

Babergh & Mid Suffolk District Councils

Baylham Neighbourhood Plan 2024-2037

SEA Screening Opinion

Final report

Prepared by LUC

September 2024



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Version	Status	Prepared	Checked	Approved	Date
1.	Draft SEA Screening Report	T. Uzuegbunam	O. Dunham	K. Nicholls	19.09.2024
2.	Final SEA Screening Report	T. Uzuegbunam	O. Dunham	K. Nicholls	20.09.2024

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 Registered number 2549296
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Chapter 1

Introduction

1.1 Baylham Parish Council is in the process of preparing a Neighbourhood Plan covering the period 2024 to 2037. Baylham is located in Mid Suffolk District, approximately seven miles 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 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 Baylham 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 Baylham Parish Council has prepared a Pre-Submission Draft version of the Neighbourhood Plan, which is being subject to public consultation between 6th September and 21st October 2024.

2.2 The Plan includes a vision for the long-term future of Baylham as well as ten objectives that fall under five themes through which the vision will be achieved:

Housing

1. New housing should be limited to infill plots and respect the character of the village.

Natural Environment

2. Villagers should be able to enjoy Baylham's natural environment and every opportunity should be taken to protect and enhance the natural environment and access to it.
3. Where possible, development should deliver a measurable net gain in biodiversity on site.

Built Environment & Development Design

4. Development should recognise and protect the importance of historic assets and their settings.
5. The quality of life of existing residents should not be compromised by new development.
6. New buildings should incorporate the latest energy efficiency technology and minimise the use of fossil fuels.

Business, Infrastructure and Services

7. Development should not place any unacceptable burden on infrastructure and services and should respect the natural limitations of the rural location.
8. Wherever possible, existing services should be maintained and improved, and commercial community assets preserved.

Transport and Travel

9. The future development of the village will have regard to the safety of pedestrians, horse riders and cyclists.
10. Public transport services to nearby services should be supported and maintained.

2.3 The Neighbourhood Plan then sets out 14 planning policies (BAY 1-14) to realise and deliver the vision. The policies are structured in line with the themes set out above.

2.4 The Neighbourhood Plan does not allocate any sites for new housing or other built development. Policy BAY 1 – Spatial Strategy states that the Neighbourhood Area will accommodate development commensurate with the policies of the adopted Babergh and Mid Suffolk Joint Local Plan - Part 1³. The policy specifies that the focus for new development will be within the defined Settlement Boundary, as shown on the Policies Map, where the principle of development is accepted.

2.5 Policy BAY 2 - Housing Development states there is a general presumption in favour of housing development comprising small infill dwellings, where proposals are within an existing frontage; would not result in backland development; and would not have a detrimental impact on the built and natural character of the site and its surroundings, the amenity of residents and infrastructure, including highways.

2.6 Other policies in the Plan address topics including design, natural assets, community facilities and business and farm diversification.

Baseline Information

2.7 This section summarises baseline information for the parish of Baylham, drawing from the information set out in the Pre-Submission Draft version of the Baylham Neighbourhood Plan 2024-2037, Local Green Space Assessment and Baylham Landscape Assessment.

Context

2.8 Baylham is a village and civil parish, 1,349 acres in size, located within Mid Suffolk District. The village is located approximately ten miles south east of Stowmarket and seven miles north west of Ipswich.

Biodiversity, Flora and Fauna

2.9 There are no international designated sites within the parish.

2.10 However, there are two Sites of Special Scientific Interest (SSSIs) within the parish, including Ditch Wood, part of the Barking Woods SSSI and Great Blakenham SSSI.

Therefore, relevant planning applications need to be assessed for their likely impact on the SSSIs. There are also seven County Wildlife Sites (CWSs) and patches of Ancient Woodland within the parish. Seven of the 20 Suffolk Priority Habitats identified by the Suffolk Biodiversity Partnership under the UK Biodiversity Action Plan, are within Baylham, including:

- Hedgerows.
- Lowland mixed deciduous woodland.
- Ponds.
- Wood pasture and parkland.
- Traditional orchards.
- Wet woodland.
- Rivers and streams.

Population

2.11 At the time of the last Census (2021), Baylham had a population of 303 people. The 2021 Census indicates that 51.8% of those aged 16 years and over were in work compared to 46.7% being economically inactive.

2.12 Baylham has an ageing population. The largest age bracket is those aged between 50-85+ years, making up 60.4% of the local population.

Human Health

2.13 Based on the 2021 census, 80.4% of the Baylham population was in either 'very good health' or 'good health'. This is lower than the average for Mid Suffolk District as a whole (82.9%), likely reflecting the age profile of the parish.

Soil

2.14 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.

