

Holbrook Neighbourhood Plan SEA Screening Opinion

Final report

Prepared by LUC
June 2022



Holbrook Neighbourhood Plan SEA Screening Opinion

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Chapter 1

Introduction

1.1 Holbrook Parish Council is in the process of preparing a Neighbourhood Plan. Holbrook Parish is situated on the Shotley peninsula which lies between the Orwell and Stour Rivers, approximately 8km south of 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 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 ¹ (PPG) 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 Submission version of the Holbrook Neighbourhood Plan (April 2022) 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 Regulations².

1.4 LUC conducted SEA Screening in November 2021 in relation to the Pre-Submission (Regulation 14) version and concluded that the Holbrook Neighbourhood Plan was unlikely to have significant environmental effects and that full SEA was therefore not required. Since this time an updated Habitats Regulations Assessment (HRA) screening of the Neighbourhood Plan has been undertaken separately by LUC on behalf of Babergh and Mid Suffolk District Councils and the outcomes have informed this update to the original SEA Screening report. This report also takes into account the changes made in the Submission version of the Neighbourhood Plan (April 2022).

¹ <https://www.gov.uk/government/collections/planning-practice-guidance>

² 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) and The Environmental Assessment

of Plans and Programmes (Amendment) Regulations 2020 (SI 2020/1531). 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

SEA Screening

Scope of the Holbrook Neighbourhood Plan

2.1 Holbrook Parish Council prepared the Pre-Submission (Regulation 14) version of the Holbrook Neighbourhood Plan, which was published for consultation between 25th October and 5th December 2021. Following the consultation, the Submission version of the Plan (April 2022) was prepared. The Neighbourhood Plan covers the entire parish of Holbrook. It includes a vision for the long-term future of Holbrook along with five objectives:

1. To seek to establish and maintain for a sustainable future a balance between housing, recreational growth and the environment.
2. To conserve and enhance the unique special character and landscape of the Parish and ensure that it does not coalesce with neighbouring villages/Parishes.
3. To respect the existing Areas of Outstanding Natural Beauty, heritage and conservation assets that typify the character of the Parish.
4. To determine the requirement of the right type of homes, of the right tenure, in the right place that meets the needs of our community, in areas that are the most appropriate in terms of their impact on the village, and that provide for the potential number of homes that would satisfy the requirements in the emerging Babergh/Mid-Suffolk Joint Local Plan.
5. Ensure that the rural employment base is, where possible, retained and the supporting infrastructure for rural working is considered.

2.2 The Neighbourhood Plan then sets out 14 planning policies (HNP1-14) to realise and deliver the vision for Holbrook. These policies are categorised under two themes: Housing and Development and Natural and Historic Environment.

2.3 No sites are allocated for housing development within the Neighbourhood Plan as the housing need for Holbrook of 65 homes has already been met through existing permissions (58 homes) and the allocation in the emerging Babergh and Mid Suffolk Joint Local Plan (JLP) for seven new dwellings at site LA068A (Land East of Ipswich Road). The plan also notes that four new dwellings have also been granted outline planning permission on a site along Church Hill.

2.4 Other policies in the Neighbourhood Plan address a range of topics including landscape, flooding, biodiversity, transport and the protection of the historic environment. Together these policies seek to ensure that new development in Holbrook is high quality and sensitively designed so as not to have adverse impacts on the surroundings.

Baseline Information

2.5 This section summarises baseline information for the parish of Holbrook, drawing from the information set out in the Neighbourhood Plan.

Context

2.6 Holbrook Parish is located on the Shotley peninsula which lies between the Orwell and Stour Rivers, approximately 8km south of Ipswich.

Biodiversity, Flora and Fauna

2.7 Holbrook Parish falls within the Stour and Orwell Estuaries Ramsar site, Special Protection Area (SPA) and Special Site of Scientific Interest (SSSI).

2.8 The parish also lies within the Suffolk Coast Recreational disturbance Avoidance and Mitigation Strategy (RAMS) 13km Zone of Influence.

2.9 Alton Water reservoir, located to the west of Holbrook, is a County Wildlife Site, offering breeding bird habitat for species such as Common Tern in summer and as a refuge/roost for wildfowl during winter months. There are also important habitats for stag beetles to the west of Holbrook.

2.10 In addition, there are areas of Ancient Woodland in the parish at Holbrook Park and Cutler's Wood.

Population

2.11 The 2011 Census showed that Holbrook had a population of 2,467, with 48.6% being female and 51.4% male. The mean age of the population of Holbrook was 38.5 years old, compared to 43.1 for Babergh District and 41.7 for the County of Suffolk as a whole.

