



East Cambridgeshire
District Council

Strategic Environmental Assessment Environmental Report

September 2021

On behalf of Swaffham Bulbeck Parish Council

Date of assessment:	10 September 2021
Date/ version of neighbourhood development plan to which Environmental Report applies:	Swaffham Bulbeck Neighbourhood Plan Draft Pre-Submission Plan – working draft at 28 June 2021

Contents

List of Maps	5
List of Figures	5
List of Tables	5
Overview	6
Acronyms	7
1. Introduction	8
Purpose and Content of Environmental Report	8
Statutory requirements of Environmental Report	8
Overview of requirements of the SEA Regulations in regard to Neighbourhood Plans	10
Summary of responsibilities for SEA process	11
Local Planning Authority (ECDC)	11
Qualifying Body (Swaffham Bulbeck Parish Council)	11
Statutory Consultation Bodies	11
Scoping Report Consultation (June – August 2021)	12
Environment Agency’s response	12
Historic England	12
Natural England’s response	13
2. Methodology for Strategic Environmental Assessment incorporating Habitats Regulation Assessment	14
Strategic Environmental Assessment (SEA)	14
Habitats Regulations Assessment	15
3. Key information on the emerging Neighbourhood Plan and neighbourhood area	19
Local Plan context for the Neighbourhood Plan	19
East Cambridgeshire Local Plan 2015	19
Current status	19
Single Issue Review	20
Local Plan 2015 Spatial Strategy for Swaffham Bulbeck	20
Withdrawn Local Plan	23
Other plans and strategies	23
Neighbourhood Plans	23
Minerals & Waste Local Plan	24
Other authorities’ Local Plans	24
Local Transport Plan	25
Water Resources and Infrastructure	26
Vision, aims and objectives of the Swaffham Bulbeck Neighbourhood Plan	27

Draft SBNP policies	28
Overview of Neighbourhood Plan’s approach to allocating land for development	31
Overview of key environmental constraints in the neighbourhood area	32
Environmental themes	33
4. Assessment of SBNP’s likely effects on the environment	42
Biodiversity, flora and fauna	43
Internationally Designated Sites	43
Habitats Regulation Assessment (June 2018)	44
Fenland SAC - Wicken Fen	45
Fenland SAC – Chippenham Fen	45
Fenland SAC – Woodwalton Fen	46
Ouse washes	46
Devil’s Dyke SAC	47
Breckland SAC/SPA	48
Potential for likely significant effects on internationally designated sites (SEA & HRA)	48
Sites of Special Scientific Interest (SSSI)	49
SSSI Impact Risk Zones	52
National Nature Reserves	54
Locally Designated Sites	54
SBNP Draft policies	56
Population	58
Human health	58
Soil	59
Water	60
Air	64
Climatic factors	64
Material assets	65
Cultural heritage, including architectural and archaeological heritage	66
Conservation Area	66
Listed Buildings	66
Scheduled Monuments	67
Registered Parks & Gardens	68
Heritage at Risk	68
Non-designated heritage assets	68
Summary of potential effects on Cultural Heritage	69
Landscape	70
The Fens NCA	70
East Anglian Chalk NCA	71

Potential allocation and 'reasonable alternatives'	75
Environmental Constraints	76
SEA & HRA Screening Assessment	78
Summary of SBNP's likely effects on the environment	85
5. Addressing potential adverse effects on the environment	86
Summary of scope of SEA	86
SEA Framework	87
Consideration of reasonable alternatives	87
Commentary and summary of mitigation measures	97
Biodiversity	97
Landscape, townscape and archaeology	97
Inclusive communities	98
Alternative option (Option 2)	98
SEA Framework conclusions	99
Monitoring	99
Other recommendations	100
6. Non-Technical Summary	101
Context	101
Screening exercise	101
Scope	101
Alternative policy options	102
SEA Framework	102
Recommended option and mitigation measures	102
Monitoring	103
Conclusions	103
Appendix 1: Responses to Scoping Report Consultation from Statutory Bodies	104
Environment Agency's response	104
Historic England's response	105
Natural England's response	107

List of Maps

Map 1: Local Plan Inset map – Swaffham Bulbeck (Green Belt)	22
Map 2: Proposed Site Allocation	31
Map 3: Boundary of the designated Swaffham Bulbeck Neighbourhood Area (ECDC)	32
Map 4: Internationally Designated Sites in Proximity of Swaffham Bulbeck.....	43
Map 5: SSSIs & IRZs in Proximity of Swaffham Bulbeck.....	52
Map 6: County Wildlife Sites in Close Proximity of Swaffham Bulbeck.....	55
Map 7: Soil types in Swaffham Bulbeck	59
Map 8: Fluvial Flood Risk (Environment Agency Flood Map for Planning).....	61
Map 9: Source Protection Zones.....	62
Map 10: Updated Flood Map for Surface Water	63
Map 11: Swaffham Bulbeck Conservation Area	66
Map 12: Scheduled monuments, Registered Parks & Gardens and Listed Buildings	68
Map 13: Character Areas (Swaffham Bulbeck Landscape Study January 2020).....	72
Map 14: Settlement Fringe Areas (Swaffham Bulbeck Landscape Study January 2020).....	72

List of Figures

Figure 1: SEA Assessment Criteria.....	16
Figure 2: Application of the SEA Directive to plans and programmes	18
Figure 3: Assessment of the likely significant effects on the environment	78
Figure 4: Application of the SEA Directive to Swaffham Bulbeck Neighbourhood Plan	83

List of Tables

Table 1: How the Environmental Report Meets Requirements of SEA Regulations.....	9
Table 2: Summary of Draft Swaffham Bulbeck Neighbourhood Plan Policies.....	28
Table 3: Overview of Potential Environmental Constraints	37
Table 4: Summary of SSSIs.....	50
Table 5: Summary of Screening Assessment Findings in Context of SEA Themes.....	86
Table 6: SEA Framework (Excerpt from ECDC SA Framework 2021).....	88
Table 7: Key to Appraisal Symbols	90
Table 8: Appraisal of Policy options Against SA Objectives	91
Table 9: Monitoring Indicators for Swaffham Bulbeck Neighbourhood Plan.....	100

Overview

Neighbourhood Development Plan to which this Environmental Report applies:

Swaffham Bulbeck Neighbourhood Plan

Version/ date of Neighbourhood Development Plan to which this Environmental Report applies:

Working draft of Swaffham Bulbeck Neighbourhood Plan Reg. 14 Pre-submission Draft at 28.06.21

Neighbourhood area to which the Neighbourhood Development Plan applies:

Swaffham Bulbeck Neighbourhood Area

Qualifying Body within the neighbourhood area:

Swaffham Bulbeck Parish Council

Acronyms

DEFRA	Department for Environment, Food & Rural Affairs
ECJ	European Court of Justice
ECDC	East Cambridgeshire District Council
EIA	Environmental Impact Assessment
EU	European Union
ha	Hectares
HRA	Habitats Regulations Assessment
IRZ	Impact Risk Zone
NCA	National Character Area
NDP	Neighbourhood Development Plan
NNR	National Nature Reserve
NPPF	National Planning Policy Framework
NPPG	National Planning Practice Guidance
NSN	National Site Network
SA	Sustainability Appraisal
SAC	Special Area of Conservation
SBNP	Swaffham Bulbeck Neighbourhood Plan
SEA	Strategic Environmental Assessment
SPA	Special Protection Area
SSSI	Site of Special Scientific Interest

1. Introduction

- 1.1. The subject of this Environmental Report is the Swaffham Bulbeck Neighbourhood Plan, Pre-submission Draft (dated 28 June 2021) (SBNP). The SBNP has been prepared by a working group of local volunteers on behalf of Swaffham Bulbeck Parish Council, the 'qualifying body' for the purposes of neighbourhood planning.
- 1.2. The SBNP is currently at an early stage of its preparation. At time of writing, Swaffham Bulbeck Parish Council is preparing for its Regulation 14 consultation, which is expected to take place in September and October 2021.
- 1.3. In June 2021, East Cambridgeshire District Council (ECDC) undertook a screening assessment of the SBNP. From this assessment, ECDC concluded that the Swaffham Bulbeck Neighbourhood Development Plan (SBNP), as currently drafted,
 - **requires** a full Strategic Environmental Assessment (SEA) - the plan is *screened in* for SEA; and
 - **does not require** a full Habitats Regulations Assessment - the SBNP is *screened out* for the purposes of Habitats Regulation Assessment.
- 1.4. ECDC's screening assessment, its findings, and the *scope* of this Environmental Report were set out in the *SEA Scoping Report: Swaffham Bulbeck Neighbourhood Plan (June 2021)*. The Scoping Report was published for consultation with statutory bodies between 28 June and 02 August 2021.

Purpose and Content of Environmental Report

- 1.5. The purpose of this Environmental Report is to document the Strategic Environmental Assessment of the draft SBNP. It will accompany the draft SBNP for pre-submission 'Regulation 14' consultation and is expected to be submitted for independent examination alongside the SBNP, by Swaffham Bulbeck Parish Council.
- 1.6. Following this introductory section, section 2 describes the SEA methodology. Section 3 provides key information about the Neighbourhood Plan and Neighbourhood Area, including an outline of the content and objectives of the SBNP, its relationship with other relevant plans and programmes including the East Cambridgeshire Local Plan 2015, and relevant environmental characteristics and issues relating to the Swaffham Bulbeck Neighbourhood Area.
- 1.7. Section 4 provides assessment of the SBNP against various SEA themes to identify the likelihood of significant effects on the environment, drawing on the environmental constraints and characteristics identified in section 3.
- 1.8. Section 5 appraises the SBNP and alternative policy options against an SEA Framework for the purpose of identifying measures to reduce, prevent or avoid adverse effects on the environment. Section 5 also provides indicators and targets for monitoring the performance of the SBNP.
- 1.9. Section 6 provides a non-technical summary of the Environmental Report's conclusions.

Statutory requirements of Environmental Report

- 1.10. To meet the requirements of Schedule 2 to the *SEA Regulations 2004*¹ the Environmental Report must contain certain information. Table 1 sets out the required information and indicates the relevant section of the Environmental Report where the information can be found.

¹ <https://www.legislation.gov.uk/ukxi/2004/1633/schedule/2/made>

TABLE 1: HOW THE ENVIRONMENTAL REPORT MEETS REQUIREMENTS OF SEA REGULATIONS

SEA Regulations 2004 required information	Report section
An outline of the contents and main objectives of the plan or programme, and of its relationship with other relevant plans and programmes.	Section 3
The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.	Section 3
The environmental characteristics of areas likely to be significantly affected.	Section 3
Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Council Directive 79/409/EEC on the conservation of wild birds(1) and the Habitats Directive.	Section 3
The environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation.	Section 3
The likely significant effects on the environment, including short, medium and long-term effects, permanent and temporary effects, positive and negative effects, and secondary, cumulative and synergistic effects, on issues such as— (a) biodiversity; (b) population; (c) human health; (d) fauna; (e) flora; (f) soil; (g) water; (h) air; (i) climatic factors; (j) material assets; (k) cultural heritage, including architectural and archaeological heritage; (l) landscape; and (m) the inter-relationship between the issues referred to in sub-paragraphs (a) to (l).	Section 4
The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.	Section 5
An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.	Section 5
A description of the measures envisaged concerning monitoring (in accordance with regulation 17).	Section 5

A non-technical summary of the Strategic Environmental Assessment process and findings.	Section 6
---	-----------

Overview of requirements of the SEA Regulations in regard to Neighbourhood Plans

- 1.11. A Neighbourhood Plan or Neighbourhood Development Plan (NDP) must meet the 'basic conditions' set out in 8(2) of Schedule 4B of the Town and Country Planning Act 1990.
- 1.12. As described in the government's planning practice guidance², basic condition 'f', requires that: *the making of the order (or neighbourhood plan) does not breach, and is otherwise compatible with, EU obligations.*
- 1.13. This can include a range of EU directives *which have been incorporated into UK law.* Of particular significance are:
- **Directive 2001/42/EC of the European Parliament and of the Council of 27 June 2001 on the assessment of the effects of certain plans and programmes on the environment** (the Strategic Environmental Assessment Directive), transposed into UK law by The Environmental Assessment of Plans and Programmes Regulations 2004; and
 - **Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora**, which was initially transposed into UK law by The Conservation (Natural Habitats, &c.) Regulations 1994 with various amendments consolidated by The Conservation of Habitats and Species Regulations 2018.
- 1.14. In addition, basic condition 'g' requires: *prescribed conditions are met in relation to the Order (or plan) and prescribed matters have been complied with in connection with the proposal for the order (or neighbourhood plan).*
- 1.15. Notably, this includes demonstrating that the making of the neighbourhood plan does not breach the requirements of Chapter 8 of Part 6 of the *Conservation of Habitats and Species Regulations 2017*, which set out the habitat regulation assessment process for land use plans, including consideration of the effect on habitats sites.
- 1.16. Following the United Kingdom's withdrawal from the European Union (i.e. *Brexit*), EU law no longer has supremacy over British laws. Whilst initially introduced by EU Directives, the processes for SEA and HRA have been transposed into UK law, namely The *Environmental Assessment of Plans and Programmes Regulations 2004 (as amended)* and the *Conservation of Habitats and Species Regulations 2017 (as amended)*.
- 1.17. In light of Brexit, to enable the continued operation of the HRA processes *The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019*³ made a number of changes to the 2017 Regulations. Most of these changes involved transferring functions from the European Commission to the appropriate authorities in England and Wales, with all other processes or terms in the 2017 Regulations remaining unchanged and existing guidance remaining relevant. The obligations of competent authorities (i.e. ECDC) for the protection of sites or species do not change.
- 1.18. Special Areas of Conservation (SACs) were originally designated under the Habitats Directive and target particular habitats (Annex I) and/or species (Annex II) identified as being of

² https://www.gov.uk/guidance/neighbourhood-planning--2?mc_cid=e09f0934ad&mc_eid=c5e5a6ab4a#basic-conditions-for-neighbourhood-plan-to-referendum

³ <https://www.legislation.gov.uk/ukxi/2019/579/contents/made>

European importance. Special Protection Areas (SPAs) are classified under the European Council Directive “on the conservation of wild birds” (79/409/EEC; ‘Birds Directive’) for the protection of wild birds and their habitats.

- 1.19. SPAs and SACs in the UK no longer form part of the EU’s *Natura 2000 ecological network*. The 2019 Regulations have created a ‘national site network’ on land and at sea, including both the inshore and offshore marine areas in the UK, and includes existing SPAs and SACs.
- 1.20. Ramsar sites are designated wetlands of international importance. Ramsar sites do not form part of the new national site network. Many Ramsar sites overlap with SPAs and SACs, and are designated for the same or different species and habitats. All Ramsar sites remain protected in the same way as SPAs and SACs.
- 1.21. This Environmental Report uses *European site* when referring collectively to SPAs, SACs, and Ramsar sites.
- 1.22. In general terms, a NDP may require full SEA following screening, where its policies and proposals are likely to result in significant effects on the environment, particularly where such effects have not already been considered and dealt with, such as through a Sustainability Appraisal (SA) (incorporating SEA) of a Local Plan.
- 1.23. In the context of neighbourhood planning, following screening, should a NDP be deemed likely to result in a significant impact occurring on a protected European Site as a result of the plan’s implementation, the HRA proceeds to Appropriate Assessment.
- 1.24. The aim of the HRA process is to assess the potential effects arising from a plan against the nature conservation objectives of any European site designated for its nature conservation importance.
- 1.25. The National Planning Policy Framework (NPPF) also expects candidate SACs, potential SPAs and Ramsar sites to be included within the assessment.

Summary of responsibilities for SEA process

Local Planning Authority (ECDC)

- 1.26. ECDC, as local planning authority is ultimately responsible for ensuring that the SEA requirements have been met prior to the Neighbourhood Plan being made. ECDC is best placed to undertake the Strategic Environmental Assessment given its access to environmental information and understanding of strategic-level planning issues relating to the Neighbourhood Area, East Cambridgeshire district, and surrounding area.

Qualifying Body (Swaffham Bulbeck Parish Council)

- 1.27. Swaffham Bulbeck Parish Council is the Qualifying Body for the Swaffham Bulbeck Neighbourhood Area (which is coterminous with the parish boundary). Only Swaffham Bulbeck Parish Council has the legal right to prepare a Neighbourhood Plan for the Swaffham Bulbeck Neighbourhood Area.
- 1.28. It is expected that the Parish Council will ensure the Neighbourhood Plan reflects the findings and recommendations that arise through the SEA process.

Statutory Consultation Bodies

- 1.29. For the purposes of SEA, the statutory bodies are executive non-departmental public bodies with responsibilities for managing the environment on government’s behalf, including:
 - Environment Agency
 - Historic England
 - Natural England

- 1.30. For the purpose of SEA, the statutory bodies are required to review and make representations when requested.

Scoping Report Consultation (June – August 2021)

- 1.31. *Scoping* is the process of agreeing the scope and level of detail of the information to go in an *Environmental Report*.
- 1.32. The outcome of scoping is an agreed evidence base and SEA ‘framework’ of objectives for the assessment of a Neighbourhood Plan. It is important that the scoping report provides relevant information as the successful examination of the Neighbourhood Plan can depend on it.
- 1.33. The scope of the SEA must be proportionate. ECDC undertook an initial screening assessment which considered a wide range of environmental themes, policy matters, designations and constraints. For many issues, the screening assessment concluded that no likely significant effects will arise from implementation of the SBNP – such matters were *screened out*.
- 1.34. However, through the initial screening exercise, ECDC was unable to rule out likely significant effects on the environment as a result of implementation of the SBNP in relation to certain themes. ECDC prepared a Scoping Report which set out the findings of its screening assessment, and identified the *scope* of the SEA.
- 1.35. The SEA Regulations require that the consultation bodies be given not less than five weeks to comment on the scope of the assessment. From 28 June to 02 August 2021, ECDC consulted the statutory bodies on the Scoping Report. A full transcript of comments received during consultation on the Scoping Report is provided in Appendix 1.
- 1.36. Whilst the SBNP was *screened in* due to the potential for likely significant effects in respect of certain SEA themes, for many other themes the plan was *screened out*.

Environment Agency’s response

- 1.37. Through its response to the Scoping Report consultation, *Environment Agency* confirmed that the scope of the SEA included only topics which are outside of its remits. Consequently, the Environment Agency had no comment to make on the Scoping report.

Historic England

- 1.38. Through its response to the Scoping Report, Historic England refers to *Historic England Advice Note 8: Sustainability Appraisal and Strategic Environmental Assessment*⁴ which sets out the historic environment factors which need to be considered during the Strategic Environmental Assessment process, and *Historic England Advice Note 3: Site Allocations and Local Plans*⁵ which sets out a methodology for assessing the potential impact of site allocations on heritage assets.
- 1.39. Historic England recommend the SEA process include consideration of any enhancements that could be made as a result of the development of the neighbourhood plan, with a view to removing assets from the Heritage at Risk Register. Opportunities to remove assets from the HAR Register are considered through the SEA Framework at the relevant SA Objective.
- 1.40. Historic England recommend the Historic Environment Recordbridgeshire County Council be consulted directly by the neighbourhood plan group, along with ECDC's conservation officer and Cambridgeshire County Council's archaeological staff be closely involved throughout the preparation of the plan and its assessment, as they are best placed to advise on; local historic environment issues and priorities.

⁴ <https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/>

⁵ <https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/>

Natural England's response

- 1.41. *Natural England* advised that to screen out significant effects to nearby sensitive SSSIs such as Devil's Dyke, the SBNP's *Policy SWB8 – Cemetery/ Pony field site* for development of up to 45 dwellings should include a commitment for the proposed development to deliver 1.8ha informal open space provision, or appropriate alternative mitigation.
- 1.42. *Natural England* advise that "*creation of high quality open space on people's doorsteps, incorporating biodiversity-rich habitats and circular dog-walking routes, connected to off-site areas where possible, can provide a suitable alternative to visiting more sensitive sites for daily recreational activities*" and "*appropriately scaled and designed ... can reduce additional pressure, and avoid adverse impact, to sensitive designated sites*".
- 1.43. As discussed in section 4, there is a degree of overlap between the site allocated for residential development by Policy SWB8, and an outline planning application currently pending determination⁶. Through consultation on the planning application *Natural England* identified that provision of "*1.8ha informal open space will provide adequate quantity of alternative open space, for the scale of development proposed, to minimise adverse impacts to Devil's Dyke SSSI*".
- 1.44. In light of *Natural England's* response to consultation on the Scoping Report, the screening assessment (Section 4) has been re-visited, and the scope of the assessment (section 5) has been updated accordingly.

⁶ [19/00746/OUM | Outline application for the construction of up to 45 new homes \(of which 4 are self-build plots\) including open space, landscaping and associated infrastructure - with all matters reserved except for access | Land Parcel West Of Hill Cottage Heath Road Swaffham Bulbeck Cambridgeshire \(eastcambs.gov.uk\)](#)

2. Methodology for Strategic Environmental Assessment incorporating Habitats Regulation Assessment

Strategic Environmental Assessment (SEA)

- 2.1. The Localism Act 2011 (Schedule 9) introduced neighbourhood planning into the Town and Country Planning Act 1990. The 1990 Act, as amended by Schedule 10 of the Localism Act 2011, requires that NDPs meet a set of 'basic conditions'.
- 2.2. To ensure that a NDP meets the basic conditions, a SEA may be required to determine the likely significant environmental effects of implementing the NDP. The basis for Strategic Environmental legislation is European Directive 2001/42/EC, which was initially transposed into domestic law by the Environmental Assessment of Plans and Programmes Regulations 2004, or 'SEA Regulations'. Detailed guidance of these regulations can be found in the Government publication 'A Practical Guide to the Strategic Environmental Assessment Directive'⁷ and paragraph 073 of National Planning Practice Guidance (NPPG) 'Neighbourhood Planning' section⁸. Paragraph 073 of the Neighbourhood Planning section advises that a NDP should be screened early. Whether a NDP proposal requires a SEA, and (if so) the level of detail needed, will depend on what is proposed within the plan.
- 2.3. Where a proposed plan is likely to have a significant effect on a European site or European offshore marine site (in relation to the Habitats Regulations), this will also trigger the need to undertake a SEA. Schedule 2 of the Neighbourhood Planning (General) Regulations 2012 makes provision in relation to the Habitats Regulations. The Regulations requires that any plan or project likely to have a significant effect on a European site must be subject to an Appropriate Assessment. To achieve this, paragraph 1 of Schedule 2 of the Neighbourhood Planning (General) Regulations 2012 prescribes a basic condition that the making of a NDP is not likely to have a significant effect on a European site or a European offshore marine site. Paragraphs 2 to 5 go on to amend the Conservation of Habitats and Species Regulations 2010 so as to apply its provisions to neighbourhood development orders and plans. A NDP's (or Neighbourhood Development Order) requirements for Appropriate Assessment are clarified further by the Conservation of Habitats and Species and Planning (Various Amendments) (England and Wales) Regulations 2018.
- 2.4. Article 3(5) of Directive 2001/42/EC details the criteria for determining whether plans are likely to have significant environmental effects. These criteria are outlined in **Figure 1**.
- 2.5. The Department of the Environment produced a flow chart diagram⁹ which sets out the process for screening a planning document to ascertain whether a full SEA is required. The flow chart diagram is provided in **Figure 2**.
- 2.6. **Section 4** provides firstly, a screening assessment of the draft SBNP, against the assessment criteria (in **Figure 3**) to identify the significance of effects which may arise as a result of the plan's implementation.
- 2.7. Secondly, **Section 4** applies the SEA Directive to the draft SBNP, as per the flow chart in **Figure 4**, to determine whether the principle of the NDP would warrant the need for SEA.
- 2.8. In order to decide whether a SEA is required, the Council needs to consider the following:

⁷ Available at:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/7657/practicalguidesea.pdf

⁸ Available at: <https://www.gov.uk/guidance/neighbourhood-planning--2#basic-conditions-for-neighbourhood-plan-to-referendum>

⁹ Department of the Environment, A Practical Guide to the Strategic Environmental Assessment Directive (2005)

- How the policies in the NDP might affect the environment, community or economy;
- Whether the policies are likely to adversely affect a “sensitive area”, such as a European site (SAC, SPA, Ramsar) or a SSSI, NNR etc.;
- Whether the policies propose a higher level of development than what is set out in the East Cambridgeshire Local Plan and that has been assessed by the SA of that Plan;
- Whether the implementation of the policies is likely to lead to new development;
- Whether the cumulative impact of the policies taken together may give rise to a significant effect.

Habitats Regulations Assessment

- 2.9. A decision by the European Court of Justice (ECJ) (People Over Wind & Sweetman vs. Coillte Teoranta) in April 2018 has had a significant impact on the HRA process for both NDPs and Local Plans. In short, the ECJ ruled that in order to determine whether it is necessary to carry out a full HRA of the implications of a plan, it is not appropriate to take account of mitigation measures at the screening stage. Rather, consideration of mitigation will need to occur at the full Appropriate Assessment stage.
- 2.10. Following the UK’s withdrawal from the EU, decisions by the ECJ are no longer legally binding but may continue to be relevant¹⁰.
- 2.11. A consequence of the ECJ’s decision is that mitigation measures set out in a plan cannot be used at the screening stage to conclude there will be ‘no likely significant effects’ on European Sites. Therefore, if a NDP includes measures to counter the plan’s effects on European Sites these should, in effect, be ignored at the screening stage.
- 2.12. Previously, plan-making in the UK has followed case law as set out in Application of Hart DC vs. Secretary of the State for Communities and Local Government in 2008, which concluded that: ‘anything which encourages the proponents of plans and projects to incorporate mitigation measures at the earliest possible stage in the evolution of their plan or project is surely to be encouraged.’
- 2.13. The government has acknowledged that the ECJ’s ruling has caused uncertainty in preparing NDPs, and could result in more plans requiring a full SEA or HRA. In December 2018, The Conservation of Habitats and Species and Planning (Various Amendments) (England and Wales) Regulations 2018¹¹ came into force, amending the basic conditions and allowing affected NDPs and Orders to proceed.
- 2.14. With regard to potential effects on European sites, this environmental report has been undertaken in accordance with the ECJ’s ruling, insofar that the effects of any mitigation measures set out in the policies of the SBNP have not been considered.

¹⁰ <https://www.legislation.gov.uk/ukpga/2018/16/section/6/enacted>

¹¹ <http://www.legislation.gov.uk/uksi/2018/1307/contents/made>

FIGURE 1: SEA ASSESSMENT CRITERIA

Article 3. Scope

5. Member States shall determine whether plans or programmes referred to in paragraphs 3 and 4 are likely to have significant environmental effects either through case-by-case examination or by specifying types of plans and programmes or by combining both approaches. For this purpose Member States shall in all cases take into account relevant criteria set out in Annex II, in order to ensure that plans and programmes with likely significant effects on the environment are covered by this Directive.

Annex II Criteria for determining the likely significance of effects referred to in Article 3(5)

1. The characteristics of plans and programmes, having regard, in particular, to

- the degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources;
- the degree to which the plan or programme influences other plans and programmes including those in a hierarchy;
- the relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development;
- environmental problems relevant to the plan or programme;
- the relevance of the plan or programme for the implementation of Community legislation on the environment (e.g. plans and programmes linked to waste-management or water protection).

2. Characteristics of the effects and of the area likely to be affected, having regard, in particular, to

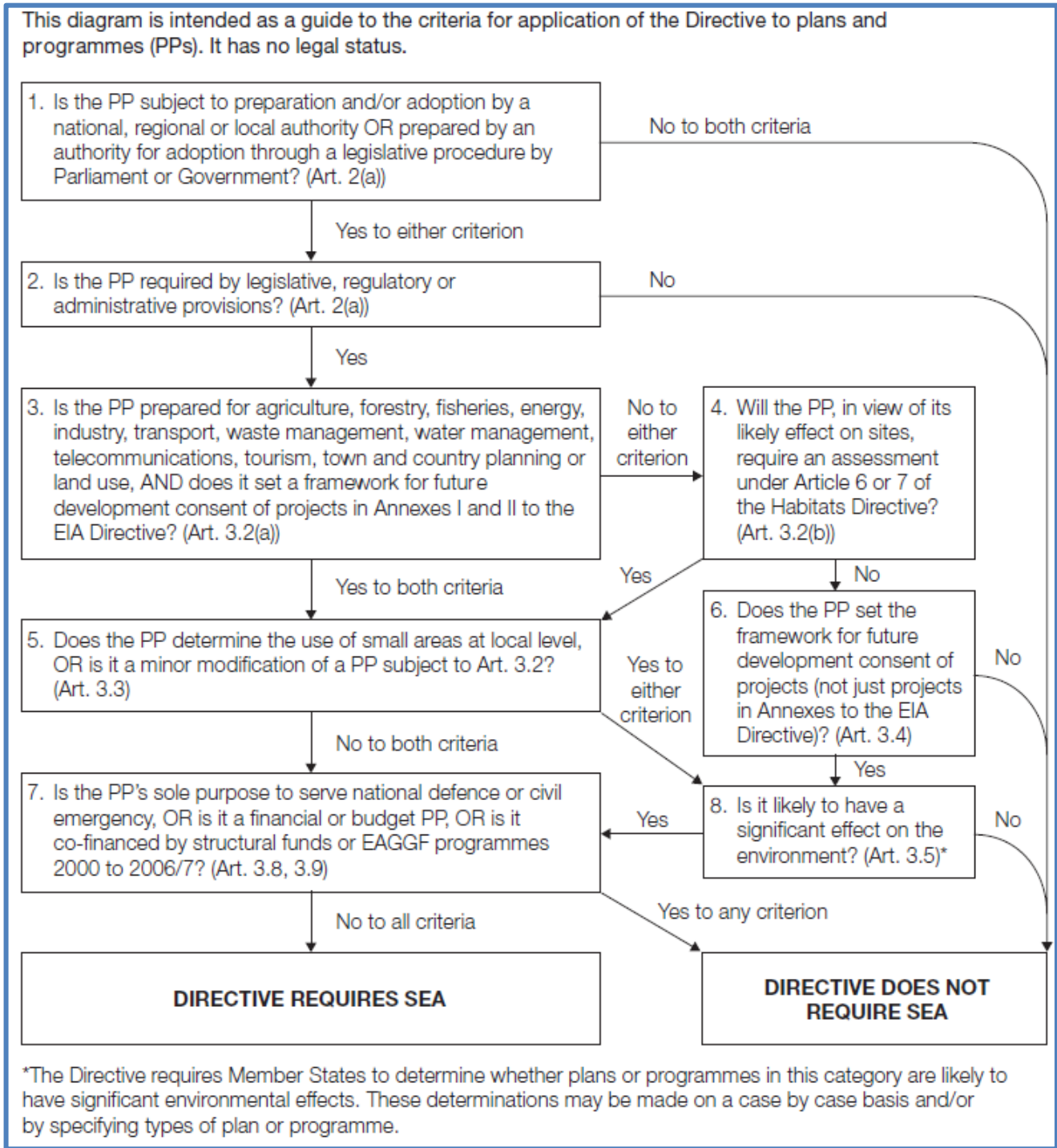
- the probability, duration, frequency and reversibility of the effects;
- the cumulative nature of the effects;
- the transboundary nature of the effects;
- the risks to human health or the environment (e.g. due to accidents);

- the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected);

- the value and vulnerability of the area likely to be affected due to:
 - special natural characteristics or cultural heritage;
 - exceeded environmental quality standards or limit values;
 - intensive land-use;

- the effects on areas or landscapes which have a recognised national, Community or international protection status.

FIGURE 2: APPLICATION OF THE SEA DIRECTIVE TO PLANS AND PROGRAMMES ¹²



¹² Annexes I and II of Directive 2011/92/EU (as referred to in Figure 2, question 3) available at: <http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32011L0092&from=EN> (see <http://ec.europa.eu/environment/eia/eia-legalcontext.htm> for details of amendments). Articles 6 and 7 of the Habitats Directive (as referred to in Figure 2, question 4) available at: <http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:31992L0043&from=EN>.

3. Key information on the emerging Neighbourhood Plan and neighbourhood area

- 3.1. This section provides contextual information about the emerging Neighbourhood Plan and Neighbourhood Area, including relevant plans and strategies in the locality, and environmental characteristics of the Neighbourhood Area and surrounding area.

