

Copdock and Washbrook Neighbourhood Plan 2023- 2037

SEA Screening Opinion

Final report

Prepared by LUC

May 2023

**Copdock and Washbrook Neighbourhood Plan
2023-2037
SEA Screening Opinion**

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Chapter 1

Introduction

1.1 Copdock and Washbrook Parish Council is in the process of preparing a Neighbourhood Plan (the Copdock and Washbrook Neighbourhood Plan 2023-2037). Copdock and Washbrook Parish is located within Babergh District on the edge of Ipswich, and is flanked to the east by the A12. 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)¹ 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 Copdock and Washbrook Neighbourhood Plan 2023-2037 (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 Regulations².

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.

¹ 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>)

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

Scope of the Neighbourhood Plan

2.1 Copdock and Washbrook Parish Council has prepared a Pre-Submission Draft (Regulation 14) version of the Neighbourhood Plan, which was subject to public consultation between 11 March and 28 April 2023.

2.2 The Neighbourhood Plan covers the entire parish, including the main settlement, Copdock and Washbrook Village, and the hamlets of Mace Green, Coles Green, Folly Lane and Washbrook Street. The Plan includes a vision for the long-term future of Copdock and Washbrook Parish, which will be achieved through 16 objectives that cover the following six themes:

1. Housing
2. Business and Employment
3. Natural Environment
4. Built Environment and Design
5. Infrastructure and Services
6. Highways and Movement

2.3 The Neighbourhood Plan then sets out 17 planning policies (C&W 1-17) to realise and deliver this vision. The policies are structured in line with the six themes listed above.

2.4 The Neighbourhood Plan does not allocate any sites for new housing or other built development but does state that new development will primarily take place within the defined Settlement Boundaries, which are based on those in the current adopted Local Plan but have been updated to take account of new development since that Plan was prepared. Only limited development will be allowed outside of the Settlement Boundaries where there are exceptional circumstances, such as on existing employment sites or for agricultural or recreational development.

2.5 Although the Neighbourhood Plan does not allocate any sites for new development, provision is made for the potential to build affordable housing that would meet an identified local need.

Baseline information

2.6 This section summarises baseline information for the parish of Copdock and Washbrook, drawing from the information set out in the Pre-Submission Draft version of the Copdock and Washbrook Neighbourhood Plan 2023-2037.

Context

2.7 The village of Copdock and Washbrook has been merged since 1994 for political and local authority purposes, although separate village names are still maintained by some residents. The village is a civil parish located within Babergh District, in the county of Suffolk. The village is located approximately 1km to the south-west of Ipswich, with the A14 acting as a separating barrier. The village maintains a generally rural environment even though it is so close to the outskirts of Ipswich.

Biodiversity, flora and fauna

2.8 There are no internationally or nationally designated nature conservation sites within Copdock and Washbrook Parish. However, there are a number of County Wildlife Sites within 200m of the parish boundaries to the north (Sproughton Park), to the south-west (Brimlin Wood and Wenham Thicks, also designated as Ancient Woodland), to the south (Bentley Long Wood, also designated as Ancient Woodland) and south-east (Brockley Wood, also designated as Ancient Woodland). Additionally, there are two further County Wildlife Sites within 500m of the parish boundaries to the south-east (Old Hall Wood, also designated as Ancient Woodland) and to the north-east (Belstead Brook Woodland). There is also a large Site of Special Scientific Interest (SSSI) (Hintlesham Woods) approximately 2km west of the parish.

2.9 The Neighbourhood Plan area is located within the 13km "Zone of Influence" of the Stour and Orwell Estuary SPA (Special Protection Area) and Ramsar site to the east. 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.

2.10 The whole 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.

2.11 There are multiple areas of Deciduous Woodland distributed throughout the parish, with several of these being located adjacent to the built-up areas of Copdock and Washbrook. The streams (Spring and Belstead Brook) to the north-west of Washbrook contribute to creating ecological corridors within the parish.

Population

2.12 At the time of the last Census (2021), Copdock and Washbrook Parish had a population of 1,130 people. Home working is popular in the parish, with 16% of those in employment working from home in 2011 (this figure is likely to be higher now, since the Covid-19 pandemic resulted in

widespread changes in working patterns). This figure is higher than for Babergh District as a whole.