Human Health

2.12 In terms of the health of Holbrook residents, according to the 2011 Census, 54% of people were classified as in very good health, 31.5% as good, 11.2% as fair, 2.6% as bad and 0.8% as very bad. These health statistics are similar to those for Babergh District and for England as a whole.

Soil

2.13 Holbrook Parish is comprised of freely draining very acid sandy and loamy soils.

2.14 The parish is comprised of Grades 2 and 3 agricultural land. It is not known if this land is Grade 3a (classed as high quality) or the lower quality Grade 3b.

Water

2.15 The majority of the parish lies outside of Flood Zones 2 and 3. However, to the south the parish is in close proximity to Holbrook Bay, which lies in Flood Zone 3.

Air and Climatic Factors

2.16 There are no Air Quality Management Areas (AQMAs) that have been declared within Holbrook, the nearest being approximately 8.17 km away in Ipswich.

2.17 Climate data is not available at parish level, but within Babergh District as a whole, reductions in overall carbon emissions of 37% were achieved between 2005 and 2017. This reduction was mostly due to progress in reducing emissions from domestic sources, closely followed by industrial and commercial sectors, with minimal progress on transport emissions. Transport makes the largest contribution to carbon emissions in Babergh District.

Material Assets

2.18 Holbrook village has a number of services and facilities including a fire station, a GP surgery, primary and secondary schools, two shops, a sports centre, two pubs and two churches. Lower Holbrook, which is a hamlet within the plan area, has a smaller population and no facilities except a car park.

Landscape

2.19 The Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB) borders the parish to the south.

2.20 To the north of the parish, the rural landscape is classified as Ancient Estate Claylands. The majority of the landscape to the south of the settlement is classified as Rolling Estate Farmlands, with smaller sections of Valley Meadowlands and Plateau Estate Farmlands.

2.21 The parish falls into the former Dodnash Special Landscape Area.

Cultural Heritage

2.22 There are 68 listed buildings in Holbrook Parish, 66 of which are Grade II and two are Grade II* (Chapel of the Royal Hospital School and Royal Hospital School). There are no buildings in Holbrook on Historic England's Buildings at Risk Register.

SEA Screening

2.23 An assessment has been undertaken to determine whether the Submission version of the Holbrook Neighbourhood Plan requires SEA in accordance with the SEA Regulations.

2.24 **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, 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 National Planning Practice Guidance; however, it still provides a useful and relevant guide to the process to use in making SEA screening decisions).