Local Plan context for the Neighbourhood Plan

- 3.2. The basic conditions require a NDP to be in *general conformity* with the strategic policies contained in the Development Plan (the Local Plan) for the area.
- 3.3. Through its strategic policies, the Local Plan effectively defines the parameters within which a NDP may operate. Throughout their preparation, Local Plans are subject to SEA (generally incorporated through a SA) and HRA. Where a NDP is in general conformity with the strategic policies of the Local Plan, it is likely that many of the environmental effects of the plan will have already been considered through the Local Plan-making process.
- 3.4. However, it is widely accepted that NDPs can promote higher levels of growth than the Local Plan (whilst still satisfying the basic condition for 'general conformity'), for example through making site allocations. In such cases, additional development may trigger a requirement for full SEA.
- 3.5. National planning policy states that evidence should be proportionate and should not repeat policy assessment already undertaken. It is therefore relevant to consider the strategic policy context for the purpose of avoiding duplication and to identify environmental effects not already considered and addressed through the Local Plan-making process.

East Cambridgeshire Local Plan 2015

Current status

- 3.6. The current East Cambridgeshire Local Plan was adopted in 2015. The Local Plan defines strategic and locally specific policies for the district, and covers a plan period from 2011 to 2031. During its preparation, the Local Plan was subject to a full SA (incorporating SEA) and HRA.
- 3.7. Being greater than five years old, it is necessary (by law) to regularly review its content to determine how 'up to date' it is. The Council undertook, and published, a second formal Review in April 2020¹³. That Review, in summary, concluded that the:

"...Local Plan 2015 does require to be revised, but only partially and only in respect of its strategic housing policies. Of those policies, Policy GROWTH1 needs to be revised, because it has an out of date housing requirement. Other strategic housing policies may also be updated during the course of updating GROWTH1, should that be necessary.

The rest of the Local Plan is considered to not, at the present time, be in need of updating, therefore a full update of the Local Plan is not considered necessary.

However, whilst only one policy has been identified in need of updating, this does not prevent the Council from commencing preparation of a new Local Plan, in whole or part, on matters as it sees fit."

¹³ <https://www.eastcamb.gov.uk/sites/default/files/ECDC%20LP%20Review%20April%202020.pdf>

- 3.8. In light of these conclusions, East Cambridgeshire District Council (ECDC) has commenced a Single Issue Review (SIR) of the adopted Local Plan.

[Single Issue Review](#)

- 3.9. At the time of writing this environmental report, ECDC is at its first stage in the process of producing the Single Issue Review (SIR) of the Local Plan. This first stage (also sometimes known as a 'Regulation 18' consultation stage) of the Local Plan captures the issues which ECDC intends to address and includes proposals to tackle those issues.
- 3.10. The SIR's proposed changes include updating the Local Plan's housing requirement. The proposals do not seek to change the plan period, site allocations and broad locations for growth, or other policies in the plan.
- 3.11. The timetable for undertaking the SIR indicates that formal adoption will take place in October 2023. Therefore, at the time at which the SBNP will likely reach the examination stage, the Local Plan 2015 will remain the adopted Local Plan and the SIR will continue to be in progress.

[Local Plan 2015 Spatial Strategy for Swaffham Bulbeck](#)

- 3.12. The adopted Local Plan directs the majority of growth to main settlements (such as Ely, Littleport and Soham), with a relatively modest amount of growth distributed across the rural area. Policy GROWTH 2 provides a locational strategy for the distribution of growth:

Policy GROWTH 2: Locational strategy

The majority of development will be focused on the market towns of Ely, Soham and Littleport. Ely is the most significant service and population centre in the district, and will be a key focus for housing, employment and retail growth.

More limited development will take place in villages which have a defined development envelope, thereby helping to support local services, shops and community needs.

Within the defined development envelopes housing, employment and other development to meet local needs will normally be permitted – provided there is no significant adverse effect on the character and appearance of the area and that all other material planning considerations are satisfied. Two key exceptions to this will apply in the case of proposals involving the loss of employment land or community facilities – which will be assessed against Policies EMP 1 and COM 3 respectively. Retail development should be focused where possible within the town centres of Ely, Soham and Littleport – or alternatively, if there are no suitable sites available, on edge of centre sites, then out of centre sites, in accordance with Policy COM 1 and other policies in Part 2 of this Local Plan.

Outside defined development envelopes, development will be strictly controlled, having regard to the need to protect the countryside and the setting of towns and villages. Development will be restricted to the main categories listed below, and may be permitted as an exception, providing there is no significant adverse impact on the character of the countryside and that other Local Plan policies are satisfied...

Excerpt from policy GROWTH 2, p25 East Cambridgeshire Local Plan

- 3.13. The Swaffham Bulbeck Neighbourhood Area is contiguous with Swaffham Bulbeck parish boundary (which includes the village of Swaffham Bulbeck) and is located within East Cambridgeshire's rural area. The Local Plan provides a description of Swaffham Bulbeck's characteristics, noting its historic context and relationship to landscape features.

Swaffham Bulbeck is a small village in a pleasant setting about 8 miles from Cambridge and 6 miles from Newmarket, and incorporates the hamlet of Commercial End. The village began as a farm of settlers from Swabia, then soon after 1066 it became the estate of Hugh of Bolbec.

The village was also an important port for water-borne trade along Swaffham Bulbeck Lode to fenland waterways and flourished as a trading post from the 17th century. This success led to the construction of many of the attractive buildings, which give the village its distinctive character. Swaffham Bulbeck has an elongated shape with an attractive green in the heart of the village and is covered by a Conservation Area.

Facilities in the village include a shop and post office, church, public house, primary school and a recreation ground with play facilities and pavilion. The village has a regular bus service which runs to Newmarket and Cambridge.

p302 East Cambridgeshire Local Plan

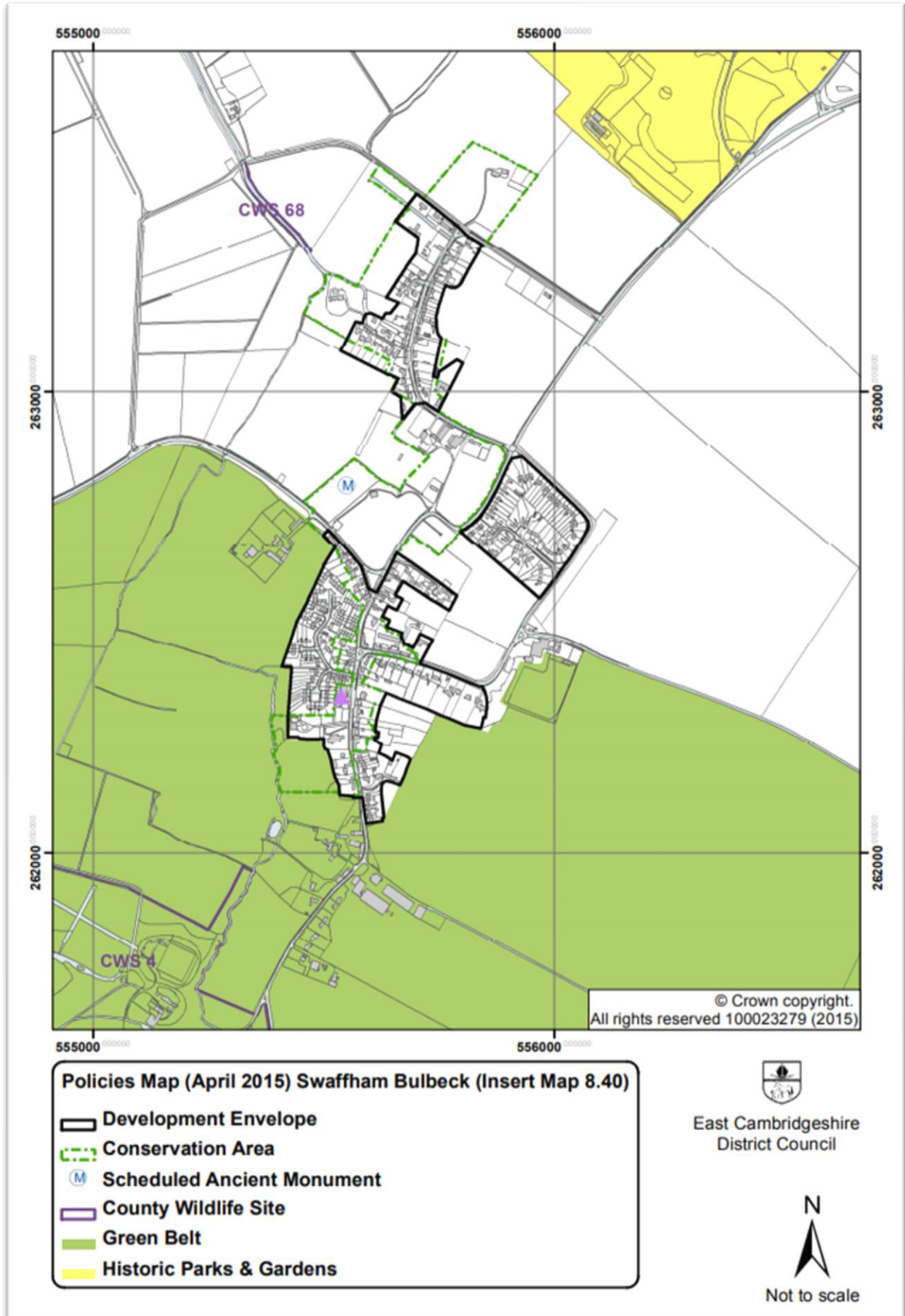
- 3.14. The Local Plan expects only limited growth to occur within Swaffham Bulbeck over the course of the plan period:

Swaffham Bulbeck is likely to grow at a slow rate over the Plan period, with new housing being built on suitable 'infill' sites within the village. No new housing allocation sites are proposed on the edge of Swaffham Bulbeck.

p303 East Cambridgeshire Local Plan

- 3.15. For the avoidance of doubt, Swaffham Bulbeck is not one of the 'market towns' described as the focus for growth in policy GROWTH 2. The Local Plan defines a Development Envelope around Swaffham Bulbeck village within which such 'infill' development will generally be acceptable. Applying policy GROWTH 2, Swaffham Bulbeck's 'place' in the locational strategy is as a 'village with a defined development envelope' in which 'more limited development' will take place.
- 3.16. The Local Plan does not identify any site allocations in Swaffham Bulbeck.
- 3.17. With limited growth opportunities, the Local Plan's top priority for the area is for improvements to infrastructure and facilities in the village, including improvements to public realm; provision of a community/village hall; improvements to pedestrian/cycle routes; improved transport links/public transport services; and potential upgrade to Bottisham Waste Water Treatment Works.
- 3.18. Local Plan policy *ENV 10: Green Belt* strictly controls development in the Cambridgeshire Green Belt, limiting development only to the certain exceptions prescribed in the NPPF. Due to its strategic, cross-boundary nature, ECDC considers that review of the Green Belt is generally outside the scope of neighbourhood planning.
- 3.19. Map 1 shows the location of the Green Belt surrounding Swaffham Bulbeck village (shaded green).

MAP 1: LOCAL PLAN INSET MAP – SWAFFHAM BULBECK (GREEN BELT)



Withdrawn Local Plan

- 3.20. In February 2018, East Cambridgeshire District Council submitted for examination a new Local Plan along with a supporting evidence base. Examination of the Local Plan commenced in June 2018. In February 2019, East Cambridgeshire District Council withdrew the draft Local Plan.
- 3.21. At the point of withdrawal, the draft Local Plan was at an advanced stage of its preparation and had been subject to a full Sustainability Appraisal incorporating SEA, and a full HRA. The withdrawn Local Plan proposed a similar growth strategy to the adopted Local Plan, focussing growth principally in the market towns, but with an increased role for some villages in the rural area. This included the identification of three proposed site allocations in Swaffham Bulbeck village.
- 3.22. Following withdrawal of the Local Plan, East Cambridgeshire District Council has retained the HRA (dated June 2018) as it provides evidence and guidance on issues relating to European Sites which the Council believes remains relevant to applicants, decision-makers and to the preparation of Neighbourhood Plans.

Other plans and strategies

- 3.23. It is necessary to also consider other plans and strategies affecting the district and surrounding area, since SEA requires consideration of the *cumulative* nature of effects, and HRA requires *in-combination* assessment

Neighbourhood Plans

- 3.24. There are 10 designated Neighbourhood Areas in East Cambridgeshire district and three formally made Neighbourhood Plans (Fordham, Sutton and Witchford). Each of those made Neighbourhood Plans was *screened out* of the SEA & HRA process and therefore are not likely to have significant effects on the environment or designated sites.
- 3.25. The majority of the remaining Neighbourhood Areas are in the early stages of plan preparation. The Reach Neighbourhood Plan and Isleham Neighbourhood Plan are following similar timetables to the SBNP. The Reach Neighbourhood Plan was recently *screened out* of the SEA & HRA process by ECDC, and the Isleham Neighbourhood Plan was *screened in*. However, at time of writing these decision have not yet been subject to consultation with the statutory bodies.
- 3.26. Swaffham Bulbeck is located in the south of East Cambridgeshire district and shares a boundary with South Cambridgeshire district.
- 3.27. At the time of preparing this environmental report, there is one made NDP in South Cambridgeshire (Great Abington Former Land Settlement Association Estate Neighbourhood Plan), and 18 other designated Neighbourhood Areas with plans underway¹⁴.
- 3.28. SEA & HRA has been carried out for a number of plans, as follows:
- Foxton Neighbourhood Plan - *screened out*
 - Fulbourn Neighbourhood Plan - *screened out*
 - Cottenham Neighbourhood Plan - *screened out* for HRA and *screened in* for SEA
 - Gamlingay Neighbourhood Plan - *screened out* for HRA and *screened in* for SEA
 - Histon & Impington Neighbourhood Plan - *screened out*

¹⁴ <https://www.scambs.gov.uk/planning/local-plan-and-neighbourhood-planning/neighbourhood-planning/neighbourhood-plans/>

- Waterbeach Neighbourhood Plan - *screened out*
- 3.29. The SEA Environmental Report for the Cottenham Neighbourhood Plan¹⁵ and the SEA Environmental Report for the Gamlingay Neighbourhood Plan¹⁶ identify a range of potential environmental effects. However, all appear confined to their respective Neighbourhood Areas and not relevant to the assessment of the SBNP.
- 3.30. West Suffolk District Council's boundary lies around 1.6km to the east of the Swaffham Bulbeck Neighbourhood Area. There are eleven designated Neighbourhood Areas in West Suffolk, of which three Neighbourhood Plans have been subject to SEA screening:
- Great Barton Neighbourhood Plan (passed referendum 06 May 2021) – *screened out*
 - Hargrave Neighbourhood Plan (made July 2018) – *screened out*
 - Newmarket Neighbourhood Plan (made February 2020)– *screened out*
- 3.31. There are no Neighbourhood Development Plans (or Orders) relevant to the SEA or HRA of the SBNP.

Minerals & Waste Local Plan

- 3.32. The *Cambridgeshire and Peterborough Minerals and Waste Local Plan Core Strategy (2011)* and *Cambridgeshire and Peterborough Minerals and Waste Local Plan Site Specific Proposals (2012)* form the current adopted Local Plan for minerals and waste development in the Swaffham Bulbeck Neighbourhood Area. The HRA concluded no adverse effects likely on European Sites.
- 3.33. A replacement Cambridgeshire and Peterborough Minerals and Waste Local Plan has recently been examined and found sound subject to modifications, and is likely to proceed to adoption shortly. The HRA concluded that the Local Plan is compliant with the Habitats Regulations and will not result in likely significant effects on any of the European sites identified, either alone or in combination with other plans and projects.
- 3.34. The Minerals & Waste Local Plan is relevant to the SEA and HRA of the SBNP as it sets policies and includes designations which affect the Swaffham Bulbeck Neighbourhood Area.

Other authorities' Local Plans

- 3.35. The following local planning authority areas adjoin East Cambridgeshire district, and have adopted Local Plan documents:
- Fenland District Council - Local Plan adopted 2014;
 - Borough Council of Kings Lynn and West Norfolk - Core Strategy adopted 2011 and Site Allocations and Development Management Policies DPD adopted 2016;
 - West Suffolk Council - Core Strategy adopted 2010 relating to former Forest Heath and St Edmundsbury areas, with subsequent Site Allocations, Development Management Policies and other DPDs;
 - South Cambridgeshire District Council – Local Plan adopted 2018; and
 - Huntingdonshire District Council – Local Plan adopted 2019.

¹⁵ https://www.scambs.gov.uk/media/12932/cottenham-np-sea-environmental-report_v10_191018.pdf

¹⁶ <https://gamlingay-future.uk/resources/Documents/FINAL-SEA-JULY-2020-for-r.14.pdf>

- 3.36. The *East Cambridgeshire Habitats Regulation Assessment 2018*¹⁷ (HRA 2018) indicates that all plans have the potential for environmental affects relating to growth and development, for example:
- Habitat damage and/or loss
 - Disturbance from recreational pressure
 - Increased demand for water resources
 - Reduced water quality from pollution
 - Atmospheric pollution from increased vehicle journeys
- 3.37. Plans in proximity of designated sites include measures to avoid adverse harm to those habitats. For example, the Borough Council of Kings Lynn and West Norfolk Core Strategy, at policy *CS12 Environmental Assets*, provides mitigation for potential significant effects, restricting new development within 1,500m of the Breckland SPA, and its Development Management Policies Plan provides mitigation for potential significant effects, requiring project level HRA and an agreed package of habitat protection measures to avoid adverse effects on European sites.
- 3.38. The Forest Heath Core Strategy (West Suffolk) at policy *CS2 Natural Environment* provides mitigation for potential significant effects, restricting new development within 1,500m of the Breckland SPA. New road infrastructure is not permitted within 200m of sites designated as SACs.
- 3.39. The St Edmundsbury Core Strategy (West Suffolk) at policy *CS2 Sustainable Development* provides mitigation for potential significant effects, protecting the network of designated sites, including Breckland SPA and applies a 400m buffer zone for Woodlark and Nightjar and 1,500m for areas that support Stone Curlew.
- 3.40. The Joint Forest Heath and St Edmundsbury (i.e. West Suffolk) Development Management Policies (at policy DM12) provides mitigation for potential significant effects, requiring all new development shown to contribute to recreational disturbance and visitor pressure within the Breckland SPA and SAC to make appropriate S106 contributions towards management projects.

Local Transport Plan

- 3.41. Following the formation of the Cambridgeshire & Peterborough Combined Authority, responsibilities to prepare a Local Transport Plan transferred from Cambridgeshire County Council to the Combined Authority. The Cambridgeshire & Peterborough Local Transport Plan (2020) sets out the vision, goals and objectives that define how transport will support the Cambridgeshire and Peterborough Combined Authority's Growth Ambition.
- 3.42. The LTP 2020 was subject to SEA and HRA. The SEA concludes that LTP 2020 promotes sustainable transport modes including low and zero emission vehicles which will help reduce transport-related emissions providing benefits for air quality, GHG reduction and health. The LTP 2020 promotes new road and rail transport infrastructure which has the potential for positive or negative effects depending on the location of the projects and mitigation measures incorporated into the design. Negative effects could include habitat loss and fragmentation, death, injury or disturbance to species, visual impacts, damage to heritage assets and

17

<https://www.eastcambs.gov.uk/sites/default/files/HRA%20Appropriate%20Assessment%20Post%20Submission%20Local%20Plan%20-%20published%2015.6.18.pdf>

archaeology, effect on setting of heritage assets, land take including loss of agricultural land, and water pollution.

- 3.43. The HRA concluded that there are no likely significant effects on the European designated sites.
- 3.44. The LTP 2020 provides an indicative route for the Cambridgeshire Autonomous Metro (CAM) – “a high-capacity public transport system designed to deliver transformative improvements to connectivity in Cambridgeshire”¹⁸. The indicative CAM network, as indicated in the LTP 2020, shows a route extending north east from Cambridge to Mildenhall, passing through several parishes in East Cambridgeshire district including Swaffham Bulbeck. A further indicative map published by the Combined Authority implies the location of a rail station/halt at Swaffham Bulbeck¹⁹.
- 3.45. The CAM project is at a conceptual design stage. It is an ambitious, complex, long term project. The CAM project is unlikely to be of major significance to the current SBNP, but may be an important consideration to future iterations of the Neighbourhood Plan.
- 3.46. The *East Cambridgeshire Transport Strategy*, (known as the ‘TSEC’) adopted July 2017, sets out a detailed policy framework and action plan of potential transport improvements for the area, addressing current problems and is consistent with the third Cambridgeshire Local Transport Plan and has been retained under the Combined Authority’s Local Transport Plan. The TSEC supports the East Cambridgeshire Local Plan by taking into account the predicted levels of growth and detailing the transport infrastructure and services necessary to deliver this growth.
- 3.47. The TSEC identifies the following transport projects, reflecting the infrastructure priorities for Swaffham Bulbeck as identified by the *East Cambridgeshire Local Plan 2015*:
- **E-85 - Walking improvement:** Pedestrian crossing from the Denny to the High Street (*current status not known*)
 - **E-86 - Traffic calming:** Traffic calming through village (*currently unfunded*)
 - **E-87 - Walking improvement:** Investigate feasibility for permissive pedestrian paths (not definitive ROW but rather important connections between ROW) around the village (*funded*)
 - **E-88 - Cycle improvement:** Cycle route from Lode / Swaffham Bulbeck to Swaffham Prior Continuation of off-road route into Swaffham Prior (*currently unfunded*)
- 3.48. Cambridgeshire County Council’s *Transport Delivery Plan*²⁰ indicates that project E-87 - *Walking improvement* was allocated £25,000 of funding in 2020/21 to investigate the feasibility for permissive pedestrian paths around the village.

Water Resources and Infrastructure

- 3.49. Anglian Water’s *Water Resources Management Plan* (WRMP) sets out how Anglian Water will manage the water supplies in the region to meet current and future needs over a minimum of 25 years. The current WRMP was published in 2019 and covers the period from 2020-2045.
- 3.50. Anglian Water’s supply-demand balance is under significant pressure from population growth, climate change, sustainability reductions and the need to increase resilience to severe drought. These challenges are acute in the Anglian Water region, which is characterised by low rainfall

¹⁸ <https://mk0cpcamainsitehdbtm.kinstacdn.com/wp-content/uploads/documents/transport/local-transport-plan/LTP.pdf>

¹⁹ <https://cambridgeshirepeterborough-ca.gov.uk/news/potential-for-peterborough-chatteris-and-ramsey-cam-extensions-to-be-developed-as-part-of-projects-next-steps/>

²⁰ <https://www.cambridgeshire.gov.uk/asset-library/Transport-Delivery-Plan-2020-2023-v2.pdf>

and is home to a significant proportion of wetland sites of conservation interest. These pressures drive the need for investment in both demand management and supply-side options, particularly in the short-term.

- 3.51. The Environment Agency's *Cam and Ely Ouse Abstraction Licensing Strategy (2020)* sets out how the Environment Agency will manage future abstraction within the Cam and Ely catchment. Under the Habitats Regulations, the Environment Agency has a duty to assess the effects of existing abstraction licences and any new applications to make sure they are not impacting on internationally important nature conservation sites. Water efficiency is also tested by the Environment Agency before a new licence is granted. If the assessment of a new application shows that it could have an impact on a SAC/SPA, the Environment Agency will have to follow strict rules in setting a time limit for their licence.
- 3.52. The Environment Agency's *Anglian River Basin Management Plan (2015)* sets out the measures needed to bring more water courses to good status to meet the requirements of the Water Framework Directive.
- 3.53. The Environment Agency's *Great Ouse Catchment Flood Management Plan Summary Report (2011)* is used by the Environment Agency and partners to plan and agree the most effective way to manage flood risk in the Great Ouse catchment.

Vision, aims and objectives of the Swaffham Bulbeck Neighbourhood Plan

- 3.54. The SBNP sets out the following Vision for the Neighbourhood Area:

To ensure that Swaffham Bulbeck, set in a parish of varied rural landscapes, remains a village whose diversity, community spirit, distinctive and attractive built heritage and green spaces can be enjoyed, protected and enhanced whilst seeking to achieve carbon-neutrality, promote biodiversity and enable proportionate development to meet local needs.

p15 Draft Swaffham Bulbeck Neighbourhood Plan

- 3.55. The SBNP identifies three objectives to achieve the vision, which echo the three over-arching objectives for sustainable development: environmental, social and economic:

Objective 1 Village Character

Retain the existing and distinctive village character by

- a) **Maintaining a dispersed but cohesive settlement with open, green spaces and corridors.**
- b) **Protecting the Cambridge Green Belt and village conservation areas.**
- c) **Protecting the wider landscape character and setting of the village.**
- d) **Securing a diverse stock of housing.**
- e) **Ensuring that the density of any new dwellings is appropriate to its context and proportionate to site and location.**

Objective 2 Housing

Promote a positive approach to growth delivery which provides at least the minimum number of dwellings required by East Cambridgeshire District Council by

- f) **Increasing housing stock which is accessible to younger families by building affordable houses and low-cost market houses.**
- g) **Ensuring that new development takes into account size, affordability, design, layout and tenure to meet local needs.**
- h) **Ensuring that new development is proportionate to the size of the village.**

Objective 3 Sustainability

Encourage a thriving village which retains a diverse range of age groups within a community which promotes sustainability by

- i) Supporting Swaffham Bulbeck primary school as a key element of the social structure of the community.**
- j) Retaining and enhancing facilities, services and employment opportunities as required.**
- k) Active promotion of low carbon emission strategies with an aim of achieving carbon neutrality through, for example, building construction, retro-fitting existing housing stock, generating electricity through solar or other community energy schemes, provision of car charging points and enhanced cycling and walking routes.**
- l) Conservation initiatives and the active promotion of new biodiversity schemes to enhance the parish's natural habitat, for example by tree planting, restoring hedgerows, protecting peatlands, and encouraging wildflower areas.**

Draft SBNP policies

3.56. To deliver the Vision and Objectives, the SBNP proposes 16 policies in total, which are summarised in Table 1. Note that the table provides a *summary* of each policy’s intent, and not the actual policy wording.

TABLE 2: SUMMARY OF DRAFT SWAFFHAM BULBECK NEIGHBOURHOOD PLAN POLICIES

Theme	Policy	Summary
Spatial Strategy	SWB 1 – Swaffham Bulbeck development envelope	<p>The policy updates the Development Envelope around Swaffham Bulbeck village, reflecting recent planning consents and completed developments. In principle, proposals for new infill development are supported within the development envelope.</p> <p>The policy limits development outside the Envelope (i.e. in the countryside) to rural exception housing on the edge of the village; community-led developments (including at a site allocated in the neighbourhood plan); and development for agriculture, horticulture, outdoor recreation, essential educational infrastructure and other uses that need to be located in the countryside.</p>
Parish Character	SWB 2 – Swaffham Bulbeck village landscape character	<p>The policy requires development proposals in the village centre to be sensitive to Swaffham Bulbeck’s distinctive landscape and settlement character, as described in the Landscape Character Assessment and Settlement Fringe Sensitivity Study commissioned by the parish council.</p> <p>Specifically, the policy seeks to retain the pattern of three distinct settlement clusters in the village, requires landscape and visual impact assessments of major development proposals, and seeks to conserve and enhance heritage assets and protect views.</p>

	SWB 3 – Swaffham Bulbeck parish-wide landscape character	The policy identifies 'fringe areas' and sets specific policy requirements for proposals within the fringe areas, to ensure new development is sensitive to Swaffham Bulbeck's distinctive landscape and character, informed by the Landscape Character Assessment and Settlement Fringe Sensitivity Study.
	SWB 4 – Swaffham Bulbeck built environment character	<p>The policy requires all development proposals to adopt a design-led approach and identifies specific design themes which proposals must address.</p> <p>The policy requires proposals to conserve and enhance the Conservation Area, quality of the street scene, historic buildings, and village gateways - and Swaffham Bulbeck's quality as a place to live.</p> <p>For major residential development proposals, the policy requires the proposal to be accompanied by a Building for a Healthy Life assessment.</p>
	SWB 5 – Swaffham Bulbeck local green spaces	The policy designates 11 green areas as Local Green Spaces, providing protection from development in accordance with national policy for Green Belts.
Housing	SWB 6 - Swaffham Bulbeck housing mix	The policy requires development proposals to include a housing mix, providing dwelling sizes and tenures which reflect the existing and future needs of the parish. This includes providing two and three-bedroom properties suitable for young families, and homes suitable for older people. The policy requires new dwellings to be constructed to meet the accessible and adaptable M4(2) standard.
	SWB 7 – Swaffham Bulbeck community-led development	The policy sets a series of specific requirements which proposals for community-led developments must satisfy. Where the requirements are met, the policy supports proposals for community-led developments in locations which are otherwise not unsuitable for market developments (e.g. outside the development envelope).
Development sites	SWB 8 – Cemetery/pony field site	<p>The policy allocates a site for the development of up to 45 homes as a community-led development scheme.</p> <p>The policy includes a series of design principles to ensure that development of the site contributes positively to the existing landscape and built environment character.</p>
A cohesive and environmentally friendly community	SWB 9 – Swaffham Bulbeck primary school	The policy identifies Swaffham Bulbeck primary school as an invaluable community facility and lends support to proposals which help facilitate the continued success of the school and its function as a community meeting space.
	SWB 10 – Community Pavilion	The policy allocates the site of the community pavilion for the provision of an improved building which delivers enhanced facilities to support the current outdoor sports uses and to deliver a purpose-built community meeting space.
	SWB 11 – Swaffham Bulbeck community infrastructure priorities	The policy seeks the provision of new and improved infrastructure in the plan area, informed by a list of infrastructure priorities which includes public realm improvements, provision of a community hall,

	<p>pedestrian and cycle routes, public transport services, upgrade to the Bottisham Waste Water Treatment Works.</p> <p>Where it is lawful to do so, the policy requires all development proposals in the plan area to contribute towards delivering these infrastructure priorities.</p>
SWB 12 – Delivering sustainable design	The policy supports development proposals which adopt innovative approaches to the construction of low carbon homes and buildings which demonstrate sustainable use of resources and high energy efficiency levels. It requires all development proposals to be accompanied by a Sustainability Statement which outlines how the scheme minimises demand for energy, maximises energy efficiency, achieves carbon dioxide reductions, and minimises water usage through meeting the optional Building Regulation water consumption standard, and other matters including waste management, choice of building materials and adaptability to climate change.
SWB 13 – Electric vehicle charging points	The policy requires all new development proposals to provide charging points for electric vehicles.
SWB 14 – Protecting and improving walking and cycling connectivity in our parish	<p>The policy expects development proposals to maintain or enhance the provision and quality current walking and cycling network and infrastructure in the parish.</p> <p>The policy requires development proposals to provide good permeability through housing areas and ensure they are well connected via walking and cycling routes to neighbouring plots, key services including Swaffham Bulbeck primary school and shops and services located on the High Street.</p>
SWB 15 - The rural footpath network	<p>Development proposals are expected to maintain or enhance the provision and quality current rural network of footpaths in the parish.</p> <p>Development that will be clearly visible from a public right of way is required to consider the appearance of the proposal from the right of way and incorporate green landscaping to reduce any visual impacts.</p>
SWB 16 – Development proposals and biodiversity	<p>The policy requires all development proposals to contribute to and enhance the natural and local environment by firstly avoiding impacts where possible, and where avoidance isn't possible minimising impacts on biodiversity and providing measurable net gains for biodiversity.</p> <p>The policy requires development proposals to protect and utilise available opportunities to enhance the existing network of habitats currently present in the parish including those provided by woodland, waterways and droves.</p>

		<p>In the absence of a nationally mandated mechanism to secure biodiversity 'net gains' is introduced, the policy requires proposals to provide evidence setting out the steps which will be taken to avoid and minimise the adverse effect of the development on the biodiversity and habitats, and to calculate the value of habitats before and after the development occurs using a Defra metric.</p>
--	--	---

Overview of Neighbourhood Plan's approach to allocating land for development

3.57. As indicated in Table 1, the SBNP identifies a site allocation for the development of up to 45 homes as a community-led development scheme through draft policy *SWB 8 – Cemetery/ pony field site*. An indicative concept plan for the site is shown in Map 2.

