

**Babergh & Mid Suffolk District
Councils**

**Whatfield Neighbourhood
Development Plan
SEA Screening Opinion**

Final report
Prepared by LUC
August 2020

Babergh & Mid Suffolk District Councils

Whatfield Neighbourhood Development Plan SEA Screening Opinion

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Chapter 1

Introduction

1.1 Whatfield Parish Council is in the process of preparing a Neighbourhood Development Plan (NDP). Whatfield is located within Babergh District, approximately ten miles to the north west 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 NDP.

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 Guidance¹ (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 Pre-Submission Consultation Version of the Whatfield NDP 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 <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). 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 NDP

2.1 Whatfield Parish Council has prepared the Pre-Submission (Regulation 14) version of the NDP which is being subject to public consultation between August and October 2020.

2.2 The Whatfield NDP covers the entire parish, including the main settlement of Whatfield. The Pre-Submission NDP includes a vision for the long-term future of Whatfield along with five objectives which aim to deliver the vision for Whatfield:

1. To protect the landscape setting and rural character of the village.
2. To protect Whatfield's existing community amenities.
3. To plan for new housing that meets the needs of the village and is appropriate to its scale and character and preserves and enhances the historic environment.
4. To improve the quality of the design and construction quality of new development in Whatfield through the implementation of the Whatfield Design Guide.
5. To ensure that construction materials are locally sourced and organic to minimise carbon footprint and to support local trades and crafts people.

2.3 The NDP then sets out six planning policies (Policies WHAT1 - 6) to realise and deliver the vision and objectives. Policy WHAT4 is a new housing development policy that supports 'windfall development' proposals within the defined settlement boundary in the form of individual dwellings or small groups of houses up to five dwellings. It states that proposals for new housing development outside of the defined settlement boundary will only be permitted where they meet certain criteria:

2.4 Policy WHAT5 is a housing mix policy that supports development proposals that enable a mixed and inclusive community. Policies WHAT1 – 3 and Policy WHAT6 are mainly criteria-based policies covering topics such as design, landscape and natural environment and the protection of community facilities. Together these policies seek to ensure that new development is high quality and sensitively designed so as not to have adverse impacts on the surroundings. The NDP does not allocate sites for residential or other built development.

Baseline Information

2.5 This section summarises baseline information for the parish of Whatfield, drawing from the information set out in the Pre-Submission NDP.

Context

2.6 Whatfield is a village and civil parish in the Suffolk District of Babergh, eastern England. It is located around ten miles north west of Ipswich. The parish's south western border is delineated by the River Brett.

Biodiversity, flora and fauna

2.7 There are no internationally or nationally designated sites within Whatfield Parish. Calves Wood, a County Wildlife Site and Ancient Woodland, lies within the north east section of the parish. There are patches of priority habitats, good quality semi-improved grassland and deciduous woodland throughout the parish.

2.8 There are also two meadows and a piece of rough woodland within the parish, all of which are of high importance to local residents and wildlife. One of the two meadows, Buckle's Meadow, is also a County Wildlife Site.

2.9 The range of habitats encourages many priority species including lapwing, turtle dove and grey partridge.

Population

2.10 The 2018 population estimates indicate a total population for the parish of 381. There is a gender split of 52% male and 48% female. The majority of residents are of working age (16-64) with 204 falling into this category. There are almost the same number of residents below 15 as there are over 65, with 88 and 89 respectively.

2.11 The unemployment rate in the parish is 2.9% which is below the figure for Suffolk as a whole. There is a higher than average number of residents with high level qualifications, and only 20.2% with no qualifications.

Human health

2.12 In terms of the health of Whatfield residents, just over 46% of people are classified as in very good health, 37% as good, 14% as fair, 1.8% as bad and 0.6% as very bad. These health ratings largely mirror the Babergh and England averages; however Whatfield's percentage of bad health is better than Babergh and England's figures.

Soil

2.13 Whatfield parish comprises entirely Grade 3 agricultural land; however it is not known if any or all of this is Grade 3a

(classed as best and most versatile agricultural land) rather than the lower quality Grade 3b.