2.13 The village is home to many elderly residents but in recent years larger developments have been completed around the main street of the village to accommodate younger residents with families.

Human health

2.14 There are no health facilities in the village with residents having to travel to Capel St Mary or Pinewood (Ipswich) for doctors and dentist facilities.

Soil

2.15 The majority of the parish is comprised of Grade 2 agricultural land. The northern region of the parish around Washbrook is comprised of Grade 3 land, although it is not clear if it is Grade 3a (classed as high quality) or the lower quality Grade 3b. There is also Grade 3 agricultural land in the south-west of the parish.

Water

2.16 There is land adjacent to the north of the built-up area of Washbrook that is located within Flood Zone 3 due to the presence of Belstead Brook. There is also land in the southernmost part of the parish that is located within Flood Zone 3. Flood Zone 3 comprises land assessed as having a 1 in 100 or greater annual probability of river flooding (>1%), or a 1 in 200 or greater annual probability of flooding from the sea (>0.5%) in any year.

2.17 The whole of the parish is located within Source Protection Zone 3.

Air quality and climatic factors

2.18 There are no Air Quality Management Areas (AQMAs) declared within Copdock and Washbrook Parish. However, there are four AQMAs within 5km of the parish boundaries to the north-east within Ipswich.

2.19 The following transport issues have been identified that may contribute to poorer air quality and increased CO₂ emissions:

- The dual carriageway encourages some drivers to travel at excessive speeds with adverse safety and environmental implications.
- The route, being relatively unconstrained, provides a rat-run for some drivers seeking to avoid delays at the A12/A14 roundabout junction to the east of Washbrook.
- The existing dual carriageway deters movement on foot and by bicycle.

Material assets

2.20 There are two Local Green Spaces designated in the Neighbourhood Plan, which are the Play area off Mill Lane and Fen View open space and play area. The play area at the Village Hall would also meet the Local Green Space criteria but it is included within the wider area identified for sport and recreation facilities in Policy C&W 16.

2.21 There are several bus stops within Copdock and Washbrook and also in the south of the parish on London Road. It has been suggested that the existing dual carriageway within the parish deters the use of buses due to having to cross the busy road. The 93 bus provides a regular service from the village to Ipswich and Colchester. The nearest railway station is located around 3.5km to the north-east of the parish in Ipswich.

2.22 The parish contains multiple Public Rights of Way that provide access to the surrounding countryside and into Ipswich to the north-east. There is a cycle route that passes from west to east through the parish and there is also a further cycle route north of Washbrook that provides access to Ipswich.

2.23 There is a primary school located within the built-up area of Washbrook. It has been identified in the Neighbourhood Plan that it is operating over capacity and further growth in the village will require adjustments to intake from the wider catchment area.

2.24 There is some land in the south of the parish to the east of London Road that is located within a 250m mineral safeguarding buffer due to the presence of a Proposed Mineral Extraction Site. Additionally, the majority of the parish is located within a Mineral Consultation Area and there is a further safeguard area approximately 200m to the north-west of the built-up area of Washbrook.

Cultural heritage

2.25 Copdock and Washbrook does not contain a designated Conservation Area, but there are 24 listed buildings within the parish boundaries, two of which are grade II* listed (Church of

St Mary and Church of St Peter). Additionally, the parish is known to be rich in archaeological finds and records. Old London Road follows the line of a Roman Road.

2.26 Outside of the parish boundaries, there is a registered park and garden (Chantry Park) approximately 2km to the north-east. There is also a scheduled monument (Moated Site) approximately 600m from the south-west boundary of the parish.

Landscape

2.27 Copdock and Washbrook Parish lies within a large National Character Area, South Suffolk and North Essex Clayland. The two predominate landscape types in the parish are Rolling Valley Farmlands along the Belstead Valley and Ancient Estate Claylands which forms the higher plateau landscape in the central and southern parts of the parish.

2.28 The closest landscape designation to the parish is the Suffolk Coast and Heaths Area of Outstanding Natural beauty (AONB), which is located approximately 3.5km to the east. Additionally, Dedham Vale AONB is located approximately 8km to the south of the parish.