MAP 2: PROPOSED SITE ALLOCATION



- 3.58. At present, an outline planning application (ref: 19/00746/OUM) for the construction of up to 45 new homes (of which 4 are self-build plots) including open space, landscaping and associated infrastructure - with all matters reserved except for access, is pending determination. The proposal and SBNP policy are aligned with one another.
- 3.59. The application was validated in May 2019. In the time since validation, ECDC has engaged with statutory consultees to identify and potential effects of the scheme. Due to the alignment of the planning application and draft policy, some information relating to the planning application is relevant in the identification of likely significant effects for the purposes of this Environmental Report.
- 3.60. In 2020, ECDC faced a legal challenge in relation to the Witchford Neighbourhood Plan²¹. A consequence of the judge's ruling is that sites which have planning permission at the time of preparing a Neighbourhood Plan can no longer be allocated, and instead should be referred to

²¹ Manor Oak Homes and Catesby Strategic Land v East Cambridgeshire DC and Witchford Parish Council

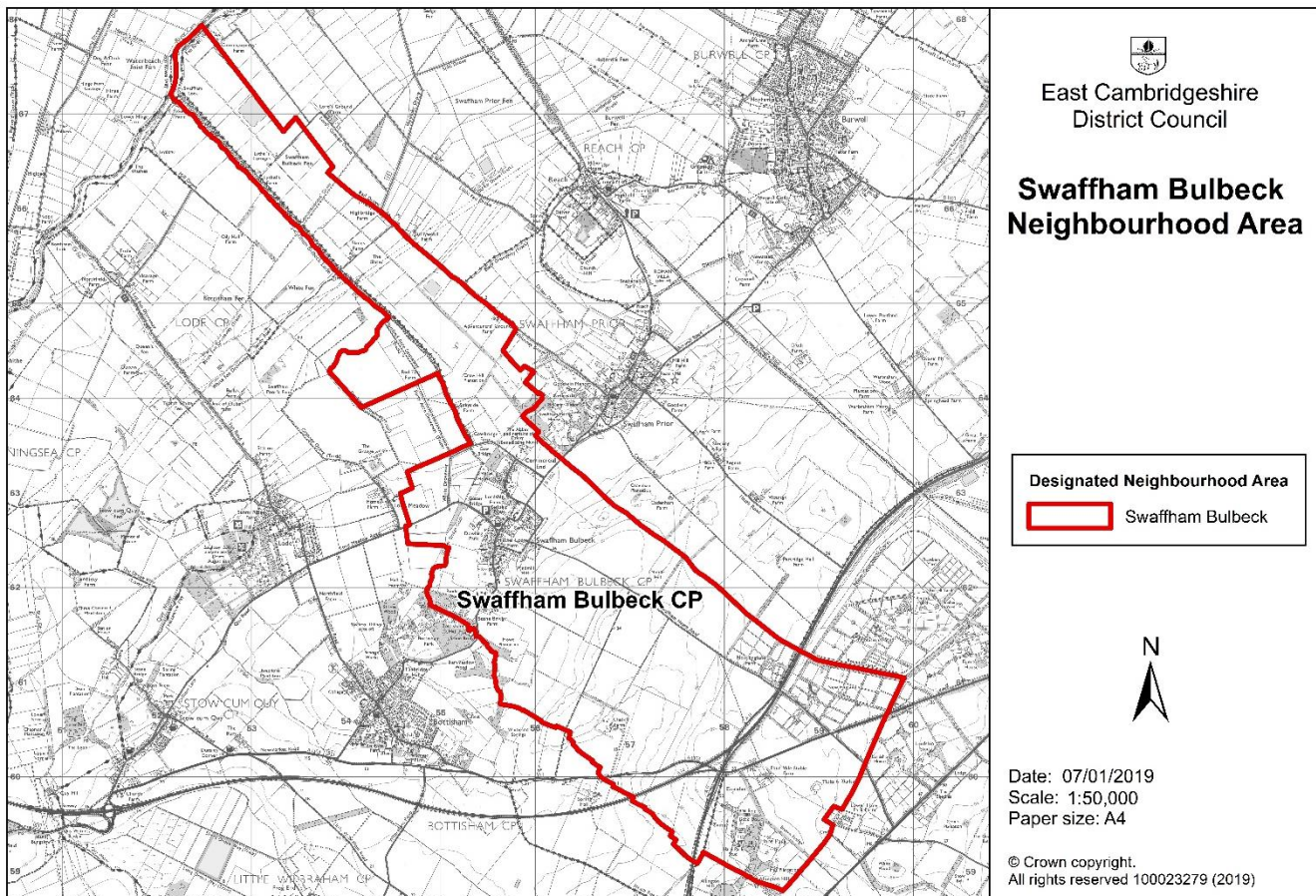
as ‘committed sites’. Therefore, if the status of the planning application changes during preparation of the SBNP, the policy (SWB8) may require modification to reflect the site’s planning status.

- 3.61. The SBNP updates the Development Envelope around Swaffham Bulbeck village, reflecting recent planning consents and completed developments. In principle, proposals for new infill development are supported within the development envelope.
- 3.62. The SBNP limits development outside the Envelope (i.e. in the countryside) to rural exception housing on the edge of the village; community-led developments (including at a site allocated in the neighbourhood plan); and development for agriculture, horticulture, outdoor recreation, essential educational infrastructure and other uses that need to be located in the countryside.
- 3.63. SBNP policy SWB7 supports proposals for community-led development, and sets a series of specific requirements which such proposals must satisfy. The policy supports proposals for community-led developments in locations which are otherwise not unsuitable for market developments (e.g. outside the development envelope).

Overview of key environmental constraints in the neighbourhood area

- 3.64. Swaffham Bulbeck parish covers a total area of 1,658 ha. It is located in the south of East Cambridgeshire, 8 miles from Cambridge and 6 miles east of Newmarket.
- 3.65. The Swaffham Bulbeck parish was formally designated as a Neighbourhood Area by ECDC on 07 January 2019. The designated area is shown in Map 3.

MAP 3: BOUNDARY OF THE DESIGNATED SWAFFHAM BULBECK NEIGHBOURHOOD AREA (ECDC)



Environmental themes

- 3.66. The SEA Regulations set out a range of themes that could be addressed in the Environmental Report:
- Biodiversity, flora and fauna
 - Population
 - Human health
 - Landscape
 - Water
 - Soil
 - Climatic factors
 - Air
 - Cultural heritage, including architectural and archaeological heritage
 - Material assets
 - The inter-relationship between the issues referred to above
- 3.67. *Locality* has prepared guidance for undertaking SEA of Neighbourhood Plans²². This guidance identifies the following environmental features and assets are relevant to the SEA themes:
- **National Parks** - Protected by the National Parks and Access to the Countryside Act 1949, the NPPF identifies these as landscapes of exceptional beauty which are influenced by the nature and communities which live in them. The NPPF highlights that great weight should be given to conserving and enhancing the landscape and scenic beauty in National Parks, and states that they have the highest status of protection in relation to these issues.
 - **Areas of Outstanding Natural Beauty** - An AONB is land protected by the Countryside and Rights of Way Act 2000 (CROW Act) to conserve and enhance its natural beauty. They comprise nationally designated landscapes of exceptional quality. With National Parks, the NPPF highlights that great weight should be given to conserving and enhancing the landscape and scenic beauty in AONBs, and states that they have the highest status of protection in relation to these issues.
 - **European sites** - European sites refer to the UK network of protected areas covering the most valuable and threatened species and habitats, as listed under the EC Birds Directive (79/409/EEC) and the Habitats Directive (92/43/EEC). These sites constitute the UK's contribution to the Bern Convention Emerald Network of internationally important sites. They include Special Areas of Conservation (SAC) and Special Protection Areas (SPA), as well as Potential or candidate SACs, Possible SPAs and Ramsar sites (wetlands of international importance). The NPPF, which refers to these as habitats sites, highlights that the presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a European site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the site.
 - **Sites of Special Scientific Interest (SSSIs)** - Natural England identifies and protects SSSIs in England under the Wildlife and Countryside Act 1981 (as amended). Natural England will select and notify an area as a new SSSI when it believes the land's wildlife, geology or

²² <https://neighbourhoodplanning.org/wp-content/uploads/Understand-if-your-plan-requires-a-Strategic-Environmental-Assessment-SEA-2021.02.26.pdf>

landform is of special interest. SSSI Impact Risk Zones (IRZ) are a GIS tool/dataset which maps zones around each SSSI according to the sensitivities of the features for which it is notified.¹³ They specify the types of development that have the potential to have adverse impacts at a given location. Natural England is a statutory consultee on development proposals that might impact on SSSIs. The NPPF highlights that development on land within or outside of the SSSI (either alone or in combination with other developments) which is likely to have adverse effects should not normally be permitted.

- **World Heritage Sites** - World Heritage Sites are described by the United Nations Educational, Scientific and Cultural Organisation (UNESCO) as exceptional places of 'outstanding universal value' and 'belonging to all the peoples of the world, irrespective of the territory on which they are located'. The NPPF identifies these assets as an irreplaceable resource which should be conserved and enhanced in a manner appropriate to their significance so that they can be enjoyed for their contribution to the quality of life of existing and future generations. Scheduled monuments are sites of national archaeological importance protected by the Ancient Monuments and Archaeological Areas Act 1979.
- **National Nature Reserve (NNR)** - National Nature Reserves (NNRs) were established to protect some of England's most important habitats, species and geology, and to provide 'outdoor laboratories' for research. NNRs are of national importance and represent an area which is among the best examples of a particular habitat. Consideration should be given both to likely effects on the biodiversity value of the National Nature Reserve and opportunities for research and visitor enjoyment.
- **Nationally listed buildings** - Nationally listed buildings are classed as Grade I, Grade II* or Grade II listed. Grade I buildings are of 'exceptional interest', Grade II* buildings are 'particularly important buildings of more than special interest' and Grade II buildings are of 'special interest'. Grade I or II* are those of 'outstanding architectural or historic interest' and comprise only 8.3% of listed buildings in England. Whilst consideration of the fabric and setting of all listed buildings is appropriate through screening, likely effects on Grade I and Grade II* listed structures have the potential to be particularly significant.
- **Buildings 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, and scheduled monuments, conservation areas, wreck sites and registered parks and gardens in England deemed to be 'at risk'. In some locations, surveys of Grade II listed buildings have also been carried out. The listing of a structure on the 'at risk' register highlights a particular sensitivity of a site.
- **Conservation area** - Whilst conservation areas are locally designated, they typically represent important concentrations of key historic environment features and townscapes.
- **Flood zone 3a and 3b** - Flood zone 3 development needs to submit a flood risk assessment as part of its planning application. Flood zone 3 is split into flood zone 3a and 3b. Flood zone 3a represents land which has been shown to be at a 1% or greater probability of flooding from rivers or 0.5% or greater probability of flooding from the sea. Flood zone 3b represents land which has been shown to be at a 5% or greater probability of flooding from rivers or the sea. Significant environmental effects may result from a Neighbourhood Plan, particularly where potential development areas are heavily constrained by flood risk zones.
- **Air Quality Management** - Area Air Quality Management Areas are designated because they are not likely to achieve national air quality objectives. Pollutants can include emissions of particulate matter or nitrogen dioxide from transport sources or sulphur dioxide from industrial activities. In practice Neighbourhood Plans have the most potential to affect air quality through effects on road transport.

- **Best and most versatile agricultural land** - The Agricultural Land Classification classifies land into six grades (plus 'non-agricultural' and 'urban'), where Grades 1 to 3a are the 'best and most versatile' land and Grades 3b to 5 are of poorer quality. Consideration should be made to the location of Grade 1 to 3a land in respect to potential development areas. Grade 1 land is the most valuable agricultural land. The likely significance of effects on such land may be influenced in part on local availability of best and most versatile agricultural land.
- **Source Protection Zones** - Source Protection Zones for groundwater sources such as wells, boreholes and springs used for public drinking water supply have been designated by the Environment Agency. These zones show the risk of contamination from any activities that might cause pollution in the area. Generally, the closer the activity, the greater the risk. Three main zones (inner, outer and total catchment) have been applied to groundwater sources with a fourth zone of special interest occasionally applied. An Inner zone (Zone 1) is defined as the 50-day travel time from any point below the water table to the source. This zone has a minimum radius of 50 metres. Through the consideration of the presence of Source Protection Zones, regard should be made to the likelihood of Neighbourhood Plan activities contaminating groundwater sources;
- **Locally designated nature conservation sites** - for example, Local Wildlife Sites, County Wildlife Sites, Sites of Importance for Nature Conservation, Sites of Nature Conservation Importance and others;
- **Local Nature Reserves;**
- **Irreplaceable habitats** - such as ancient woodland, ancient and veteran trees) and priority habitats;
- **Non-designated and locally listed historic environment assets;**
- **Areas of high archaeological potential;**
- **Locations where air quality is monitored due to potential exceedances to air quality objectives;**
- **Areas with surface water flooding issues;**
- **Areas with significant areas of contaminated land;**
- **Soil types;**
- **Locations within coastal change management areas;**
- **Scheduled Monuments;**
- **Registered Parks & Gardens;**
- **Registered Battlefield Sites;**
- **National Character Areas.**

3.68. To identify potential environmental constraints, the Swaffham Bulbeck Neighbourhood Area's proximity to each of those designations, features or assets listed is indicated in Table 2. These features have been identified through a desk-based assessment, including GIS analysis of

various publicly available spatial datasets. The table therefore provides a comprehensive summary of the environmental constraints related to the Neighbourhood Area.

- 3.69. The potential effects of the SBNP on those features identified is discussed in *Section 4 - Assessment*. Where available and relevant to the SEA themes, the assessment (in section 4) draws on other data sources, studies, and strategic policy documents.
- 3.70. Depending on the characteristics of the environmental feature, a range of distances are applied in identifying assets. For example, for certain features it may be appropriate to search only within the Neighbourhood Area itself. For other features it may be necessary to extend the area of search beyond the Neighbourhood Area.
- 3.71. As a 'rule of thumb', the following 'buffers' have been applied to determine the area of search for environmental features and designations:
- Neighbourhood Area + 0.4km (400m) buffer where the feature is potentially at risk from urbanisation - for example, development within the setting of the feature, or other localised issues such as increased littering, eutrophication or predation from cats.
 - Neighbourhood Area + 8km (8,000m) buffer where the feature is potentially at risk from visitor disturbance or recreational pressure.
 - Neighbourhood Area + 30km (30,000m) buffer where the feature may have a functional relationship to surrounding land, such as water courses, green infrastructure, or land providing opportunities for grazing or foraging for protected species.
 - Neighbourhood Area only, where only land within the neighbourhood area is a relevant consideration.
- 3.72. The justification for the proximity value is provided in Table 3.

TABLE 3: OVERVIEW OF POTENTIAL ENVIRONMENTAL CONSTRAINTS

Potential environmental constraint	Proximity metric	Data source	Summary of relevant environmental constraints and features identified
National Parks	Neighbourhood Area + 8km due to potential for increased visitor pressure from new development	https://data.gov.uk/dataset/334e1b27-e193-4ef5-b14e-696b58bb7e95/national-parks-england	There are no National Parks within the Neighbourhood Area or 8km buffer.
Areas of Outstanding Natural Beauty (AONB)	Neighbourhood Area + 8km due to potential for increased visitor pressure from new development	https://data.gov.uk/dataset/8e3ae3b9-a827-47f1-b025-f08527a4e84e/areas-of-outstanding-natural-beauty-england	There are no AONBs within the Neighbourhood Area or 8km buffer.
European sites	Neighbourhood Area + 30km due to potential for effects on functionally related land	https://data.gov.uk/dataset/67b4ef48-d0b2-4b6f-b659-4efa33469889/ramsar-england	<p>There are no SACs, SPAs or Ramsars within the Neighbourhood Area. The following European Sites are within 30km of the Neighbourhood Area:</p> <p>Breckland SPA/SAC Devils Dyke SAC Eversden and Wimpole Woods SAC Fenland (Wicken Fen) SAC/Ramsar Fenland (Chippenham Fen) SAC/Ramsar Ouse Washes SPA/SAC/Ramsar Portholme SAC Rex Graham Reserve SAC</p> <p>There are no Proposed Ramsar sites, Possible Special Areas of Conservation, or Potential Special Protection Areas in proximity of Swaffham Bulbeck Neighbourhood Area</p>
Sites of Special Scientific Interest (SSSIs)	Neighbourhood Area + 8km due to potential for increased visitor pressure from new development	https://data.gov.uk/dataset/a85e64d9-d0f1-4500-9080-b0e29b81fbc8/special-areas-of-conservation-england https://data.gov.uk/dataset/174f4e23-acb6-4305-9365-1e33c8d0e455/special-protection-areas-england https://data.gov.uk/dataset/5b632bd7-9838-4ef2-9101-ea9384421b0d/sites-of-special-scientific-interest-england	<p>Newmarket Heath SSSI adjoins the Neighbourhood Area boundary. The following SSSIs are located within 8km of the Neighbourhood Area:</p> <p>Cam Washes SSSI Devil's Dyke SSSI Fleam Dyke SSSI Fulbourn Fen SSSI Great Wilbraham Common SSSI Newmarket Heath SSSI Out and Plunder Woods SSSI Park Wood SSSI Snailwell Meadows SSSI Stow-cum-Quy Fen SSSI Ten Wood SSSI Upware Bridge Pit North SSSI Upware North Pit SSSI Upware South Pit SSSI Wicken Fen SSSI Wilbraham Fens SSSI</p>

SEA Environmental Report: Swaffham Bulbeck Neighbourhood Plan, September 2021

World Heritage Sites	Neighbourhood Area + 400m due to potential impacts on setting	https://data.gov.uk/dataset/3ac5c299-6805-476b-af9b-90aadec5e7b4/world-heritage-sites-gis-data	There are no World Heritage Sites within Neighbourhood Area or 400m buffer
Registered Battlefields	Neighbourhood Area + 400m due to potential impacts on setting	https://data.gov.uk/dataset/3b327613-faa1-4d0b-8fb8-75436fed80cc/registered-battlefields-gis-data	There are no Registered Battlefields within Neighbourhood Area or 400m buffer
Scheduled Monuments	Neighbourhood Area + 400m due to potential impacts on setting	https://historicengland.org.uk/listing/the-list/data-downloads	<p>The following Scheduled Monuments are within the Neighbourhood Area or a 400m buffer:</p> <p>Three bowl barrows 640m north west of Hare Park Stud (List entry 1016819) Four bowl barrows at Allington Hill, 420m south west of Allington Hill Farm (List entry 1016820) Swaffham Bulbeck moated site. (List entry 1012622) Long barrow 650m NNW of Lythel's Farm (List entry 1020843) Roman settlement (List entry 1006793) Earthworks at the Abbey (List entry 1472391) Deserted medieval village in Bottisham Park (List entry 1006900) Romano-British settlement 200m west of Allington Hill (List entry 1006901) Five bowl barrows 270m north of Hare Park Stud (List entry 1016818)</p>
National Nature Reserve (NNR)	Neighbourhood Area + 8km due to potential for increased visitor pressure from new development	https://data.gov.uk/dataset/726484b0-d14e-44a3-9621-29e79fc47bfc/national-nature-reserves-england	<p>None in Neighbourhood Area. The following NNRs are located within a 8km buffer of the Neighbourhood Area:</p> <p>Wicken Fen NNR</p>
Nationally listed buildings	Neighbourhood Area + 400m due to potential impacts on setting	https://data.gov.uk/dataset/8db67112-67b0-43f2-b863-2ac9c58d52bf/listed-buildings-gis-data	<p>The Following Listed Buildings Are Within The Neighbourhood Area Or A 400m Buffer:</p> <p>108 And 110, High Street (Grade II) 112, High Street (Grade II) 30 And 32, Commercial End (Grade II) 43, Commercial End (Grade II) 48, High Street (Grade II) 64 And 66, Commercial End (Grade II) 88, High Street (Grade II) 89, High Street (Grade II) 94, Commercial End (Grade II) 96, 98 And 100, Commercial End (Grade II) Appletrees (Grade II) Barn At Spring Hall Farm (Grade II) Barn, About 100 Yards North East Of Burgh Hall (Grade II) Barn, At Downing Farm (Grade II)</p>

SEA Environmental Report: Swaffham Bulbeck Neighbourhood Plan, September 2021

			<p>Barn, To East Of Burgh Hall (Grade II) Barn, To South Front And Two Cartway Entrances At Mitchell Hall Farm (Grade II) Barn, To South Of Burgh Hall (Grade II) Bolebec Cottage (Grade II) Bottisham Hall (Grade II) Bottisham Water Mill At Bottisham Park (Grade II) Bowyers Cottage (Grade II) Burgh Hall (Grade II*) Cattle Sheds, At Mitchell Hall Farm (Grade II) Church Of St Mary The Virgin (Grade I) Downing Farmhouse (Grade II) Garden Building To Burgh Hall (Grade II) Gate Piers And Adjoining Wall, To Number 86 Swaffham Prior House (Grade II) Hillside Cottage (Grade II) Hillside House (Grade II) Linton House (Grade II) Lordship Cottage (Grade II) Lordship Farmhouse (Grade II) Milestone, 5 Metres East Of Spring Hall Farm (Grade II) Mill House At Bottisham Water Mill (Grade II) Mitchell Hall (Grade II) Outbuildings And Stable To Number 86 Swaffham Prior House (Grade II) Priests House (Grade II) Ram Cottage (Grade II) Royal Oak Public House (Grade II) Swaffham Bulbeck War Memorial (Grade II) Swaffham Prior House (Grade II) Thatchers (Grade II) The Abbey (Grade I) The Merchants House (Grade II) The Old Rectory (Grade II) Village Hall (Grade II) Wall About 20 Yards South East Of The Abbey (Grade II) Warehouse And Granary, Approximately 25 Yards North Of Merchants House (Grade II)</p>
Buildings at risk	Neighbourhood Area + 400m due to potential impacts on setting	https://historicengland.org.uk/listing/the-list/data-downloads	<p>The following Heritage at Risk assets are located within the Neighbourhood Area or 400m buffer:</p> <p>Roman settlement, Lode - East Cambridgeshire Long barrow 650m NNW of Lythel's Farm, Swaffham Bulbeck</p>
Conservation area	Neighbourhood Area + 400m due to potential impacts on setting	https://www.eastcambs.gov.uk/conservation/conservation-areas-east-cambridgeshire	Swaffham Bulbeck Conservation Area is located within the Neighbourhood Area. There are no other CAs within the Neighbourhood Area or a 400m buffer.
Registered Parks & Gardens	Neighbourhood Area + 400m due to potential impacts on setting	https://historicengland.org.uk/listing/the-list/data-downloads	Swaffham Prior House Registered Park & Garden intersects the Neighbourhood Area with 400m buffer.
Flood zone 3a and 3b	Neighbourhood Area	https://data.gov.uk/dataset/bed63fc1-dd26-4685-b143-2941088923b3/flood-map-for-planning-rivers-and-sea-flood-zone-3	Approximately 18% of the Neighbourhood Area is located in Flood Zone 3. The majority of the Neighbourhood Area is in Flood Zone 1.

SEA Environmental Report: Swaffham Bulbeck Neighbourhood Plan, September 2021

Air Quality Management	Neighbourhood Area + 8km due to potential for impacts on road network beyond Neighbourhood Area.	https://uk-air.defra.gov.uk/agma/maps/	There are no Air Quality Management Areas within the Neighbourhood Area. The following AQMAs are within an 8km buffer of the Neighbourhood Area: A14 Corridor AQMA Newmarket AQMA
Best and most versatile agricultural land	Neighbourhood Area	https://data.gov.uk/dataset/952421ec-da63-4569-817d-4d6399df40a1/provisional-agricultural-land-classification-alc	The national Agricultural Land Classification dataset shows that the Neighbourhood Area consists of the following grades of agricultural land: 12% - Grade 1 (excellent quality agricultural land with no or very minor limitations); 50% - Grade 2 (very good quality agricultural land with minor limitations which affect crop yield, cultivations or harvesting); 38% - Grade 3 (good quality agricultural land with moderate limitations / moderate quality agricultural land with strong limitations).
Soil Types	Neighbourhood Area	https://magic.defra.gov.uk/Metadata_for_MAGIC/magsoilscape.html	The Soilscape (England) shows a variety of soil types in the parish: Fen peat soil; Loamy and sandy soils with naturally high groundwater and a peaty surface; Restored soils mostly from quarry and opencast spoil; Shallow lime-rich soils over chalk or limestone; Freely draining lime-rich loamy soils; Freely draining slightly acid but base-rich soils.
Source Protection Zones	Neighbourhood Area	https://data.gov.uk/dataset/09889a48-0439-4bbe-8f2a-87bba26fbbf5/source-protection-zones-merged	The southern 'half' of the village is intersected by a Source Protection Zone, predominantly defined as 'Zone III - total catchment', with a small area at the far south of the parish in 'Zone II - outer protection'. The land within the SPZ is principally in agricultural use and does not include the built area of Swaffham Bulbeck village.
Locally designated nature conservation site	Neighbourhood Area + 400m due to potential impacts of urbanisation	https://www.eastcambs.gov.uk/local-development-framework/east-cambridgeshire-local-plan-2015-policies-map	The following County Wildlife Sites are located within the Neighbourhood Area or a 400m buffer: Bottisham Park CWS Cow Bridge Pollard Willows CWS Heath Road/Street Way Green Lanes CWS River Cam CWS
Local Nature Reserves	Neighbourhood Area + 400m due to potential impacts of urbanisation	https://data.gov.uk/dataset/acdf4a9e-a115-41fb-bbe9-603c819aa7f7/local-nature-reserves-england	There are no LNRs within the Neighbourhood Area or 400m buffer.

SEA Environmental Report: Swaffham Bulbeck Neighbourhood Plan, September 2021

Irreplaceable habitats such as ancient woodland, ancient and veteran trees) and priority habitats	Neighbourhood Area + 400m due to potential impacts of urbanisation	https://naturalengland.defra.opendata.arcgis.com/datasets/priority-habitat-inventory-central-england/data?geometry=0.166%2C52.233%2C0.427%2C52.270	There are no Ancient Woodlands within the Neighbourhood Area or 400m buffer. Natural England's Priority Habitat Inventory dataset indicates the following priority habitats within the Neighbourhood Area or 400m buffer: Coastal and floodplain grazing marsh Deciduous woodland Good quality semi-improved grassland Lowland calcareous grassland No main habitat but additional habitats present Traditional orchard
Non-designated and locally listed historic environment assets	Neighbourhood Area	https://www.eastcambs.gov.uk/sites/default/files/Final%20Document_4.pdf	There is one 'Building of Local Interest' within the Neighbourhood Area: BL79 - Newnham House, 48 Commercial End
Areas of high archaeological potential	Neighbourhood Area		Data not available
Locations where air quality is monitored due to potential exceedances to air quality objectives	Neighbourhood Area	https://www.eastcambs.gov.uk/pollution/air-quality	There are no areas where air quality is monitored due to potential exceedances to air quality objectives within the Neighbourhood Area.
Areas with surface water flooding issues	Neighbourhood Area	https://www.eastcambs.gov.uk/local-development-framework/strategic-flood-risk-assessment-pslp-document-library	Approximately 1.5 ha (0.1%) of the Neighbourhood Area is at risk from surface water flooding in a 1 in 30-year event. Land at risk from surface water flooding increases in a 1 in 100 year and 1 in 1000-year event to approximately 44 ha (around 3% of total area).
Areas with significant areas of contaminated land	Neighbourhood Area	https://www.eastcambs.gov.uk/local-development-framework/strategic-flood-risk-assessment-pslp-document-library	There is a historic landfill site within the Neighbourhood Area, at <i>South of Swaffham Heath Road</i> .
Locations within coastal change management areas	Neighbourhood Area + 8km due to potential for increased visitor pressure from new development	http://publications.naturalengland.org.uk/file/5869554089852928	There are no CCMA within the Neighbourhood Area or an 8km buffer
National Character Areas	Neighbourhood Area	https://data.gov.uk/dataset/21104eeb-4a53-4e41-8ada-d2d442e416e0/national-character-areas-england	NCA 46 - The Fens and NCA 87 - East Anglian Chalk

3.73. The implications and significance of the identified potential environmental constraints are discussed in section 4.

4. Assessment of SBNP's likely effects on the environment

- 4.1. This section provides analysis and discussion of the likely significant environmental effects of the SBNP's policies and potential allocations against the environmental themes set out in the SEA Regulations, taking into account the potential environmental constraints and certain policy designations identified in Section 3.
- 4.2. The 'responsible authority' in the case of SEA and the 'competent authority' in the case of HRA, must determine whether a plan or programme, in this case the SBNP, is likely to have a significant environmental effect with reference to specified criteria.
- 4.3. Since data on the environmental constraints in the area has been gathered (Table 2), it is possible to determine whether there would be any likely significant effects, *positive* and / or *negative* on the environment.
- 4.4. Generally speaking, significance is an outcome of the characteristics of the impact of the policy or plan, such as its 'scale', and the 'sensitivity' of the area in which the impact is felt.
- 4.5. Determining significance is a somewhat subjective exercise. Drawing on the environmental constraints data will help to provide objectivity, and the process of consultation with statutory bodies will help to ensure that the conclusions drawn and assumptions applied are reasonable.
- 4.6. Through the inclusion of a site allocation, the draft SBNP proposes a higher level of growth than identified by the adopted Local Plan 2015. The *Habitats Regulation Assessment 2018*²³ (HRA) included assessment of this proposed site allocation, along with other sites, and tested higher levels of growth than set by the adopted Local Plan. The HRA's findings are therefore an important and relevant consideration in assessing the likely significant effects of the SBNP on European sites.
- 4.7. Paragraphs **4.9** to **4.162** consider the likely environmental effects of the SBNP policies in relation to the topics set out in Annex I (f) of the SEA Directive. These are biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape, and includes the interaction between these factors. In addition, this section incorporates the assessment of likely significant effects of the SBNP policies in relation to the conservation objectives for European sites – including the potential allocation and consideration of 'reasonable alternatives'. Matters of 'reasonable alternatives' are discussed at **paras. 4.163** to **4.192**.
- 4.8. **Figure 3** and **Figure 4** consider the SBNP against the criteria from Annex II of the SEA Directive and Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 2004.

23

<https://www.eastcambs.gov.uk/sites/default/files/HRA%20Appropriate%20Assessment%20Post%20Submission%20Local%20Plan%20-%20published%2015.6.18.pdf>

Biodiversity, flora and fauna

Internationally Designated Sites

4.9. As indicated in Table 2, there are no internationally designated sites of nature conservation interest sites within the Swaffham Bulbeck Neighbourhood Area. The following European sites (Special Protection Areas, Special Areas of Conservation, Ramsar sites) lie within 30km of Swaffham Bulbeck Neighbourhood Area (Swaffham Bulbeck Civil Parish) (see **Map 4** for their location):

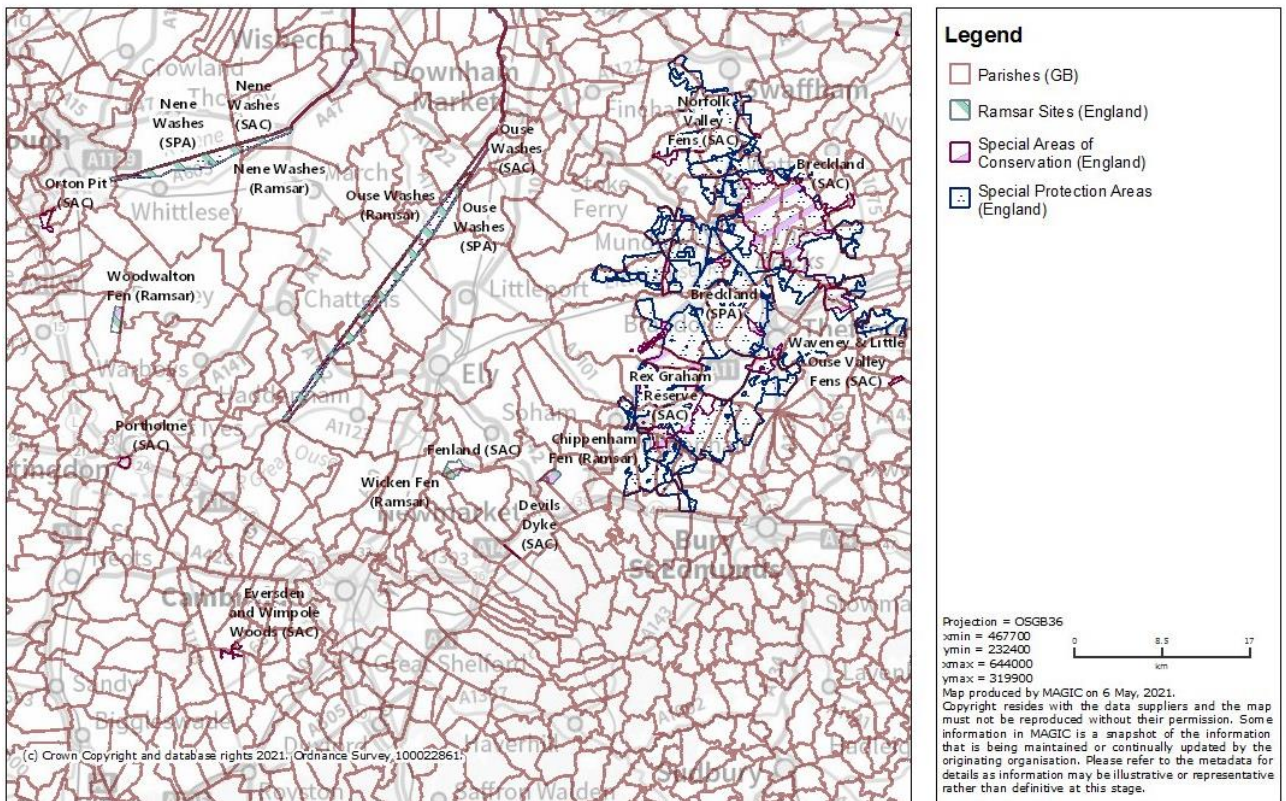
- Breckland SPA and SAC
- Devil’s Dyke SAC
- Eversden and Wimpole Woods SAC
- Fenland SAC (Chippenham Fen Ramsar)
- Fenland SAC (Wicken Fen Ramsar)
- Ouse Washes SPA, SAC and Ramsar
- Portholme SAC
- Rex Graham Reserve SAC

4.10. There are no Proposed Ramsar sites, Possible Special Areas of Conservation, or Potential Special Protection Areas in proximity of Swaffham Bulbeck Neighbourhood Area.