Water

2.14 The area along the River Brett in the south west of the parish is located within Flood Zone 3. Flood Zone 3 comprises land assessed as having a 1 in 100 or greater annual probability of river flooding (>1%), or a 1 in 200 or greater annual probability of flooding from the sea (>0.5%) in any year.

Air and Climatic Factors

2.15 There are no Air Quality Management Areas (AQMAs) that have been declared within Whatfield Parish, the nearest being in Ipswich. However, the NDP notes that some of the issues that arose from the consultation were centred around traffic congestion and road safety.

2.16 Climate data are not available at parish level, but within Babergh District as a whole, reductions in overall carbon emissions of 26% were achieved between 2005 and 2018. 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

2.17 The parish has several open spaces, four of which are designated within Policy WHAT3 of the NDP: the playing field adjacent to the school; Churchyard of the Church of St. Margaret of Antioch; Allotments off Semer Road; and Church Farm Place Green.

2.18 The 461 bus starts in Whatfield and terminates in Hadleigh; however the timing of the bus services does not suit commuting and is therefore a leisure service. There is also an additional service operated by Hadleigh Community Transport on a Thursday which offers a connection via Elmsett and Sproughton to Ipswich – Route 120. Overall, the area is poorly served by public transport.

2.19 There are a number of public footpaths within the parish which link the built-up area of the village with the surrounding countryside. The network provides a number of recreational circular walks.

2.20 The parish has one primary school located in the village of Whatfield and it is assumed that it is operating sufficiently as there is no need to either expand or contract capacity.

2.21 Whatfield does not lie within a Mineral Safeguarding Area.

Cultural heritage

2.22 There are 15 listed buildings within the parish, all of which are Grade II except for the Church of St. Margaret which is Grade I. The listed buildings are largely in distinct groupings - around the green, along The Street or close to the church. None of these features appear on Historic England's Heritage at Risk Register. There are no Scheduled Monuments or Registered Parks and Gardens within the parish.

Landscape

2.23 The parish is rural in character. Whatfield lies outside of the Dedham Vale Area of Outstanding Natural Beauty (AONB) and falls within the South Suffolk and North East Essex Claylands landscape as identified by Natural England's National Character Area classification.

2.24 An area in the south and west of the Parish is identified in the Adopted Babergh Local Plan (2006) as an area of Special Landscape Area relating to the 'valleys of the rivers Glem, Box, Brett and Chad Brook'. The designation stretches as far as the western edge of the built-up area of the village at the junction of Rectory Lane and Semer Road and includes the school, village hall and playing field together with dwellings and land south of Semer Road.

2.25 The character of this area is that of ancient landscape of wooded arable countryside with a distinct sense of enclosure. The overall character is of a gently undulating, chalky boulder clay plateau, the undulations being caused by the numerous small-scale river valleys that dissect the plateau. There is a complex network of old species-rich hedgerows, ancient woods and parklands, meadows with streams and rivers that flow eastwards.

SEA Screening

2.26 An assessment has been undertaken to determine whether the Regulation 14 Pre-Submission version of the Whatfield NDP requires SEA in accordance with the SEA Regulations.

2.27 **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 Directive³, 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).