SEA screening

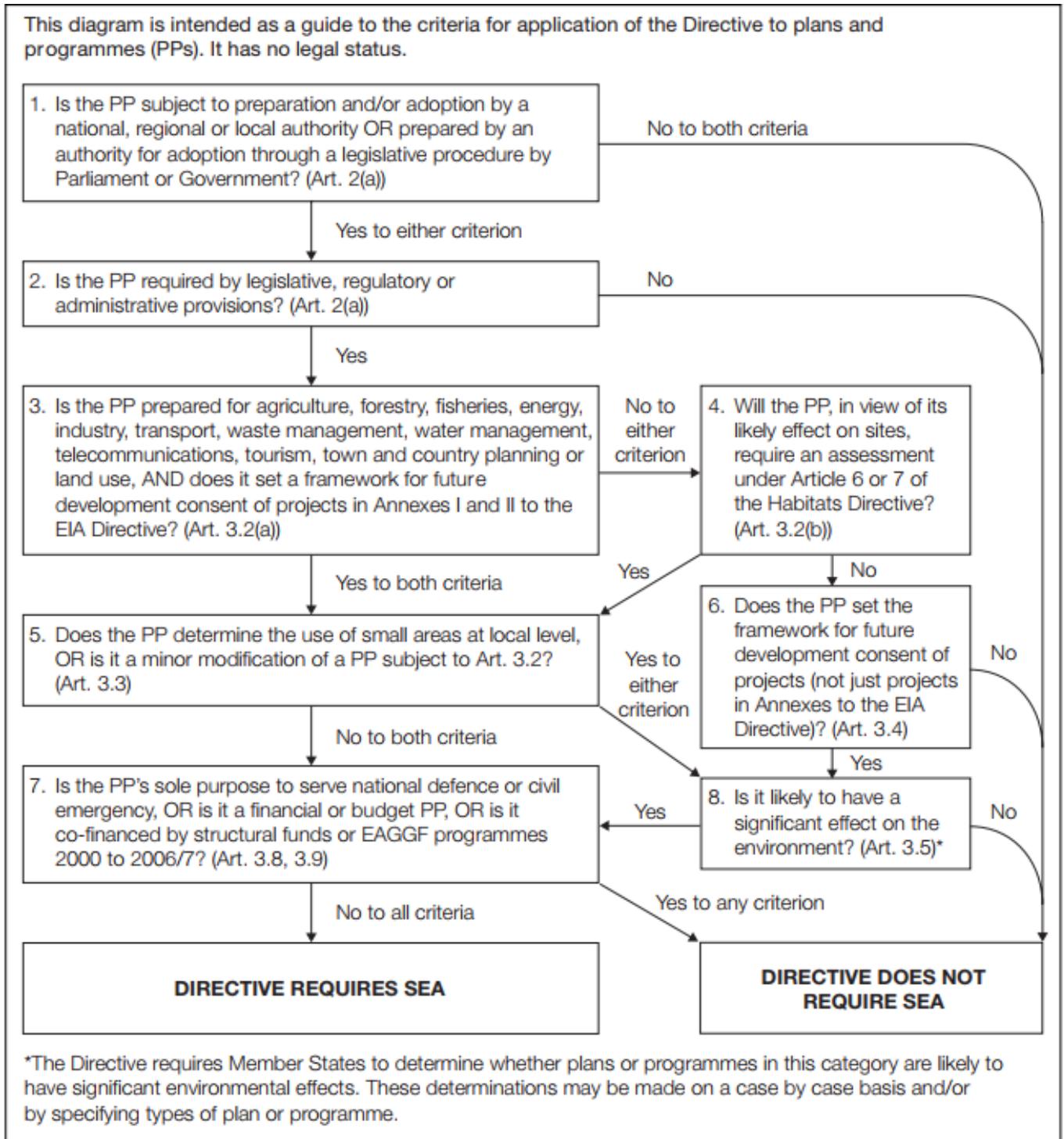
2.29 An assessment has been undertaken to determine whether the Pre-Submission Draft Regulation 14 version of the Copdock and Washbrook Neighbourhood Plan 2023-2037 requires SEA in accordance with the SEA Regulations.