MAP 4: INTERNATIONALLY DESIGNATED SITES IN PROXIMITY OF SWAFFHAM BULBECK

MAGiC

Designated Sites



Habitats Regulation Assessment (June 2018)

- 4.11. East Cambridgeshire's latest Habitats Regulation Assessment report²⁴ accompanied the submitted, but now withdrawn, Local Plan. The purpose of the HRA report was to set out the method, findings and conclusions of the Habitats Regulation Assessment (Stage 1 Screening and Stage 2 Appropriate Assessment) of the now withdrawn East Cambridgeshire Local Plan. The HRA was carried out by East Cambridgeshire District Council, as the competent authority, in consultation with Natural England.
- 4.12. Despite the Local Plan having been withdrawn, this HRA continues to be considered relevant and appropriate in the context of this SEA/HRA screening assessment since it relies on more up to date evidence than the HRA which supported the Local Plan 2015, such as evidence pertaining to designated sites, the current context of recent growth, other authorities' plans and strategies, and the views of stakeholders such as the statutory environmental bodies.
- 4.13. The HRA complies with the judgement of the Court of Justice for the European Union of 12th April 2018. Through the Local Plan examination process, Natural England confirmed the HRA is legally compliant.
- 4.14. The following European sites, within and outside East Cambridgeshire's administrative boundary, were scoped into the HRA for consideration:
- Fenland SAC (including Wicken Fen, Woodwalton Fen and Chippenham Fen Ramsars)
 - Ouse Washes SAC/SPA/Ramsar
 - Devil's Dyke SAC
 - Breckland SAC/SPA
- 4.15. Other designated sites in proximity of East Cambridgeshire district were screened out at stage 1 of the Habitats Regulation Assessment.
- 4.16. The HRA was prepared to assess the effects of the now withdrawn Local Plan. The withdrawn Local Plan proposed higher growth levels than the current adopted local Plan 2015. The potential likely significant effects on designated sites arising from the withdrawn Local Plan were:
- Habitat damage and/or loss
 - Disturbance from urbanisation effects
 - Disturbance from increased recreational pressure
 - Reduced air quality as a result of increased vehicle journeys
 - Water quality changes from water consumption and abstraction
 - Reduced water quality from pollution due to increased demand for waste-water treatment
- 4.17. As previously discussed, the withdrawn Local Plan proposed three site allocations at Swaffham Bulbeck. Notably, this included the site proposed for allocation by the SBNP at "*Policy SWB8 – Cemetery/ Pony field site*". This site was assessed through the HRA as site allocation "*SWB.H1 - Land off Heath Road and Quarry Lane*". The HRA therefore remains a relevant consideration for the screening assessment of the SBNP.

24

<https://www.eastcambs.gov.uk/sites/default/files/HRA%20Appropriate%20Assessment%20Post%20Submission%20Local%20Plan%20-%20published%2015.6.18.pdf>

Fenland SAC - Wicken Fen

- 4.18. Swaffham Bulbeck Neighbourhood Area is located approximately 2.5km from Wicken Fen. The HRA identified the following pressures and threats which could arise were the now withdrawn Local Plan implemented:
- **Increased recreational pressure:** The site lies within the East Cambridgeshire area and Natural England have advised that the qualifying features of the site are under threat from increased visitor pressure. The screening assessment identified the potential for likely significant effects due to residential site allocations being within 8km of the site boundary of the Ramsar. These could be significant in-combination, i.e. total recreation pressure from multiple residential developments within and beyond the study area.
 - **Water quality:** The features of this site are sensitive to water quality changes. Water quality is important for floodplain fen, which is dependent on an adequate supply of nutrients being maintained to support aquatic habitats and the range of species associated with them.
 - **Water quantity:** The features of this site are water resource sensitive.
- 4.19. Whilst visitor pressure is a potential threat, the HRA 2018 notes that Wicken Fen is owned by the National Trust and public access is actively encouraged by the Trust, which places public access “at the very heart of the Wicken Fen Vision” to provide green space for people to escape the pressures of everyday life and have access to nature. As a National Nature Reserve, visitor access to Wicken Fen is encouraged and managed. The site is open from dawn to dusk. There is a visitor centre and shop, nature trails, hides and walking routes. The car park has recently been expanded to facilitate further visitors. The site is open to the public throughout the year, with entry to the site by permit only to help control visitor numbers.
- 4.20. Due to this ongoing management, implementation of the SBNP is therefore not likely to increase the risk of recreational pressure on Wicken Fen (Fenland SAC).
- 4.21. The HRA 2018 (p68) also rules out likely significant effects on Fenland SAC (Wicken Fen and Chippenham Fen Ramsars) as a result of increased recreational pressure from development within neighbouring local authorities.
- 4.22. Through its assessment of likely significant effects of site SWB.H1 / the SBNP’s proposed allocation site (SWB8), the HRA 2018 states:
- Wicken Fen is vulnerable to changes in water quality and quantity. Development could lead to potential effects on these key vulnerabilities in combination with other residential allocations.*
- 4.23. The HRA 2018 provides assessment of effects of the implementation of the now withdrawn Local Plan on water quality and water quantity, in combination with other plans, and in consultation with the Environment Agency and Anglian Water. The HRA 2018 (p78) concludes *...delivery of the East Cambridgeshire Local Plan will not result in adverse effects on the Ouse Washes SPA/Ramsar or Fenland SAC [inc. Wicken Fen] through excessive water abstraction, whether alone or in combination with other plans and projects.*
- 4.24. It is therefore reasonable to conclude that implementation of the SBNP, including its opportunities for growth such as the proposed site allocation, are not likely to adversely affect the *Fenland SAC - Wicken Fen*.

Fenland SAC – Chippenham Fen

- 4.25. Swaffham Bulbeck Neighbourhood Area is located around 9 km from Chippenham Fen. The HRA identified the following pressures and threats which could arise were the now withdrawn Local Plan implemented:

- **Increased recreational pressure:** This European site lies within the East Cambridgeshire area and Natural England have advised (see Appendix 6) that the qualifying features of the site are under threat from increased visitor pressure. The screening assessment identified the potential for likely significant effects due to residential site allocations being within 8km of the site boundary of the Ramsar. These could be significant in-combination, i.e. total recreation pressure from multiple residential developments within and beyond the study area.
- **Urbanisation:** An employment allocation in Fordham (FRD.E1) is less than 400m from the site boundary of Chippenham Fen. The site's features are therefore potentially exposed to increased urbanisation pressure.
- **Water quality:** The features of this site are sensitive to water quality changes, particularly high nutrient water reaching the fen from a mixture of groundwater, rainwater and run-off.
- **Water quantity:** The features of this site are water resource sensitive, with concerns water does not seep into site compartments between ditches to the extent it once did.

4.26. Through its assessment of site SWB.H1 / the SBNP's proposed allocation site (SWB8), the HRA 2018 did not identify likely effects on Chippenham Fen. Therefore, likely significant effects on the integrity of the *Fenland SAC - Chippenham Fen* are not expected to arise from implementation of the SBNP.

Fenland SAC – Woodwalton Fen

4.27. Swaffham Bulbeck Neighbourhood Area is located approximately 33km from Woodwalton Fen. Woodwalton Fen was screened in for consideration prior to Stage 1 Screening, however the screening assessment did not identify any potential impact pathways between this site and the proposals in the East Cambridgeshire Local Plan. On this basis, Woodwalton Fen was ruled out of further consideration of the HRA.

Ouse washes

- 4.28. Reach Neighbourhood Area is located approximately 14.5km from the Ouse Washes SAC/SPA/Ramsar. The HRA identified the following pressures and threats which could arise were the now withdrawn Local Plan implemented:
- **Physical damage/ loss of habitat:** Some site allocations within the Local Plan fall within the 'Goose and Swan Functional IRZ' for this site, recently prepared by Natural England. Land within this zone is considered to be potentially functionally linked to the Ouse Washes and therefore there is the potential for likely significant effects on the integrity of the European site.
 - **Increased recreational pressure:** This Natura 2000 site lies within the East Cambridgeshire area and Natural England have advised (see Appendix 6) that the qualifying features of the site are under threat from increased visitor pressure. The screening assessment identified the potential for likely significant effects due to residential site allocations in the Plan being within 8km of the site boundary of the SPA. These could be significant in-combination, i.e. total recreation pressure from multiple residential developments within and beyond the study area.
 - **Water quality:** The features of this site are sensitive to water quality changes, particularly inappropriate levels of nutrients from diffuse pollution in combination with inappropriate water levels.
 - **Water quantity:** The features of this site are water resource sensitive and are particularly vulnerable to increased flooding.

- 4.29. The HRA identifies that land beyond the boundary of the Ouse Washes may also provide important functional habitat for qualifying bird species. The HRA provides advice on development proposals on greenfield sites that fall within the Goose and Swan Functional Land IRZ to ensure there are no adverse effects on the qualifying species of the Ouse Washes. Swaffham Bulbeck Neighbourhood Area is located outside of the Goose & Swan Functional Land IRZ.
- 4.30. Through its assessment of site SWB.H1 / the SBNP's proposed allocation site (SWB8), the HRA 2018 did not identify likely effects on the Ouse Washes SAC/SPA. Therefore, likely significant effects on the integrity of the Ouse Washes SAC/SPA are not expected to arise from implementation of the SBNP.

Devil's Dyke SAC

- 4.31. The Devil's Dyke, an Anglo-Saxon earthwork runs from nearby Reach village to Woodditton. The full extent of the Devil's Dyke is over 11km long with different designations along its course. The section designated as the Devil's Dyke SAC is approximately 1.5 km from the boundary of the Swaffham Bulbeck Neighbourhood Area.
- 4.32. The HRA 2018 (p16) provides the following summary of threats and pressures to Devil's Dyke SAC, relating to habitat damage or loss and recreational pressure:
- This species rich calcareous grassland is vulnerable to vegetation succession by rank grasses and requires active management by grazing. It is also vulnerable to increased recreational pressure. Habitat degradation is occurring, particularly through trampling of vegetation and soil enrichment from dog excrement. Antisocial behaviour such as littering, fires and other activities is damaging vegetation. Dogs off leads also pose a risk to the continuance of the essential long-term management of the site through livestock grazing. The site is also potentially at risk from atmospheric nitrogen deposition, although the site improvement plan states this requires further investigation.*
- 4.33. In addition, the HRA identifies that air pollution is a key issue for the Devil's Dyke SA, since it lies within 200m of the A14 and A1304. Natural England's Site Improvement Plan (SIP) for Devil's Dyke states: "nitrogen deposition exceeds the site-relevant critical load for ecosystem protection and hence there is a risk of harmful effects, but the sensitive features are currently considered to be in favourable condition on the site. This requires further investigation".
- 4.34. According to the SIP, Devil's Dyke SAC does not support any notified species that are sensitive to changes to water quality and/or quantity and does not list this impact as a priority pressure or threat.
- 4.35. In summary, potential pressures or threats to the Devil's Dyke SAC are:
- **Increased recreational pressure:** This European site lies within the East Cambridgeshire area and Natural England have advised that the qualifying features of the site are under threat from increased visitor pressure. The screening assessment identified the potential for likely significant effects due to residential site allocations being within 8km of the site boundary of the SAC. These could be significant in-combination, i.e. total recreation pressure from multiple residential developments within and beyond the study area.
 - **Reduced air quality:** The interest features of the SAC are sensitive to atmospheric pollutants and Devil's Dyke lies within 200m of the A14 and A1304, which may be used by new residents of site allocations in the settlements of: Bottisham, Burrough Green/ Burrough End, Dullingham, Swaffham Bulbeck, Swaffham Prior to access services and facilities in Newmarket. There is therefore potential for likely significant effects.

- 4.36. Through its assessment of site SWB.H1 / the SBNP's proposed allocation site (SWB8), the HRA 2018 identifies the following potential threats from development of the site to the Devil's Dyke SAC:

There is potential for increased disturbance from recreational pressure on Devil's Dyke and Wicken Fen in combination with other residential allocations and in-combination with housing development in neighbouring districts of Forest Heath and South Cambridgeshire.

There is potential for this site to contribute to reduced air quality through traffic movements past Devil's Dyke SAC in combination.

- 4.37. The HRA 2018 ruled out likely significant effects as a result of increased recreational pressure from implementation of the now withdrawn Local Plan, which included the SBNP's proposed site allocation, and development within neighbouring local authorities.
- 4.38. The HRA 2018 considered the effects on air quality from increased traffic movements of site SWB.H1 / SBNP site allocation SWB8, and other proposed sites in proximity of the Devil's Dyke SAC. The HRA 2018 concluded that the relatively small-scale nature of these developments means that there is unlikely to be a significant increase in vehicle traffic.
- 4.39. Therefore, likely significant effects on the integrity of the Devil's Dyke SAC are not expected to arise from implementation of the SBNP.

Breckland SAC/SPA

- 4.40. Swaffham Bulbeck Neighbourhood Area is located approximately 14km from Breckland SAC/SPA. The HRA identified the following potential pressures and threats which could arise were the now withdrawn Local Plan implemented:
- **Physical damage/ loss of habitat:** Site allocation KEN.M1 within the Local Plan falls within the IRZ for Breckland Farmland SSSI, a component of Breckland SPA. Land within this zone is considered to be potentially functionally linked to Breckland and therefore there is the potential for likely significant effects on the integrity of the European site.
 - **Increased recreational pressure:** Whilst the site is outside of the East Cambridgeshire area, a mixed-use site allocation at Kennett (KEN.M1) is approximately 2km from Breckland Farmland SSSI, a component of Breckland SPA and falls within the IRZ for this SSSI. The Breckland Farm SSSI has interest features that are potentially sensitive to increased recreational pressure. The screening assessment identified the potential for likely significant effects due to residential site allocations in the Plan being within 8km of the site boundary of the SPA. These could be significant in-combination, i.e. total recreation pressure from multiple residential developments within and beyond the study area.
 - **Urbanisation:** Whilst urbanisation is recognised in the SIP for Breckland SPA/SAC as a priority issue, there is no development proposed in the Local Plan within 400m of the site boundary. The Local Plan will therefore have no effect via this pathway.
- 4.41. Through its assessment of site SWB.H1 / the SBNP's proposed allocation site (SWB8), the HRA 2018 did not identify likely effects on Breckland SPA/SAC. Therefore, likely significant effects on the integrity of the Breckland SPA/SAC are not expected to arise from implementation of the SBNP.

Potential for likely significant effects on internationally designated sites (SEA & HRA)

- 4.42. In assessing the potential for and likelihood of effects on internationally designated sites (i.e. SACs, SPAs, Ramsars), this environmental report draws information from the East Cambridgeshire Habitats Regulation Assessment 2018, since the document remains relevant for planning purposes – with Natural England having confirmed the HRA followed accepted methodology, was in line with relevant legislation and guidance, and agreed with the

conclusion of the HRA²⁵. In addition, the withdrawn Local Plan applied a similar growth strategy to the SBNP, therefore the HRA 2018 provides assessment of proposed SBNP site allocation SWB8 – Cemetery / Pony Field Site²⁶.

- 4.43. National planning policy states that evidence should be proportionate, and should not repeat policy assessment already undertaken. To take an alternative approach, such as preparing evidence bespoke to the SBNP, would be disproportionate and result in unnecessary duplication. This would be contrary to national planning policy.
- 4.44. The preceding paragraphs in this section discuss the vulnerabilities of designated sites, and reviews the findings of the HRA 2018. **No likely significant effects on internationally designated sites (European sites) are expected to arise from implementation of the SBNP, either alone or in combination.**
- 4.45. The consequence of this is that **the SBNP is ‘screened out’ for the purposes of Habitats Regulation Assessment i.e. a full HRA is not required.**
- 4.46. The SBNP is likely to support the integrity of designated sites through its modest opportunities for growth, and a range of policy measures which could contribute to conserving water resources, improving air quality, and reducing recreational pressure, for example see policies:
- SWB 1 – Swaffham Bulbeck development envelope
 - SWB 5 – Swaffham Bulbeck local green spaces
 - SWB 12 – Delivering sustainable design
 - SWB 13 – Electric vehicle charging points
 - SWB 14 – Protecting and improving walking and cycling connectivity in our parish
 - SWB 16 – Development proposals and biodiversity

Sites of Special Scientific Interest (SSSI)

- 4.47. The Newmarket Heath SSSI adjoins the eastern boundary of the SBNP area, toward the south of the Neighbourhood Area. As indicated in table 3, the following SSSIs are located within 8km of the Swaffham Bulbeck Neighbourhood Area:
- Cam Washes SSSI
 - Devil's Dyke SSSI
 - Fleam Dyke SSSI
 - Fulbourn Fen SSSI
 - Great Wilbraham Common SSSI
 - Newmarket Heath SSSI
 - Out and Plunder Woods SSSI
 - Park Wood SSSI
 - Snailwell Meadows SSSI
 - Stow-cum-Quy Fen SSSI
 - Ten Wood SSSI
 - Upware Bridge Pit North SSSI
 - Upware North Pit SSSI
 - Upware South Pit SSSI
 - Wicken Fen SSSI

²⁵ Appendix 7, HRA 2018:

<https://www.eastcambs.gov.uk/sites/default/files/HRA%20Appropriate%20Assessment%20Post%20Submission%20Local%20Plan%20-%20published%2015.6.18.pdf>

²⁶ As SWB.H1 – Land off Heath Road and Quarry Lane

- Wilbraham Fens SSSI

- 4.48. SSSIs are outside the scope of the HRA 2018, which covers European sites only²⁷. Effects on SSSIs have been considered through Sustainability Appraisal of the *East Cambridgeshire Local Plan 2015*. However, the SBNP proposes a higher level of growth than the Local Plan 2015, notably through the inclusion of a proposed site allocation for 45 dwellings.
- 4.49. Table 4 shows that SSSIs provide a range of different habitat types, and are in a range of differing conditions.

TABLE 4: SUMMARY OF SSSIs

SSSI	Summary of features and condition (Source: Natural England)²⁸
Cam Washes SSSI	Unit: 001 Habitat: Fen, Marsh and Swamp - Lowland Area: 62.6 ha Condition: Favourable Unit: 002 Habitat: Fen, Marsh and Swamp - Lowland Area: 43.56 ha Condition: Unfavourable - No Change Unit: 003 Habitat: Fen, Marsh and Swamp - Lowland Area: 60.36 ha Condition: Favourable
Devil's Dyke SSSI	Unit: 001 Habitat: Broadleaved, Mixed and Yew Woodland - Lowland Area: 11.47 ha Condition: Favourable Unit: 002 Habitat: Calcareous Grassland - Lowland Area: 5.75 ha Condition: Unfavourable - Recovering Unit: 003 Habitat: Calcareous Grassland - Lowland Area: 8.25 ha Condition: Favourable Unit: 004 Habitat: Calcareous Grassland - Lowland Area: 3.57 ha Condition: Unfavourable - Recovering Unit: 005 Habitat: Calcareous Grassland - Lowland Area: 6.09 ha Condition: Unfavourable - Recovering Unit: 006 Habitat: Calcareous Grassland - Lowland Area: 2.31 ha Condition: Unfavourable - Recovering Unit: 007 Habitat: Calcareous Grassland - Lowland Area: 2.34 ha Condition: Unfavourable - Recovering
Fleam Dyke SSSI	Unit: 001 Habitat: Calcareous Grassland - Lowland Area: 5.18 Ha Condition: Unfavourable - Recovering Unit: 002 Habitat: Calcareous Grassland - Lowland Area: 3.99 Ha Condition: Unfavourable - Recovering Unit: 003 Habitat: Calcareous Grassland - Lowland Area: 2.59 Ha Condition: Unfavourable - No Change
Fulbourn Fen SSSI	Unit: 001 Habitat: Broadleaved, Mixed and Yew Woodland - Lowland Area: 15.85 Ha Condition: Unfavourable - Recovering Unit: 002 Habitat: Neutral Grassland - Lowland Area: 6.27 Ha Condition: Favourable Unit: 003 Habitat: Neutral Grassland - Lowland Area: 5.22 Ha Condition: Unfavourable - Recovering
Great Wilbraham	Unit: 001 Habitat: Neutral Grassland - Lowland Area: 23.51 Ha Condition: Favourable

²⁷ Except where the SPA/SAC/Ramsar was also designated as a SSSI.

²⁸ <https://designatedsites.naturalengland.org.uk/SiteSearch.aspx>

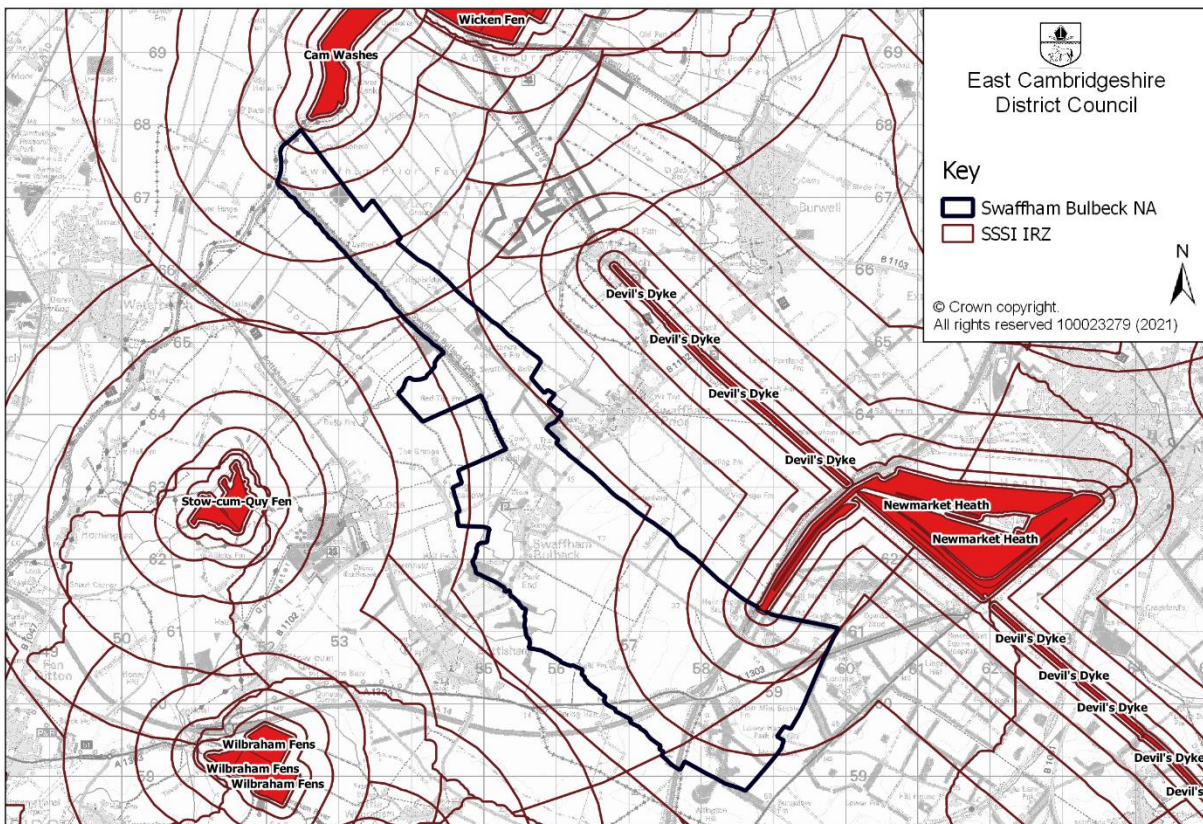
Common SSSI	
Newmarket Heath SSSI	Unit: 001 Habitat: Calcareous Grassland - Lowland Area: 244.26 Ha Condition: Favourable Unit: 002 Habitat: Calcareous Grassland - Lowland Area: 35.04 Ha Condition: Unfavourable - Recovering
Out and Plunder Woods SSSI	Unit: 001 Habitat: Broadleaved, Mixed and Yew Woodland - Lowland Area: 9.49 Ha Condition: Unfavourable - Declining Unit: 002 Habitat: Broadleaved, Mixed and Yew Woodland - Lowland Area: 29.07 Ha Condition: Unfavourable - Declining
Park Wood SSSI	Unit: 001 Habitat: Broadleaved, Mixed and Yew Woodland - Lowland Area: 8.06 Ha Condition: Favourable
Snailwell Meadows SSSI	Unit: 001 Habitat: Neutral Grassland - Lowland Area: 14.82 Ha Condition: Unfavourable - Recovering
Stow-cum-Quy Fen SSSI	Unit: 001 Habitat: Neutral Grassland - Lowland Area: 11.11 Ha Condition: Unfavourable - Recovering Unit: 002 Habitat: Neutral Grassland - Lowland Area: 18.27 Ha Condition: Unfavourable - Recovering Unit: 003 Habitat: Standing Open Water and Canals Area: 0.47 Ha Condition: Unfavourable - Recovering
Ten Wood SSSI	Unit: 001 Habitat: Broadleaved, Mixed and Yew Woodland - Lowland Area: 17.71 Ha Condition: Favourable
Upware Bridge Pit North SSSI	Unit: 001 Habitat: Standing Open Water and Canals Area: 1.08 Ha Condition: Unfavourable - Recovering
Upware North Pit SSSI	Unit: 001 Habitat: Standing Open Water and Canals Area: 1.08 Ha Condition: Unfavourable - Recovering
Upware South Pit SSSI	Unit: 001 Habitat: Earth Heritage Area: 0.43 Ha Condition: Favourable Unit: 001 Habitat: Earth Heritage Area: 0.43 Ha Condition: Favourable
Wicken Fen SSSI	Unit: 001 Habitat: Fen, Marsh and Swamp - Lowland Area: 66.28 Ha Condition: Unfavourable - Recovering Unit: 002 Habitat: Fen, Marsh and Swamp - Lowland Area: 68.68 Ha Condition: Unfavourable - Recovering Unit: 003 Habitat: Fen, Marsh and Swamp - Lowland Area: 27.39 Ha Condition: Favourable Unit: 004 Habitat: Fen, Marsh and Swamp - Lowland Area: 86.87 Ha Condition: Favourable Unit: 005 Habitat: Standing Open Water and Canals Area: 5.26 Ha Condition: Favourable
Wilbraham Fens SSSI	Unit: 001 Habitat: Fen, Marsh and Swamp - Lowland Area: 6.97 Ha Condition: Unfavourable - Declining Unit: 002 Habitat: Fen, Marsh and Swamp - Lowland Area: 18.24 Ha Condition: Favourable

Unit: 003 Habitat: Neutral Grassland - Lowland Area: 21.01 Ha Condition: Unfavourable - Recovering
Unit: 004 Habitat: Neutral Grassland - Lowland Area: 15.77 Ha Condition: Unfavourable - Recovering

SSSI Impact Risk Zones

- 4.50. SSSI Impact Risk Zones (IRZs) are a GIS tool developed by Natural England to make a rapid initial assessment of the potential risks to SSSIs posed by development proposals. They define zones around each SSSI which reflect the particular sensitivities of the features for which it is notified and indicate the types of development proposal which could potentially have adverse impacts.
- 4.51. There are several SSSI Impact Risk Zones (IRZs) that extend into the Swaffham Bulbeck Neighbourhood Area (see **Map 5**), including the IRZ relating to the Devil's Dyke SSSI, Newmarket Heath SSSI, Cam Washes SSSI and Stow-cum-Quy Fen SSSI. All parts of the Neighbourhood Area are located within an IRZ.
- 4.52. The IRZs identify that any new housing developments will, at the planning application stage, require an assessment of recreational pressure on relevant SSSIs and measures to mitigate adverse impacts e.g. alternative open space provision.

MAP 5: SSSIs & IRZs IN PROXIMITY OF SWAFFHAM BULBECK



- 4.53. The amount of growth proposed by the SBNP is relatively modest, but exceeds that identified by the Local Plan as a result of proposed site allocation SWB8. Other opportunities for growth (such as within the Development Envelope, and countryside “exception” developments, etc.) are already supported by the Local Plan.
- 4.54. Since there are no SSSIs within the Neighbourhood Area²⁹, SSSIs are unlikely to be directly affected by urbanising effects of new development. However, there remains potential for significant effects to arise from development proposed by the SBNP, such as from recreational pressure or air quality impacts. This is confirmed by the presence of a number of SSSI Impact Risk Zones which intersect the Neighbourhood Area.
- 4.55. Whilst there is a degree of overlap with sites considered by the the HRA 2018, the HRA did not specifically address the effects on SSSIs since its purpose is to identify effects in relation to European Sites.
- 4.56. Outline planning application 19/00746/OUM (*Land Parcel West Of Hill Cottage. Heath Road*) is at time of writing pending determination. The proposed development is located on the draft allocation site and the proposal is broadly aligned with draft Policy SWB8. A preliminary assessment of ecological impacts which accompanies the planning application concludes that the effects of the development proposal on ‘statutory sites’ are likely ‘negligible by virtue of distance’³⁰.
- 4.57. Natural England were consulted as part of the planning application process. On 14 June 2019, Natural England provided comments in respect of planning application 19/00746/OUM³¹:

...

Devil’s Dyke Site of Special Scientific Interest (SSSI)

Residential development in this location triggers Natural England’s Recreational Pressure Impact Risk Zone (IRZ) for Cambridgeshire SSSIs, notably Devil’s Dyke Site of Special Scientific Interest (SSSI). Natural England will shortly issue guidance to LPAs on this recently established IRZ and the requirement for relevant planning applications to consider recreational pressure impacts. Whilst the Preliminary Ecological Appraisal (Basecology, April 2019) for this application has not assessed recreational pressure impacts we are satisfied that the proposed provision of 1.8ha informal open space will provide adequate quantity of alternative open space, for the scale of development proposed, to minimise adverse impacts to Devil’s Dyke SSSI. Natural England therefore has no objection to the application. We advise you authority to secure through planning conditions the implementation of proposed informal open space provision, designed to a high quality incorporating semi-natural habitats and circular dog-walk(s) to deliver benefits for people and wildlife.

...

Excerpt from Natural England comments 14 June 2019, planning application 19/00746/OUM

- 4.58. Natural England’s comments indicate that the proposed development has the potential to increase recreational pressure on the Devil’s Dyke SSSI. However, this risk is mitigated by the

²⁹ The Newmarket Heath SSSI ‘touches’ the boundary of the Neighbourhood Area and is distant from Swaffham Bulbeck village.

³⁰ https://pa.eastcambs.gov.uk/online-applications/files/D9F2F60EA2A51E81CB22E6D98FC36E50/pdf/19_00746_OUM-Additional_Information-994415.pdf

³¹ https://pa.eastcambs.gov.uk/online-applications/files/54587E8D55422A1EAB1DCF501B091027/pdf/19_00746_OUM-Consultee_Response-1000348.pdf

proposed inclusion of 1.8ha of informal open space as part of the development scheme. No other concerns were raised in respect of potential effects on SSSIs.

