 of the advice note focus on how to translate evidence into policy, understand the SEA process and Historic England's role in neighbourhood planning.

Local

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

- CS2 Settlement Pattern Policy; and
- CS14 Green Infrastructure

Current baseline summary

Settlement pattern

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),

⁷⁴ 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/>

⁷⁵ Historic England (2017): 'Setting of Heritage Assets: 2nd Edition' [online] available at: <https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/>

⁷⁶ 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/>

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 east.⁷⁷

Designated heritage assets

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.

The Neighbourhood Plan area is relatively limited in terms of designated assets, however there are a number of Grade II* and Grade II listed buildings present.

Listed Buildings

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:

Grade II*:

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

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

⁷⁷ Alison Farmer Associates (2019) Copdock and Washbrook Neighbourhood Plan Landscape Appraisal [online] available at: <http://www.cwnpsg.onesuffolk.net/home/consultation-documentation/>

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.

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.⁷⁸ 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
- Copdock Mill and Mill House, both Grade II
- Copdock Church of St Peter, Grade II* and Tithe Barn (16th Century), Grade II

Archaeology

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.⁷⁹ 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

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.

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.

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.

⁷⁸ Alison Farmer Associates (2019) Copdock and Washbrook Neighbourhood Plan Landscape Appraisal [online] available at: <http://www.cwnpsg.onesuffolk.net/home/consultation-documentation/>

⁷⁹ Suffolk County Council (date unknown) Suffolk Historic Environment Record [online] available via: https://www.heritagegateway.org.uk/Gateway/Results_Application.aspx?resourceID=1017

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.
- 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.

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 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.

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

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.⁸⁰

Future baseline

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.

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.

Land, soil and water resources

Context review

National

Key messages from the National Planning Policy Framework⁸¹ (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.

⁸⁰ Historic England (2018): 'Heritage at Risk Register' [online] available at: <https://historicengland.org.uk/advice/heritage-at-risk/>

⁸¹ 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

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

Since July 2017 the Government’s Planning Practice Guidance (PPG) requires Local Planning Authorities to publish a Brownfield Land Register, and review it at least once a year, in order to identify all previously developed sites with potential for delivering new development. This is to help achieve maximum planning value and efficiency from available land, whilst avoiding unnecessary land take at greenfield sites.⁸² 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.⁸³

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’.⁸⁴ The implementation of this plan aims to achieve clean air, clean and plentiful water, reduced risk from environmental hazards, and managed exposure to chemicals. Specific policies and actions relating to environmental quality include:

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

Safeguarding our Soils: A strategy for England⁸⁵ 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.

⁸² MHCLG (2017) Guidance: Brownfield Land Registers [online] available at: <https://www.gov.uk/guidance/brownfield-land-registers>

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

⁸⁴ DEFRA (2018) 25 Year Environment Plan [online] available at: <https://www.gov.uk/government/publications/25-year-environment-plan>

⁸⁵ 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>

The Water Framework Directive⁸⁶ (2000) requires a management plan to be prepared for water catchment areas to inform planning and help meet objectives and obligations in areas such as water efficiency and sustainable drainage.

The Water White Paper 2011⁸⁷ sets out the Government's vision for a more resilient water sector. It states the measures that will be taken to tackle issues such as poorly performing ecosystems, and the combined impacts of climate change and population growth on stressed water resources.

The Government's Water Strategy for England⁸⁸ (2008) provides strategy for the water sector up until 2030, which aims to sustainably deliver secure water supplies and an improved and protected water environment. It sets out actions within the following areas:

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

Water for life⁸⁹ (2011) sets out the Government's vision for a more resilient water sector. It states the measures that will be taken to tackle issues such as poorly performing ecosystems, and the combined impacts of climate change and population growth on stressed water resources.

The National Waste Management Plan⁹⁰ 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 Directive⁹¹. 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.

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

Local

The Babergh Water Cycle Study (2011)⁹² 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;

⁸⁶ 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.

⁸⁷ Defra (2011) Water for life (The Water White Paper) [online] available at: <http://www.official-documents.gov.uk/document/cm82/8230/8230.pdf>

⁸⁸ 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>

⁸⁹ Defra (2011) Water for life [online] available at: <http://www.official-documents.gov.uk/document/cm82/8230/8230.pdf>

⁹⁰ 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

⁹¹ Directive 2008/98/EC

⁹² 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>

- Flood Risk; and
- Demand Management and Sustainable Drainage Systems.

The Anglian Water Services (AWS) Water Resource Management Plan (WRMP) (2019)⁹³ is a technical document written primarily for regulators, as well as other technical stakeholders, following principles set out in the Water Resources Planning Guideline. The 2019 WRMP:

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

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

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

Current baseline summary

Early origins of the Parish

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.

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 seasonal drainage stream which create a gentle but notable depression in the more elevated farmland plateau.

Agricultural land quality

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.

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>

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.

Natural England (2017) have produced a series of maps showing the 'likelihood of Best and Most Versatile (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. The Predictive BMV Land Assessment carried out by Defra (2017) indicates that there is a high and moderate likelihood of BMV land within the Plan area.

Minerals

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

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.

