

Babergh & Mid Suffolk District Councils

**Badwell Ash & Long Thurlow
Neighbourhood Plan 2024-2038
SEA Screening Opinion**

Final report

Prepared by LUC

November 2024



Babergh & Mid Suffolk District Councils

**Badwell Ash & Long Thurlow Neighbourhood Plan
2024-2038**

SEA Screening Opinion

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Chapter 1

Introduction

1.1 Badwell Ash and Long Thurlow Parish Council is in the process of preparing a Neighbourhood Plan covering the period 2024 to 2038. The parish of Badwell Ash and Long Thurlow is located in Mid Suffolk District, approximately 12 miles from both Bury St Edmunds and Stowmarket. 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. However, SA 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 Badwell Ash & Long Thurlow Neighbourhood Plan (September 2024) (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 In October 2023 the Levelling up and Regeneration Act received royal assent, setting out detailed reforms to the planning system. Amongst other things, the Act allows for 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 \(2016, updated 2024\) 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 Neighbourhood Plan

2.1 Badwell Ash & Long Thurlow Parish Council has prepared a Pre-Submission Draft version of the Neighbourhood Plan, which has been subject to public consultation between 27th September and 8th November 2024.

2.2 The Plan includes a vision for the long-term future of Badwell Ash & Long Thurlow as follows:

'Badwell Ash and Long Thurlow will be a thriving, healthy, safe, rural community with good facilities for all, improved pedestrian and cycle access/ connectivity and appropriate viable businesses supported by the community. Any development will reflect current and future housing needs, be sympathetically designed, built with suitable infrastructure and be sustainable with ambitious Net Zero targets. Our local heritage will continue to be proactively valued and improved. From an environmental perspective, the rural setting, green spaces and wildlife will be protected, nurtured and enhanced.'

2.3 The vision is supported by the following five objectives:

Design and Housing

1. To ensure that new housing development in the parish reflects the needs of the population both now and in the future.

Community Infrastructure

2. To ensure that the parish remains a thriving, healthy and safe rural community with good facilities which are accessible and available for all.

Accessibility

3. To encourage pedestrian and cycle connectivity within each of the individual settlements within the parish and also between them, particularly between Badwell Ash and Long Thurlow.

Business

4. To encourage and support local businesses, helping them to grow and flourish contributing to the economic health and sustainability of the community.

Natural Environment

- 5.** To protect and enhance the parish's local heritage, rural setting, green spaces and wildlife.
- 2.4** The Neighbourhood Plan then sets out 17 parish-wide policies (BALT 1-17) and nine area-based policies (BALT18-26) to realise and deliver the vision. The parish-wide policies are structured in line with the themes set out above.
- 2.5** The Neighbourhood Plan does not allocate any sites for new housing or other built development. Policy BALT2 - Scale and pattern of new housing development states that the scale and pattern of new development in the parish should conserve and enhance the form and character of the existing settlements of Badwell Ash and Long Thurlow. New housing development within the Parish over the plan period should consolidate the existing settlement pattern and be located within the defined settlement boundaries for Badwell Ash and Long Thurlow. Policy BALT4 – Exception sites sets out criteria that will apply to affordable housing developments that may come forward within the parish.
- 2.6** Other policies in the Plan address topics including design, biodiversity, the landscape, infrastructure and new and existing business.

Baseline Information

- 2.7** This section summarises baseline information for the parish of Badwell Ash & Long Thurlow, drawing from the information set out in the Pre-Submission Draft version of the Badwell Ash & Long Thurlow Neighbourhood Plan 2024-2038 and the Landscape and Biodiversity Evaluation.

Context

- 2.8** Badwell Ash & Long Thurlow is a village and civil parish, 7.513 km² in size, located within Mid Suffolk District. The parish is located 12 miles from both Bury St Edmunds and Stowmarket.

Biodiversity, Flora and Fauna

- 2.9** There are no nationally or international designated sites within the parish, nor are there any County Wildlife Sites.
- 2.10** However, the Gardens, Great Ashfield Site of Special Scientific Interest (SSSI) is located adjacent to the southern part of the parish boundary and its Impact Risk Zone (IRZ) covers the parish. IRZs are a GIS tool developed by Natural England to make a rapid initial assessment of the potential risks to SSSIs posed by development proposals. They define zones around each SSSI which reflect particular sensitivities of the features for which it is notified and indicate the types of development proposals which could potentially have adverse impacts.

- 2.11** There are also records of protected species and priority habitats within the parish.