- 4.59. By implication, if 1.8ha of informal open space were not provided, the proposed development could lead to harm to the Devil's Dyke SSSI as a result of recreational pressure.
- 4.60. SBNP policy SWB8, along with the accompanying Concept Plan and supporting text, make clear that the provision of open space forms an important part of the development scheme.
- 4.61. The supporting text notes the contribution the proposed allocation site, which is currently an open area of land, makes to the setting of the village. The Settlement Fringe Sensitivity Study undertaken to support the work of the neighbourhood plan concluded that this area of land has some capacity for development and incorporated a landscape strategy for the site, and is illustrated on the Concept Plan.
- 4.62. Policy SWB8 requires new development to contribute positively to the existing landscape and built environment character by adhering to certain design principles. This includes retaining a flow of open space and long views through the land parcel, providing a green corridor through the site, and the retention of distinct development clusters. The Concept Plan, which accompanies the policy, provides an indicative site layout, which clearly shows a large portion of the site area as open space.
- 4.63. Whilst the policy recognises the importance of open space, it does not identify the role of informal open space in mitigating effects of growth on sensitive SSSIs. Nor does the policy quantify the overall amount of informal open space required to mitigate such impacts.
- 4.64. During consultation on the SEA Scoping Report, Natural England re-affirmed the need for the provision of 1.8ha of informal open space, identifying it as a potential policy requirement:
In order to screen out significant effects to nearby sensitive SSSIs, such as Devil's Dyke, our advice is that SBNP Policy SWB8 should include a commitment for the proposed development to deliver 1.8ha informal open space provision, or appropriate alternative mitigation.
- 4.65. **Due to the potential for development proposed by SBNP Policy SWB8 to lead to significant effects on sensitive SSSIs as a result of increased recreational pressure, the SBNP should be 'screened in' for the purposes of SEA.**

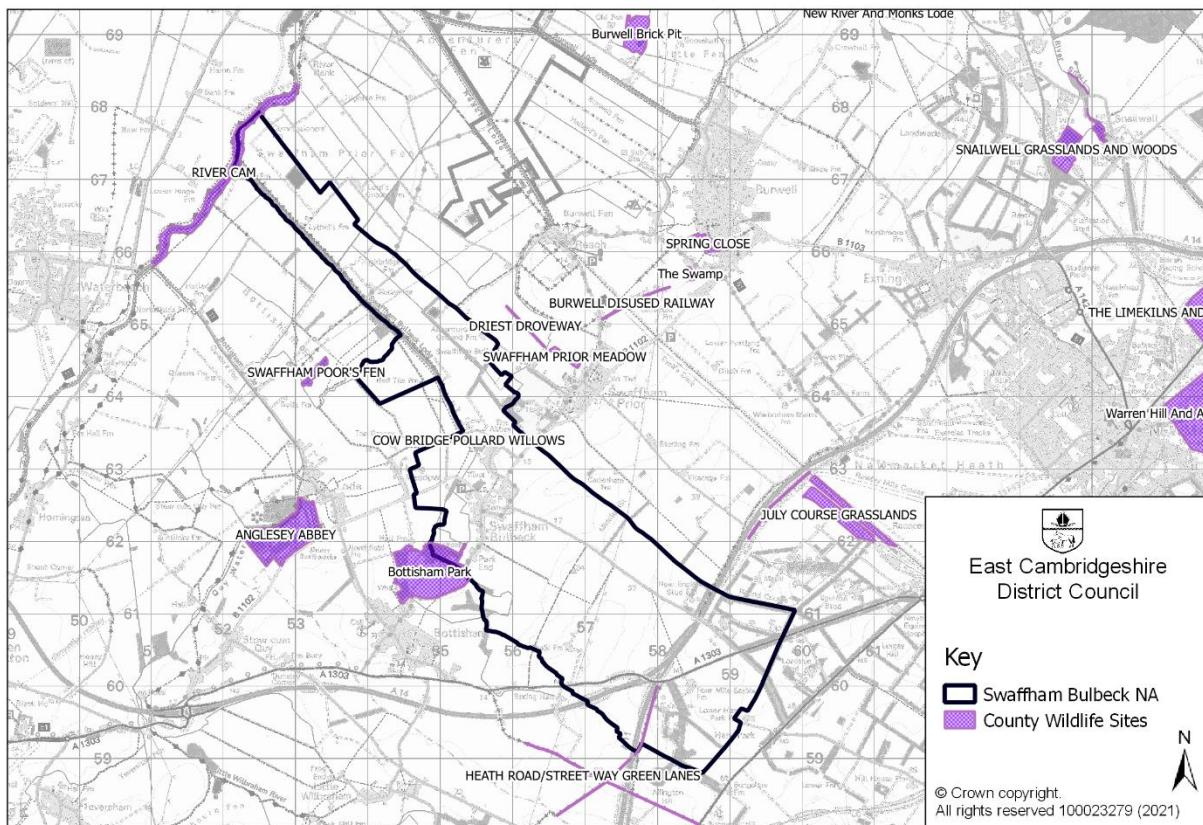
National Nature Reserves

- 4.66. As indicated in Table 2, there are no national Nature Reserves (NNR) in the Neighbourhood Area. Wicken Fen NNR is located approximately 2.5km from the Swaffham Bulbeck Neighbourhood Area.
- 4.67. The Wicken Fen NNR is broadly aligned with the *Fenland SAC – Wicken Fen* designation. As previously discussed, the HRA 2018 identifies potential threats from recreational pressure, water quality and water quality. However, as previously discussed, **significant effects on Wicken Fen following implementation of the SBNP are not likely.**

Locally Designated Sites

- 4.68. There are no Local Nature Reserves within the SBNP area or a 400m buffer (see Table 2).
- 4.69. There are 4 County Wildlife Sites within the boundary of the SBNP area or 400m buffer (see **Map 6**) –
- River Cam CWS (intersects northern boundary of Neighbourhood Area)
 - Cow Bridge Pollard Willows CWS
 - Bottisham Park CWS (intersects western boundary of Neighbourhood Area)
 - Heath Road / Street Way Green Lanes (intersects south of Neighbourhood Area)

MAP 6: COUNTY WILDLIFE SITES IN CLOSE PROXIMITY OF SWAFFHAM BULBECK



- 4.70. New development poses a potential threat to CWSs, may be vulnerable to impacts of urbanisation, (for example fly tipping, vandalism, litter, increased risk of fire and cat predation), and increased recreational pressure (with potential impacts such as trampling, eutrophication (dog fouling) and habitat damage).
- 4.71. The SBNP does not propose growth in immediate proximity of a CWS. However, Cow Bridge Pollard Meadow CWS is around 300m from proposed allocation SWB8.
- 4.72. Data on the sensitivities and vulnerabilities of specific CWSs is not directly available at the time of preparing this environmental report. However, the preliminary assessment of ecological impacts which accompanies outline planning application 19/00746/OUM concludes that the effects of the development proposal on County Wildlife Sites are likely 'negligible by virtue of distance'³².
- 4.73. *The Wildlife Trust for Bedfordshire, Cambridgeshire & Northamptonshire* provided comments in respect of planning application 19/00746/OUM³³ and indicates it is unlikely there would be direct ecological impacts on County Wildlife Sites from the proposed development.
- 4.74. Whilst the *Wildlife Trust's* comments were supplied in the context of a planning application, they are considered relevant to the assessment of likely significant effects in respect of the

³² https://pa.eastcambs.gov.uk/online-applications/files/D9F2F60EA2A51E81CB22E6D98FC36E50/pdf/19_00746_OUM-Additional_Information-994415.pdf

³³ https://pa.eastcambs.gov.uk/online-applications/files/D68CF82A5834BE2A757FBAE2193B8596/pdf/19_00746_OUM-Consultee_Response-1002564.pdf

SBNP's proposed site allocation SWB8. **As such, it is reasonable to 'screen out' likely significant effects on County Wildlife Sites.**

- 4.75. To do otherwise (i.e. screen in and undertake a full SEA) would result in duplication of work carried out through the planning application process. In addition, due to the similarities between the policy and planning application, it would be illogical to come to any different conclusion regarding potential effects on County Wildlife Sites.

SBNP Draft policies

- 4.76. The SBNP seeks to conserve and enhance biodiversity, as evident through Objective 3:

Objective 3 Sustainability

Encourage a thriving village which retains a diverse range of age groups within a community which promotes sustainability by

...

m) Conservation initiatives and the active promotion of new biodiversity schemes to enhance the parish's natural habitat, for example by tree planting, restoring hedgerows, protecting peatlands, and encouraging wildflower areas.

- 4.77. There are a number of policies in the SBNP that seek to protect and enhance biodiversity. *Policy SWB1 – Swaffham Bulbeck Development Envelope* updates the Development Envelope thereby concentrating development within Swaffham Bulbeck village only, and strictly limiting growth in the surrounding countryside. The Development Envelope therefore plays an important role in managing development within the Neighbourhood Area, directing development to the existing built area, and away from habitats and natural features.
- 4.78. *Policy SWB 3 – Swaffham Bulbeck parish-wide landscape character* includes measures principally to conserve the area's landscapes. However, such measures may be beneficial to biodiversity, flora and fauna – namely, requirements to maintain and manage tree cover and hedges, waterways and ponds; incorporate tree planting; reinstate and reinforce landscape structure including field boundary hedges with trees, roadside tree planting and strip woodlands/shelter belt, and replace arable land use with species rich grassland and/or improving biodiversity in roadside verges; and maintain and reinforce woodland, trees and hedges to retain the wooded character to the village edge, etc., with the precise requirements differing between character areas.
- 4.79. *Policy SWB 5 – Swaffham Bulbeck local green spaces* designates 11 green areas for protection from development, many of which may be of biodiversity value and provide opportunities for informal and formal recreation, thereby reducing recreational pressure on important habitats.
- 4.80. *Policy SWB15 – Development proposals and biodiversity* requires all development proposals to contribute to and enhance the natural and local environment by firstly avoiding impacts, and where avoidance isn't possible minimising impacts on biodiversity and providing measurable net gains for biodiversity. In the absence of a nationally mandated mechanism to secure 'net gains', the policy sets a series of policy requirements to ensure the post-development biodiversity value of the onsite habitat will significantly exceed its pre-development biodiversity value.
- 4.81. *Policy SWB 12 – Delivering sustainable design* could provide indirect benefits to biodiversity by reducing the environmental effects of new development, requiring proposals to be sustainably designed and reduce emissions and improve energy and water efficiency. Similarly, other policies reduce emissions and impacts of travel on air quality by supporting a transition to electric vehicles (*Policy SWB13 – Electric vehicle charging points*) and encouraging walking

and cycling (*Policy SWB14 – Protecting and improving walking and cycling connectivity in our parish*).

- 4.82. in addition, the SBNP includes policies which create opportunities for additional development. *Policy SWB 7 – Community-led development* supports proposals for small scale community-led residential development schemes, including affordable housing schemes, on the edge of the development envelope. The policy provides a local interpretation of, and is aligned with, Local Plan policy *GROWTH 6: Community-led development*. Whilst the policy provides opportunities for development outside the Development Envelope, the policy includes measures to ensure development does not result in harm to character and landscape. To complement policy SB 7, the SBNP identifies a site allocation for a community-led residential development scheme providing approximately 45 dwellings through *Policy SWB8 – Cemetery/ Pony field site*.
- 4.83. The SBNP includes a range of policy measures to conserve and enhance biodiversity, flora and fauna, whilst also creating opportunities for additional growth beyond those identified in the adopted Local Plan through site allocation SWB8. For the purposes of SEA, such policies are not expected to give rise to likely significant effects.
- 4.84. Therefore, following consideration of the SBNP's policies against a range of ecological constraints, it is considered that **no likely significant effects on biodiversity, flora and fauna are expected to arise from implementation of the SBNP.**
- 4.85. The HRA 2018 tested higher levels of growth than the current adopted Local Plan, and included assessment of the SBNP's proposed site allocation *Cemetery/Pony field site* (Policy SWB8). Applying the HRA's findings to the SBNP, it is reasonable to conclude that **no likely significant effects on internationally designated sites (European sites) are expected to arise from implementation of the SBNP, either alone or in combination. As such, a full Habitats Regulation is not required. The SBNP is screened out for HRA purposes.**

Population

- 4.86. The Census 2011 indicates there were 826 residents in the parish at 2011. Estimates from the Office for National Statistics indicate that the parish population in mid-2018 was 922; or a population density of 0.5 persons per ha.
- 4.87. The Census 2011 data shows there were 369 households in Swaffham Bulbeck parish at 2011, of which 57.5% were owned outright or owned with a mortgage or loan. At the time of the Census 2011, Swaffham Bulbeck had an average household size of 2.24 people per household. This is lower than the East Cambridgeshire average of 2.34 people per household.
- 4.88. The mean age of the population living in the parish of Swaffham Bulbeck at the time of the Census 2011 was 43.9 years. This is higher than the national average of 39.3 years and the average for East Cambridgeshire of 40.2 years. There were 192 residents aged 65 and over living within the SBNP area.
- 4.89. 16.3% of all households in Swaffham Bulbeck at the time of the Census 2011 had no cars or vans in the household. This is higher than the figure for East Cambridgeshire (13.0%), but lower than the figure for England (25.8%).
- 4.90. *Policy SWB 6 – Swaffham Bulbeck housing mix* seeks to ensure residential development proposals include a housing mix in terms of size and tenure that reflects the existing and future needs of the parish. This means including a significant proportion of two- or three-bedroom properties and affordable homes suitable for young families or older people. The policy requires new homes to be built to the accessible and adaptable M4(2) optional technical Building Regulations standard. Similarly, *Policy SWB12 – Delivering Sustainable Design* seeks to minimise energy demand and maximise energy efficiency, which could reduce fuel bills and play a role in alleviating fuel poverty.
- 4.91. *Policy SWB 7 – Community-led development* and *Policy SWB8 – Cemetery/ Pony field site* create additional opportunities for the development of homes which meet local needs, including through the allocation of the Cemetery/Pony field site.
- 4.92. The SBNP includes policies which are likely to contribute to meeting the housing needs of the population by creating some additional opportunities for the development of homes, and ensuring homes meet higher standards. Overall, the policies are fairly limited in their scale and scope and **are not likely to have significant effects on the population.**

Human health

- 4.93. In terms of the health of the population living within the SBNP, at the time of the Census 2011, 45.8% of the population of Swaffham Bulbeck described their health as 'very good' and 36.7% as 'good'³⁴.
- 4.94. Whilst the SBNP includes no specific objective addressing human health, objective 3, 'Sustainability', aims to create "enhanced cycling and walking routes".
- 4.95. *Policy SWB14 – Protecting and improving walking and cycling connectivity in our parish* expects development proposals to maintain or enhance the provision and quality of the walking and cycling network and infrastructure in the parish and requires good permeability through housing areas and to key services. Such measures could encourage healthy lifestyles. Similarly, *Policy SWB 5 – Swaffham Bulbeck local green spaces* designates 11 green areas for protection from development, many of which provide opportunities for informal and formal recreation. In addition, *Policy SWB 11 – Swaffham Bulbeck community infrastructure priorities* seeks investment in specific pedestrian and cycle infrastructure projects.

³⁴ <http://www.nomisweb.co.uk/reports/localarea?compare=E04001645>

- 4.96. The SBNP includes policies which are likely to provide some positive enhancement to human health. Through implementation of the SBNP, **no likely significant effects are expected to arise in respect of human health.**

Soil

- 4.97. The Soilscape (England) dataset is based on the National Soil Map of England and Wales (NATMAPvector)³⁵. The soil map shows a variety of soil types in the parish, as illustrated on **Map 4**. From north to south, the SBNP area includes the following soil types:

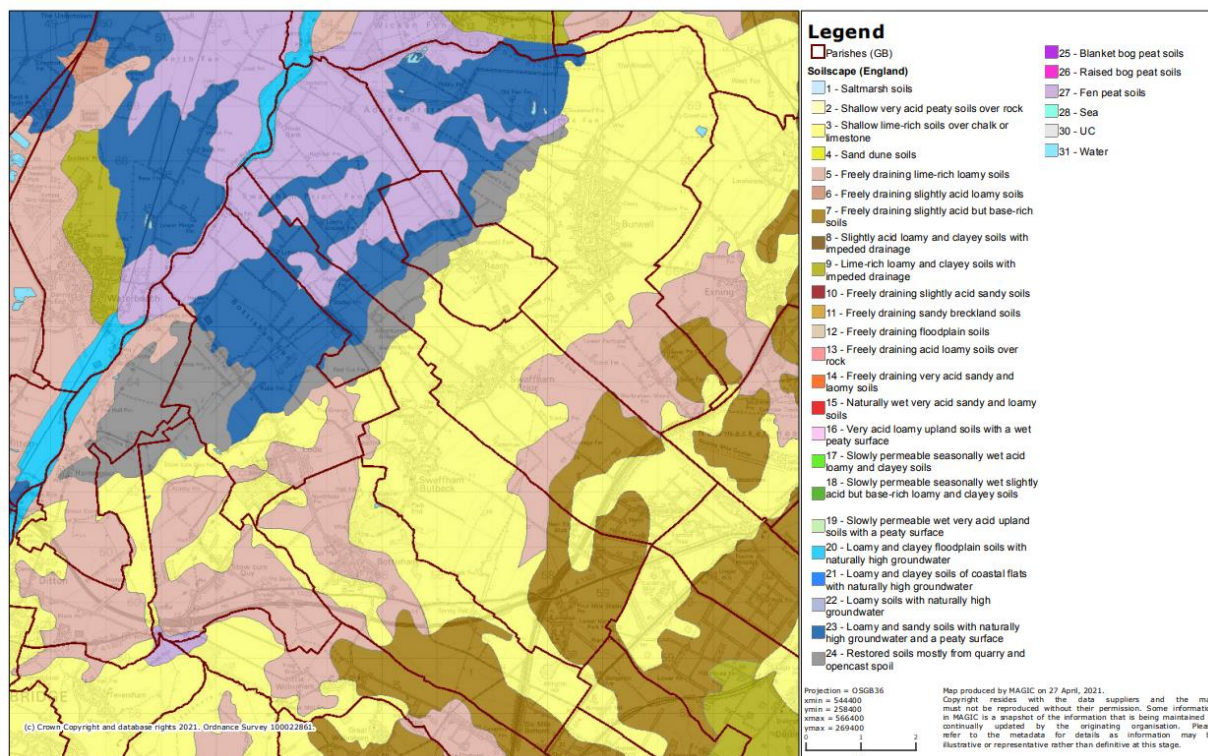
- Fen peat soils
- Loamy and sandy soils with naturally high groundwater and a peaty surface
- Restored soils mostly from quarry and opencast spoil
- Shallow lime-rich soils over chalk or limestone
- Freely draining lime-rich loamy soils
- Freely draining slightly acid but base-rich soils

- 4.98. The variety and location of the various soil types reflects the SBNP area changes in landscape character, as it transitions from fenland in the north to East Anglian Chalk in the south.

MAP 7: SOIL TYPES IN SWAFFHAM BULBECK

MAGiC

Soil Types - Swaffham Bulbeck



- 4.99. The SBNP recognises how soils have shaped the parish

“...variation in soils and terrain had a strong impact on historical land management and is responsible for the patterns in the landscape today...”

³⁵ <https://magic.defra.gov.uk/MagicMap.aspx>

- 4.100. The protection of peat soils is also an important sustainability issue, since peatlands form a natural carbon store. Peat soils are located in the north of the parish, remote from the main built area of Swaffham Bulbeck, and are designated as “countryside” by the SBNP with very limited opportunities for development.
- 4.101. The national *Agricultural Land Classification* dataset³⁶ shows that the Neighbourhood Area consists of the following grades of agricultural land:
- 12% - Grade 1 (excellent quality agricultural land with no or very minor limitations);
 - 50% - Grade 2 (very good quality agricultural land with minor limitations which affect crop yield, cultivations or harvesting);
 - 38% - Grade 3 (good quality agricultural land with moderate limitations / moderate quality agricultural land with strong limitations).
- 4.102. The best and most versatile land is defined as Grades 1, 2 and 3a. The ALC data does not distinguish between grades 3a and 3b (instead simply referring to Grade 3). More detailed assessment would be required to identify subgrades 3a and 3b.
- 4.103. Grade 1 land is located toward the north of the parish, corresponding with the location of peat and fen soils. However, since all land falls within Grades 1 to 3, it is reasonable to assume that all undeveloped land in the parish constitutes ‘best and most versatile agricultural land’.
- 4.104. The proposed site allocation (*Policy SWB8*) adjoins the built area of the village, is located on Grade 3 agricultural land and does not affect peat soil resources. Since there are no areas of poor-quality agricultural land or significant brownfield or urban sites available for redevelopment within the SBNP area, there are no sequentially preferable sites within the Neighbourhood Area. Therefore, soil type and agricultural land data is not significant in identifying ‘reasonable alternatives’ for potential allocations.
- 4.105. Through limiting development in the open countryside, the SBNP is likely to play a positive contribution in protecting best and most versatile agricultural land and peat soils but, **in the context of soil, no likely significant effects are expected to arise through implementation of the SBNP.**

Water

- 4.106. In terms of the water environment, the SBNP area falls within the Environment Agency’s Cam and Ely Ouse Management Catchment³⁷.
- 4.107. The Swaffham-Bulbeck Lode runs broadly north-south through the parish and to the west of Swaffham Bulbeck village. Swaffham-Bulbeck Lode flows downstream to the River Cam. Swaffham-Bulbeck Lode is monitored by the Environment Agency for its chemical and ecological status and is currently classified as ‘moderate’ (base date 2019).
- 4.108. According to the Environment Agency’s Flood Risk Map³⁸ (see **Map 5**), there are areas of fluvial flood risk (i.e. flood risk zones 2 and 3) within the SBNP area. These areas are largely located in proximity of the course of the Swaffham-Bulbeck Lode, and to the north of the village reflecting the low-lying fen topography in those areas of the parish. Higher land principally in the south of the parish, and within the East Anglian Chalk NCA, is predominantly in Flood Zone

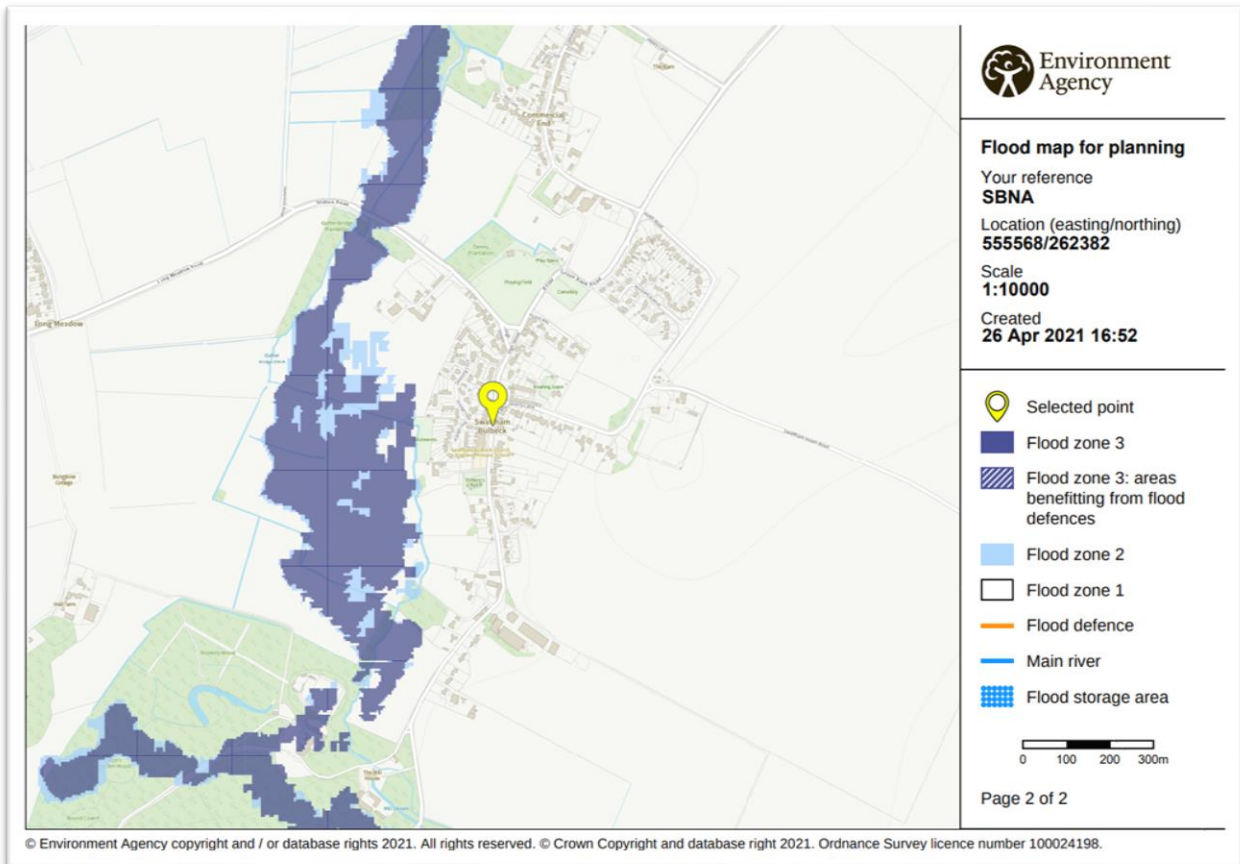
³⁶ <https://data.gov.uk/dataset/952421ec-da63-4569-817d-4d6399df40a1/provisional-agricultural-land-classification-alc>

³⁷ <https://environment.data.gov.uk/catchment-planning/ManagementCatchment/3009>

³⁸ <https://flood-map-for-planning.service.gov.uk/>

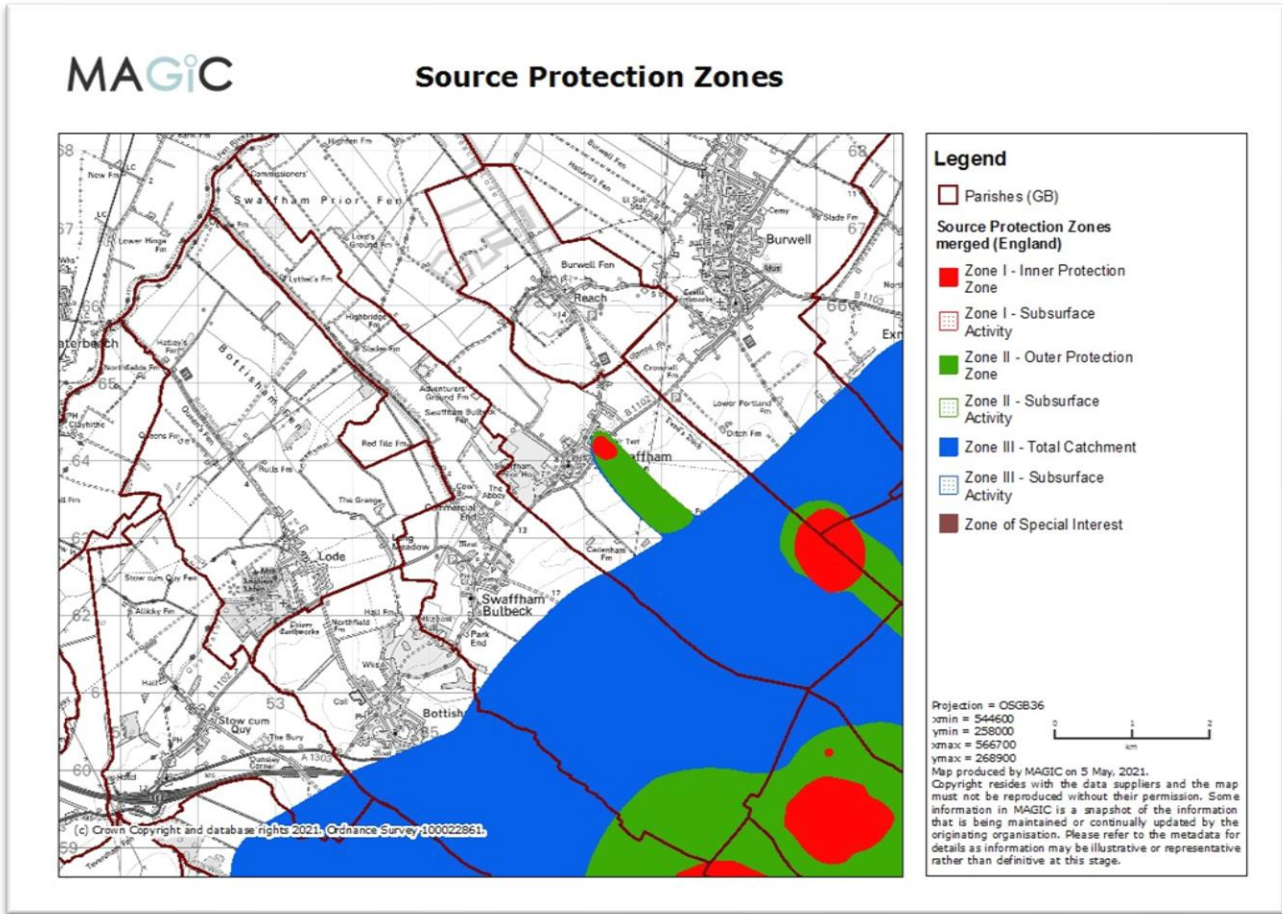
1. Approximately 18% of the Neighbourhood Area is located in Flood Zone 3. The majority of the Neighbourhood Area is in Flood Zone 1.

MAP 8: FLUVIAL FLOOD RISK (ENVIRONMENT AGENCY FLOOD MAP FOR PLANNING)



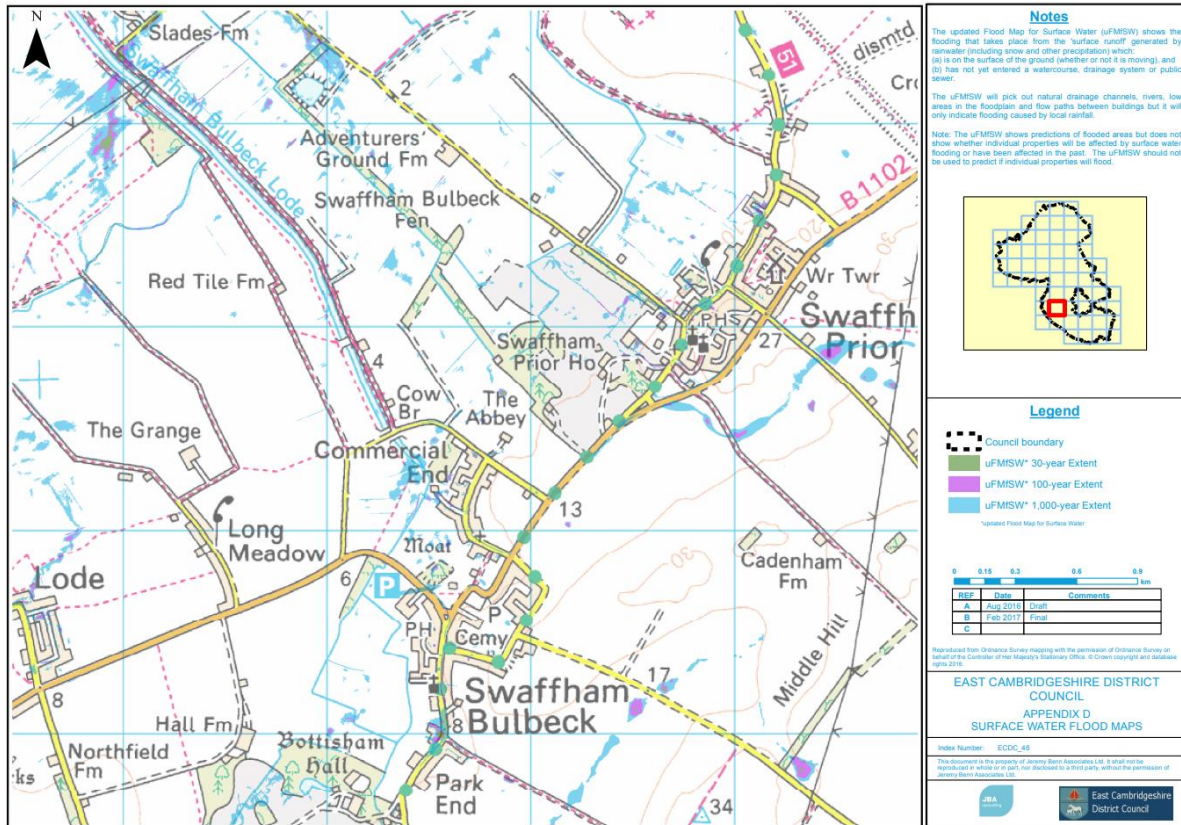
- 4.109. Source Protection Zones are defined around large and public potable groundwater abstraction sites, including wells, boreholes and springs. An area at the south of the SBNP area intersects a Source Protection Zone classified as 'Zone 3: Total catchment'. This zone is defined as the total area needed to support the abstraction or discharge from the protected groundwater source. A small area at the far south of the parish in 'Zone II - outer protection'. The land within the SPZ is principally in agricultural use and is separate from the built area of Swaffham Bulbeck village.
- 4.110. Groundwater Source Protection Zones are areas of groundwater where there is particular sensitivity to pollution risks due to the closeness of a drinking water source and groundwater flows. The SBNP area does not fall within a Groundwater Protection Zone.

