

**Babergh & Mid Suffolk District  
Councils**

**Laxfield Parish Council  
Neighbourhood  
Development Plan  
SEA Screening Opinion**

**Final report**

Prepared by LUC  
March 2020

## Babergh & Mid Suffolk District Councils

### Laxfield Parish Council Neighbourhood Development Plan SEA Screening Opinion

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1.	Draft SEA Screening Opinion	H Briggs	K Nicholls	J Owen	05.03.2020
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# Chapter 1

## Introduction

1.1 Laxfield Parish Council is in the process of preparing a Neighbourhood Development Plan (NDP). Laxfield Parish is located in Mid Suffolk District, approximately 6.25 miles north of Framlingham. 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 Guidance<sup>1</sup> (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 Draft Laxfield 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 Regulations<sup>2</sup>.

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<sup>1</sup> <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

# SEA Screening

### Scope of the NDP

2.1 Laxfield Parish Council has prepared the Draft (Regulation 14) version of the NDP which is being subject to public consultation between 22<sup>nd</sup> February and 6<sup>th</sup> April 2020.

2.2 The Laxfield NDP covers the entire parish, including the main settlement of Laxfield, the hamlet of Barnyard's Green to the north-east of Laxfield village and areas of residential development connected to the B1117 that passes through the parish.

2.3 The Draft NDP identifies key issues to be addressed within the parish, and links them to the following seven Themes:

1. Settlement Pattern and Spatial Policy
2. Housing Demand and Development Opportunity
3. Built Environment and Design
4. Natural Environment
5. Amenities and Services
6. Businesses, Employment and Makers
7. Transport, Infrastructure and Distribution.

2.4 The Draft NDP includes a Vision for the long-term future of Laxfield, which is supported by the following guiding principles:

- **Change incrementally:** Organic and gradual development that contributes to the wellbeing and successful livelihoods of all.
- **Consider others:** Anticipate climate change in ways that enhance the desirability of the location and minimise environmental impact. A place which people wish to visit and stay.
- **Use existing resources wisely: recycle, renew, revitalise:** Minimise additional land take and encourage the sharing of services and amenities.
- **Create places:** That provide a distinctive identity through the quality of design, appropriateness of functions, accessibility of location and diversity of lifestyles.
- **Collaborate to succeed:** By sharing common aspirations, respecting diverse points of view and

recognising the value of continuous community involvement from inception to post occupancy.

2.5 The NDP then sets out 20 planning policies (LAX 1-20) to realise and deliver this vision. The policies are structured in line with the seven themes listed above.

2.6 Policy LAX 2: Housing Development states that the NDP provides for the development of around 70 additional dwellings in the parish between 2018 and 2036, which are to be met through:

1. The site allocations identified in Policies LAX 3 and LAX 4 in the Plan; and
2. Small brownfield “windfall” sites and infill plots within the Settlement Boundary that come forward during the plan period and are not identified in the Plan.
3. In exceptional circumstances, dwellings outside the Settlement Boundary where it can be demonstrated that the dwelling is essential for the operation of agriculture, horticulture, forestry, outdoor recreation and other exceptional uses for which it can satisfactorily be demonstrated that it needs to be located in the countryside.

2.7 The two sites that are allocated for housing development in policies LAX 3 and 4 provide for a total of 17 dwellings. In total, there are 64 dwellings with outstanding planning permission to be delivered in Laxfield, 38 of which were not completed at 1<sup>st</sup> April 2018 and 26 which are new residential planning permissions since 1<sup>st</sup> April 2018. The allocations in LAX 3 and LAX 4 are among the 26 dwellings which have been granted permission since 1<sup>st</sup> April 2018. The NDP does not, therefore, allocate any sites for new development that do not already have planning permission.

## Baseline Information

2.8 This section summarises baseline information for the parish of Laxfield, drawing from the information set out in the Draft NDP<sup>3</sup> and the supporting evidence documents, which includes a Housing Needs Assessment and Site Options Assessment by AECOM and the Heritage and Settlement Sensitivity Assessment for Babergh and Mid Suffolk District Councils by Place Services<sup>4</sup>.