Population

- 2.12** At the time of the last Census (2021), Badwell Ash & Long Thurlow had a population of 817 people. The 2021 Census indicates that 54.7% of the parish's residents are economically active (including full time students) compared to 46.7% being economically inactive.
- 2.13** Badwell Ash & Long Thurlow has an ageing population. The largest age bracket is those aged between 50-85+ years, and between the 2011 and 2021 census the percentage of the population aged 65 years and over has increased from 18.2% to 28.1%.

Human Health

- 2.14** Based on the 2021 census, 85.8% of the Badwell Ash & Long Thurlow population was in either 'very good health' or 'good health'. This is higher than the average for Mid Suffolk District as a whole (82.9%).

Soil

- 2.15** The majority of the parish is made up of Grade 2 and Grade 3 Agricultural Land, although it is not clear if it is Grade 3a (classified as high quality) or the lower quality Grade 3b.
- 2.16** The soils of the parish are mixed, consisting of:
- Deep well drained fine loam, coarse loam and sandy soils, locally flinty and in places over gravel. Slight risk water erosion.
 - Slowly permeable calcareous/non calcareous clay soils, slight risk water erosion.
 - Slowly permeable seasonally waterlogged fine loam over clay.
 - Stoneless clay soils mostly overlying peat. Soils variably affected by groundwater. Risk of localised flooding.

Water

- 2.17** Langham Brook, a tributary of the River Blackbourn, marks the western parish boundary between Badwell Ash and Langham. Consequently, some western areas of the parish such as those located south west of Four Ashes and north of Hunston are at high risk of flooding. The high-risk area means that the area has a chance of flooding of greater than 3.3% each year.

Air Quality and Climatic Factors

- 2.18** There are no Air Quality Management Areas (AQMAs) within or near to Badwell Ash & Long Thurlow Parish. The closest AQMA is to the southeast within the centre of Ipswich.

2.19 Climate data are not available at parish level, but within Mid Suffolk District as a whole, reductions in overall carbon emissions of about 37% were achieved between 2005 and 2022. This reduction was mostly due to progress in reducing emissions from industrial and commercial sources. Transport and agriculture make the largest contribution to carbon emissions in Mid Suffolk.

Material Assets

2.20 The Neighbourhood Plan lists a number of key community facilities that are located within Badwell Ash & Long Thurlow including:

- The Village Hall and Recreation Grounds;
- St Mary's Church; and
- Village Shop and Post Office.

2.21 However, Badwell Ash & Long Thurlow does not have any schools or GP surgeries. There are two bus stops in the main part of the village, located close to St Mary's Crescent and adjacent to the village hall/shop. From here, public bus services operate to take passengers, including school children to Thurston Community College and Beyton Sixth form via Elmwell. There are also services between Bury St Edmunds and Diss. There is also a bus stop in Long Thurlow, where services to Bury St Edmunds and Eye can be accessed, the latter via High Suffolk Community Transport.

2.22 The Neighbourhood Plan identifies 23 Local Green Spaces in Badwell Ash & Long Thurlow.

2.23 The parish contains a number of footpaths and permissive paths that provide access to the surrounding countryside.

Cultural Heritage

2.24 There are several listed buildings within Badwell Ash & Long Thurlow, the majority of which are Grade II*. There are no Scheduled Monuments or Conservation Areas within the parish.

Landscape

2.25 There are no National Parks or National Landscapes (formerly Areas of Outstanding Natural Beauty) within or close to Badwell Ash & Long Thurlow, the nearest being Suffolk Coast and Heaths National Landscape which is located 36km to the south east.

2.26 According to the Badwell Ash and Long Thurlow parish Design Guidance and Codes, the parish is divided into 5 distinct Character Areas, including:

- Historic core of Badwell Ash village: largely centred on The Street.
- Wider village: areas of 20th century development off Back Lane, Hunston Road, Richer Road and The Broadway.
- Long Thurlow: linear development fronting onto Long Thurlow Road.
- Badwell Green: development located at Badwell Green and The Broadway.
- Rural Hinterland: the area away from the main areas of settlement, includes scattered dwellings and farmsteads

2.27 According to the Joint Babergh and Mid Suffolk District Council Landscape Guidance 2015, Badwell Ash is identified as Ancient Plateau Claylands and Long Thurlow is identified as Plateau Claylands. The key characteristics of these character areas are outlined below:

- Ancient Plateau Claylands landscape are gently rolling heavy clay plateaux with ancient woodlands.
- Plateau Claylands are a gently rolling heavy clay plateaux with sparse woodland cover and some extensive areas of post WWII field boundary loss.