In terms of the ecological and chemical classification of these water bodies, 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.

Watercourses

The main water course in the Neighbourhood Plan area is the Belstead Brook. There is a small spring that runs down the Street, forming the dividing boundary between the two villages of Copdock and Washbrook.

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.

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.⁹⁴ 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.

⁹⁴ Environment Agency and Defra (2018) Nitrate Vulnerable Zones [online] available at: <https://www.gov.uk/government/collections/nitrate-vulnerable-zones>

Water resources

Babergh District is served by one water company, Anglian Water Services (AWS). The Environment Agency have published a document entitled 'Areas of Water Stress: final classification' which included a map of England, identifying areas of relative water stress. The whole of AWS' supply area is shown as an area of 'Serious' water stress, based upon the amount of water available per person both now and in the future.⁹⁵

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.⁹⁶ Babergh District is served by the East Suffolk WRZ.⁹⁷ In terms of the growth impacts for East Suffolk WRZ, demand is predicted to increase by 5-10% between 2017 to 2045.

The WRMP further states that even with the proposed demand management strategy, the Essex Suffolk WRZ will be in a resource deficit by 2044-2055.⁹⁸ It is considered that the WRMP will have outlined measures required to address the predicted shortfalls and investment priorities in this respect.

Future baseline

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

The majority of the Neighbourhood Plan area has potential to be BMV agricultural land, including areas of Grade 2 land. Future development within the Neighbourhood Plan area could therefore 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.

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.

Population and community

National

Key messages from the National Planning Policy Framework⁹⁹ (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.

⁹⁵ 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>

⁹⁶ Babergh District Council (2011) Babergh Water Cycle Study [online] available at:

<https://www.babergh.gov.uk/assets/Strategic-Planning/Babergh-CoreStrategy/CoreStrategyCoreDocList/BDCWaterCycleStudyFinalv2Report.pdf>

⁹⁷ Anglian Water (2019) Water Resource Management Plan 2019 [online] available at:

<https://www.anglianwater.co.uk/siteassets/household/about-us/wrmp-report-2019.pdf>

⁹⁸ Ibid.

⁹⁹ 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

- Ensure that developments create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion. Places should contain clear and legible pedestrian routes, and high-quality public spaces, which encourage the active and continual use of public areas.
- Enable and support healthy lifestyles through provision of green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.
- Ensure that there is a 'sufficient choice of school places' and taking a 'proactive, positive and collaborative approach' to bringing forward 'development that will widen choice in education'.

National Planning Practice Guidance (NPPG)¹⁰⁰ identifies that:

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

The Select Committee on Public Service and Demographic Change report Ready for Ageing? (2013)¹⁰¹ warns that society is underprepared for the ageing population. The report says that "*longer lives can be a great benefit, but there has been a collective failure to address the implications and without urgent action this great boon could turn into a series of miserable crises*". The report says that the housing market is delivering much less specialist housing for older people than is needed. Central and local government, housing associations and house builders need urgently to plan how to ensure that the housing needs of the older population are better addressed and to give as much priority to promoting an adequate market and social housing for older people as is given to housing for younger people.

Local

The Babergh & Mid Suffolk District Councils Joint Homelessness Reduction and Rough Sleeping Strategy Homelessness Strategy 2019-2024 sets out the homelessness strategy in the area¹⁰². The strategy presents six key priorities with associated actions to enable the delivery of the Councils' shared vision for the service over the next five years.

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

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

- CS2: Settlement Pattern Policy;
- CS3: Strategy for Growth and Development;

¹⁰⁰ Department for Communities and Local Government (2012) National Planning Practice Guidance [online] available at: <http://planningguidance.communities.gov.uk/>

¹⁰¹ 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/>

¹⁰² 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>

- CS18: Mix and Types of Dwellings;
- CS19: Affordable Homes; and
- CS21: Infrastructure Provision.

Summary of current baseline

Population

The population of Copdock and Washbrook increased between 2001 and 2011 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.

In terms of the age distribution within the Plan area, 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.

Deprivation

According to 2011 ONS data, within the Plan area, 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%).

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.

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.

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.

Household tenure

2011 ONS data shows that 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

2011 ONS data shows that a relatively high proportion of residents within the Neighbourhood Plan area do not hold any qualifications (23.25%) in comparison to the district (22.97%), region (22.53%) and country as a whole (20.70%). 4.04% of Copdock and Washbrook residents have apprenticeships, which is relatively aligned with the district (3.92%) and the region (3.74%); however is lower than the national comparator (5.7%).

Employment

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.

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

ONS data (2011) 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%)

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

Local services and facilities

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
- Cricket Field
- Play Area
- Allotments
- Bowls Club
- Tennis Club
- Church Room
- Pre-School
- St Peter's Church
- St Mary's Church

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.

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)¹⁰³ acknowledges that the Copdock retail service area primarily serves residents within Ipswich Borough rather than residents in the immediate area.

Future baseline

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

The suitability (e.g. size and design) and affordability of housing to meet local needs will depend on the implementation of appropriate housing policies through the Local Plan and Neighbourhood Plan.

