

# Hadleigh Neighbourhood Plan 2023-2038 SEA Screening Opinion

**Final report**

Prepared by LUC  
October 2023



# Hadleigh Neighbourhood Plan 2023-2038

## SEA Screening Opinion

**Project Number**  
10994

Version	Status	Prepared	Checked	Approved	Date
1.	Draft Report	O. Tugulea	K Nicholls	K Nicholls	16.10.2023
2.	Final Repor	O. Tugulea	K. Nicholls	K. Nicholls	19.10.2023

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# Chapter 1

## Introduction

**1.1** Hadleigh Town Council is in the process of preparing a Neighbourhood Plan (the Hadleigh Neighbourhood Plan 2023-2038). Hadleigh Town is located within Babergh District in Suffolk, approximately 10 miles from Ipswich. LUC has been appointed by Babergh and Mid Suffolk District Councils to consider whether there is a need for Strategic Environmental Assessment (SEA) to be undertaken for the emerging Neighbourhood Plan.

**1.2** SEA may be required for a Neighbourhood Plan, if it is likely to have significant environmental effects. Sustainability Appraisal (SA) is similar to SEA but includes assessment of the likely significant effects of a plan or programme on economic and social factors, as well as environmental factors. Planning Practice Guidance (PPG)<sup>1</sup> clarifies that there is no legal requirement for a Neighbourhood Plan to be subject to SA, but that SA can be used to demonstrate how the plan will contribute to sustainable development.

**1.3** Babergh and Mid Suffolk District Councils have commissioned LUC to carry out SEA Screening of the Pre-Submission Draft version of the Hadleigh Neighbourhood Plan 2023-2038 (hereafter referred to as the Neighbourhood Plan) in order to determine whether an assessment is required under European Directive 2001/42/EC (the SEA Directive), transposed into UK law through the SEA Regulations<sup>2</sup>.

**1.4** On 11th May 2022, the Government published the Levelling Up and Regeneration Bill, which sets out in detail the Government's proposals for reforming the planning system. Amongst other things, the Bill proposes the replacement of the current SEA regime with a new requirement for an Environmental Outcomes Report. The specific requirements will be set out in forthcoming regulations, along with information about transition arrangements; however, at present the requirement for SEA remains as set out in existing legislation.

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<sup>1</sup> Department for Levelling Up, Housing and Communities and Ministry of Housing, Communities and Local Government (2016, updated 2021). Planning Practice Guidance. (see <https://www.gov.uk/government/collections/planning-practice-guidance>)

<sup>2</sup> The Environmental Assessment of Plans and Programmes Regulations 2004 (SI 2004/1633), as amended by The Environmental Assessments and

Miscellaneous Planning (Amendment) (EU Exit) Regulations 2018 (SI 2018/1232). It should be noted that the purpose of the amendments to the SEA Regulations is to ensure that the law functions correctly after the UK has left the European Union. No substantive changes are made to the way the SEA regime operates.

## Chapter 2

# Scope of the Neighbourhood Plan

**2.1** Hadleigh Town Council has prepared a Pre-Submission Draft (Regulation 14) version of the Neighbourhood Plan, which is due to be subject to consultation with residents of the town, required statutory bodies and other interested parties.

**2.2** The Neighbourhood Plan covers the entire town. The Plan includes a vision for the long-term future of Hadleigh Town, which will be achieved through the following nine objectives:

1. Provide a full range of community services and facilities for residents and visitors of all ages.
2. Enhance existing visitor/heritage attractions, making Hadleigh a 'destination of choice'.
3. Protect, expand and enhance areas of nature and biodiversity and linkages between them, both in public and private spaces.
4. Protect existing green spaces and provide usable green spaces in new development.
5. Maintain the essential character of Hadleigh as a historical market town.
6. Ensure that Hadleigh's Town centre continues to thrive and serves the community as its needs change.
7. Deliver low carbon development, both in new build and renovation.
8. Provide additional safe cycling and walking infrastructure to reduce car dependency.
9. Ensure housing meets the range of needs of the community and is well integrated with it.

**2.3** The Neighbourhood Plan then sets out 12 planning policies (HAD 1-12) to realise and deliver this vision. The policies are structured in line with the objectives listed above.