³https://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

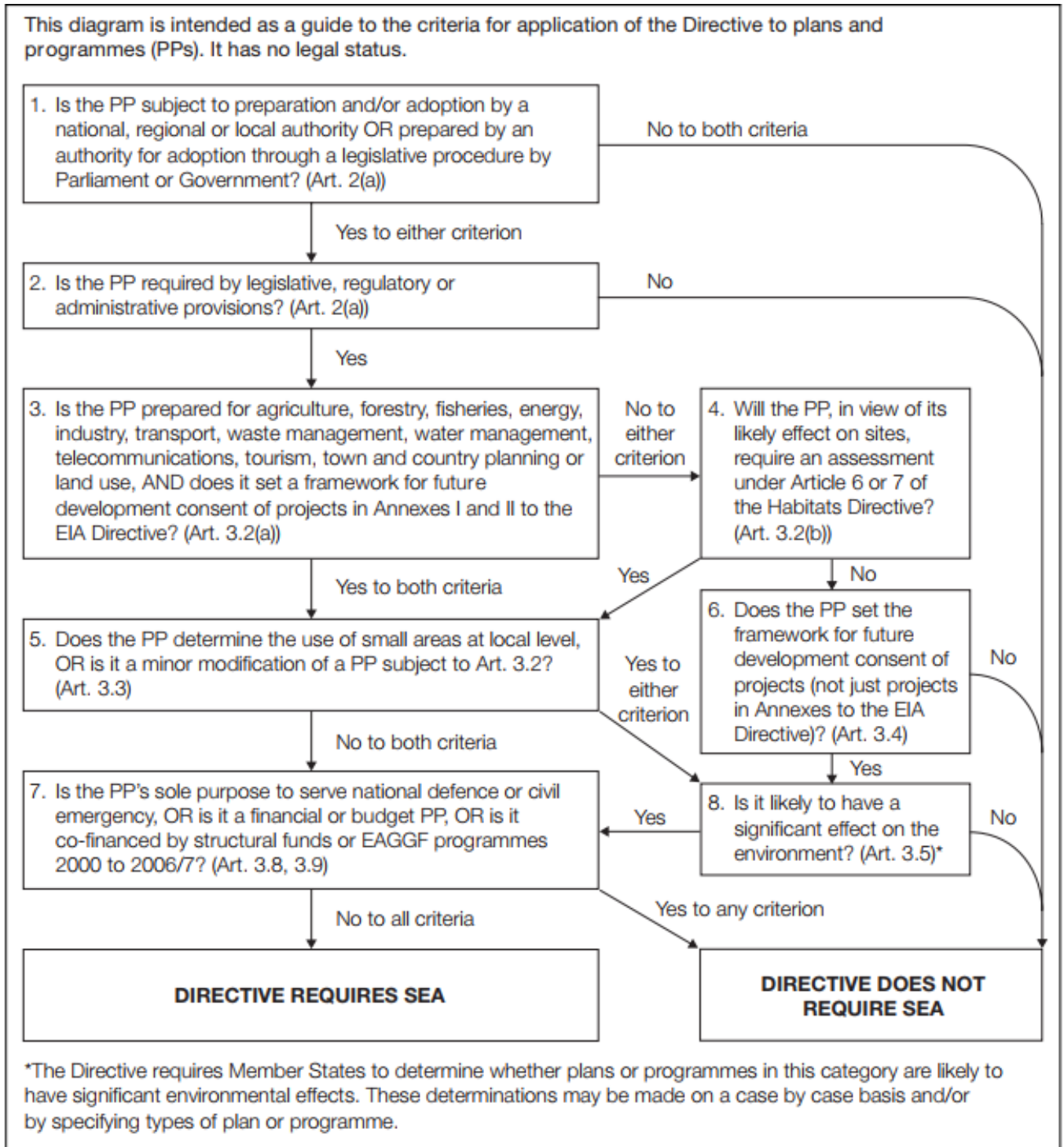


Table 2.1: Application of SEA Directive to the Whatfield NDP

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 NDP 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 NDP 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 NDP 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))	Unlikely	As the NDP does not allocate sites for housing or employment development it is considered unlikely that the Plan will require assessment under the Habitats Directive. 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 NDP does not allocate any sites for housing or other development but the policies in the NDP set out a framework to help guide future development in Whatfield. Move to Q8.
8. Is it likely to have a significant effect on the environment? (Art. 3.5)	No	See Table 2.2. SEA IS NOT REQUIRED.

2.28 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 Whatfield NDP meets these criteria.