MAP 9: SOURCE PROTECTION ZONES



4.111. The Updated Flood Map for Surface Water (Map 10) indicates some small areas affected by surface water flooding. However, surface water does not appear to be a major constraint.

MAP 10: UPDATED FLOOD MAP FOR SURFACE WATER



- 4.112. Constraints relating to the water environment are relevant to the assessment of 'reasonable alternatives' for potential allocations. As illustrated in Map 8, land immediately west (including south west and north west) of Swaffham Bulbeck village is generally constrained by flood risk, with large areas of land located in Flood Zones 2 and 3³⁹. Those areas would generally be considered not suitable for residential development.
- 4.113. Land in the south of the parish (and south and south east of Swaffham Bulbeck) falls within a Source Protection Zone and is needed to support the abstraction or discharge from protected groundwater sources.
- 4.114. The proposed site allocation (*Policy SWB8*) is located within Flood Zone 1 and outside of the Source Protection Zone. There are no sequentially preferably sites within the Neighbourhood Area in flooding terms.
- 4.115. The SBNP includes policies to protect the water environment and water resources, notably *Policy SWB12 - Delivering Sustainable Design* requires new development to minimise water usage to no more than 110 litres per person per day. Other policies, such as *Policy SWB15 – Development proposals and biodiversity* and *Policy SWB 3 – Swaffham Bulbeck parish-wide landscape character* include measures to protect waterways.
- 4.116. The SBNP is expected to contribute positively to protecting water resources and the water environment. **Overall, no likely significant environmental effects, in terms of water, are expected to arise from implementation of the SBNP.**

³⁹ Or not sequentially preferable to Flood Zone 1 land.

Air

- 4.117. There are no Air Quality Management Areas designated within the SBNP area. In addition, there are no areas where air quality is monitored due to potential exceedances to air quality objectives within the Neighbourhood Area.
- 4.118. The A14 Corridor AQMA and Newmarket AQMA fall within 8km buffer of the Neighbourhood Area. Therefore, there is the potential from traffic generated from new development within the Neighbourhood Area to impact upon those AQMAs.
- 4.119. The SBNP includes measures to reduce emissions from motor vehicles. *Policy SWB13 – Electric vehicle charging points* and *Policy SWB14 – Protecting and improving walking and cycling connectivity in our parish* will likely play a role in encouraging sustainable travel, thereby reducing vehicle emissions.
- 4.120. The SBNP supports biodiversity and green infrastructure, which play a valuable role in maintaining air quality. *Policy SWB 16 – Development proposals and biodiversity* requires all development proposals to contribute to and enhance the natural and local environment, avoiding impacts and providing measurable net gains for biodiversity. In addition, *SWB 5 – Swaffham Bulbeck local green spaces* policy designates 11 green areas as Local Green Spaces providing protection from development.
- 4.121. Due to the relatively modest growth levels proposed by the SBNP, along with measures to reduce vehicular emissions, **no likely significant effects are expected to arise in terms of air quality.**

Climatic factors

- 4.122. Climatic factors involve the consideration of a plan or programme in relation to climate change. Climate change adaptation and mitigation are closely interrelated and are closely linked to other environmental issues.
- 4.123. Through objective 3, the SBNP promotes sustainability:

Objective 3 – Sustainability

Encourage a thriving village which retains a diverse range of age groups within a community which promotes sustainability by

...

k) Active promotion of low carbon emission strategies with an aim of achieving carbon neutrality through, for example, building construction, retro-fitting existing housing stock, generating electricity through solar or other community energy schemes, provision of car charging points and enhanced cycling and walking routes.

- 4.124. *Policy SWB 12 – Delivering sustainable design* requires proposals to be sustainably designed, minimising demand for energy, reduce emissions, and improve energy and water efficiency, including through the incorporation of renewable and low carbon energy sources.
- 4.125. *Policy SWB13 – Electric vehicle charging points* and *Policy SWB14 – Protecting and improving walking and cycling connectivity in our parish* will play a role in encouraging sustainable travel, thereby reducing vehicle emissions.
- 4.126. Green infrastructure plays an important role in CO₂ absorption. *SWB 5 – Swaffham Bulbeck local green spaces* designates open spaces for protection from development.
- 4.127. The SBNP will play a role in reducing emissions from new developments and travel. **Overall, no likely significant effects in respect of climatic factors are expected to arise as a result of implementing the policies in the SBNP.**

Material assets

- 4.128. The SEA Directive does not define what is meant by ‘material assets’ and it can be interpreted in a number of ways. This environmental report takes material assets to include a range of social, physical and environmental infrastructure, such as schools, health facilities, roads, railways, bus services, wastewater treatment works, flood defences, etc. Impacts on materials assets are likely to relate to a number of other SEA topics.
- 4.129. Cambridgeshire County Council and Peterborough City Council are in the process of reviewing the joint Minerals and Waste Development Plan. The plan has been examined and found ‘sound’ subject to modifications. The plan is expected to proceed to adoption shortly.
- 4.130. The emerging Minerals and Waste Development Plan indicates that the mid and southern section of the Neighbourhood Area is located within a Minerals Safeguarding Area for chalk, and the northernmost area of the parish is within a Mineral Safeguarding area for gravel.
- 4.131. In Mineral Safeguarding Areas (MSA), development outside the Development Envelope or allocated sites must consult the Mineral Planning Authority (Cambs County Council), and must demonstrate the mineral can be extracted prior to development taking place; or that the mineral concerned is demonstrated is not of current or future value; or that the development will not prejudice future extraction of the mineral; or that there is an overriding need for the development (where prior extraction is not feasible).
- 4.132. Since the vast majority of the Neighbourhood Area is within a MSA, there are unlikely to be sequentially preferable sites to the proposed allocation. The MSA is therefore not of particular significance in identifying ‘reasonable alternatives’ for potential allocations. However, mineral deposits close to the built area may be of lesser value, since their extraction may be constrained by existing development.
- 4.133. *Policy SWB9 – Swaffham Bulbeck primary school* identifies Swaffham Bulbeck primary school as an invaluable community facility, both as a school and as a community meeting space during non-school hours. The policy lends support to proposals which help facilitate the continued success of the school including its function as a community meeting space.
- 4.134. *Policy SWB10 – Community Pavilion* seeks the provision of an improved pavilion building.
- 4.135. The SBNP is likely to make a positive contribution to the provision and longevity of community facilities. **Overall, the SBNP is not likely to have significant effects in terms of material assets.**

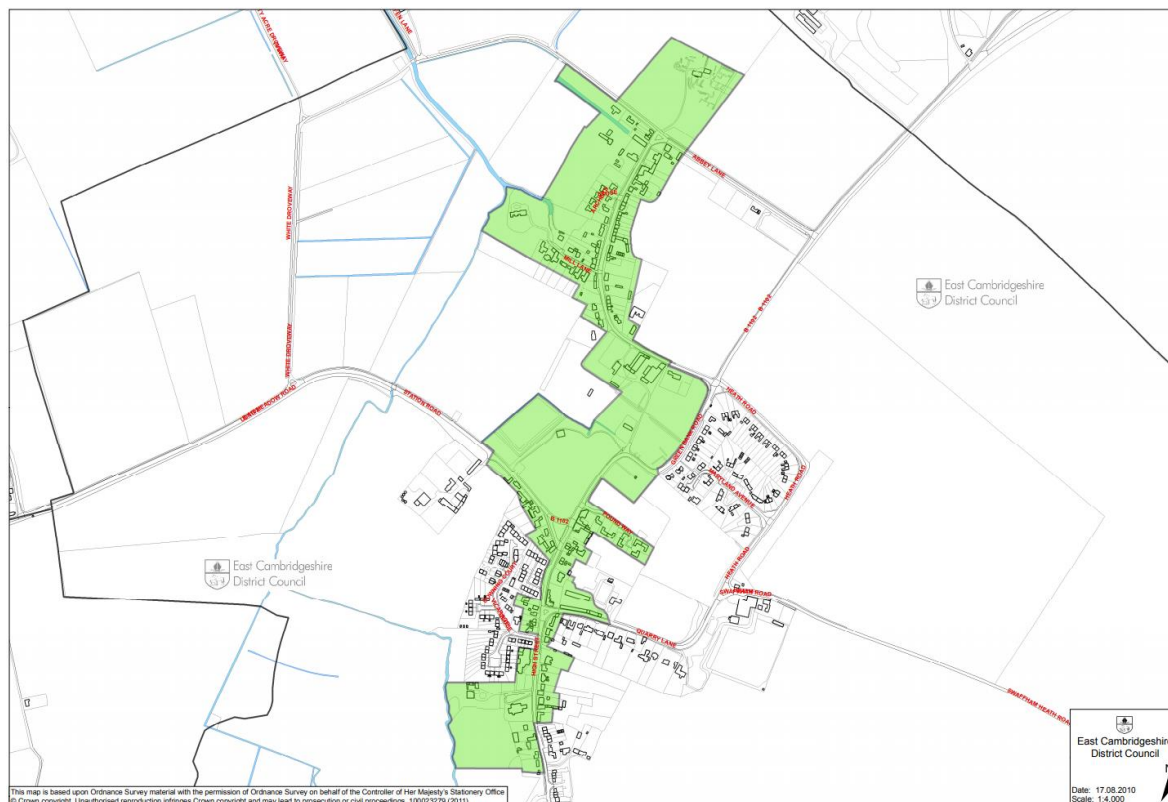
Cultural heritage, including architectural and archaeological heritage

4.136. The Swaffham Bulbeck Neighbourhood Area includes a range of protected heritage assets and features.

Conservation Area

4.137. A significant portion of the built area of Swaffham Bulbeck village is designated as a Conservation Area, as illustrated on **Map 11**. Conservation Areas are designated because of its special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance. Its statutory protections apply to land, buildings and some natural features within the Conservation Area, and within its setting.

MAP 11: SWAFFHAM BULBECK CONSERVATION AREA



Listed Buildings

4.138. As indicated in Table 2, there are 48 listed buildings within the SBNP⁴⁰ area plus a 400m buffer. Their location is shown on **Map 12** and are mainly concentrated within Swaffham Bulbeck village. The listed buildings within, or in proximity of the SBNP area are:

- 108 And 110, High Street (Grade II)
- 112, High Street (Grade II)
- 30 And 32, Commercial End (Grade II)
- 43, Commercial End (Grade II)
- 48, High Street (Grade II)
- 64 And 66, Commercial End (Grade II)
- 88, High Street (Grade II)
- 89, High Street (Grade II)

⁴⁰ <https://historicengland.org.uk/listing/>

- 94, Commercial End (Grade II)
- 96, 98 And 100, Commercial End (Grade II)
- Appletrees (Grade II)
- Barn at Spring Hall Farm (Grade II)
- Barn, About 100 Yards North East of Burgh Hall (Grade II)
- Barn, At Downing Farm (Grade II)
- Barn, To East of Burgh Hall (Grade II)
- Barn, To South Front and Two Cartway Entrances at Mitchell Hall Farm (Grade II)
- Barn, To South of Burgh Hall (Grade II)
- Bolebec Cottage (Grade II)
- Bottisham Hall (Grade II)
- Bottisham Water Mill at Bottisham Park (Grade II)
- Bowyers Cottage (Grade II)
- Burgh Hall (Grade II*)
- Cattle Sheds, At Mitchell Hall Farm (Grade II)
- Church of St Mary The Virgin (Grade I)
- Downing Farmhouse (Grade II)
- Garden Building to Burgh Hall (Grade II)
- Gate Piers and Adjoining Wall, To Number 86 Swaffham Prior House (Grade II)
- Hillside Cottage (Grade II)
- Hillside House (Grade II)
- Linton House (Grade II)
- Lordship Cottage (Grade II)
- Lordship Farmhouse (Grade II)
- Milestone, 5 Metres East of Spring Hall Farm (Grade II)
- Mill House at Bottisham Water Mill (Grade II)
- Mitchell Hall (Grade II)
- Outbuildings and Stable to Number 86 Swaffham Prior House (Grade II)
- Priests House (Grade II)
- Ram Cottage (Grade II)
- Royal Oak Public House (Grade II)
- Swaffham Bulbeck War Memorial (Grade II)
- Swaffham Prior House (Grade II)
- Thatchers (Grade II)
- The Abbey (Grade I)
- The Merchants House (Grade II)
- The Old Rectory (Grade II)
- Village Hall (Grade II)
- Wall About 20 Yards South East of The Abbey (Grade II)
- Warehouse and Granary, Approximately 25 Yards North of Merchants House (Grade II)

Scheduled Monuments

4.139. There are multiple Scheduled Monuments within the SBNP area or within a 400m buffer, as indicated on **Map 12**:

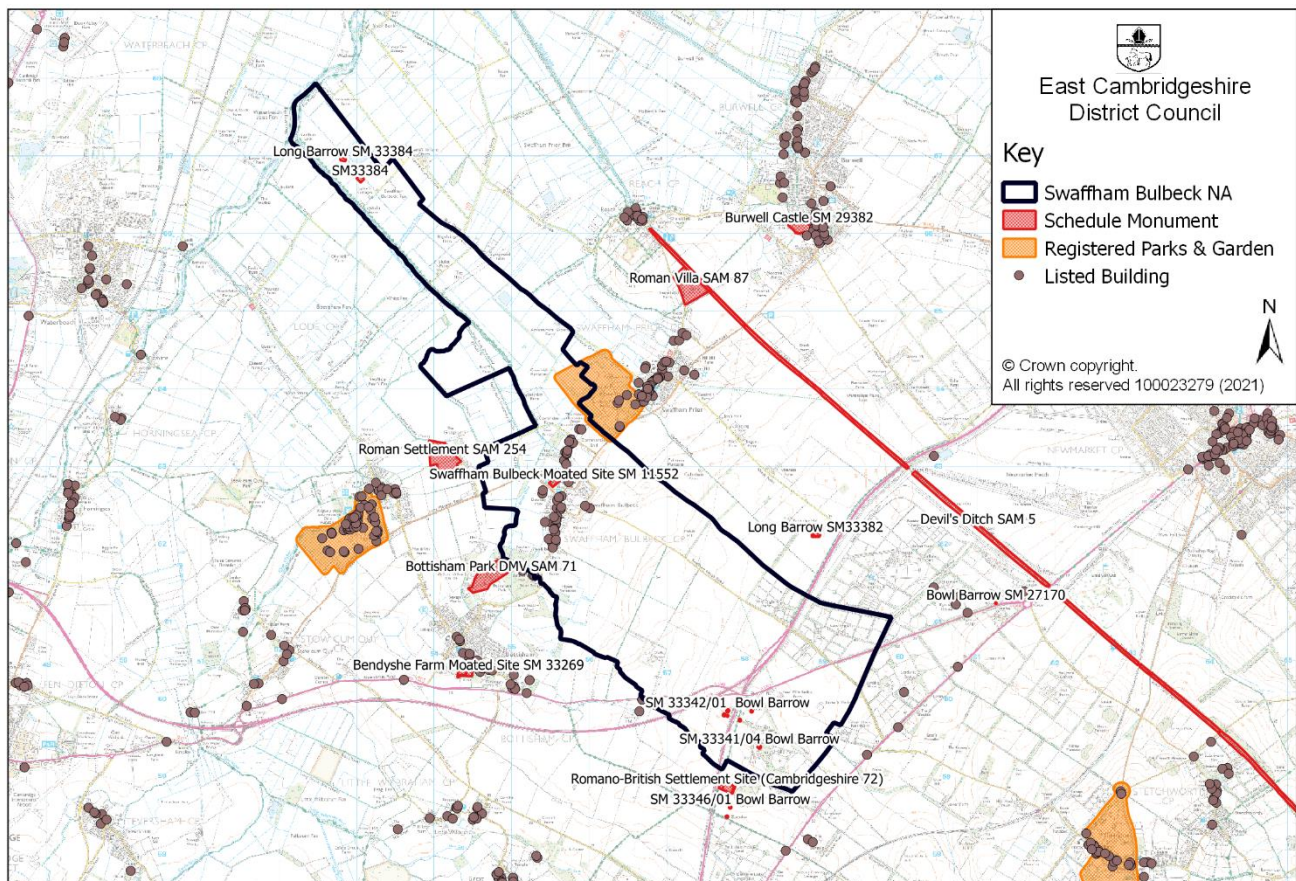
- Three bowl barrows 640m north west of Hare Park Stud (List entry 1016819)
- Four bowl barrows at Allington Hill, 420m south west of Allington Hill Farm (List entry 1016820)
- Swaffham Bulbeck moated site. (List entry 1012622)
- Long barrow 650m NNW of Lythel's Farm (List entry 1020843)

- Roman settlement (List entry 1006793)
- Earthworks at the Abbey (List entry 1472391)
- Deserted medieval village in Bottisham Park (List entry 1006900)
- Romano-British settlement 200m west of Allington Hill (List entry 1006901)
- Five bowl barrows 270m north of Hare Park Stud (List entry 1016818)

Registered Parks & Gardens

4.140. Swaffham Prior House Registered Parks and Garden intersects the SBNP area, as indicated on **Map 12**. In addition, there are other Registered Parks and Gardens in the vicinity, including Anglesey Abbey around 1.5km from the Neighbourhood Area boundary.

MAP 12: SCHEDULED MONUMENTS, REGISTERED PARKS & GARDENS AND LISTED BUILDINGS



Heritage at Risk

4.141. Within the Swaffham Bulbeck Neighbourhood Area and 400m buffer, there are two assets identified as Heritage at Risk⁴¹:

- Roman settlement, Lode - East Cambridgeshire
- Long barrow 650m NNW of Lythel's Farm, Swaffham Bulbeck

Non-designated heritage assets

4.142. There is one 'Building of Local Interest' within the Neighbourhood Area - BL79 - *Newnham House, 48 Commercial End*.

⁴¹ <https://historicengland.org.uk/listing/the-list/>

Summary of potential effects on Cultural Heritage

- 4.143. As identified above in paragraphs section 3, there are a number of heritage assets within the Neighbourhood Area, including a Conservation Area, 48 Listed Buildings, two Scheduled Monuments, and a Building of Local Interest.
- 4.144. The Heritage Gateway⁴² provides information from Cambridgeshire's Historic Environment Record on the various designated heritage assets within SBNP area. However, this information does not identify specific threats to those assets.
- 4.145. Cambridgeshire's Historic Environment Record shows more than 218 records within Swaffham Bulbeck, suggesting a rich historic environment. As indicated in the SBNP, the historic environment is central to the character and identity of Swaffham Bulbeck.
- 4.146. *Policy SWB 2 – Swaffham Bulbeck village landscape character* requires development proposals in the village centre to be sensitive to Swaffham Bulbeck's distinctive landscape and settlement character. Specifically, the policy seeks to conserve and enhance heritage assets and protect views.
- 4.147. *Policy SWB 4 – Swaffham Bulbeck built environment character* requires all development proposals to adopt a design-led approach and identifies specific design themes which proposals must address. The policy requires proposals to conserve and enhance the Conservation Area, quality of the street scene, historic buildings, and village gateways.
- 4.148. The SBNP area has a rich heritage with many assets of national significance. The SBNP includes policies to conserve the built environment. **The proposed site allocation (*Policy SWB8*) includes no heritage assets within its boundary, but adjoins the Conservation Area. In addition, there are a number of listed buildings in the vicinity of the site.**
- 4.149. Policy SWB8, provides design principles to guide the layout and form of development, and the SBNP includes other policies to minimise impacts of development on the Conservation Area and other heritage assets. The *Swaffham Bulbeck Landscape Study* includes a concept plan for the development of the site, and notes the *sensitive edges where it [the site] adjoins the Conservation Area*. Therefore, the SBNP includes measures which could provide mitigation against harm to heritage assets. However, at present ECDC is unable to determine the extent of effects on heritage assets.
- 4.150. **For the purposes of Strategic Environmental Assessment, at this stage it is not possible to rule out likely significant effects on the historic environment from implementation of the SBNP, notably on the significance of the Swaffham Bulbeck Conservation Area and listed buildings in proximity of proposed site allocation SWB8 - Cemetery/ Pony field site.**

⁴² <https://www.heritagegateway.org.uk/gateway/>

Landscape

4.151. The SBNP area lies within two National Character Areas (NCAs). The north 'half' of the parish is located in The Fens NCA, and the southern half of the parish, including the majority of Swaffham Bulbeck village is located in the East Anglian Chalk NCA. The key characteristics of these NCAs include:

*The Fens NCA*⁴³

- Expansive, flat, open, low-lying wetland landscape influenced by the Wash estuary, and offering extensive vistas to level horizons and huge skies throughout, provides a sense of rural remoteness and tranquillity.
- Jurassic clays are overlain by rich, fertile calcareous and silty soils over the coastal and central fens and by dark, friable fen peat further inland. The soils are important for agriculture, which is hugely significant for the rural economy in the Fens. There are over 4,000 farms in the Fens; enough wheat is grown here annually to produce a quarter of a million loaves of bread and one million tons of potatoes are grown here. In addition to traditional vegetables, exotics such as pak choi are now cultivated. Some 40 per cent of England's bulbs and flowers are also produced in the Fens.
- The Wash is the largest estuarine system in Britain, supporting internationally important intertidal and coastal habitats influenced by constant processes of accretion and deposition, forming salt marsh and mudflats and providing habitats for wildfowl, wading birds and other wildlife, including grey seals and approximately 90 per cent of the UK's common seals. It also provides important natural sea defences and plays a key role in climate change regulation. Flood storage areas on the Nene, Cam, Lark and Ouse washes also provide significant biodiversity interest. True fen mainly occurs at remnant conservation sites, such as Baston or Wicken Fen.
- Overall, woodland cover is sparse, notably a few small woodland blocks, occasional avenues alongside roads, isolated field trees and shelterbelts of poplar, willow and occasionally leylandii hedges around farmsteads, and numerous orchards around Wisbech. Various alders, notably grey alder, are also used in shelterbelts and roadside avenues.
- The predominant land use is arable – wheat, root crops, bulbs, vegetables and market gardening made possible by actively draining reclaimed land areas. Associated horticultural glasshouses are a significant feature. Beef cattle graze narrow enclosures along the banks of rivers and dykes and on parts of the salt marsh and sea banks.
- Open fields, bounded by a network of drains and the distinctive hierarchy of rivers (some embanked), have a strong influence on the geometric/rectilinear landscape pattern. The structures create local enclosure and a slightly raised landform, which is mirrored in the road network that largely follows the edges of the system of large fields. The drains and ditches are also an important ecological network important for invertebrates, fish including spined loach, and macrophytes.
- The area is very rich in geodiversity and archaeology, with sediments containing evidence for past environmental and climate changes and with high potential for well-preserved waterlogged site remains at the fen edge, within some of the infilled paleo-rivers and beneath the peat.
- Large, built structures exhibit a strong vertical visual influence, such as the 83 m-high octagonal tower of 'Boston Stump' (St Botolph's Church), Ely Cathedral on the highest part of the Isle of Ely dominating its surrounding fen, wind farms and other modern large-scale industrial and agricultural buildings, while drainage and flood storage structures and embanked rail and road routes interrupt the horizontal fen plain.
- Settlements and isolated farmsteads are mostly located on the modestly elevated 'geological islands' and the low, sinuous roddon banks (infilled ancient watercourses within fens).

⁴³ [46 The Fens 240215.pdf](#)

Elsewhere, villages tend to be dispersed ribbon settlements along the main arterial routes through the settled fens, and scattered farms remain as relics of earlier agricultural settlements. Domestic architecture mostly dates from after 1750 and comprises a mix of late Georgian-style brick houses and 20th century bungalows.

East Anglian Chalk NCA⁴⁴

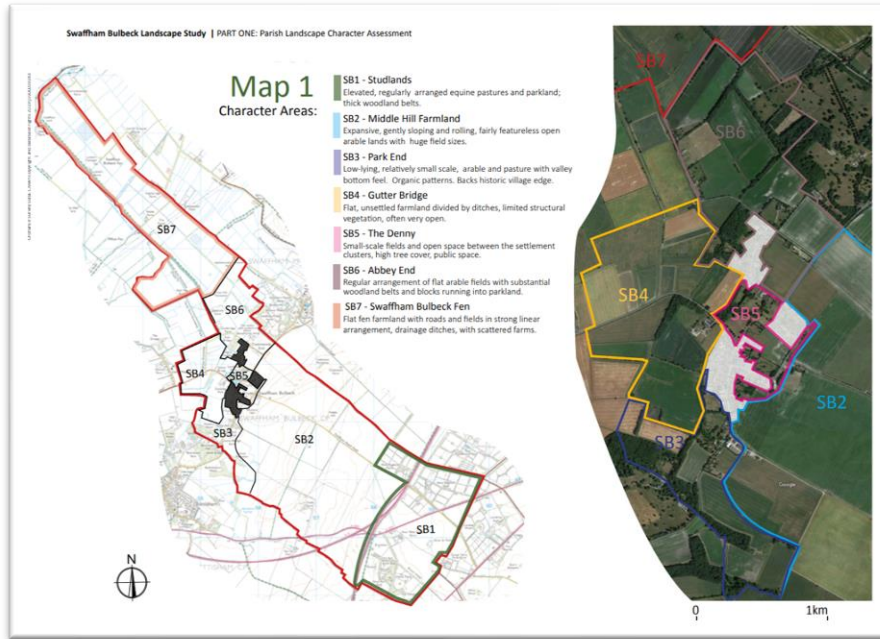
- The underlying and solid geology is dominated by Upper Cretaceous Chalk, a narrow continuation of the chalk ridge that runs south-west–north-east across southern England, continuing in the Chilterns and along the eastern edge of The Wash. The chalk bedrock has given the NCA its nutrient-poor and shallow soils.
- Distinctive chalk rivers, the River Rhee and River Granta, flow in gentle river valleys in a diagonally north-west direction across the NCA.
- The chalk aquifer is abstracted for water to supply Cambridge and its surroundings and also supports flows of springs and chalk streams; features associated with a history of modification include watercress beds, culverts and habitat enhancements.
- The rolling downland, mostly in arable production, has sparse tree cover but distinctive beech belts along long, straight roads. Certain high points have small beech copses or ‘hanger’, which are prominent and characteristic features in the open landscape. In the east there are pine belts.
- Remnant chalk grassland, including road verges, supports chalkland flora and vestigial populations of invertebrates, such as great pignut and the chalkhill blue butterfly.
- Archaeological features include Neolithic long barrows and bronze-age tumuli lining the route of the prehistoric Icknield Way; iron-age hill forts, including that at Wandlebury; impressive Roman burial monuments and cemeteries such as the Bartlow Hills; a distinctive communication network linking the rural Roman landscape to settlements and small towns, such as Great Chesterford; the four parallel Cambridgeshire dykes that cross the Chalk: the Anglo-Saxon linear earthworks of Devil’s Dyke, Fleam Dyke, Heydon/Bran Ditch and Brent Ditch; ridge-and-furrow cultivation remains of the open field systems of the earlier medieval period; and large numbers of later moated enclosures, park lands created, sheepwalks, arterial routes and nucleated villages that emphasise the land use change of this period.
- Brick and ‘clunch’ (building chalk) under thatched roofs were the traditional building materials, with some earlier survival of timber frame. Isolated farmhouses built of grey or yellowish brick have a bleached appearance.
- Settlement is focused in small towns and in villages. There are a number of expanding commuter villages located generally within valleys. Letchworth Garden City is a nationally significant designed garden city.
- In and around the wider area of Newmarket, stud farms impose a distinctive geometric, enclosed and manicured pattern to the landscape.
- The NCA is traversed by the Icknield Way, an ancient route that is now a public right of way. Roads and lanes strike across the downs perpendicularly and follow historical tracks that originally brought livestock to their summer grazing. Today major roads and railways are prominent landscape characteristics of the NCA.

4.152. A Landscape Appraisal and Sensitivity Study of the Neighbourhood Area was commissioned by Swaffham Bulbeck Parish Council in order to provide a robust evidence base to support the development of policies in the Neighbourhood Plan.

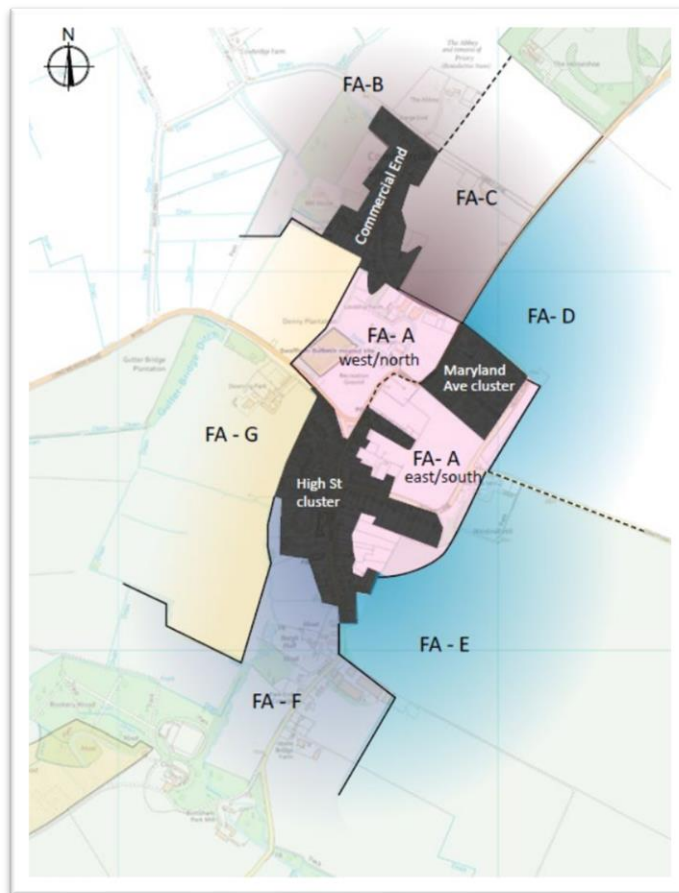
⁴⁴ [NCA Profile: 87 East Anglian Chalk - NE529 \(naturalengland.org.uk\)](https://naturalengland.org.uk/nca-profile/87-east-anglian-chalk-ne529)

4.153. The Landscape Appraisal identifies seven distinct character areas in the parish, and eight settlement fringe areas. These are illustrated on **Maps 13 and 14**.

MAP 13: CHARACTER AREAS (SWAFFHAM BULBECK LANDSCAPE STUDY JANUARY 2020)



MAP 14: SETTLEMENT FRINGE AREAS (SWAFFHAM BULBECK LANDSCAPE STUDY JANUARY 2020)



- 4.154. Drawing on the landscape study, conservation of the parish's landscapes is an important theme of the SBNP Neighbourhood Plan.
- 4.155. *Policy SWB 2 – Swaffham Bulbeck village landscape character* requires development proposals in the village centre to be sensitive to Swaffham Bulbeck's distinctive landscape and settlement character, as described in the Landscape Character Assessment and Settlement Fringe Sensitivity Study, by satisfying a range of policy requirements.
- 4.156. The policy seeks to retain the pattern of three distinct settlement clusters in the village, requires landscape and visual impact assessments of major development proposals, and seeks to conserve and enhance heritage assets and protect views.
- 4.157. *Policy SWB 3 – Swaffham Bulbeck parish-wide landscape character* identifies 'fringe areas' and sets specific policy requirements for proposals within the fringe areas, to ensure new development is sensitive to Swaffham Bulbeck's distinctive landscape and character, informed by the Landscape Character Assessment and Settlement Fringe Sensitivity Study.
- 4.158. As previously discussed, and as illustrated on Map 1, land to the south, east and west of Swaffham Bulbeck village is designated as Green Belt. This protects the open countryside landscape by preventing the sprawl of urban centres, in this case *Cambridge*, ensuring it remains a compact city.
- 4.159. The Cambridge Green Belt and findings of the Landscape Character Assessment and Settlement Fringe Sensitivity Study have significant implications for the consideration of 'reasonable alternatives' for potential allocations. The Green Belt strictly limits opportunities for development, thereby ruling out those areas for development.
- 4.160. The Landscape Character Assessment and Settlement Fringe Sensitivity Study provides an objective assessment of Swaffham Bulbeck's settlement fringe. Each settlement fringe area (Map 14) was assessed and scored in terms of its landscape and visual sensitivity. The following scale was used to describe sensitivity, from high to low:
- Very high
 - High
 - Moderate
 - Modest
 - Low
- 4.161. In summary, the Sensitivity Study identified the following sensitivities:
- **Fringe Area A – A: West/north:** This area is very highly sensitive in landscape and visual terms.
 - **Fringe Area A – B: East/south:** This area is moderately sensitive in landscape terms and moderately sensitive in visual terms.
 - **Fringe Area B:** This area is highly sensitive in landscape terms and of moderate sensitivity in visual terms.
 - **Fringe Area C:** This area is of high sensitivity in landscape and visual terms.
 - **Fringe Area D:** This area is of modest sensitivity in landscape terms and is very highly visually sensitive.
 - **Fringe Area E:** This area is of modest sensitivity in landscape terms and is moderately sensitive in visual terms.