**2.4** The Neighbourhood Plan does not allocate any sites for new housing or other built development but does state that proposals for co-housing schemes will be strongly supported, subject to meeting the requirements of Babergh and Mid Suffolk Emerging Joint Local Plan Policy LP07 (Community-led and rural exception housing).

## Baseline information

**2.5** This section summarises baseline information for the town of Hadleigh, drawing from the information set out in the Pre-Submission Draft version of the Hadleigh Neighbourhood Plan 2023-2038.

### Context

**2.6** The town of Hadleigh has a long and rich history dating back to 878CE. The town is a civil parish located within Babergh District, in the county of Suffolk. The town is the second largest town in the Babergh area, located in the rural countryside around approximately 10 miles west of Ipswich, with the A1071 running through the town. The River Brett flows through the centre of Hadleigh (north to south).

### Biodiversity, flora and fauna

**2.7** There are no internationally designated nature conservation sites within Hadleigh. However, there are nine County Wildlife Sites (CWSs) in Hadleigh, many of which are designated because they are ancient woodlands, including Coram Street Woods CWS, Fenn's Grove CWS, Tom's/Broadoak Woods CWS and Raydon Great Wood CWS. The amount of ancient woodland habitat within the town is particularly notable. Additionally, a small part of the Hintlesham Woods Site of Special Scientific Interest (SSSI) lies within the parish.

**2.8** Ten priority habitats have been identified, with a significant number of Protected and Priority Species recorded in association with these habitats. Three are well distributed across the parish: Lowland Deciduous Woodland, Hedgerows and Ponds. Wet Woodland exists along the River Brett to the west of Hadleigh and there is an area of Wood Pasture and Parkland associated with Holbecks Park. Areas of Lowland Dry Acid Grassland occur surrounding the Broom Hill Wood CWS and there is also a small area of Coastal and Floodplain Grazing Marsh. Other areas of Priority Habitat such as Fen and Traditional Orchard will be present. In the vicinity of Hadleigh lies the large RSPB Wolves Wood site across the A1071.

**2.9** The River Brett and the Hadleigh Railway Walk CWS and their associated habitats contribute significantly to the ecological network of Hadleigh Town. The hedgerow network and other features also provide local ecological connectivity.

**2.10** The Neighbourhood Plan area is located partly within the 13km "Zone of Influence" of the Stour and Orwell Estuary SPA (Special Protection Area). Unless mitigated against, Natural England considers that additional residential development within the Zone of Influence could have a detrimental impact on the designations due to an increase in recreational trips.

**2.11** The majority of the parish also falls within Impact Risk Zones (IRZs) for national designations (SSSIs) in the area that flag residential development of 50 dwellings or more as a potential risk.

### Population

**2.12** At the time of the last Census (2021), Hadleigh Parish had a population of 8,764 people. The majority of Hadleigh's households are families with children (26.62% versus 24.88% across Babergh District as a whole).

**2.13** The town's population is generally well split across the age brackets with fewer in the 75+ category. The age distribution shows that Hadleigh has a higher proportion of young persons aged 0-15 (17%) than Babergh overall (15%).

### Human health

**2.14** The health of the town as per the 2011 census shows that slightly fewer residents considered themselves to be in very good health at a local level (45%) compared to Babergh as whole (49.5%) and nationally (47.5%). 16.8% of Hadleigh residents declared that their fair/bad/very bad health is limiting day-to-day activities a little or a lot, compared to 17.4% in Babergh (17.6% England).

**2.15** There is a general practitioner and a dental practice within Hadleigh, with the closest hospital in Ipswich.

### Soil

**2.16** Most of Hadleigh Parish outside of the built up area of the town is classed as Grade 3 agricultural land, with a small area of Grade 2 in the south west of the parish. The soilscape is predominantly made up of freely draining lime-rich loamy soils.

### Water

**2.17** There is land through the centre of Hadleigh (north to south) that is located within Flood Zone 3 due to the presence of River Brett. Flood Zone 3 comprises land assessed as having a 1 in 100 or greater annual probability of river flooding (>1%), or a 1 in 200 or greater annual probability of flooding from the sea (>0.5%) in any year.