## Context

2.9 Laxfield is a village and civil parish in the District of Mid-Suffolk, eastern England. It is located approximately 6.25

miles north of Framlingham. The parish is agricultural in character with most residents commuting to nearby market towns. The B1117 connects Laxfield to a network of villages in the area, and the A143 to the north, A140 to the west and A12 to the east connect Laxfield to larger towns such as Ipswich and Lowestoft.

## Biodiversity, flora and fauna

2.10 There are no internationally or nationally designated nature conservation sites within Laxfield Parish. However, there are two County Wildlife Sites adjacent to the built-up area of Laxfield Village, with one located to the north-west (Laxfield Cemetery) and the other to the east (Laxfield Meadows). There is also a further County Wildlife Site (Laxfield Wood) in the south of the parish around 2km from the built-up area of Laxfield Village (this is also designated as Ancient Woodland). Outside of the parish boundaries, there is a County Wildlife Site (Ubbeston Wood) located approximately 2.2km to the east of the built-up area of Laxfield (this is also designated as Ancient Woodland).

2.11 There are multiple areas of Deciduous Woodland distributed throughout the parish, with three of these areas being located adjacent to the northern boundary of the built-up area of Laxfield. Mixed deciduous woodland supports a wide range of plants, invertebrates, birds and mammals. Additionally, the rivers and streams (the River Blyth) within the parish provide a variety of important habitats for aquatic plants and fish.

2.12 The whole of the parish falls within Impact Risk Zones (IRZs) associated with a SSSI (Chippenhall Green) that is approximately 3.2km north of the built-up area of Laxfield. The IRZs do not flag residential development as a potential risk.

## Population

2.13 At the time of the 2011 Census the Laxfield Neighbourhood Plan area had a total of 910 residents. Laxfield’s population is generally older than that of Mid Suffolk and England, with a significantly high amount of people over the age of 65 in the area. There has been a contraction in the younger population within Laxfield.

2.14 Agricultural occupations are the most common amongst residents, although there are a number of small businesses as well as residents who commute to surrounding towns or even to London for work.

<sup>3</sup> <https://www.laxfield.online/assets/Neighbourhood-Plan/Laxfield-Reg-14-Pre-Submission-Plan-22-February-2020.pdf>

<sup>4</sup> <https://drive.google.com/drive/folders/1w4icx0UETfKei5x6iAkg5P9pxqXDyo7X>



### Human health

2.15 The parish contains a Branch Surgery within the built-up area of Laxfield, which offers prescription services. However, there is no doctor's or dentist surgery in the village and therefore residents are required to travel elsewhere (e.g. Fressingfield around 6km to the north-west) to access health services.

### Soil

2.16 The majority of the parish is comprised of Grade 3 agricultural land (there is no data distinguishing whether the land is Grade 3a or the lower quality Grade 3b). However, there is also a substantial area of Grade 2 agricultural land adjacent to the northern boundary of the built-up area of Laxfield. Additionally, there are also smaller areas of Grade 2 agricultural land located on the eastern and southern boundaries of the parish.

### Water

2.17 There are small areas in close proximity to the built-up area of Laxfield Village that are located within Flood Zone 3 due to the presence of a watercourse (Blyth). 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 majority of the parish is located within Source Protection Zone 3.

### Air quality and climatic factors

2.19 There are no Air Quality Management Areas (AQMAs) that have been declared within or close the Laxfield Parish.

2.20 It has been identified in the NDP that limited public transport options have resulted in private car travel dominating and speeding is identified as an issue within the parish, including by cars lorries, vans and tractors. Additionally, it has been identified that parking is an issue in the village that may contribute to congestion given increases in traffic and the presence of large agricultural vehicles on the roads.

### Material assets

2.21 It has been identified in the NDP that there is little open green space within the settlement boundary. The following areas have been designated in the Laxfield NDP as Local Green Spaces: allotments at Bickers Hill and Station Road, Mobbs Meadow, Village Pond, Field behind Church Walk and High Street Verges.

2.22 The main built up area of Laxfield has several bus stops and there are also further bus stops in the Hamlet of

Barnyard's Green to the north-east and in the south-eastern corner of the parish. However, it has been highlighted in the NDP that public transport options are limited, which has resulted in private car travel dominating amongst residents. The 118 bus service provides access into Ipswich and Framlingham but it does not provide any early morning or late evening services. The parish is not in close proximity to any railway stations, with the closest being Halesworth approximately 10km to the north-east.