2.28 In addition, the Neighbourhood Plan has identified a number of Important Views into, out of and within Badwell Ash (11 views), Badwell Green (4 views), and Long Thurlow (7 views), all of which are of high importance to their character, setting and sense of rurality.

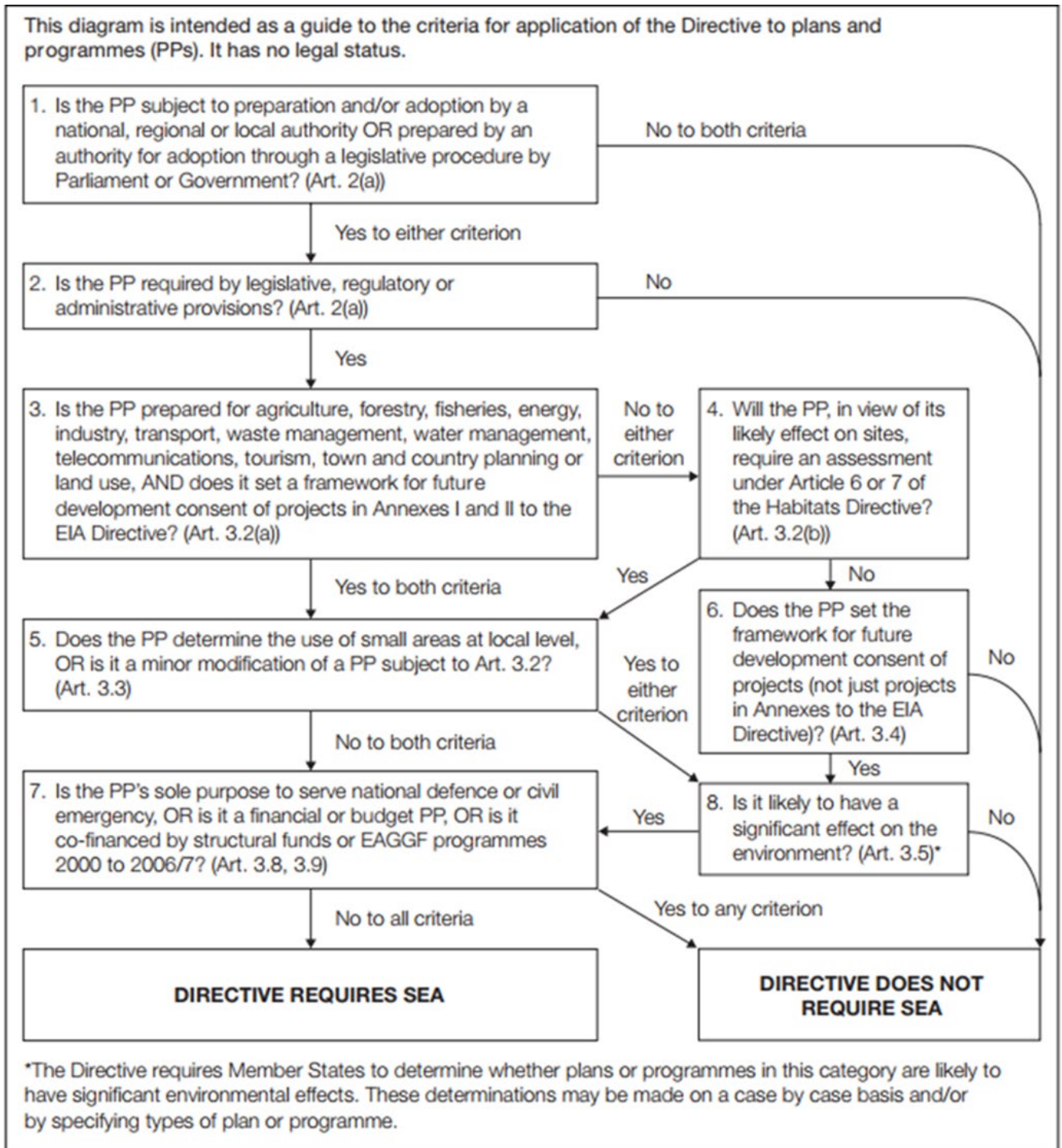
SEA Screening

2.29 An assessment has been undertaken to determine whether the Pre-Submission Draft version of the Badwell Ash & Long Thurlow Neighbourhood Plan 2024-2038 requires SEA in accordance with the SEA Regulations.