**2.18** The whole of the town is located within Source Protection Zones 2 and 3.

### Air quality and climatic factors

**2.19** There are no Air Quality Management Areas (AQMAs) within or near to Hadleigh, with the closest being in Ipswich.

### Material assets

**2.20** There are 19 Local Green Spaces designated in the Neighbourhood Plan. These include hills, parks, walks, allotments, sports ground, and a cemetery.

**2.21** There are several bus stops within the centre of Hadleigh. However, bus services are quite infrequent. The 91 bus provides a service from the town to Ipswich and Sudbury. The nearest railway stations are located around 16km to the east of the parish in Ipswich and around 17.5km to the west in Sudbury.

**2.22** The parish contains multiple Public Rights of Way that provide access to the surrounding countryside. There is a cycle route south of Hadleigh that provides access to Ipswich.

**2.23** There is a pre-school, three primary schools and a High School, located within the centre of Hadleigh. It has been identified in the Neighbourhood Plan that further expansion of the high school is required so that young people do not have to leave Hadleigh to go to Colchester and Ipswich for educational services.

**2.24** There are three safeguarded waste sites in the parish. Additionally, a large proportion of the town is located within a Mineral Consultation Area.

### Cultural heritage

**2.25** Hadleigh contains a designated Conservation Area spanning approximately 60 hectares and contains 246 listed buildings within the boundaries, 24 of which are Grade II\* and four which are Grade I listed (The Deanery, St Mary's Church and The Guildhall and 62-66, High Street). Additionally, the parish is known to be rich in archaeological finds and records.

**2.26** Outside of the parish boundaries, there is a Registered Park and Garden (Parkland and gardens of Giffords Hall) approximately 6km to the south. There are two Scheduled Monuments (Toppesfield Bridge, south-west of the town centre and an archaeological exploration, which revealed Bronze Age ring ditch cremations, north of the town centre).

### Landscape

**2.27** Hadleigh Parish lies within a large National Character Area, South Suffolk and North Essex Clayland. The predominate landscape type in the parish is the Rolling Valley Farmlands around Hadleigh. There are Valley Meadowlands landscape type comprising of low-lying and flat meadows are found to the South of Hadleigh.

**2.28** The closest landscape designation to the parish is the Dedham Vale Area of Outstanding Natural beauty (AONB) is

located approximately 2.8km to the south. Additionally, Suffolk Coast and Heaths AONB, is located approximately 5km to the south-east of the parish.