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

³ 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)

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



2.31 Table 2.1 below presents the assessment of whether the Copdock and Washbrook 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 Copdock and Washbrook 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. Move to Q2.
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. 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? (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. 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? (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 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 Neighbourhood Plan does not allocate sites for development, although it includes policies which proposals for development within the parish will be assessed against. 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.

2.32 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 Copdock and Washbrook 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:	
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>Once made, the Neighbourhood Plan will become part of the statutory development plan and will guide the delivery of development in Copdock and Washbrook Parish, 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 Copdock and Washbrook as a 'Hinterland Village' 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 1,050 homes to be delivered within the Core and Hinterland Villages over the Plan period to 2031.</p> <p>The emerging Babergh and Mid Suffolk Joint Local Plan (Nov 2020) identified Copdock and Washbrook as a Hinterland Village and as falling within the Babergh Ipswich Fringe area. However, following Examination the emerging Joint Local Plan will now be presented as a Part 1 Plan, with Part 2 to be prepared at a later date. 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 Copdock and Washbrook Neighbourhood Plan.</p> <p>As of April 2022, there were permissions for 43 new homes in Copdock and Washbrook that have yet to be finished.⁴</p>
2. the degree to which the plan or programme influences other plans and programmes including those in a hierarchy	<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 Copdock and Washbrook Parish and will be used in conjunction with the emerging Babergh and Mid Suffolk Joint Local Plan (once adopted) to determine planning applications.</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>One of the Basic Conditions which the Neighbourhood Plan must meet is to contribute to sustainable development.</p>
4. environmental problems relevant to the plan or programme,	<p>Baseline information relating to Copdock and Washbrook 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 Zone 3, multiple areas of Deciduous Woodland 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 for recreation around the Stour and Orwell Estuary SPA and Ramsar site. The Suffolk Coast and Heaths AONB is 3.5km to the east of the parish. There are four AQMAs within 5km of the parish boundaries to the north-east within Ipswich.</p>

⁴ Babergh District Council (2022). Draft Five-Year Housing Land Supply Position Statement 2022. (see <https://www.babergh.gov.uk/assets/Strategic-Planning/AMR/5HLS-2022/Babergh-2022-5HLS.pdf>)

SEA Requirement	Comments
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 Neighbourhood Plan does not allocate sites for housing or other forms of development. The Neighbourhood Plan covers the period up to 2037. 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,	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. The adopted Babergh Core Strategy (2014) identifies Copdock and Washbrook as a Hinterland Village in the settlement hierarchy. Policy CS3 made provision for 1,050 homes to be delivered within the Core and Hinterland Villages over the Plan period to 2031. The modified Part 1 Babergh and Mid Suffolk Joint Local Plan does not identify a minimum housing requirement for Copdock and Washbrook, however as of April 2022, there were permissions for 43 new homes in Copdock and Washbrook that had yet to be completed.
8. the transboundary nature of the effects,	The Neighbourhood Plan focuses on Copdock and Washbrook Parish only. Transboundary effects under the SEA Regulations refers to 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 Copdock and Washbrook Parish. According to the 2021 Census, the population of the parish stood at 1,130.
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, 	Copdock and Washbrook Parish is home to a number of Priority Species and Priority Habitats, there are a number of County Wildlife Sites within 500m of the parish boundaries 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 for recreation in relation to the Stour and Orwell Estuary SPA and Ramsar site. There are 24 listed buildings located within the parish. The majority of the parish is comprised of Grade 3 agricultural land. The remaining land within the parish is Grade 3 although it is not clear if it is Grade 3a (considered to be high quality) or the lower quality Grade 3b. There are four AQMAs within 5km of the parish boundaries to the north-east within Ipswich, indicating that air pollution limits are being exceeded in these areas.
12. the effects on areas or landscapes which have a recognised national, Community or international protection status.	Suffolk Coast and Heaths AONB is approximately 3.5km to the east and Dedham Vale AONB is located approximately 8km to the south.

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 Copdock and Washbrook 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 parish up to 2037 and decision makers will need to consider the criteria of these policies when determining future applications in the parish. 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 Copdock and Washbrook 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

May 2023