Table 2.2: Likely Significant Effects

SEA Requirement	Comments
The characteristics of plans and programmes, having regard, in particular, to:	
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	Once made, the NDP will become part of the statutory development plan and will guide the delivery of development in Whatfield Parish, including in terms of design. The NDP does not allocate any sites for housing or other types of development but does set out a policy framework to help guide future development in Whatfield. The adopted Babergh Core Strategy (2014) identifies Whatfield as a Hinterland Village in Policy CS2 – Settlement Pattern. This policy seeks to direct development to towns/urban areas and to the Core Villages and Hinterland Villages. The Core Strategy provides for a total of 1,050 dwellings at the Hinterland Villages over the Plan period to 2031. The emerging Babergh and Mid Suffolk Joint Local Plan also identifies Whatfield as a Hinterland Village. While the new Local Plan

SEA Requirement	Comments
	is unlikely to be adopted until 2021, it has been taken into consideration in the preparation of the NDP. It is noted that the Preferred Options version of the Joint Local Plan makes provision for building 9,343 new homes across Babergh between 2018 and 2036 and that it is proposed that 10% of these will be in the Hinterland Villages. For Whatfield specifically, the Preferred Options document identifies a minimum figure of one new home, which reflects the current commitment for Whatfield at the base date of the Plan.
2.the degree to which the plan or programme influences other plans and programmes including those in a hierarchy	The NDP 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 NDP must also have regard to the National Planning Policy Framework. The NDP does not have influence over other plans. Once made, the NDP will form part of the statutory development plan for Whatfield parish and will be used in conjunction with the emerging Babergh and Mid Suffolk Joint Local Plan (once adopted) to determine planning applications.
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 NDP must meet is to contribute to sustainable development.
4. environmental problems relevant to the plan or programme,	Baseline information relating to Whatfield Parish was described earlier in this chapter. Key issues of relevance to the NDP are the presence of potentially high-quality agricultural land in the parish, the presence of land within Flood Zone 3, several areas of priority habitat, County Wildlife Sites and a number of designated heritage assets.
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
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 NDP does not allocate any sites for housing or other types of development; however it does set out a policy framework to help guide future development in Whatfield. The Whatfield NDP covers the period 2018-2036 and the effects of any development that occurs during the plan period are expected to be long-term and permanent. Any effects associated specifically with construction are likely to be short-term and temporary.
7. the cumulative nature of the effects,	Cumulative effects could result from the NDP in combination with development that takes place in the surrounding towns and villages – albeit the parish of Whatfield is rural. Whatfield village itself is about two miles from the nearest settlement, Hadleigh to the south. As the emerging Babergh and Mid Suffolk Joint Local Plan 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 Whatfield Parish. The Adopted Babergh Core Strategy (2014) identifies Whatfield as a ‘hinterland village’ in the settlement hierarchy, with the expectation that new development should meet local needs.
8. the transboundary nature of the effects,	The NDP focuses on Whatfield Parish only. Transboundary effects under the SEA Regulations refers transboundary effects on other EU Member States; therefore, they are not relevant to this NDP.
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 NDP.

SEA Requirement	Comments
10. the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected),	The NDP covers all of Whatfield Parish. According to population estimates, the population of the parish in 2018 was 381 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, ■ intensive land-use, 	Whatfield Parish is home to a number of Priority Species and Priority Habitats. There are two County Wildlife Sites and patches of ancient woodland within the northern part of the parish. There are 15 listed buildings within the parish of Whatfield that are included on Historic England's National List.
12. the effects on areas or landscapes which have a recognised national, Community or international protection status.	The parish does not lie within an AONB, but it is to the north of Dedham Vale AONB and falls within the South Suffolk and North East Essex Claylands landscape classification.

SEA Screening Conclusion

2.29 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 Whatfield NDP is likely to have significant environmental effects when assessed against the topics listed in the SEA Regulations.

2.30 The NDP sets out a vision, objectives and planning policies to shape development in the parish up to 2036. It sets out a policy framework to help guide development in Whatfield. Although the parish contains sensitive environmental assets, it does not allocate sites for housing or other development, with the NDP policies instead focusing on ensuring that development is delivered in a way that safeguards the environmental assets. Allocations will be made through the emerging Babergh and Mid Suffolk Joint Local Plan. The Joint Local Plan is being subject to SA (incorporating SEA) throughout its preparation, which will assess the likelihood of significant effects arising from potential development allocations. Mitigation will be provided by policies within the NDP and in the emerging Babergh and Mid Suffolk Joint Local Plan; however, given the current stage of development, emerging policies may change.

2.31 On this basis, it is considered that the Whatfield NDP will not have significant environmental effects and that SEA is therefore not required.

Next Steps

2.32 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.