### SEA screening

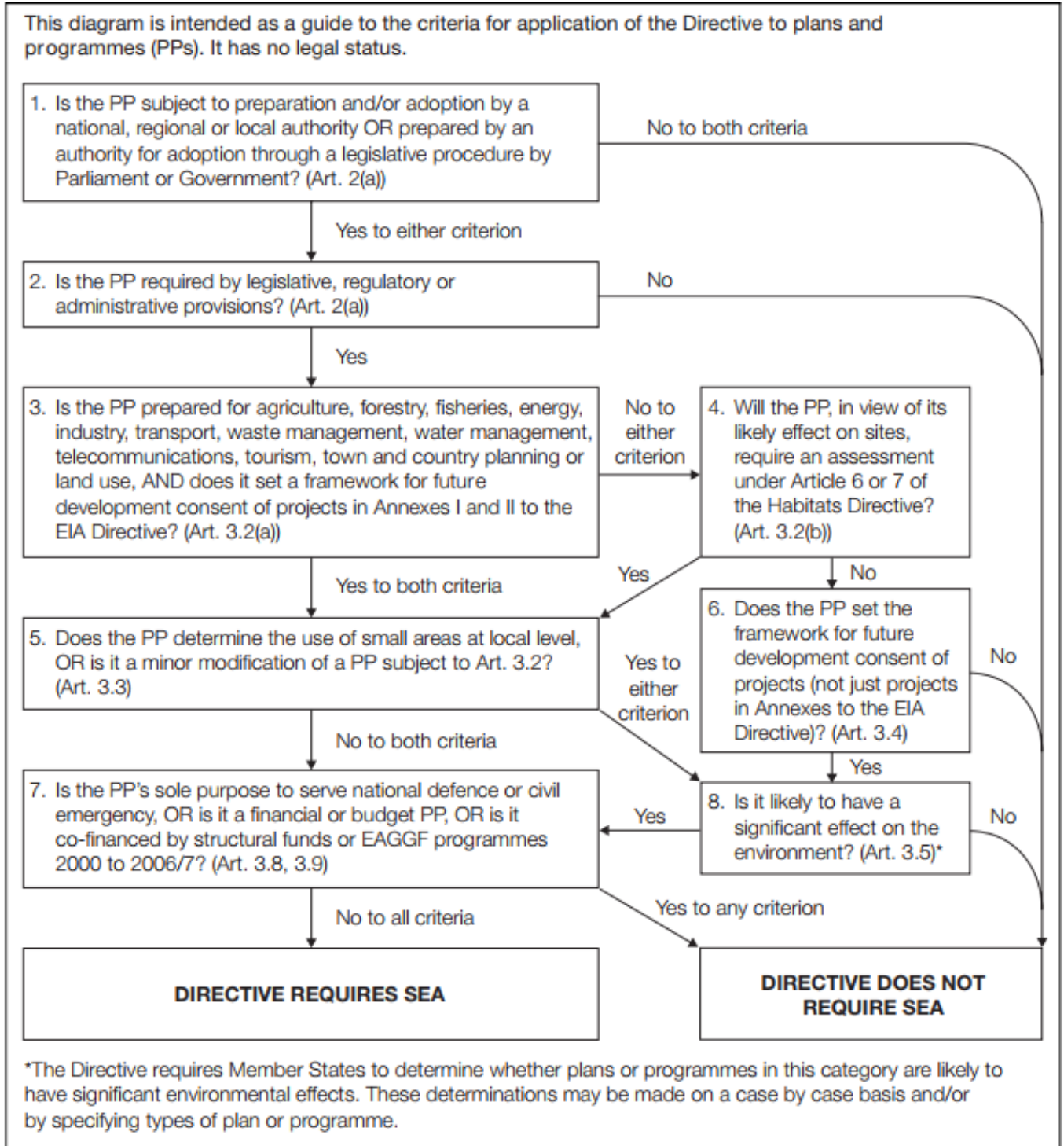
**2.29** An assessment has been undertaken to determine whether the Pre-Submission Draft Regulation 14 version of the Hadleigh Neighbourhood Plan 2023-2038 requires SEA in accordance with the SEA Regulations.

**2.30** Figure 2.1 overleaf presents the flow diagram entitled 'Application of the SEA Directive to plans and programmes' which is taken from the Practical Guide to the Strategic Environmental Assessment Directive<sup>3</sup>, published in September 2005. This is a useful guide when considering whether a plan should be subject to SEA (The Practical Guide has been superseded by the Planning Practice Guidance; however it still provides a useful and relevant guide to the process to use in making SEA screening decisions).

<sup>3</sup> Office of the Deputy Prime Minister (2005). A Practical Guide to the Strategic Environmental Assessment Directive. (see

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/7657/practicalguidesea.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/7657/practicalguidesea.pdf))

Figure 2.1: Application of the SEA Directive to plans and programmes





**2.31 Table 2.1** below presents the assessment of whether the Hadleigh Neighbourhood Plan will require a full SEA. The questions in the first column are drawn from the diagram above which sets out how the SEA Directive should be applied.