2.23 The parish contains a number of Public Rights of Way that provide access to the surrounding countryside. However, there are no designated cycle routes through the parish.

2.24 There is one primary school located on the western side of the built-up area of Laxfield Village. However, it has been identified in the NDP that the school is at capacity and therefore there is likely to be a need for an additional classroom.

2.25 There is some land within the parish approximately 600m to the south-east of the built-up area of Laxfield that is located within a Mineral Consultation Area.

### Cultural heritage

2.26 There are over 30 listed buildings within the parish, a high concentration of which are located within the built-up area of Laxfield village, which is designated as a Conservation Area. Within the eastern side of Laxfield Conservation Area, there are two Grade II listed buildings and one Grade I listed building. Further heritage assets in the area include a Scheduled Monument (Moated site at Grange Farm), which is located approximately 1.4km to the south-west, but outside of the parish boundaries.

2.27 The Heritage and Settlement Sensitivity Assessment for Babergh and Mid Suffolk Districts has identified the historic core of Laxfield as being of high historic value, but suggests that the value and susceptibility of the settlement has been harmed by large areas of modern development on the southern side of the settlement. The assessment also suggests that the north-eastern end of the settlement is highly susceptible to change.

### Landscape

2.28 Laxfield Parish lies within a large National Character Area, South Norfolk and High Suffolk Claylands. The parish landscape is gently undulating, with a heavy clay plateau to the north of the settlement and rolling valleys along the River Blyth, which rises from a number of streams around the parish and flows north-east towards Halesworth.

2.29 There are no nationally designated landscapes within the parish. The Suffolk Coast and Heaths AONB is located approximately 15km to the east of the parish.

2.30 There is an Environmentally Sensitive Area classified as the Suffolk River Valleys adjacent to the eastern boundary of the parish. This designation is designed to provide protection from overly intensive farming practices.

### SEA Screening

2.31 An assessment has been undertaken to determine whether the Regulation 14 Draft Laxfield NDP requires SEA in accordance with the SEA Regulations.