¹⁰³ 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

Unplanned development may have wider implications in terms of delivering the right mix of housing types, tenures and sizes in suitably connected places.

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

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

Health and wellbeing

Context review

National

Key messages from the National Planning Policy Framework¹⁰⁴ (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.

National Planning Practice Guidance (NPPG)¹⁰⁵ identifies that local planning authorities should ensure that health and wellbeing, and health infrastructure are considered in local and neighbourhood plans and in planning decision making.

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

The Fair Society, Healthy Lives ('The Marmot Review')¹⁰⁶ 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"*.

¹⁰⁴ 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

¹⁰⁵ Department for Communities and Local Government (2012) National Planning Practice Guidance [online] available at:
<http://planningguidance.communities.gov.uk/>

¹⁰⁶ 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>

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).¹⁰⁷ The report highlights that:

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

Local

The Joint Strategic Plan Refresh 2016-2020¹⁰⁸ provides an assessment of the current and future health and wellbeing needs of the people of Babergh and Mid Suffolk until 2020.

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

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

Current baseline summary

Health indicators

ONS (2011) data shows 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%).

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%). It is noted that the Lodge Care Home is located within the Neighbourhood Plan area, which may have some influence upon local long-term health figures.

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 include¹⁰⁹:

- 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.

¹⁰⁷ Health Equity in England: The Marmot Review 10 Years on (2020) <https://www.health.org.uk/publications/reports/the-marmot-review-10-years-on>

¹⁰⁸ Joint Strategic Plan Refresh 2016-2020 available at: <https://www.babergh.gov.uk/assets/The-Council/Performance/Joint-Strategic-Plan-2016-2020.pdf>

¹⁰⁹ 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>

The State of Suffolk Report (2019)¹¹⁰ 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.
- 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

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).

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

The Parish contains a number of areas of open spaces (discussed above). This includes:

- Playing field and cricket pitches east of London Road;
- Allotments west of London Road;
- Open space at Fen View housing;
- Mill Lane Plan Area;
- Woodland associated with Washbrook Primary School; and
- Linear area of woodland along Belstead Brook west of the A12.

¹¹⁰ 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

Future baseline

The lack of direct healthcare services within the Plan area coupled with the ageing population of Copdock and Washbrook (see above) 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.

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.

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.

Transportation

Context review

National

Key messages from the National Planning Policy Framework¹¹¹ (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.

National Planning Practice Guidance (NPPG)¹¹² 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.

¹¹¹ 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

¹¹² Department for Communities and Local Government (2012) National Planning Practice Guidance [online] available at: <http://planningguidance.communities.gov.uk/>

The Transport Investment Strategy - Moving Britain Ahead (2017)¹¹³ sets out the Department for Transport's approach for future investment decisions and priorities. At the local level, the strategy relies on devolved decision-making where local communities have the power and will be backed by funding. Investment aims to achieve a transport network that is reliable, well-managed, safe, and works for everyone. The transport system should also provide smooth, fast and comfortable journeys, and have the right connections in the right places.

The Cycling and Walking Investment Strategy (2016)¹¹⁴ sets out the objectives that the DfT are working towards to meet the following walking and cycling ambition for England:

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

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

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

Department for Transport (2020) Decarbonising Transport: Setting the Challenge (2020)¹¹⁵ sets out in detail what government, business and society will need to do to deliver the significant emissions reduction needed across all modes of transport, putting us on a pathway to achieving carbon budgets and net zero emissions across every single mode of transport by 2050.

In February 2020, the government announced a new £5 billion 5-year funding package to overhaul bus and cycle links for every region outside London.¹¹⁶ This builds on the Government's determination to make buses work better for their passengers. The details of these programmes will be announced in the upcoming National Bus Strategy, to be published later in 2020, and follows the allocation of £170 million to support more electric buses, increase rural mobility and trial new 'Superbus' services.

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

Local

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

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

¹¹³ Department for Transport (2017) Transport Investment Strategy - Moving Britain Ahead [online] available at: <https://www.gov.uk/government/publications/transport-investment-strategy>

¹¹⁴ 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

¹¹⁵ 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

¹¹⁶ 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>

Current baseline summary

Local transport infrastructure

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.

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 and 93c bus provides a regular service from the village to Ipswich and Colchester. Local school bus services also extend through the Parish.

Strategic road network

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.

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.

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.¹¹⁷ 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

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.

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.

¹¹⁷Railton TPC Ltd (2019) Copdock and Washbrook Preliminary Highways Scheme [online] available at: <http://www.cwnpsg.onesuffolk.net/home/consultation-documentation/>

Car and van ownership

ONS data (2011) 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

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, more residents commute out of Babergh than in for employment.¹¹⁸

In terms of method of travel to work, ONS data (2011) shows that the majority of residents commute into work via driving a car or van (51.2%). This is higher than averages for Babergh (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%).

Future baseline

In the absence of strategic transport interventions, growth in the Plan area is likely to continue trends which favour the private vehicle as the primary mode of transport. New development therefore has the potential to increase traffic and lead to additional localised congestion issues which in turn may reduce road safety. A key concern in this respect is the dual carriage way '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.

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.

¹¹⁸ 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>