2.30 **Figure 2.1** overleaf presents the flow diagram entitled 'Application of the SEA Directive to plans and programmes' which is taken from the Practical Guide to the Strategic Environmental Assessment 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](#)

Figure 2.1 Application of the SEA Directive to plans and programmes



2.31 Table 2.1 below presents the assessment of whether the Badwell Ash & Long Thurlow 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 Badwell Ash & Long Thurlow 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 (Mid Suffolk 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 & 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 Mid Suffolk 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 with other plans or projects. 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)? (Article 3.4)	Yes	Although the Neighbourhood Plan does not allocate sites for development, 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? (Article 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 Badwell Ash & Long Thurlow Neighbourhood Plan meets these criteria.

Table 2.2 Likely Significant Effects of the Badwell Ash & Long Thurlow Neighbourhood Plan

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 Badwell Ash & Long Thurlow, including in terms of design. The Neighbourhood Plan does not allocate sites for residential or other forms of development.</p> <p>The previously adopted Mid Suffolk Core Strategy (2008, review 2012) identified Badwell Ash as a 'Primary Village' in Policy CS1 – Settlement Hierarchy. The Core Strategy did not identify a minimum housing requirement for Badwell Ash & Long Thurlow. Policy CS2 – Development in the Countryside and Countryside Villages restricts development to defined categories, such as agriculture and forestry, the preservation of Listed Buildings, extension of dwellings etc.</p> <p>The recently adopted Babergh and Mid Suffolk Joint Local Plan Part 1 (Nov 2023) does not set out a settlement hierarchy. Following the examination of the Joint Local Plan it was decided that an up-to-date settlement hierarchy will now come forward in Part 2 of the Plan. This is at an early stage in its development and is unlikely to be adopted for some time.</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 and Mid Suffolk Joint Local Plan Part 1 and saved policies from the previous local plans). 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 Badwell Ash & Long Thurlow Parish and will be used in conjunction with the adopted Babergh and Mid Suffolk Joint Local Plan Part 1 and the emerging Babergh and Mid Suffolk Joint Local Plan Part 2 (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 Badwell Ash & Long Thurlow Parish was described earlier in this report. Key issues of relevance to the Neighbourhood Plan are the presence of high quality agricultural land in the parish, areas at high risk of flooding, SSSIs, County Wildlife Sites, Priority Habitats and Ancient Woodland.</p>
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.	<p>The Neighbourhood Plan does not allocate sites for housing or other forms of development. The Neighbourhood Plan covers the period up to 2038. Any</p>

SEA Requirement	Comments
	effects of the Neighbourhood Plan are expected to be indirect (due to not allocating sites) but would be long-term and permanent.
7. The cumulative nature of the effects.	<p>Cumulative effects could result from the Neighbourhood Plan in combination with development that takes place in the surrounding towns and villages, although the Neighbourhood Plan does not allocate sites for housing or other forms of development.</p> <p>The previously adopted Mid Suffolk Core Strategy (2008, review 2012) identified Badwell Ash & Long Thurlow as a 'Primary Village' in Policy CS1 – Settlement Hierarchy. The Core Strategy did not identify a minimum housing requirement for Badwell Ash & Long Thurlow. Policy CS2 – Development in the Countryside and Countryside Villages restricts development to defined categories, such as agriculture and forestry, the preservation of Listed Buildings, extension of dwellings etc.</p> <p>The adopted Part 1 Babergh and Mid Suffolk Joint Local Plan does not identify a minimum housing requirement for Badwell Ash & Long Thurlow.</p>
8. The transboundary nature of the effects.	The Neighbourhood Plan focuses on Badwell Ash & Long Thurlow 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 the entirety of Badwell Ash & Long Thurlow Parish. The population of the parish, according to the 2021 Census, was 817 people.
<p>11. The value and vulnerability of the area likely to be affected due to:</p> <ul style="list-style-type: none"> ■ Special natural characteristics or cultural heritage; ■ Exceeded environmental quality standards or limit values; and ■ Intensive land-use. 	There are several listed buildings within the parish. There are several sensitive locations within the parish including Priority Habitats and patches of Ancient Woodland. The parish contains Grade 2 and Grade 3 agricultural land. There are no internationally designated nature conservation sites within the parish but The Gardens, Great Ashfield SSSI is located adjacent to the southern part of the parish boundary and its Impact Risk Zone covers the parish.
12. The effects on areas or landscapes which have a recognised national, Community or international protection status.	There are no National Landscapes within or close to Badwell Ash & Long Thurlow Parish, the closest being Suffolk Coast and Heaths National Landscape which is located 36km to the south east.

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 Badwell Ash & Long Thurlow 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 2038 and decision makers will need to consider the criteria of

these policies when determining future applications in the village. 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 Badwell Ash & Long Thurlow Neighbourhood Plan is unlikely to have significant environmental effects and 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

November 2024