**Table 2.1: Application of SEA Directive to the Hadleigh Neighbourhood Plan**

Stage	Yes/No	Reason
1. Is the PP (plan or programme) 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? (Article 2(a))	Yes	The Neighbourhood Plan is being prepared under the Localism Act 2011 and will be adopted ('made') by the Local Authority (Babergh District Council) as part of the statutory development plan.  <b>Move to Q2.</b>
2. Is the PP required by legislative, regulatory or administrative provisions? (Article 2(a))	No	The Neighbourhood Plan is being prepared under the Localism Act 2011 and in accordance with the Neighbourhood Planning (General) Regulations 2012. However, there is no requirement to produce a Neighbourhood Plan; it is an optional plan. Once made it will become part of the statutory development plan. Therefore, it should continue to be screened.  <b>Move to Q3.</b>
3. Is the PP 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? (Article 3.2(a))	Yes and No	The Neighbourhood Plan is being prepared for town and country planning and land use, but it does not set a framework for future development consent of projects in Annexes I and II to the EIA Directive.  <b>Move to Q4.</b>
4. Will the PP, in view of its likely effect on sites, require an assessment for future development under Article 6 or 7 of the Habitats Directive? (Article 3.2 (b))	No	Habitats Regulations Assessment (HRA) screening of the Neighbourhood Plan has been undertaken separately on behalf of Babergh District Council and has concluded that the Neighbourhood Plan is not likely to have a significant effect on any European site, either alone or in combination  <b>Move to Q6.</b>
6. Does the PP set the framework for future development consent of projects (not just projects in Annexes to the EIA Directive)? (Art. 3.4)	Yes	The Neighbourhood Plan does not allocate sites for development, although it includes policies which proposals for development within the town will be assessed against.  <b>Move to Q8.</b>
8. Is it likely to have a significant effect on the environment? (Art. 3.5)	No	See <b>Table 2.2.</b>  <b>SEA IS NOT REQUIRED.</b>

**2.32** Schedule 1 of the SEA Regulations sets out the criteria for determining the likely significance of effects. These are listed in Table 2.2 below along with comments on the extent to which the Hadleigh Neighbourhood Plan meets these criteria.

Table 2.2: Likely Significant Effects

SEA Requirement	Comments
The characteristics of plans and programmes, having regard, in particular, to:	
<p>1. 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>	<p>Once made, the Neighbourhood Plan will become part of the statutory development plan and will guide the delivery of development in Hadleigh Town, including in terms of design. The Neighbourhood Plan does not allocate sites for residential or other forms of development.</p> <p>The adopted Babergh Core Strategy (2014) identifies Hadleigh as a 'Town / Urban Area' under Policy CS2 – Settlement Pattern. This policy seeks to direct development to towns/urban areas (which includes the Ipswich Fringe) and to the Core Villages and Hinterland Villages, and states that development in the countryside will only be permitted in exceptional circumstances subject to a proven justifiable need. The Core Strategy (2014) made provision for 250 homes to be delivered at Hadleigh (though a strategic allocation) over the Plan period to 2031.</p> <p>The submitted Babergh and Mid Suffolk Joint Local Plan (Nov 2020) identified Hadleigh as a Market Town/Urban Area. However, following Examination the Joint Local Plan has been subject to Main Modifications and is now presented as a Part 1 Plan, with Part 2 to be prepared at a later date (adoption of Part 1 is expected imminently at the time of writing). An up-to-date settlement hierarchy will now come forward in Part 2 of the Plan, which is unlikely to be adopted until late 2025. The Neighbourhood Plan suggests there has been limited regard to the emerging policies of the Joint Local Plan in the development of the Hadleigh Neighbourhood Plan.</p> <p>As of April 2022, there were permissions for 295 deliverable new homes in Hadleigh that have yet to be finished.<sup>4</sup></p>
<p>2. the degree to which the plan or programme influences other plans and programmes including those in a hierarchy</p>	<p>The Neighbourhood Plan has to be in general conformity with the local strategic framework (i.e. the adopted Babergh Core Strategy (2014) and the emerging Babergh and Mid Suffolk Joint Local Plan). The Neighbourhood Plan must also have regard to the National Planning Policy Framework. The Neighbourhood Plan does not have influence over other plans. Once made, the Neighbourhood Plan will form part of the statutory development plan for Hadleigh Parish and will be used in conjunction with the emerging Babergh and Mid Suffolk Joint Local Plan (once adopted) to determine planning applications.</p>

<sup>4</sup> Babergh District Council (2022). Draft Five-Year Housing Land Supply Position Statement 2022 (see <https://www.babergh.gov.uk/w/annual-monitoring-report-and-housing-land-supply-position-statement>).