2.15 The soils of the parish are mixed, consisting of:

- Deep well drained loam and sandy soils, locally flinty, in places over gravel, slight risk water erosion;
- Slowly permeable calcareous/non calcareous clay soils, slight risk water erosion; and
- Stoneless clay soils mostly overlying peat, variably affected by groundwater, risk of localized flooding⁴.

³ [New Joint Local Plan - Mid Suffolk District Council - baberghmid-suffolk.com](https://www.mid-suffolk.gov.uk/media/pdfs/new-joint-local-plan-mid-suffolk-district-council-baberghmid-suffolk-com)

⁴ <https://heritage.suffolk.gov.uk/media/pdfs/baylham.pdf>

Water

2.16 The River Gipping runs through the parish, and as such the eastern section of the parish falls within Flood Zones 2 and 3. The majority of the parish lies within Flood Zone 1 and as such is at very low risk of flooding from rivers. Elsewhere, areas are prone to surface water flooding as a result of run-off during heavy periods of rain, in particular in and around Baylham Common.

Air Quality and Climatic Factors

2.17 There are no Air Quality Management Areas (AQMAs) within or near to Baylham Parish. The closest AQMA is to the south east within Ipswich.

2.18 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

2.19 The Neighbourhood Plan lists a number of key community facilities that are located within Baylham:

- Village Hall;
- The Church of St Peter; and
- Baylham House Rare Breeds Farm.

2.20 However, Baylham does not have any schools, GP surgeries or convenience stores. There are bus stops near the junction of the B1113 and Upper Street, around one kilometre from the village centre and two kilometres from The Stone, where the number 88 bus provides a link to Needham Market/Stowmarket and Ipswich centre. There are generally services every half-hour during the daytime on Monday to Saturday, but no services in an evening or on Sundays.

2.21 The Neighbourhood Plan identifies five Local Green Spaces in Baylham.

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

Cultural Heritage

2.23 There are 20 listed buildings within Baylham, four of which are Grade II*. There are no Scheduled Monuments or Conservation Areas within the parish.

The Neighbourhood Plan also identifies 19 properties and structures of local heritage interest. Landscape

2.24 There are no National Parks or National Landscapes (formerly Areas of Outstanding Natural Beauty) within or close to Baylham, the nearest being Suffolk Coast and Heaths National Landscape which is located 11km to the south east.

2.25 The Neighbourhood Plan designates the whole parish as an Area of Local Landscape Sensitivity.

2.26 There are two Special Character Areas within the parish, including the northern end of Church Lane and the smaller area covering the Church of St Peter and the former Baylham National School.

2.27 According to the Baylham Landscape Assessment, Baylham falls within three Character Areas, including:

- High Baylham - broadly typical of the Ancient Plateau Claylands Suffolk Landscape Type;
- Middle Baylham - broadly typical of the Rolling Valley Farmlands Suffolk Landscape Type; and
- Lower Baylham - broadly typical of the Valley Meadowlands Suffolk Landscape Type

2.28 According to the Joint Babergh and Mid Suffolk District Council Landscape Guidance 2015, the key characteristics of the character areas outlined above are:

- Ancient Plateau Claylands landscape are gently rolling heavy clay plateaux with ancient woodlands.
- Rolling Valley Farmlands are deep well drained loamy soils with small ancient woodlands on valley fringes. The settlement pattern mainly consists of Towns and villages with distinctive mediaeval cores and late mediaeval churches.
- Valley Meadowlands are flat valley floor grasslands on silty and peat soils. These landscapes are generally unsettled although there are occasional farmsteads on the edge of the valleys or on locally higher spots

2.29 In addition, 12 Important Views have been identified within the Neighbourhood Plan, into, out of and within the village that are of high importance to its character, setting and sense of rurality.

SEA Screening

2.30 An assessment has been undertaken to determine whether the Pre-Submission Draft version of the Baylham Neighbourhood Plan 2024-2037 requires SEA in accordance with the SEA Regulations.