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

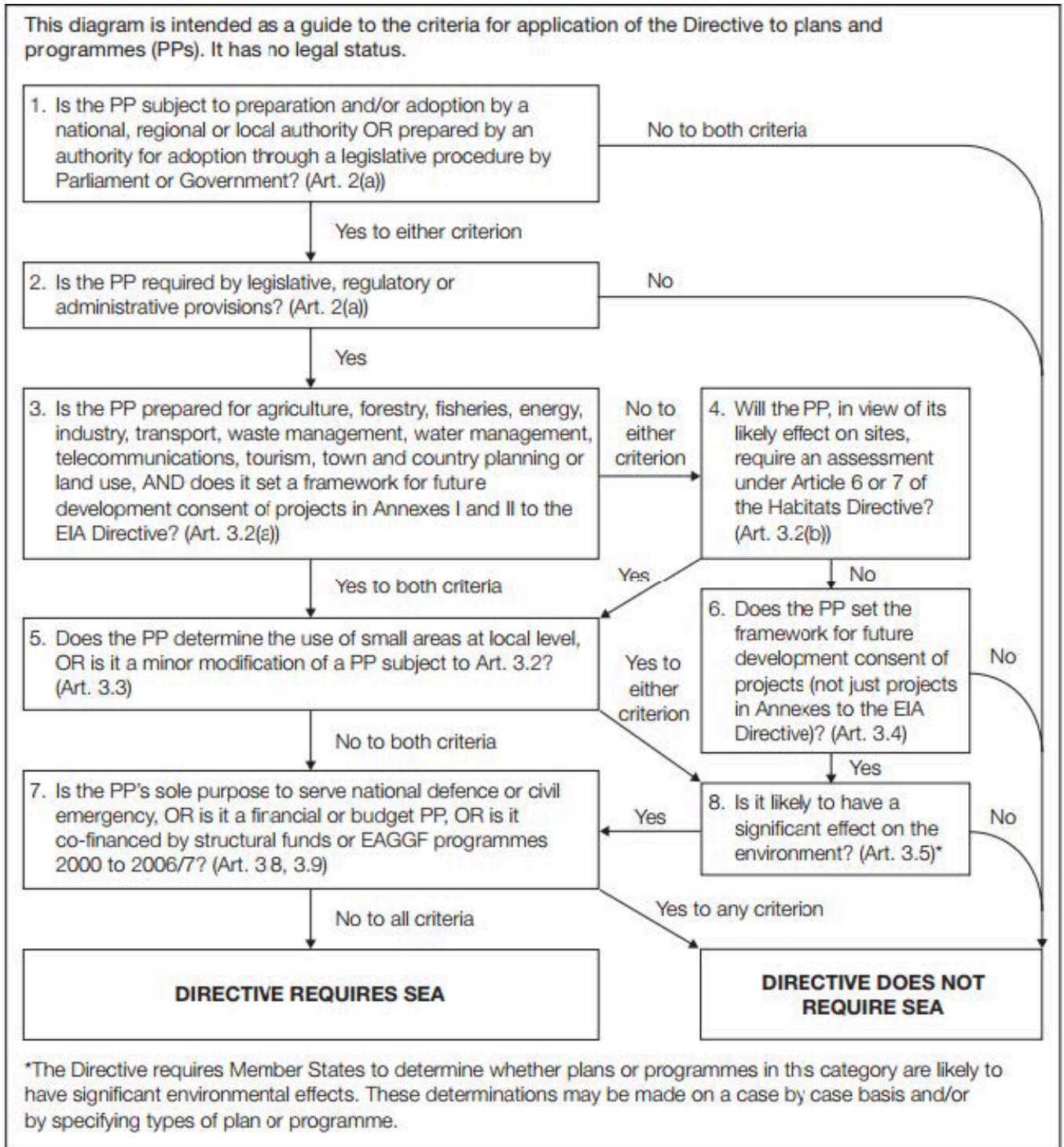


Table 2.1: Application of SEA Directive to the Holbrook Neighbourhood Plan

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? (Art. 2(a))	Yes	The Holbrook 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. Move to Q2.
2. Is the PP required by legislative, regulatory or administrative provisions? (Art. 2(a))	No	The Holbrook 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. Move to Q3.
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? (Art 3.2(a))	Yes and No	The Holbrook 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. Move to Q4.
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? (Art. 3.2 (b))	No	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 significant effects on European sites, either alone or in combination. No: Move to Q6.
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 Holbrook Neighbourhood Plan does not allocate sites for development; however it includes policies which proposals for development within the parish will be assessed against. Move to Q8 for assessment of significant effects.
8. Is it likely to have a significant effect on the environment? (Art. 3.5)	No	See Table 2.2. SEA IS NOT REQUIRED

2.37 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 Holbrook Neighbourhood Plan meets these criteria.

Table 2.2: Likely Significant Effects

SEA Requirement	Comments
The characteristics of the plans and programmes, having regard, in particular, to:	

SEA Requirement	Comments
<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 Holbrook Neighbourhood Plan will become part of the statutory development plan and will guide the delivery of development in Holbrook Parish, including in terms of design. The Holbrook Neighbourhood Plan does not allocate sites for residential or other forms of development.</p> <p>The adopted Babergh Core Strategy (2014) identifies Holbrook as a Core Village in Policy CS2- Settlement Pattern. This policy seeks to direct development to towns/urban areas and to the Core Villages and Hinterland Villages. However, Lower Holbrook, located in the south of the parish, is classed as a Hamlet Village. While the new Local Plan is unlikely to be adopted until 2022, it has been taken into consideration in the preparation of the Holbrook Neighbourhood Plan.</p> <p>It is noted that the Regulation 19 (Pre-Submission) version of the Joint Local Plan (November 2020) makes provision for building at least 9,611 new homes across Babergh between 2018 and 2037 and that it is proposed that 28% of these will be at the Core Villages. In the emerging JLP, a housing requirement of 65 is identified for Holbrook. The JLP identifies that 58 dwellings had planning permission at the base date of the JLP and makes a further allocation LA068A at Land East of Ipswich Road for seven dwellings. The minimum housing requirement for Holbrook has therefore already been achieved.</p>
<p>2. The degree to which the plan or programme influences other plans and programmes including those in a hierarchy</p>	<p>The Holbrook 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 Holbrook Neighbourhood Plan must also have regard to the National Planning Policy Framework. The Holbrook Neighbourhood Plan does not have influence over other plans. Once made, the Holbrook Neighbourhood Plan will form part of the statutory development plan for the Holbrook Parish and will be used in conjunction with the emerging Babergh and Mid Suffolk Joint Local Plan (once adopted) to determine planning applications.</p>
<p>3. The relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development.</p>	<p>One of the Basic Conditions which the Holbrook Neighbourhood Plan must meet is to contribute to sustainable development.</p>
<p>4. Environmental problems relevant to the plan or programme.</p>	<p>Baseline information relating to Holbrook was described earlier in this chapter. Key issues of relevance to the Neighbourhood Plan are the presence of the Stour and Orwell Estuaries Ramsar site, Special Protection Area (SPA) and Special Site of Scientific Interest (SSSI), and the County Wildlife Site at Alton Water reservoir. The parish also lies within the Suffolk Coast Recreational disturbance Avoidance and Mitigation Strategy (RAMS) 13km Zone of Influence, as well as the former Dodnash Special Landscape Area. The parish is in close proximity to an area of Flood Zone 3 at Holbrook Bay and there are a number of designated heritage assets in the parish.</p>
<p>5. The relevance of the plan or programme for the implementation of Community legislation on the environment</p>	<p>N/A</p>