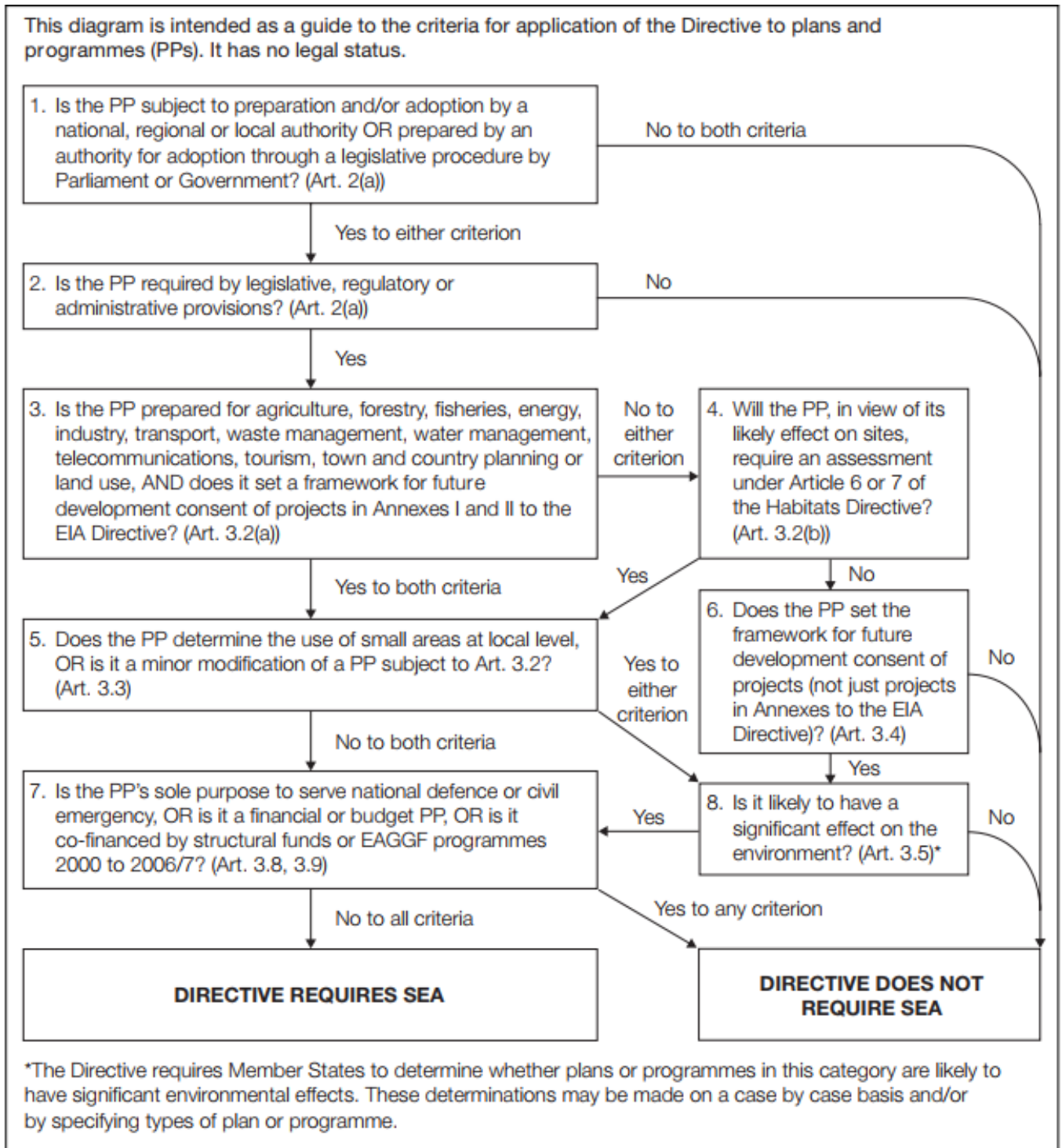
2.32 **Figure 2.1** overleaf presents the flow diagram entitled 'Application of the SEA Directive to plans and programmes' which is taken from the Practical Guide to the Strategic Environmental Assessment Directive<sup>5</sup>, published in September 2005. This is a useful guide when considering whether a plan should be subject to SEA (The Practical Guide has been superseded by the National Planning Practice Guidance; however it still provides a useful and relevant guide to the process to use in making SEA screening decisions).

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<sup>5</sup>[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



2.33 **Table 2.1** below presents the assessment of whether the Laxfield NDP 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 Laxfield 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 (Mid Suffolk 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? (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. <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? (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. The developments allocated in the NDP are small scale housing sites, which are not included in Annexes I or II of 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?  (Art. 3.2 (b))	Uncertain	HRA screening of the NDP is being undertaken separately on behalf of Mid Suffolk District Council and the outcome of that work is unknown at the time of writing. Therefore, it is necessary at this stage to consider both scenarios under Q4. <b>Yes: Move to Q5.</b> <b>No: Move to Q6.</b>
5. Does the PP determine the use of small areas at local level, OR is it a minor modification of a PP subject to Art.3.2? (Art. 3.3)	Yes and No	The NDP allocates small-scale sites for housing development (although both sites allocated in the NDP already have planning permission). It is not a minor modification of a PP. <b>Move to Q8.</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 NDP allocates two small-scale sites for housing development, setting the framework for future development consent (although both sites do already have planning permission). The NDP also provides a framework for development of small-scale housing schemes on rural exception sites outside the settlement boundary (subject to meeting criteria) although it does not allocate sites for this purpose. <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>

2.34 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 Laxfield 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	<p>Once made, the NDP will become part of the statutory development plan and will guide the delivery of development in Laxfield Parish, including in terms of design. The NDP allocates two sites for residential development which are expected to accommodate a total of 17 dwellings; however both of these sites already have planning permission. The NDP also provides a framework for the development of small-scale housing schemes on rural exception sites outside the Settlement Boundaries (subject to meeting criteria) although it does not allocate sites for this purpose.</p> <p>The adopted Mid Suffolk Core Strategy (2008, review 2012) identifies Laxfield as a Primary Village in Policy CS-1 Settlement Hierarchy. This policy seeks to direct development to towns and key service centres but also with some provision for meeting local housing needs in primary and secondary villages. The Core Strategy identifies that Primary Villages should deliver limited growth where a local need has been established.</p> <p>The emerging Babergh and Mid Suffolk Joint Local Plan identifies Laxfield as a Hinterland Village. However, the new Local Plan is unlikely to be adopted until 2021. The NDP suggests there has been limited regard to the emerging policies of the Joint Local Plan in the development of the Laxfield NDP.</p>
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 Mid Suffolk Core Strategy (2008/2012) 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 Laxfield 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 Laxfield Parish was described earlier in this chapter. Key issues of relevance to the NDP 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, three County Wildlife Sites (one of which is also designated Ancient Woodland) and a high concentration of heritage assets including Laxfield Conservation Area. The parish also falls within IRZs associated with a SSSI to the north, but these do not flag residential development as a potential risk.
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 allocates two sites for housing development, amounting to a total of 17 dwellings, which already have planning permission and are in addition to 47 other dwellings with existing planning permission to be delivered in Laxfield. The Laxfield NDP covers the