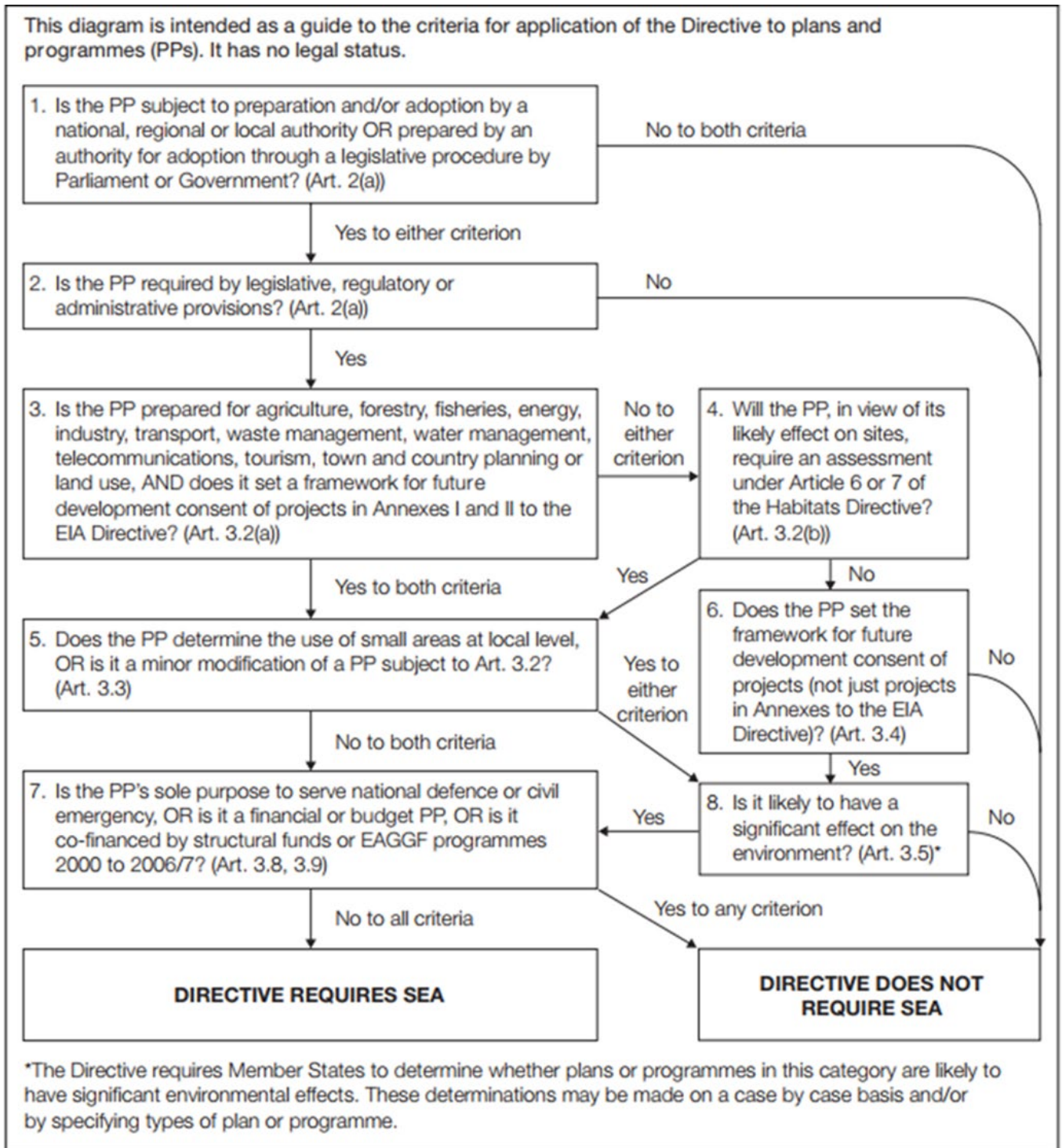
2.31 **Figure 2.1** overleaf presents the flow diagram entitled 'Application of the SEA Directive to plans and programmes' which is taken from the Practical Guide to the Strategic

Environmental Assessment Directive⁵, 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).

⁵ 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



2.32 Table 2.1 below presents the assessment of whether the Baylham 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 Baylham 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.

2.33 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 Baylham Neighbourhood Plan meets these criteria.

Table 2.2 Likely Significant Effects of the Baylham 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 Baylham, 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 Baylham as 'Countryside and Countryside Villages' in Policy CS1 – Settlement Hierarchy. The Core Strategy did not identify a minimum housing requirement for Baylham. 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.	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 Baylham 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.
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 Neighbourhood Plan must meet is to contribute to sustainable development.
4. Environmental problems relevant to the plan or programme.	Baseline information relating to Baylham 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, land within flood zones 2 and 3, SSSIs, County Wildlife Sites, Priority Habitats and Ancient Woodland.
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. Any 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.	Cumulative effects could result from the Neighbourhood Plan in combination with development that takes place in the surrounding towns and villages,

SEA Requirement	Comments
	<p>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 Baylham as ‘Countryside and Countryside Villages’ in Policy CS1 – Settlement Hierarchy. The Core Strategy did not identify a minimum housing requirement for Baylham. 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 Baylham.</p>
8. The transboundary nature of the effects.	The Neighbourhood Plan focuses on Baylham 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 Baylham Parish. The population of the parish, according to the 2021 Census, was 303 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 20 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 there are two SSSIs and seven County Wildlife Sites in Baylham.
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 Baylham Parish, the closest being Suffolk Coast and Heaths National Landscape which is located 11km to the south east.

SEA Screening Conclusion

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

2.35 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 village. The Neighbourhood Plan does not directly impact on land use through the allocation of sites for housing or other forms of development.

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

Next Steps

2.37 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
September 2024