- **Fringe Area F:** This area is very highly sensitive in landscape terms and of modest sensitivity in visual terms.

4.162. Only *Fringe Area E* and *Fringe Area A – B: East/south* are not *highly sensitive* or *very highly sensitive* in terms of landscape or visual sensitivity.

4.163. Fringe Area E is located within the Cambridge Green Belt, and is therefore not a 'reasonable alternative' for potential allocations.

4.164. *Fringe Area A – B: East/south* is located outside the Green Belt. Development is not incompatible with the findings of the Settlement Fringe study, which notes:

Where these conditions are met this side of the parcel has some scope for development without significant impact to the character of the village. This needs to be at modest scale and integrated well with the landscape and its mature vegetative features, and be responsive to the land form.

4.165. The proposed allocation (Policy SWB8) is located within *Fringe Area A – B: East/south*.

4.166. Overall, the SBNP has a strong focus on conserving the area's landscapes, as evident through its policies and commissioned LCA and Sensitivity Study. The location of the proposed site allocation is compatible with the Sensitivity Study's findings and the Cambridge Green Belt.

Overall, the SBNP is not likely to lead to significant environmental effects on the landscape.

Potential allocation and 'reasonable alternatives'

- 4.167. A Neighbourhood Plan may typically be more likely to have significant environmental effects if it allocates sites for development (for housing, employment, etc.). The assessment of 'reasonable alternatives' is a requirement of the SEA Regulations.
- 4.168. In practice, a central focus of the assessment of 'reasonable alternatives' will be the consideration of different development strategies for the Neighbourhood Plan. This means exploring the sustainability implications of alternative approaches to delivering new development in the neighbourhood area, including in terms of scale and location. This will help support neighbourhood planners in determining which locations would potentially be appropriate for taking forward as allocations through the Neighbourhood Plan. In light of this, this assessment does not only focus on the sites likely to be allocated through the Neighbourhood Plan, but also considers the wider range of locations that could be considered for potential allocation in the plan.
- 4.169. The SBNP identifies a site allocation for a community-led housing scheme, via policy *SWB 8 – Cemetery/ pony field site*. The SBNP supports the principle of development at the cemetery/pony field site on the proviso that the community benefits of the scheme will be significantly greater than what would be delivered on an equivalent open market site. This includes the delivery of affordable housing that meets parish needs. Within the Neighbourhood Area, there are no other known sites available for a *community-led* model of housing delivery.
- 4.170. The SBNP recognises the importance of a design and landscape-led approach to development of the site, and the *Swaffham Bulbeck Landscape Study* provides an indicative layout plan. SBNP Policy SWB8 seeks to ensure any development on this site is done in a sensitive way which does not adversely harm settlement and landscape character.
- 4.171. As discussed in Section 3, the East Cambridgeshire Local Plan 2015 was subject to Sustainability Appraisal (incorporating SEA), and documented in a Sustainability Appraisal Report⁴⁵ which fully considered the environmental, social and economic impacts of each of the policies and site allocations within the Local Plan.
- 4.172. The Local Plan's growth strategy concentrates growth in the market towns, with lesser growth in the rural area. The SA Report considered a range of options for distributing growth and concluded a market-led approach was the most sustainable option:
- 4.173. *The policy should help to deliver a range of social, environmental and economic benefits. In particular, it will help to reduce the need to travel, promote accessibility to services and facilities, protect the countryside, and help to support the rural economy. The approach represents a continuation of the current policy approach, so no significant temporal differences are identified.*
- p145 Sustainability Appraisal Report 2015
- 4.174. Since the growth strategy directs new development away from small, rural villages such as Swaffham Bulbeck village, and limits development in the open countryside, no site options were considered in Swaffham Bulbeck by the SA Report. However, the Local Plan sets a Development Envelope around Swaffham Bulbeck village within which development is, in principle, acceptable. The SA Report concluded:
- In principle, development envelopes are sustainable if they help to concentrate development in the most sustainable locations, creating critical mass of services, jobs and homes...*

p29 Sustainability Appraisal Report 2015

⁴⁵ <https://www.eastcambs.gov.uk/local-development-framework/east-cambridgeshire-local-plan-2015>

- 4.175. As discussed in section 3, in February 2018, ECDC submitted for examination a new Local Plan along with a supporting evidence base. Examination of the Local Plan commenced in June 2018. However, in February 2019, East Cambridgeshire District Council withdrew the draft Local Plan. At the point of withdrawal, the draft Local Plan was at an advanced stage of its preparation and had been subject to a full Sustainability Appraisal incorporating SEA and a full HRA.
- 4.176. Following withdrawal of the Local Plan, East Cambridgeshire District Council has retained the HRA (dated June 2018) and other key documents which are potentially relevant to SEA & HRA matters, including the Water Cycle Study (2017).
- 4.177. Crucially, the HRA 2018 assessed the impacts of the now withdrawn Local Plan's proposed growth strategy. This included three site allocations at Swaffham Bulbeck village:
- SWB.H1 - Land off Heath Road and Quarry Lane (approx. 38 dwellings)
 - SWB.H2 - Land fronting Heath Road (approx. 18 dwellings)
 - SWB.H3 - Hillside Mill, Quarry Lane (approx. 12 dwellings)
- 4.178. Withdrawn Local Plan site allocation "*SWB.H1 - Land off Heath Road and Quarry Lane*" is proposed for allocation by the draft SBNP at "*Policy SWB8 – Cemetery/ Pony field site*".
- 4.179. There is currently an outline planning application (ref: 19/00746/OUM) pending determination for the construction of up to 45 new homes (of which 4 are self-build plots) including open space, landscaping and associated infrastructure - with all matters reserved except for access. The development proposal and draft policy are broadly aligned with another, proposing 45 dwellings. It is understood that the proposal will be a community-led development scheme, reflecting the aspirations of the policy.
- 4.180. Withdrawn Local Plan allocation "*SWB.H2 - Land fronting Heath Road*" was refused planning permission in January 2020 for reasons relating to visual impact on the open countryside landscape, and the transitional character from the village to countryside⁴⁶. **Through refusing the application, ECDC has determined the site not suitable for development, and therefore this site cannot be considered a 'reasonable alternative' for SEA purposes.**
- 4.181. Withdrawn Local Plan allocation "*SWB.H3 - Hillside Mill, Quarry Lane*" was granted planning permission for the development of 19 dwellings in 2018 and appears to be progressing to implementation⁴⁷. **Since the site already benefits from planning permission, it is not proposed for allocation in the draft SBNP and does not constitute a 'reasonable alternative'**. The SBNP proposes that the Development Envelope be updated to include the Hillside Mill, Quarry Lane site, reflecting its status as a committed site.
- 4.182. There are **no other known, available sites** within the Neighbourhood Area.

Environmental Constraints

- 4.183. As identified in Table 2, and discussed at length in preceding sections of this report, there are many environmental constraints which effect the Swaffham Bulbeck Neighbourhood Area. The consequence of these constraints is that opportunities for new development are very limited.
- 4.184. The Neighbourhood Area consists principally of open countryside in agricultural use, and includes the village of Swaffham Bulbeck at its centre.

⁴⁶ Application ref: 19/01469/OUM

⁴⁷ Application ref: 17/01231/FUM

- 4.185. The Local Plan (and likewise the SBNP) resists isolated development in the open countryside. Therefore, the area of search for 'reasonable alternatives' must be limited to Swaffham Bulbeck village and adjoining areas.
- 4.186. Swaffham Bulbeck village comprises of three separate residential clusters - the 'Commercial End' cluster in the north, the 'main village' cluster in the south, and the 'Maryland Avenue/Heath Road' cluster to the east.
- 4.187. The Local Plan provides a Development Envelope around each village cluster. The SBNP proposes the Development Envelope be updated to reflect recent planning decisions and completed developments. Opportunities for development within the Development Envelope are likely to be small scale. Therefore no 'reasonable alternatives' can be identified within the Development Envelope.
- 4.188. As shown on Map 1, the southern 'half' of the Neighbourhood Area is located in the Cambridge Green Belt. This includes land immediately west and south of the main village, and more loosely to the east. Site allocations would be incompatible with the Green Belt designation.
- 4.189. Extensive and to the west, north west and south west of Swaffham Bulbeck village is located in Flood Zones 2 and 3.
- 4.190. Land south and south east of the village is located in a Source Protection Zone.
- 4.191. The Swaffham Bulbeck Conservation Area (as shown on Map 1) includes much of the main village and Commercial End cluster. In addition, the Conservation Area includes extensive land between the three village clusters, and extending west and north from Commercial End. Major development in such locations would likely be incompatible with the requirement to protect the significance of the Conservation Area.
- 4.192. Located between the three village clusters is the *Swaffham Bulbeck Moated Site* (as indicated on Map 1 and Map 12). Development on or within the setting of the Scheduled Monument would likely adversely impact on its significance, and therefore this area is not a 'reasonable alternative'.
- 4.193. A County Wildlife Site is located north west of the Commercial End cluster, and a Registered Park and Garden is located to the north east, further limiting locations for development.
- 4.194. The *Settlement Fringe Study* divided areas adjoining the village into seven 'fringe areas'. The study identified that all fringe areas are 'very highly' or 'highly' sensitive in both or either landscape or visual terms, with the exception of *Fringe Area A – B: East/south* and *Fringe Area E*. Therefore, all areas (with the exception of areas A-B and E) have insufficient landscape capacity to accommodate major development without adverse harm.
- 4.195. Fringe Area E falls within the Cambridge Green Belt and is therefore not suitable for allocation. The SBNP's proposed allocation is located in *Fringe Area A – B: East/south*, and includes the majority of undeveloped land within the fringe area.
- 4.196. Due to the highly constrained nature of the Neighbourhood Area and aspiration for community-led development, no 'reasonable alternative' potential allocation sites can be identified.

SEA & HRA Screening Assessment

- 4.197. The preceding paragraphs assess the SBNP against the SEA Directive’s environmental themes, and taking into account a range of environmental constraints within, or in proximity of the Neighbourhood Area, as summarised in Table 2.
- 4.198. Potential likely significant effects were identified in respect of *cultural heritage, including architectural and archaeological heritage*, notably the significance of the *Swaffham Bulbeck Conservation Area* and *Listed Buildings* in proximity of the proposed site allocation.
- 4.199. No other likely significant effects on the environment are identified. Crucially, significant effects on European sites are not likely to arise from implementation of the SBNP.
- 4.200. **Figure 3** provides assessment of the SBNP against the SEA Directive criteria to identify likely *significant* effects on the environment.
- 4.201. **Figure 4** applies the SEA Directive criteria to the SBNP as per the flow chart in **Figure 2**, to determine whether the *principle* of the SBNP would warrant the need for SEA.

FIGURE 3: ASSESSMENT OF THE LIKELY SIGNIFICANT EFFECTS ON THE ENVIRONMENT

SEA Directive criteria and Schedule 1 of Environmental Assessment of plans and programmes Regulations 2004	Assessment	Likely significant environmental effect
The characteristics of plans and programmes, having regard, in particular, to –		
(a) the degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources.	<p>The SBNP has been prepared for town and country planning purposes and would, if adopted, form part of the statutory Development Plan and contribute to the framework for future development projects.</p> <p>The principle of development in the Neighbourhood Area, including the nature of development, location and scale, has already been determined by the East Cambridgeshire Local Plan 2015’s growth strategy.</p> <p>The SBNP provides additional opportunities for modest development beyond that identified by the Local Plan - notably through the allocation of a development site for 45 dwellings. The potential for significant effects arising from the proposals have therefore not been tested through SA of the Local Plan. However, the effects of the proposed site allocation on European Sites were assessed through the updated HRA 2018 (and screened out).</p> <p>Once made, the SBNP would apply to a relatively small geographical area (the Swaffham Bulbeck Neighbourhood Area) where a limited number of proposals are anticipated over the plan period. With the</p>	Yes

SEA Directive criteria and Schedule 1 of Environmental Assessment of plans and programmes Regulations 2004	Assessment	Likely <i>significant</i> environmental effect
	<p>exception of the proposed site allocation for 45 dwellings, most proposals are expected to be of a small scale.</p> <p>The SBNP provides a framework for additional development opportunities beyond those identified by the Local Plan.</p>	
(b) the degree to which the plan or programme influences other plans and programmes including those in a hierarchy;	<p>The SBNP must be in general conformity with the strategic policies of the East Cambridgeshire Local Plan and national planning policy as set out in the NPPF.</p> <p>The SBNP provides policies for the Swaffham Bulbeck Neighbourhood Area, and are therefore relevant to the parish area only. The SBNP would therefore not strongly influence other plans and programmes higher up the spatial planning hierarchy.</p>	No
(c) the relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development;	<p>It is a basic condition that a NDP must contribute to the achievement of sustainable development. The SBNP seeks to ensure that environmental considerations are taken into account. It includes the following policies which promote environmental considerations with a view to promoting sustainable development:</p> <p>SWB 1 – Swaffham Bulbeck development envelope</p> <p>SWB 2 – Swaffham Bulbeck village landscape character</p> <p>SWB 3 – Swaffham Bulbeck parish-wide landscape character</p> <p>SWB 4 – Swaffham Bulbeck built environment character</p> <p>SWB 5 – Swaffham Bulbeck local green spaces</p> <p>SWB 12 – Delivering sustainable design</p> <p>SWB 13 – Electric vehicle charging points</p> <p>SWB 16 – Development proposals and biodiversity</p> <p>Other policies in the plan seek to address social and economic matters, such as ensuring that new development helps meet housing needs, community facilities and infrastructure, etc.</p> <p>These policies are compatible with the adopted East Cambridgeshire Local Plan, which was subject to both SA/SEA and HRA throughout the plan making process.</p>	No

SEA Directive criteria and Schedule 1 of Environmental Assessment of plans and programmes Regulations 2004	Assessment	Likely significant environmental effect
(d) environmental problems relevant to the plan or programme; and	There are no specific environmental problems relevant to the SBNP that have not been identified and assessed through the higher-level Local Plan and its accompanying SA/SEA.	No
(e) the relevance of the plan or programme for the implementation of Community legislation on the environment (for example, plans and programmes linked to waste management or water protection).	The content of the SBNP is not in conflict with any plans or programmes within the wider area for the implementation of Community legislation on the environment.	No
2. Characteristics of the effects and of the area likely to be affected, having regard, in particular, to —		
(a) the probability, duration, frequency and reversibility of the effects;	<p>The SBNP allocates a site for development which would enable additional growth beyond that identified by the Local Plan.</p> <p>Assessment of the SNP (Section 3) identified the potential for likely significant effects on sensitive SSSIs as a result of development proposed by <i>Policy SWB8 – Cemetery/Pony field site</i>.</p> <p>Assessment of the SBNP also identified the potential for likely significant effects on the Swaffham Bulbeck Conservation Area and Listed Buildings as a result of development proposed by <i>Policy SWB8 – Cemetery/Pony field site</i>.</p> <p>The SBNP also supports infill development within the Development Envelope and Community-led Development Schemes. However, this is a continuation of the Local Plan's strategy. Opportunities for windfall sites are expected to be generally limited and typically small scale, infill development, therefore the effects are not likely to be significant and are expected to be minimal.</p> <p>It is likely that some policies may result in minor positive effects by helping to preserve and enhance the environmental features within the Neighbourhood Area.</p> <p>See also paras 4.9 to 4.162.</p>	Yes (likely significant effects cannot be ruled out)

SEA Directive criteria and Schedule 1 of Environmental Assessment of plans and programmes Regulations 2004	Assessment	Likely significant environmental effect
(b) the cumulative nature of the effects;	As above in 2(a)	Yes (likely significant effects cannot be ruled out)
(c) the transboundary nature of the effects;	The SBNP is not expected to give rise to any transboundary effects.	No
(d) the risks to human health or the environment (for example, due to accidents);	The SBNP is not anticipated to give rise to any significant environmental effects that would pose risk to human health or the environment: the effects of the policies in the SBNP may enhance these elements.	No
(e) the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected);	<p>The Swaffham Bulbeck Neighbourhood Area is coterminous with the boundary of Swaffham Bulbeck parish.</p> <p>Swaffham Bulbeck parish has a relatively small population, estimated by ONS to be 922 people at mid-2018.</p> <p>The spatial extent of any effects of the implementation of the SBNP are expected to be limited to the immediate local area (i.e. the Neighbourhood Area), although the potential for likely significant effects on SSSIs and County Wildlife Sites located outside the Neighbourhood area cannot be ruled out at this stage.</p> <p>The magnitude and spatial extent of the effects are expected to be limited in both the local and wider district context.</p>	No
(f) the value and vulnerability of the area likely to be affected due to— (i) special natural characteristics or cultural heritage;	<p>As considered in paras. 4.9 to 4.162 it is generally unlikely that the SBNP would adversely impact the special natural characteristics or cultural heritage of the Neighbourhood Area.</p> <p>However, there is <i>potential</i> for likely significant effects on sensitive SSSIs in proximity of the Neighbourhood Area, and the Swaffham Bulbeck Conservation Area and Listed Buildings.</p>	Yes

SEA Directive criteria and Schedule 1 of Environmental Assessment of plans and programmes Regulations 2004	Assessment	Likely significant environmental effect
<p>(ii) exceeded environmental quality standards or limit values; or</p> <p>(iii) intensive land-use; and</p>	<p>As discussed in paras 4.44 and 4.45, significant effects on internationally designated habitat sites (European sites) are not likely to arise.</p> <p>The SBNP is not expected to exceed environmental quality standards or lead to intensive land use.</p> <p>The SBNP includes policies which promote environmental considerations and seek to provide greater protection for the character of the area. Therefore, it is not considered that there will be any significant adverse impacts in terms of criteria (f) (i to iii).</p>	
<p>(g) the effects on areas or landscapes which have a recognised national, Community or international protection status.</p>	<p>As identified in Table 2, the Swaffham Bulbeck Neighbourhood Area includes a number of areas and assets benefitting from protection through statute or local policies, including a Conservation Area, Listed Buildings, Scheduled Monuments, and County Wildlife Sites, etc. In addition, the assessment identified the potential for effects on SSSIs located beyond the Neighbourhood area.</p> <p>Effects of the SBNP on landscapes are expected to be positive and localised, as a Landscape Character Study has been undertaken to inform the SBNP's policies. However, the effects are not likely to be significant in the context of SEA.</p> <p>Significant effects on internationally designated habitat sites (European sites) are not likely to arise.</p>	Yes

FIGURE 4: APPLICATION OF THE SEA DIRECTIVE TO SWAFFHAM BULBECK NEIGHBOURHOOD PLAN

Criteria	Response: Yes/ No/ Not applicable	Details
1. Is the NDP subject to preparation and/or adoption by a national, regional or local authority OR prepared by an authority for adoption through a legislative procedure by Parliament or Government? (Art 2 (a))	Yes	The preparation and adoption of the SBNP is allowed under the Town and Country Planning Act 1990, as amended by the Localism Act 2011. Whilst the SBNP has been prepared by Swaffham Bulbeck Parish Council, it will be adopted by ECDC as the local authority and will form part of the statutory development plan for the East Cambridgeshire area. GO TO STAGE 2
2. Is the NDP required by legislative, regulatory or administrative provisions? (Art 2 (a))	Yes	Whilst the production of a NDP is not a requirement and is optional, it will, if made, form part of the statutory development plan for the East Cambridgeshire area. It is therefore important that this screening process considers the potential effects. GO TO STAGE 3
3. Is the NDP prepared for agriculture, forestry, fisheries, energy, industry, transport, waste management, water management, telecommunications, tourism, town and country planning or land use, AND does it set a framework for future development consent of projects in Annexes I and II to the EIA Directive? (Art 3.2 (a))	Yes – Town & Country Planning / land use; No - EIA Directive Annex I & II	The SBNP is being prepared for town and country planning and land use purposes, setting a framework for future development consents within the Swaffham Bulbeck Neighbourhood Area. However, the NDP does not set a framework for consent of projects in Annexes I and II to the EIA Directive. GO TO STAGE 4
4. Will the NDP, in view of its likely effect on sites, require an assessment for future development under Article 6 or 7 of the Habitats Directive? (Art 3.2 (b))	No	See paras 4.44 and 4.45 and Figure 3 for assessment of the NP in terms of HRA. Significant effects on internationally designated habitat sites (European sites) are not likely to arise, and therefore no assessment under Article 6 or 7 is required. GO TO STAGE 6

Criteria	Response: Yes/ No/ Not applicable	Details
5. Does the NDP determine the use of small areas at local level, OR is it a minor modification of an NDP subject to Art. 3.2? (Art 3.3)	n/a	
6. Does the NDP set the framework for future development consent of projects (not just projects in annexes to the EIA Directive)? (Art 3.4)	Yes	Once 'made' the SBNP forms part of the Development Plan and will be used in the decision-making process on planning applications. It therefore sets the framework for future developments at a local level. GO TO STAGE 8
7. Is the NDP's sole purpose to serve the national defence or civil emergency, OR is it a financial or budget PP, OR is it co-financed by structural funds or EAGGF programmes 2000 to 2006/7?	n/a	The SBNP does not deal with these issues.
8. Is it likely to have a significant effect on the environment?	Yes	A NDP could potentially have a significant effect on the environment, dependent on the proposed policies within the NDP. This requires detailed assessment to determine. As discussed in paras. 4.9 to 4.162 and applied in Figure 3 , implementation of the SBNP has the potential to give rise to likely significant effects on the environment - specifically through the potential for effects on SSSIs, including Devil's Dyke SSSI, and the historic environment, notably the significance of the Swaffham Bulbeck Conservation Area and certain Listed Buildings.
Outcome: SEA REQUIRED ('Screened in') AND HRA NOT REQUIRED ('Screened out')		

Summary of SBNP's likely effects on the environment

4.202. Having reviewed the environmental characteristics of the SBNP area and the vision, objectives and policies against the SEA criteria, ECDC is unable to rule out likely significant effects on the environment as a result of implementation of the SBNP.

4.203. Specifically, this includes the potential for likely significant effects on:

- **Sensitive SSSIs, including Devil's Dyke SSSI, due to the potential for increased recreational pressure from proposed development; and**
- **The historic environment, notably the significance of the Swaffham Bulbeck Conservation Area and certain Listed Buildings in the vicinity of the proposed site allocation.**

Therefore, the SBNP must be screened in for further SEA.

4.204. The assessment of the SBNP found that significant effects on designated European sites are not likely. Therefore, further HRA assessment under the Habitats Regulations can be **screened out**.

4.205. A number of the SBNP's objectives and policies are particularly environmentally conscientious and address environmental issues positively by seeking to improve the quality of new development to reduce its impacts on the environment. The assessment concluded that such policies and objectives, whilst positive, are not likely to constitute 'significant effects' for the purposes of SEA.

4.206. In the event that the vision, objectives and/or policies covered by the SBNP should change significantly during the plan-making process, or specific sites are allocated for development, this assessment may need to be revisited.

5. Addressing potential adverse effects on the environment

- 5.1. This section seeks to identify measures to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the SBNP.
- 5.2. Section 4 identified the potential for likely significant effects to arise from implementation of the SBNP. More specifically, such potential effects relate to the development of the SBNP's site allocation through implementation of *Policy SWB8 – Cemetery/Pony Field site* only. The policy provides additional opportunities for growth not accounted for in the SA/SEA of the East Cambridgeshire Local Plan 2015. Likely significant effects were identified in respect of:
- Sensitive SSSIs, including Devil's Dyke SSSI, due to the potential for increased recreational pressure from proposed development; and
 - The historic environment, notably the significance of the Swaffham Bulbeck Conservation Area and certain Listed Buildings in the vicinity of the proposed site allocation.
- 5.3. Other development opportunities, such as infill development within the updated Development Envelope, rural affordable housing exception sites, community-led developments, and rural workers dwellings (through *Policy SWB1 – Swaffham Bulbeck Development Envelope*), are already acceptable in principle through the Local Plan 2015. The Local Plan policies which enable these forms of development were subject to SEA through Sustainability Appraisal of the Local Plan.
- 5.4. It should be noted that the SBNP's site allocation is intended to form a *community-led development* scheme. The Local Plan 2015's *Policy GROWTH 6: Community-led development* lends support to such developments in locations outside the Development Envelope. However, whilst the Local Plan policy was subject to sustainability appraisal, it did not consider effects directly related to development of the *Cemetery/Pony Field site* and therefore the need for SEA remains.
- 5.5. Consequently, the scope of the SEA Framework should be limited only to those matters where there is potential for likely significant effects to arise. To consider other issues would be unnecessary and disproportionate. In other words, for the purposes of this SEA, their effects can be assumed to be 'neutral'.
- 5.6. For the avoidance of doubt, no likely significant effects were identified in respect of European Sites, and a HRA is not required.

Summary of scope of SEA

TABLE 5: SUMMARY OF SCREENING ASSESSMENT FINDINGS IN CONTEXT OF SEA THEMES

SEA Themes	Screened in / out
Biodiversity, flora and fauna	Screened in
Population	Screened out
Human health	Screened out
Landscape	Screened out
Water	Screened out
Soil	Screened out
Climatic factors	Screened out
Air	Screened out
Cultural heritage, including architectural and archaeological heritage	Screened in
Material assets	Screened out
The inter-relationship between the issues referred to above	Screened out

- 5.7. As discussed in Section 1, ECDC consulted statutory bodies on the scope of the assessment (through the *Scoping Report* from June to August 2021).

SEA Framework

- 5.8. To ensure the SEA is relevant, it must be locally specific. In formulating a SEA Framework, this section draws on ECDC's recent *SA Scoping Report (March 2021)*⁴⁸.
- 5.9. Section 3 - *Key information on the emerging Neighbourhood Plan and neighbourhood area* explores the SBNP's proposals, the policy context (namely the Local Plan 2015), neighbouring authorities' plans, and identifies a broad range of environmental constraints. For the purposes of SEA, section 3 provides a 'baseline'.
- 5.10. ECDC has recently updated its Sustainability Appraisal Framework (SA Framework) for the purposes of undertaking a *Single Issue Review* of its Local Plan. The SA Framework was developed in consultation with the statutory bodies, with a scoping report published in March 2021.
- 5.11. It is proposed that **Policy SWB8 – Cemetery/Pony Field Site** be appraised against the relevant SA objectives listed in Table 6, taken from ECDC's latest SA Framework.
- 5.12. The purpose of the SEA framework is to further explore the issues identified as being within the scope of this assessment and identify mechanisms to avoid environmental harm, such as mitigation measures or pursuing an alternative strategy. The outcomes of the SEA process should directly inform preparation of the SBNP and support it in satisfying the *Basic Conditions* for neighbourhood planning.

Consideration of reasonable alternatives

- 5.13. It is a requirement of the SEA to assess 'reasonable alternatives'. As discussed in section 4, it has not been possible to identify any alternative potential allocation sites as:
- Other known sites have either secured planning permission or been refused planning permission and therefore are not 'reasonable alternatives' for potential allocations;
 - Land in the Neighbourhood Area is highly constrained by policy designations (such as Green Belt and open countryside) and is not suitable for allocation;
 - Land in the Neighbourhood Area, notably around Swaffham Bulbeck's fringe, is highly constrained by environmental designations including areas of flood risk, Source Protection Zones, Scheduled Monuments, the Conservation Area, Registered Parks & Gardens and County Wildlife Sites and is not suitable for allocation;
 - The *Swaffham Bulbeck Landscape Study* indicates there is insufficient capacity in the landscape to accommodate new development, and is therefore not suitable for allocation; and
 - Opportunities for development within the Development Envelope are likely to be small-scale, and therefore not suitable for allocation.
- 5.14. A potential 'alternative' could be to not allocate a site through the SBNP. In other words, omit Policy SWB8 – Cemetery/Pony Field Site, with all other elements of the SBNP remaining the same. It is questionable whether such an option is truly 'reasonable' since it is a clear aspiration of the community to deliver new development, as evident through the establishment of the Swaffham Bulbeck Community Land Trust in parallel to the Neighbourhood Plan for the purpose of delivering and managing new homes:

⁴⁸ https://www.eastcamb.gov.uk/sites/default/files/Final%20Scoping%20Report%20-%20Local%20Plan%202036AC_0.pdf

The Community Land Trust, set up by local people in June 2017, is an independent non-profit charitable trust with its own set of governance rules. Its primary object is the provision of housing in perpetuity for the benefit of people with a local connection.

- 5.15. The aspiration to meet local housing needs is reflected in objective 2, part f:
Increasing housing stock which is accessible to younger families by building affordable houses and low-cost market houses.
- 5.16. An alternative option of *not* allocating sites risks conflict with the community’s aspirations and undermining the principles of neighbourhood planning which empowers communities to deliver growth. It is evident from the SBNP that there is a strong will from the community to deliver a community-led development scheme to provide housing which meets local needs. Where the Neighbourhood Plan does not reflect the community’s aspirations, it may fail to gain support at the referendum stage and therefore be unsuccessful.
- 5.17. Despite the wider implications to the neighbourhood planning process, for the purposes of SEA it is proposed that ‘not allocating a site’ be assessed as a reasonable alternative.
- 5.18. Not allocating a site has the potential to lead to unintended consequences in terms of its environmental effects, particularly in relation to the SEA theme of *population*, as the SBNP’s ability to meet local housing needs would be severely curtailed. To fully assess the implications of the alternative option, it is necessary to extend the scope of the assessment beyond those issues where potential likely effects on the environment have been identified in respect of the draft site allocation.
- 5.19. Table 4 sets out the SA Topics, SA Objectives and Decision-making criteria of relevance to the scope of the SEA. Notably, this includes *SA Topic 2 Biodiversity*, *SA Topic 3 Landscape, townscape and archaeology* and *SA Topic 6 Inclusive communities* from ECDC’s SA Framework 2021.

TABLE 6: SEA FRAMEWORK (EXCERPT FROM ECDC SA FRAMEWORK 2021)

SA Topic	SA Objective	Decision-making criteria
2 Biodiversity	2.1 Avoid damage to designated statutory and non statutory sites and protected species	<ul style="list-style-type: none"> Will it protect sites designated for nature conservation interest? Will it mitigate against any harm caused by proposed development?
	2.2 Maintain and enhance the range and viability of characteristic habitats and species	<ul style="list-style-type: none"> Will it conserve species, reverse declines, help to enhance diversity? Will it reduce habitat fragmentation? Will it help achieve Biodiversity Action Plan targets?
	2.3 Improve opportunities for people to access and appreciate wildlife and wild places	<ul style="list-style-type: none"> Will it improve access to wildlife, and wild places? Will it maintain or increase the area of high-quality green space? Will it promote understanding and appreciation of wildlife?
3 Landscape, townscape and archaeology	3.1 Conserve, sustain and enhance the historic environment including the significance of designated and non-designated heritage assets	<ul style="list-style-type: none"> Will it protect or enhance sites, features of areas of historical, archaeological, or cultural interest and their settings? Will it foster heritage-led sustainable tourism?

	(and any contribution made to that significance by setting)	
	3.2 Maintain and enhance the diversity and distinctiveness of landscape and townscape character	<ul style="list-style-type: none"> • Will it maintain and enhance the diversity and distinctiveness of landscape and townscape character? • Will it protect and enhance open spaces of amenity and recreational value? • Will it maintain and enhance the character of settlements?
	3.3 Create places, spaces and buildings that work well, wear well and look good	<ul style="list-style-type: none"> • Will it improve the satisfaction of people with their neighbourhoods as places to live? • Will it lead to developments built to a high standard of design?
6 Inclusive communities	6.1 Improve the quality, range and accessibility of services and facilities (e.g. health, transport, education, training, leisure opportunities)	<ul style="list-style-type: none"> • Will it improve accessibility to key local services and facilities? • Will it improve accessibility by means other than the car? • Will it support and improve community and public transport? • Will it improve and broaden access to the local historic environment?
	6.2 Redress inequalities related to age, gender, disability, race, faith, location and income	<ul style="list-style-type: none"> • Will it improve relations between people from different backgrounds or social groups? • Will it reduce poverty and social exclusion in those areas most affected? • Will it promote accessibility for all members of society?
	6.3 Ensure all groups have access to decent, appropriate and affordable housing	<ul style="list-style-type: none"> • Will it support the provision of a range of housing types and sizes to meet the identified needs of all sectors of the community? • Will it reduce the number of unfit homes? • Will it meet the needs of the travelling community?
	6.4 Encourage and enable the active involvement of local people in community activities	<ul style="list-style-type: none"> • Will it increase the ability of people to influence decisions? • Will it provide better opportunities for people to understand local heritage, buildings and to participate in cultural and leisure activities?