**Chapter 2**  
Scope of the Neighbourhood Plan

Hadleigh Neighbourhood Plan 2023-2038  
October 2023

SEA Requirement	Comments
3. the relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development,	One of the Basic Conditions which the Neighbourhood Plan must meet is to contribute to sustainable development.
4. environmental problems relevant to the plan or programme,	Baseline information relating to Hadleigh Parish was described earlier in this chapter. Key issues of relevance to the Neighbourhood Plan are the presence of high quality agricultural land in the parish, the presence of land within Flood Zone 3 and Source Protection Zones 2 and 3, multiple areas of Deciduous Woodland and Hedgerow Priority Habitat, multiple County Wildlife Sites within 500m of the parish boundaries (several of which are also Ancient Woodland) and multiple listed buildings. The parish falls within IRZs associated with national SSSI designations in the area that flags development of 50 dwellings or more as a potential risk. The parish also falls within the 13km Zone of Influence area for recreation around the Stour and Orwell Estuary SPA and Ramsar site. Dedham Vale AONB is around 2.8km to the south of the parish.
5. 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).	N/A
<b>Characteristics of the effects and of the area likely to be affected, having regard, in particular, to:</b>	
6. the probability, duration, frequency and reversibility of the effects,	The Neighbourhood Plan does not allocate sites for housing or other forms of development. The Neighbourhood Plan covers the period up to 2038. Effects of the Neighbourhood Plan are expected to be indirect (due to not allocating sites) but long-term and permanent.
7. the cumulative nature of the effects,	<p>Cumulative effects could result from the Neighbourhood Plan in combination with development that takes place in the surrounding towns and villages, although the Neighbourhood Plan does not allocate sites for housing or other forms of development.</p> <p>The adopted Babergh Core Strategy (2014) identifies Hadleigh as a Town / Urban area in the settlement hierarchy. Policy CS3 made provision for 250 homes to be delivered at Hadleigh over the Plan period to 2031, through a strategic allocation. The modified Part 1 Babergh and Mid Suffolk Joint Local Plan does not identify a minimum housing requirement for Hadleigh, however as of April 2022, there were permissions for 295 deliverable new homes in Hadleigh that had yet to be completed.</p>
8. the transboundary nature of the effects,	The Neighbourhood Plan focuses on Hadleigh Parish only. Transboundary effects under the SEA Regulations refers to

SEA Requirement	Comments
	transboundary effects on other EU Member States; therefore they are not relevant to this Neighbourhood Plan.
9. the risks to human health or the environment (e.g. due to accidents),	There are no anticipated risks to human health or the environment from the Neighbourhood Plan.
10. the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected),	The Neighbourhood Plan covers all of Hadleigh Parish. According to the 2021 Census, the population of the parish stood at 8,764.
11. the value and vulnerability of the area likely to be affected due to: <ul style="list-style-type: none"> <li>■ special natural characteristics or cultural heritage,</li> <li>■ exceeded environmental quality standards or limit values,</li> <li>■ intensive land-use,</li> </ul>	Hadleigh Parish is home to a number of Priority Species and Priority Habitats, there are a number of County Wildlife Sites and the whole of the parish is located within IRZs that flag residential development as a potential risk. The parish also falls within the 13km Zone of Influence area for recreation in relation to the Stour and Orwell Estuary SPA and Ramsar site. There are 246 listed buildings located within the parish. The majority of the parish is comprised of Grade 3 agricultural land, although it is not clear if it is Grade 3a (classed as high quality) or the lower quality Grade 3b.
12. the effects on areas or landscapes which have a recognised national, Community or international protection status.	Dedham Vale AONB is located approximately 2.8km to the south and Suffolk Coast and Heaths AONB is located approximately 5km to the south-east of the town.

## SEA screening conclusion

**2.33** A screening assessment has been undertaken by applying the criteria from the SEA Directive and Schedule 1 of the SEA Regulations to determine whether or not the Hadleigh Neighbourhood Plan is likely to have significant environmental effects when assessed against the topics listed in the SEA Regulations.

**2.34** The Neighbourhood Plan sets out a vision and detailed planning policies to shape development in the town up to 2038 and decision makers will need to consider the criteria of these policies when determining future applications in the town. The Neighbourhood Plan does not directly impact on land use through the allocation of sites for housing or other forms of development.

**2.35** On this basis, it is considered that the Hadleigh Neighbourhood Plan is unlikely to have significant environmental effects and the full SEA is therefore not required.

## Next steps

**2.36** This SEA screening opinion will be sent to the three statutory consultees (Natural England, Historic England and the Environment Agency) and will be reviewed as appropriate in light of any comments received.

LUC

October 2023