Sea Requirement	Comments
	period 2018-2036 and the effects of housing 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 Laxfield is rural and Laxfield village itself is some distance from the nearest settlement. 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 Laxfield. It is noted that the housing allocations included in the NDP already have planning permission and are in addition to 47 other dwellings to be delivered that also have planning permission.
8. the transboundary nature of the effects,	The NDP focuses on Laxfield Parish only. Transboundary effects under the SEA Regulations refers to 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.
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 Laxfield Parish. The population of the parish in the 2011 Census was 910 residents.
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>	Laxfield Parish is home to a number of Priority Species and Priority Habitats, there are three County Wildlife Sites within the parish and the whole of the parish is located within a SSSI IRZ (although resident development is not flagged as a potential risk. There are over 30 listed buildings located within the parish, a high concentration of which are located within Laxfield Conservation Area in the built-up area of the village. There is a substantial area of Grade 2 agricultural land adjacent to the built-up area of Laxfield, with smaller areas adjacent to the eastern and southern boundaries of the parish. The remaining land within the parish is Grade 3 although it is not clear if it is Grade 3a or the lower quality Grade 3b. The two housing allocations in the NDP, LAX 3 (four dwellings) and LAX 4 (13 dwellings), are both located within 200m of Laxfield Conservation Area. Additionally, both of the allocations are located within 500m of the County Wildlife Sites that are located in close proximity to the east (Laxfield Meadows) and north-west (Laxfield Cemetery) of the settlement.
12. the effects on areas or landscapes which have a recognised national, Community or international protection status.	There are no nationally or internationally protected landscapes in close proximity to Laxfield Parish. Suffolk Coast and Heaths AONB is approximately 15km to the east.

## SEA Screening Conclusion

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

2.36 The NDP sets out a vision and detailed planning policies to shape development in the parish up to 2036. It allocates two small sites for residential development, delivering a total of 17 homes. These sites, however, both already have planning permission. They in addition to 47 other dwellings to

be delivered in Laxfield that also already have planning permission.

2.37 The residential development allocated through the NDP could have a range of environmental effects during the construction period and afterwards, in particular in relation to additional traffic generation and demand for water treatment. However, the scale of any such effects will be small given that the total number of homes to be delivered on the two allocated sites is only 17.

2.38 The two housing allocations in the Laxfield NDP, LAX 3 (four dwellings) and LAX 4 (13 dwellings) are both located within 200m of Laxfield Conservation Area, which contains

multiple listed buildings, and both are located within 500m of County Wildlife Sites. However, it is assumed that the environmental effects of the development on the sites with planning permission would have been assessed during the planning application process, with conditions attached to the consent as appropriate to ensure that adverse effects on the environment do not result. Although these sites are allocated in the NDP they are, in effect, part of the baseline conditions for the preparation of the NDP. They are included as allocations in the NDP because they already have planning consent.

2.39 There are policies in the NDP and in the adopted Mid Suffolk Core Strategy that may provide mitigation. Mitigation may also be provided by the policies in the emerging Babergh and Mid Suffolk Joint Local Plan, although it is noted that, given its current stage of development, emerging policies may change.

**2.40 Given that the two allocated sites in the Laxfield NDP already have planning consent and it does not allocate any additional sites for development, it is considered that the NDP does not have the potential to have significant environmental effects in relation to the baseline, and that SEA is therefore not required.**

### Next steps

2.41 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.