5.20. Those SA themes and objectives will provide a framework for the assessment process. Table 7 provides a key to the appraisal symbols which will be used in assessing policy/site allocation.

TABLE 7: KEY TO APPRAISAL SYMBOLS

Symbol	Likely effect upon the SA Objective
+++	Strong and significant beneficial impact
++	Potentially significant beneficial impact
+	Policy or proposal supports this objective although it may only have a minor beneficial impact
~	Policy or proposal has no impact or effect is neutral insofar as the benefits and drawbacks appear equal and neither is considered significant
?	Uncertain or insufficient information on which to determine the assessment at this stage
-	Policy or proposal appears to conflict with the objective and may result in adverse impacts
--	Potentially significant adverse impact
---	Strong and significant adverse impact

- 5.21. In undertaking the assessment consideration has been given to latest guidance and advice from Historic England and Natural England, and advice has been sought from ECDC's Conservation Officer.
- 5.22. Table 8 provides assessment of the following two policy options against the SA objectives:
- SBNP Policy SWB8 – Cemetery / Pony Field site (as drafted); and
 - SBNP with policy SWB8 omitted (i.e. no site allocation).

TABLE 8: APPRAISAL OF POLICY OPTIONS AGAINST SA OBJECTIVES

SA Topic	SA Objective	Decision-making criteria	Option 1: Policy SWB8 – Cemetery / Pony Field Site	Option 2: SBNP with Policy SBB8 omitted i.e. no site allocation
2 Biodiversity	2.1 Avoid damage to designated statutory and non statutory sites and protected species	<ul style="list-style-type: none"> Will it protect sites designated for nature conservation interest? Will it mitigate against any harm caused by proposed development? 	--	~
			<p>As indicated in section 4, the site is intersected by SSSI Impact Risk Zones.</p> <p>In their consultation response to the <i>Scoping Report</i>, Natural England identify the potential for major development at the proposed site allocation to increase recreational pressure on sensitive SSSIs, including the Devil's Dyke SSSI.</p> <p>The Concept Plan and design principles at policy SWB8 identify requirements for extensive open space as part of the development scheme for the purposes of conserving landscape character and retaining green corridors. It is not clear to what extent this open space will mitigate against recreational pressure at SSSIs.</p>	<p>In the absence of the proposed site allocation, no major development is expected to take place in the Neighbourhood Area over the plan period.</p> <p>The effects on biodiversity, including statutory and non-statutory sites and protected species, are therefore likely to be neutral i.e. the SBNP will have no effects in respect of the SA objective.</p>
	2.2 Maintain and enhance the range and viability of characteristic habitats and species	<ul style="list-style-type: none"> Will it conserve species, reverse declines, help to enhance diversity? Will it reduce habitat fragmentation? Will it help achieve Biodiversity Action Plan targets? 	--	~
			<p>Major development at the proposed site allocation has the potential to increase recreational pressure on sensitive SSSIs, including the Devil's Dyke SSSI. This could adversely affect efforts to maintain and enhance the SSSI's integrity.</p> <p>The Concept Plan and design principles at policy SWB8 identifies a requirement to provide a green corridor, which could play a role in supporting habitats and species.</p>	<p>In the absence of the proposed site allocation, no major development is expected to take place in the Neighbourhood Area over the plan period.</p> <p>The effects of the option are therefore neutral.</p>

	<p>2.3 Improve opportunities for people to access and appreciate wildlife and wild places</p>	<ul style="list-style-type: none"> • Will it improve access to wildlife, and wild places? • Will it maintain or increase the area of high-quality green space? • Will it promote understanding and appreciation of wildlife? 	<p style="text-align: center;">+</p> <p>The policy enables major development of a site located in East Cambridgeshire’s rural area, in proximity of a range of nature conservation sites.</p> <p>The Concept Plan and design principles at policy SWB8 identify requirements for extensive open space as part of the development scheme for the purposes of conserving landscape character and retaining green corridors – thereby increasing the availability of green space.</p> <p>It is likely that residents of the site would benefit from good access to wildlife and wild spaces.</p>	<p style="text-align: center;">~</p> <p>In the absence of the proposed site allocation, no major development is expected to take place in the Neighbourhood Area over the plan period.</p> <p>The option would have no effect in respect of the SA Objective.</p>
<p>3 Landscape, townscape and archaeology</p>	<p>3.1 Conserve, sustain and enhance the historic environment including the significance of designated and non-designated heritage assets (and any contribution made to that significance by setting)</p>	<ul style="list-style-type: none"> • Will it protect or enhance sites, features of areas of historical, archaeological, or cultural interest and their settings? • Will it foster heritage-led sustainable tourism? 	<p style="text-align: center;">?</p> <p>The proposed site allocation (<i>Policy SWB8</i>) adjoins the Conservation Area. In addition, there are a number of listed buildings in the vicinity of the site (outside the site boundary). As indicated in section 4, development of the site allocation has the potential to adversely affect such heritage assets and their settings.</p> <p>The presence of heritage assets, such as Conservation Area or Listed Buildings, does not preclude development. For example, more modern development already exists in proximity of the Swaffham Bulbeck Conservation Area, such as to the south of the proposed site allocation at Quarry Lane.</p> <p>However, the presence of such heritage assets is an important consideration for the design of a development scheme for the site.</p>	<p style="text-align: center;">~</p> <p>In the absence of the proposed site allocation, no major development is expected to take place in the Neighbourhood Area over the plan period.</p> <p>The option would have no effect in respect of the SA Objective.</p>

			<p>Policy SWB8 requires new development to contribute positively to the existing landscape and built environment character, and requires development to conserve the pattern of three distinct settlement clusters in the village, as illustrated by the Concept Plan for the site. The Concept Plan was informed by a Landscape Character Assessment and Settlement Fringe Study commissioned by the Parish Council.</p> <p>In addition, <i>Policy SWB4 – Swaffham Bulbeck Built environment character</i> requires ‘development proposals in or in the setting of the Conservation Area to conserve or enhance the quality of the street scene and be in keeping or complement existing historic buildings’.</p> <p>As identified in Section 3, there are two assets listed on the Heritage at Risk register in proximity of the Neighbourhood Area. Both assets are located beyond the Neighbourhood Area boundary, and are Scheduled Monuments. Scheduled Monuments are at risk from a wide range of processes and pressures, such as damage from cultivation, forestry and natural processes such as scrub growth, animal burrowing and erosion. The policy option is likely to have no effect on the status of assets on the Heritage at Risk register.</p>	
	<p>3.2 Maintain and enhance the diversity and distinctiveness of landscape and townscape character</p>	<ul style="list-style-type: none"> • Will it maintain and enhance the diversity and distinctiveness of landscape and townscape character? • Will it protect and enhance open spaces 	<p style="text-align: center;">++</p> <p>Policy SWB8 requires the new development to contribute positively to the existing landscape and built environment character, and follow design principles illustrated on the Concept Plan.</p>	<p style="text-align: center;">~</p> <p>In the absence of the proposed site allocation, no major development is expected to take place in the Neighbourhood Area over the plan period.</p>

		<p>of amenity and recreational value?</p> <ul style="list-style-type: none"> • Will it maintain and enhance the character of settlements? 	<p>This includes conserving the pattern of three distinct settlement clusters in the village, and retaining a flow of open space and retaining long views through the land parcel between the Denny to the west and valley sides to the east. Housing is required to be located in less visually prominent areas and where it fits with the existing settlement pattern.</p> <p>Development must also reflect existing densities in adjoining areas in each part of the site. The north east area of the site is to be kept free from development.</p>	<p>The option would have no effect in respect of the SA Objective.</p>
	3.3 Create places, spaces and buildings that work well, wear well and look good	<ul style="list-style-type: none"> • Will it improve the satisfaction of people with their neighbourhoods as places to live? • Will it lead to developments built to a high standard of design? 	<p style="text-align: center;">++</p> <p>Though adhering to the design principles set out in Policy SWB8 and elsewhere in the SWB, it is reasonable to conclude that new development will be built to a high standard.</p>	<p style="text-align: center;">~</p> <p>In the absence of the proposed site allocation, no major development is expected to take place in the Neighbourhood Area over the plan period.</p> <p>The option would have no effect in respect of the SA Objective.</p>
6 Inclusive communities	6.1 Improve the quality, range and accessibility of services and facilities (e.g. health, transport, education, training, leisure opportunities)	<ul style="list-style-type: none"> • Will it improve accessibility to key local services and facilities? • Will it improve accessibility by means other than the car? • Will it support and improve community and public transport? • Will it improve and broaden access to the 	<p style="text-align: center;">++</p>	<p style="text-align: center;">~</p>
			<p>The site adjoins Swaffham Bulbeck village, which offers a limited but important range of local services and facilities.</p> <p>Such services and facilities would be located would be accessible by foot or cycle from the proposed site allocation.</p>	<p>In the absence of the proposed site allocation, no major development is expected to take place in the Neighbourhood Area over the plan period.</p> <p>The option would have no effect in respect of the SA Objective.</p>

		local historic environment?	The site is located close to Swaffham Bulbeck's Conservation Area and is in close proximity to heritage assets, such as listed buildings.	
6.2 Redress inequalities related to age, gender, disability, race, faith, location and income	<ul style="list-style-type: none"> • Will it improve relations between people from different backgrounds or social groups? • Will it reduce poverty and social exclusion in those areas most affected? • Will it promote accessibility for all members of society? 		++	~
		<p>By enabling major development of a community-led development scheme (which will include affordable housing) at Swaffham Bulbeck, the policy will support people excluded due to low income / poverty.</p> <p>The proposed site allocation provides homes in a location which is accessible to village services and facilities, and could play a role in maintaining the viability of local services.</p>	<p>In the absence of the proposed site allocation, no major development is expected to take place in the Neighbourhood Area over the plan period.</p> <p>The option would have no effect in respect of the SA Objective.</p>	
6.3 Ensure all groups have access to decent, appropriate and affordable housing	<ul style="list-style-type: none"> • Will it support the provision of a range of housing types and sizes to meet the identified needs of all sectors of the community? • Will it reduce the number of unfit homes? • Will it meet the needs of the travelling community? 		+++	~
		<p>The policy supports the delivery of major development for a community-led development scheme.</p> <p>Development of this scale will provide a significant increase in the supply of homes in the village, and will deliver a range of house types and tenures. This will include the provision of affordable homes, thereby meeting the housing needs of different groups.</p>	<p>In the absence of the proposed site allocation, no major development is expected to take place in the Neighbourhood Area over the plan period.</p> <p>The option would have no effect in respect of the SA Objective.</p>	
6.4 Encourage and enable the active involvement of local people in community activities	<ul style="list-style-type: none"> • Will it increase the ability of people to influence decisions? • Will it provide better opportunities for people to understand 		+++	---
		<p>The policy requires new development to be <i>community-led</i>, with demonstrable support from the Parish Council, the Swaffham Bulbeck Community Land Trust.</p>	<p>The site allocation proposed through policy SWB8 reflects the community's aspiration to enable development of the site.</p>	

		<p>local heritage, buildings and to participate in cultural and leisure activities?</p>	<p>This model of development enables local people to play an active role in planning for and delivering of new homes, and enables the community to benefit in perpetuity from the new affordable homes.</p> <p>The policy reflects a community aspiration to deliver new homes on the site.</p>	<p>To omit the policy would be counter to the community's aspiration and would undermine inclusivity and engagement in the planning process.</p>
--	--	---	---	--

Commentary and summary of mitigation measures

Biodiversity

- 5.23. As illustrated in the SEA Framework, major development of the SBNP's proposed site allocation at the Cemetery / Pony Field site has the potential to adversely affect SSSIs through increased recreational pressure.
- 5.24. In order to screen out significant effects to nearby sensitive SSSIs, such as Devil's Dyke, Natural England advised that SBNP Policy SWB8 should include a commitment for the proposed development to deliver 1.8ha informal open space provision, or appropriate alternative mitigation. Creation of high quality open space on people's doorsteps, incorporating biodiversity-rich habitats and circular dog-walking routes, connected to off-site areas where possible, can provide a suitable alternative to visiting more sensitive sites for daily recreational activities. Appropriately scaled and designed this can reduce additional pressure, and avoid adverse impact, to sensitive designated sites.
- 5.25. The Concept Plan and design principles in policy SWB8 identify requirements for extensive open space as part of the development scheme for the purposes of conserving landscape character and retaining green corridors. As currently drafted, it is not clear to what extent this open space will mitigate against recreational pressure at SSSIs. To avoid adverse impacts on SSSIs as a result of increased recreational pressure, the policy should be amended to include the following mitigation measure, requiring development proposals to:
- **Make provision for a minimum of 1.8ha of informal open space for general recreation and leisure use, or appropriate alternative mitigation to avoid or limit impacts on nearby sensitive sites designated for nature conservation.**

Landscape, townscape and archaeology

- 5.26. As identified in the SEA Framework Policy SWB8's effects upon designated heritage assets (namely the Swaffham Bulbeck Conservation Area and listed buildings in proximity of the proposed site allocation) are uncertain, since such effects are dependent upon the design of the development scheme.
- 5.27. Historic England's *Sustainability Appraisal and Strategic Environmental Assessment Historic England Advice Note 8*⁴⁹ indicates that avoidance of damage to all heritage assets remains highly desirable owing to the finite nature of the resource. The advice note indicates that "*alternative proposals that avoid or result in less harm to the historic environment should be considered preferentially before considering whether mitigation appropriate to the level of impact and type of harm involved can be identified*". However, no other site options could be identified (other than to not allocate a site).
- 5.28. The advice note indicates that "*mitigation measures for the implementation stage of a planning application are the most appropriate method of dealing with situations where damage cannot be avoided*". The advice note provides examples of possible mitigation measures for the historic environment, of which the following are relevant to the context of the SBNP:
- Strengthened references to the historic environment in the policy framework, criteria and guidance e.g. addition of a specific historic environment policy, regeneration policies, planning obligations;
 - Heritage conservation requirements including positive measures to promote the conservation and enjoyment of heritage assets within site specific development policies;
 - Undertaking of detailed historic characterisation studies to inform development;

⁴⁹ [heag036-sustainability-appraisal-strategic-environmental-assessment \(historicengland.org.uk\)](https://historicengland.org.uk/heag036-sustainability-appraisal-strategic-environmental-assessment)

- 5.29. Policy SWB8 sets out design principles for the proposed site allocations. As discussed in the SEA Framework, many of these policy requirements relate to conserving characteristics of the landscape and townscape, and design quality. However, there is opportunity to mitigate potential effects on the historic environment through incorporating additional site specific policy requirements at SWB8.
- 5.30. For example, to ensure development proposals are designed to respond sensitively and appropriately to the historic environment, the policy could include a requirement for development proposals to be accompanied by a Heritage Statement – e.g. the following example policy requirement could be incorporated into draft Policy SWB8.
- **The design of the scheme should respond appropriately to Swaffham Bulbeck’s rich historic environment and be informed by a Heritage Statement which, as a minimum, should:**
 - **identify the relationship of the site to heritage assets;**
 - **demonstrate understanding of significance and contribution made by heritage assets and their settings;**
 - **quantify the impact of the development on the special character of heritage asset; and**
 - **illustrate and justify the mitigation measures which have been taken in designing the scheme to avoid or limit harm to heritage assets and their settings.**

Inclusive communities

- 5.31. Policy SWB8 creates an opportunity for major residential development. As illustrated in the SEA Framework, development of the site has the potential to contribute positively through an increase in the supply of new homes of a range of types and tenures, thereby meeting the housing needs of different groups. The proposed site allocation is in an accessible location close to village services and facilities. The policy’s requirement that any development scheme be *community-led* promotes inclusivity and engagement and helps to retain the community benefits of the development in perpetuity. The policy reflects a community aspiration to deliver new homes on the site. The policy therefore scores positively against the *Inclusive communities SA Objective*.

Alternative option (Option 2)

- 5.32. As indicated in the SEA Framework, alternative option 2 (to omit policy SWB8) avoids the potential adverse effects in respect of the *Biodiversity and Landscape, townscape and archaeology SA Objectives* by virtue of not promoting major development.
- 5.33. The alternative option to not allocate a site would result in the plan failing to realise the benefits development of the site would bring to the community.
- 5.34. In addition, the option conflicts with the community’s aspiration for development of the site undermining the inclusive nature of the neighbourhood planning process. Consequently, the SEA Framework identifies *strong and significant adverse impacts* in respect of SA objective 6.4 *Encourage and enable the active involvement of local people in community activities*.

SEA Framework conclusions

- 5.35. Following appraisal against the SEA Framework, it is recommended that:
- a) Option 2 (SBNP with Policy SWB8 omitted) be rejected as, whilst it avoids the potential adverse effects on the environment, it fails to realise the benefits growth can provide in terms of meeting housing needs and improving accessibility. Furthermore, the option would likely have adverse consequences in terms of inclusivity and community involvement as it conflicts with the community's aspiration to deliver a major, community-led housing development, as illustrated through the SBNP.
 - b) Option 1 (SBNP Policy SWB8) be retained - *subject to the inclusion of the following mitigation measures* to mitigate potential adverse effects on the environment:
 - **Make provision for a minimum of 1.8ha of informal open space for general recreation and leisure use, or appropriate alternative mitigation to avoid or limit impacts on nearby sensitive sites designated for nature conservation.**
 - **The design of the scheme should respond appropriately to Swaffham Bulbeck's rich historic environment and be informed by a Heritage Statement which, as a minimum, should:**
 - **identify the relationship of the site to heritage assets;**
 - **demonstrate understanding of significance and contribution made by heritage assets and their settings;**
 - **quantify the impact of the development on the special character of heritage asset; and**
 - **illustrate and justify the mitigation measures which have been taken in designing the scheme to avoid or limit harm to heritage assets and their settings.**

Monitoring

- 5.36. The purpose of monitoring is to identify adverse effects and enable appropriate remedial action following the plan's implementation.
- 5.37. ECDC recommends that Swaffham Bulbeck Parish Council monitors the implementation of the SBNP, using the indicators set out in Table 9 which are relevant to the scope of this Environmental Report.

TABLE 9: MONITORING INDICATORS FOR SWAFFHAM BULBECK NEIGHBOURHOOD PLAN

Indicator	Target	Commentary	Data source
Condition of Devil's Dyke SSSI	100% of site area favourable or unfavourable recovering condition	As identified through the SEA, growth in the Neighbourhood Area has the potential to impact on the Devil's Dyke SSSI through increased recreational pressure. The condition of the SSSI should be monitored on an annual basis and should maintain 100% of the site area as 'favourable' or 'unfavourable recovering' condition.	Natural England's 'Designated Sites View' database provides details on the condition of SSSIs: https://designatedsites.naturalengland.org.uk/ReportConditionSummary.aspx?SiteCode=S1000404&ReportTitle=Devil%27s%20Dyke%20SSSI
Number of designated heritage assets in the Neighbourhood Area	No net reduction in the number of designated historic assets in the Neighbourhood Area	Swaffham Bulbeck has a rich historic environment. The indicator aims to ensure there is no degradation of heritage assets that would result in their de-listing.	Historic England's <i>National Heritage List for England</i> : https://historicengland.org.uk/listing/the-list/

Other recommendations

- 5.38. As recommended by Historic England in their consultation response to the Scoping Report, Swaffham Bulbeck parish Council should consult Cambridgeshire County Council's Historic Environmental Records team, ECDC's conservation officer and Cambridgeshire County Council's archaeological staff on the *Draft Swaffham Bulbeck Neighbourhood Plan (Regulation 14)*.

6. Non-Technical Summary

Context

- 6.1. The subject of this Environmental Report is the draft Swaffham Bulbeck Neighbourhood Plan (SBNP), which is expected to be published for consultation in September 2021⁵⁰. The plan has been prepared by Swaffham Bulbeck Parish Council with the support of local volunteers. This Environmental Report documents the *Strategic Environmental Assessment* (SEA) of the draft SBNP. It will be published alongside the draft SBNP during consultation, and is expected to be submitted alongside the SBNP prior to the independent examination of the neighbourhood plan.
- 6.2. SEA is a crucial part of preparing a neighbourhood plan and is essential in demonstrating the plan meets the *basic conditions*⁵¹ and other statutory requirements. Whilst SEA originates from a European Directive⁵², the process has been incorporated into UK law⁵³ and remains in force despite the UK's withdrawal from the European Union.

Screening exercise

- 6.3. In June 2021, East Cambridgeshire District Council (ECDC) undertook an initial screening assessment of the SBNP which concluded the plan requires a full Strategic Environmental Assessment (SEA) – this is commonly referred to as being *screened in*.
- 6.4. ECDC also concluded that the SBNP is not likely to lead to adverse harm to sites designated for nature conservation through the National Sites Network⁵⁴ or Ramsar Sites. Therefore, a full Habitats Regulations Assessment is not required.

Scope

- 6.5. ECDC's screening assessment findings and scope of the Environmental Report were set out in a *Scoping Report*. The Scoping Report was published for consultation with statutory consultation bodies⁵⁵ between 28 June and 02 August 2021. The responses from the statutory bodies have been taken into consideration in carrying out the SEA.
- 6.6. The methodology⁵⁶ applied in this SEA and the content of this Environmental Report, reflect requirements set out in relevant legislation. This includes key information about the Neighbourhood Plan and Neighbourhood Area, including an outline of the content and objectives of the SBNP, its relationship with other relevant plans and programmes, and relevant environmental characteristics of the Neighbourhood Area are described in Section 3.

⁵⁰ Regulation 14 pre-submission stage consultation.

⁵¹ As set out in 8(2) of Schedule 4B of the Town and Country Planning Act 1990.

⁵² Namely, *Directive 2001/42/EC of the European Parliament and of the Council of 27 June 2001 on the assessment of the effects of certain plans and programmes on the environment* (the Strategic Environmental Assessment Directive).

⁵³ As *The Environmental Assessment of Plans and Programmes Regulations 2004* (i.e. the 'SEA Regulations').

⁵⁴ Special Areas of Conservation and Special Protection Areas formerly part of the Natura 2000 network.

⁵⁵ The consultation bodies are Environment Agency, Historic England, and Natural England.

⁵⁶ Set out in section 2.

- 6.7. Section 4 provides assessment of the SBNP's policies against various *SEA themes*⁵⁷ to identify the likelihood of significant effects on the environment. This assessment draws on the environmental constraints and characteristics identified in section 3.
- 6.8. The assessment identifies the potential for likely significant effects to arise in respect of:
- **Sensitive SSSIs, including Devil's Dyke SSSI, due to the potential for increased recreational pressure from proposed development; and**
 - **The historic environment, notably the significance of the Swaffham Bulbeck Conservation Area and certain Listed Buildings in the vicinity of the proposed site allocation.**
- 6.9. These potential effects relate to *Biodiversity, flora and fauna* and *cultural heritage, including architectural and archaeological heritage* SEA themes. For all other SEA themes, no likely significant effects on the environment were identified.
- 6.10. A number of the SBNP's objectives and policies are particularly environmentally conscientious and address environmental issues positively by seeking to improve the quality of new development to reduce its impacts on the environment. The assessment concluded that such policies and objectives, whilst positive, are not likely to constitute 'significant effects' for the purposes of SEA.

Alternative policy options

- 6.11. The assessment⁵⁸ identifies just one draft policy which could give rise to 'likely significant effects' – draft *Policy SWB8 – Cemetery / Pony Field Site*. The policy allocates a site for major residential development of approximately 45 dwellings. The policy requires the scheme to be *community-led*, and includes a number of design principles for the development of the site informed by a *Landscape Character Assessment and Settlement Fringe Sensitivity Study*.
- 6.12. Section 4 attempts to identify alternative site options. However, due to the presence of environmental and policy constraints, and lack of known available land including – particularly for *community-led development*, no alternative site options could be identified. In the absence of alternative sites, for the purposes of SEA the options are:
- **Option 1: Policy SWB8 – Cemetery / Pony Field Site** i.e. the SBNP as drafted; and
 - **Option 2: SBNP with policy SWB8 omitted** i.e. the SBNP without a site allocation for major residential development.

SEA Framework

- 6.13. Section 5 appraises options 1 and 2 against an SEA Framework. The SEA Framework has been compiled using objectives from ECDC's latest *Sustainability Appraisal Framework*. The SEA Framework includes only SA Objectives relevant to the scope of the SEA.

Recommended option and mitigation measures

- 6.14. The purpose of the appraisal against the SEA Framework is to identify measures to reduce, prevent or avoid adverse effects on the environment. Following appraisal against the SEA Framework, it is recommended that:

⁵⁷ The SEA themes are defined by the SEA Regulations 2004 and include biodiversity; population; human health; fauna; flora; soil; water; air; climatic factors; material assets; cultural heritage, including architectural and archaeological heritage; landscape; and the inter-relationship between these issues.

⁵⁸ At section 4.

- Option 2 (SBNP with Policy SWB8 omitted) be rejected as, whilst it avoids the potential adverse effects on the environment, it fails to realise the benefits growth can provide in terms of meeting housing needs and improving accessibility. Furthermore, the option would likely have adverse consequences in terms of inclusivity and community involvement as it conflicts with the community's aspiration to deliver a major, community-led housing development, as illustrated through the SBNP.
- Option 1 (SBNP Policy SWB8) be retained - *subject to the inclusion of the following mitigation measures* to mitigate potential adverse effects on the environment, including the integrity of sensitive SSSIs and heritage assets:
 - **Make provision for a minimum of 1.8ha of informal open space for general recreation and leisure use, or appropriate alternative mitigation to avoid or limit impacts on nearby sensitive sites designated for nature conservation.**
 - **The design of the scheme should respond appropriately to Swaffham Bulbeck's rich historic environment and be informed by a Heritage Statement which, as a minimum, should:**
 - **identify the relationship of the site to heritage assets;**
 - **demonstrate understanding of significance and contribution made by heritage assets and their settings;**
 - **quantify the impact of the development on the special character of heritage asset; and**
 - **illustrate and justify the mitigation measures which have been taken in designing the scheme to avoid or limit harm to heritage assets and their settings.**

Monitoring

- 6.15. The purpose of monitoring is to identify adverse effects and enable appropriate remedial action following the plan's implementation. ECDC recommends that Swaffham Bulbeck Parish Council monitor the implementation of the SBNP using the following relevant indicators and targets:
- **Condition of Devil's Dyke SSSI - 100% of site area to meet 'favourable' or 'unfavourable recovering' condition; and**
 - **Number of designated heritage assets in the Neighbourhood Area – With no net reduction in the number of designated historic assets in the Neighbourhood Area.**

Conclusions

- 6.16. The assessment has concluded that as currently drafted, the SBNP could lead to significant effects on the environment.
- 6.17. ECDC is satisfied that, subject to incorporating the measures recommended in this Environmental Report, such effects can be adequately mitigated or avoided.

Appendix 1: Responses to Scoping Report Consultation from Statutory Bodies

Environment Agency's response

Thank you for your email.

We understand the scope of the SEA will include the following SA Topics only:

- Landscape, townscape and archaeology
- Inclusive communities

These topics are outside of our remit, therefore we have no comment to make on this Scoping report.

We hope that this information is of assistance to you. If you have any further queries please do not hesitate to contact us.

Kind regards

Elizabeth

Elizabeth Mugova

Sustainable Places

East Anglia Area (West)

Sustainable Places Team, Bromholme Lane, Brampton, Huntingdon, Cambs. PE28 4NE

Direct Dial: 020 3025 5999

Email: planning.brampton@environment-agency.gov.uk

Historic England's response

Ref: Swaffham Bulbeck Scoping Report

Thank you for your email requesting a scoping opinion for the Swaffham Bulbeck Neighbourhood Plan SEA.

We would refer you to the advice in *Historic England Advice Note 8: Sustainability Appraisal and Strategic Environmental Assessment*, which can be found here:

<https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/>. This advice sets out the historic environment factors which need to be considered during the Strategic Environmental Assessment or Sustainability Appraisal process, and our recommendations for information you should include.

We would also refer you to *Historic England Advice Note 3: Site Allocations and Local Plans*. This advice note sets out what we consider to be a robust process for assessing the potential impact of site allocations on any relevant heritage assets. In particular we would highlight the Site Selection Methodology set out on Page 5. This is similar to the methodology used to assess potential impacts on the setting of heritage assets (Good Practice Advice 3) but is focused specifically on the site allocation process.

We would expect a proportionate assessment based on this methodology to be undertaken for any site allocation where there was a potential impact, either positive or negative, on a heritage asset, and the SEA consequently to advise on how any harm should be minimised or mitigated. Advice Note 3 can be found here: <https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/>

We are pleased to note that the Scoping Report identifies a reasonably comprehensive historic environment evidence base, and consider that the included maps are helpful in setting out the location and extent of designated heritage assets in the Parish. However, the Scoping Report should also identify where there are gaps in evidence, for example the lack of conservation area appraisal for Swaffham Bulbeck, and make recommendations for how these gaps are to be mitigated when undertaking the SEA.

We are also pleased to note that consideration of heritage at risk is included, and would recommend that the SEA process include consideration of any enhancements that could be made as a result of the development of the neighbourhood plan, with a view to removing these assets from the Heritage at Risk Register.

We are pleased to note that the Cambridgeshire HER is referred to, but would note that the Heritage Gateway website is not an appropriate source of Historic Environment Record (HER) data, as it is not updated on a regular enough basis. The HER at Cambridgeshire County Council should be consulted directly. This may be free of charge for neighbourhood plan groups.

In general, 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 in the HER mentioned above 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.

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.

Yours sincerely,

Edward James

Historic Places Advisor, East of England

Edward.James@HistoricEngland.org.uk

Natural England's response

Thank you for your consultation on the above in your email of 28 June 2021.

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.

The Strategic Environmental Assessment Scoping Report incorporating Habitats Regulations Assessment (East Cambridgeshire District Council, 28 June 2021) considers the implications of the Swaffham Bulbeck Neighbourhood Plan (SBNP) for relevant aspects of natural environment including statutorily protected sites, wider biodiversity, local landscape and soils, including protection of the important peat resource. Natural England generally supports the no significant effects findings of the report in relation to these matters.

Our only significant comment is that Swaffham Bulbeck Neighbourhood Plan (SBNP) area falls within Natural England's Cambridgeshire SSSI Recreational Pressure Impact Risk Zone (IRZ), as referenced in our response to planning application 19/00746/OUM, alluded to in section 4.57 of the Screening Report. The introduction of this IRZ, in 2019, post-dates the East Cambridgeshire Local Plan Review. Whilst the planning application did not consider recreational pressure effects we advised that the proposed provision of 1.8ha informal open space will provide adequate quantity of alternative open space, for the scale of development proposed, to minimise adverse impacts to Devil's Dyke SSSI. The development is now being taken forward through SBNP's proposed site allocation SWB8. Section 4.60 of the Screening Report states:

Whilst Natural England's comments were supplied in the context of a planning application, they are considered relevant to the assessment of likely significant effects in respect of the SBNP's proposed site allocation SWB8. As such, it is reasonable to 'screen out' likely significant effects on SSSIs.

In order to screen out significant effects to nearby sensitive SSSIs, such as Devil's Dyke, our advice is that SBNP Policy SWB8 should include a commitment for the proposed development to deliver 1.8ha informal open space provision, or appropriate alternative mitigation. Creation of high quality open space on people's doorsteps, incorporating biodiversity-rich habitats and circular dog-walking routes, connected to off-site areas where possible, can provide a suitable alternative to visiting more sensitive sites for daily recreational activities. Appropriately scaled and designed this can reduce additional pressure, and avoid adverse impact, to sensitive designated sites.

The above matter should be addressed through the revised SEA report and the draft SBNP to confirm the no significant environmental effect conclusion of the report. I hope you will find our comments helpful. For any correspondence or queries relating to this consultation only, please contact Janet Nuttall On 020 802 65894. For all new consultations, please contact consultations@naturalengland.org.uk

Yours sincerely

Janet Nuttall

Sustainable Land User Adviser