SEA Requirement	Comments
(e.g. plans and programmes linked to waste-management or water protection).	
Characteristics of the effects and of the area likely to be affected, having regard, in particular, to:	
6. The probability, duration, frequency and reversibility of the effects.	The Holbrook Neighbourhood Plan does not allocate sites for housing or other forms of development. The Holbrook Neighbourhood Plan covers the period up to 2037. Effects of the Holbrook 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 Holbrook Neighbourhood Plan in combination with development that takes place in the surrounding towns and villages, although the Holbrook Neighbourhood Plan does not allocate sites for housing or other forms of development.</p> <p>As the emerging Babergh and Mid Suffolk JLP is still in its development, it is not yet possible to assess with certainty the amount and location of development that may result from the Plan within and close to Holbrook. Although the Holbrook Neighbourhood Plan does not allocate sites for housing or other forms of development, it does recognise the allocation made in the emerging JLP at site LA068A at Land East of Ipswich Road for seven dwellings.</p> <p>The Adopted Babergh Core Strategy (2014) identifies Holbrook as a 'Core Village' in Policy CS2. This policy seeks to direct development to towns/urban areas and to the Core Villages and Hinterland Villages.</p>
8. The transboundary nature of the effects.	The Neighbourhood Plan focuses on Holbrook Parish only. Transboundary effects under the SEA Regulations refers transboundary effects on other EU Member States; therefore they are not relevant to the 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 Holbrook Neighbourhood Plan.
10. The magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected).	The Holbrook Neighbourhood Plan covers all of Holbrook Parish. The population of the parish is estimated to be around 2,467 people.
11. The value and vulnerability of the area likely to be affected due to: <ul style="list-style-type: none"> ■ Special natural characteristics or cultural heritage; ■ Exceeded environmental quality standards or limit values; and ■ Intensive land-use. 	<p>The Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB) borders the parish to the south. The parish also falls within the Stour and Orwell Estuaries Ramsar site, Special Protection Areas (SPA) and Special Site of Scientific Interest (SSSI) . Holbrook also lies within the Suffolk Coast Recreational disturbance Avoidance and Mitigation Strategy (RAMS) 13km Zone of Influence. Alton Water reservoir, located to the west of Holbrook, is a County Wildlife Site. Areas of Ancient Woodland are also present in the parish. There are 68 Listed Buildings within the parish. The parish is also in close proximity to Flood Zone 3 from Holbrook Bay and contains a significant proportion of Grade 2 and 3 agricultural land.</p>

SEA Requirement	Comments
12. The effects on areas or landscapes which have a recognised national, Community or international protection status.	The Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB) borders the parish to the south.

SEA Screening Conclusion

2.25 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 Holbrook Neighbourhood Plan is likely to have significant environmental effects when assessed against the topics listed in the SEA Regulations.

2.26 The Holbrook Neighbourhood Plan sets out a vision and detailed planning policies to shape development in the parish up to 2037 and decision makers will need to consider the criteria of these policies when determining future applications in the parish. It does not directly impact on land use through the allocation of sites for housing or other forms of development.

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

Next Steps

2.28 This SEA screening report 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
June 2022