

Needham Market Town Council

**Needham Market
Neighbourhood
Development Plan
SEA Screening Opinion**

Final report

Prepared by LUC

February 2020

Needham Market Town Council

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SEA Screening Opinion

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Chapter 1

Introduction

1.1 Needham Market Town Council is in the process of preparing a Neighbourhood Development Plan (NDP). Needham Market is a town within the central part of Mid Suffolk District. The town is located to the south east of the town of Stowmarket and north west of Ipswich. LUC has been appointed by Babergh and Mid Suffolk District Councils to consider the need for Strategic Environmental Assessment (SEA) to be undertaken for the NDP.

1.2 SEA may be required for a Neighbourhood Plan, if it is likely to have significant environmental effects. Sustainability Appraisal (SA) is similar to SEA but includes assessment of the likely significant effects of a plan or programme on economic and social factors, as well as environmental factors. Planning Practice Guidance¹ (PPG) clarifies that there is no legal requirement for a neighbourhood plan to be subject to SA, but that SA can be used to demonstrate how the plan will contribute to sustainable development.

1.3 Babergh and Mid Suffolk District Councils have commissioned LUC to carry out SEA Screening of the Draft Needham Market NDP in order to determine whether an assessment is required under European Directive 2001/42/EC (the SEA Directive), transposed into UK law through the SEA Regulations².

¹ <https://www.gov.uk/government/collections/planning-practice-guidance>

² The Environmental Assessment of Plans and Programmes Regulations 2004 (SI 2004/1633), as amended by The Environmental Assessments and Miscellaneous Planning (Amendment) (EU Exit) Regulations 2018 (SI

2018/1232). It should be noted that the purpose of the amendments to the SEA Regulations is to ensure that the law functions correctly after the UK has left the European Union. No substantive changes are made to the way the SEA regime operates.

Chapter 2

SEA Screening

Scope of the NDP

2.1 Needham Market Town Council has prepared the Draft (Regulation 14) version of the NDP which is the subject of public consultation between January and March 2020.

2.2 The Needham Market NDP covers the entire town of Needham Market.

2.3 The Draft NDP sets out a vision for the long-term future of Needham Market along with seven key objectives. It then sets out 10 planning policies (listed as 9 in the NDP due to a numbering duplication) (NM1-9) to realise and deliver this vision which are structured in line with the themes of the five NDP objectives:

1. Housing
2. Employment and Business
3. Community
4. Natural Historic and Environment
5. Transport

2.4 Needham Market is identified as a Market Town in Policy CS1 of the Mid Suffolk District Council Adopted Core Strategy (2008/review 2012). Babergh and Mid Suffolk District Councils are now working together to produce a Joint Local Plan. The Regulation 18 version of the emerging Joint Local Plan continues to identify Needham Market as a Market Town in the settlement hierarchy and does not identify it for substantial growth. The town is allocated a housing delivery figure of 497 dwellings which has largely been met through existing commitments and windfall sites.

2.5 The Draft NDP has been prepared in the context of the emerging Joint Local Plan and does not seek to allocate sites for housing development, instead setting out a number of size, type, tenure and design requirements through policies NM1 (Housing mix) and NM2 (Securing Good Design and Layout).

Baseline Information

2.6 This section summarises baseline information for the town of Needham Market, drawing from the information set out in the Draft NDP.

Context

2.7 Needham Market is a Market Town in Mid Suffolk District. The town is located along the B1113 with the town of Stowmarket located just over 3 miles to the north west and Ipswich located approximately 9 miles to the south east. The A14 trunk road runs parallel to the town to the east.

Biodiversity, flora and fauna

2.8 Needham Lake Local Nature Reserve is located within the NDP Designated Area and is located circa 50m to the east of the built form of Needham Market. Creting St Mary Pits SSSI is located within 550m to the east of Needham Market (albeit outside of the NDP Designated Area). Barking Woods SSSI is located 700m to the south west of Needham Market and the town is located (in part) within an Impact Risk Zone³ associated with this designation.

2.9 A number of Priority Habitats are located within, and surrounding, the town including lowland calcareous grassland, floodplain grazing marsh and deciduous/coniferous woodland.

2.10 There are no European designated sites within or close to the town.

Population

2.11 The 2011 Census recorded 4,528 people living in Needham Market with a 48/52% split between males and females of which 60% were working age adults and 23.6% were aged over 65. This was higher than both the figures for Mid Suffolk (20.1%) and England as a whole (16.3%).

2.12 At the time of the Census in 2011, 20% of households were occupied by a single pensioner (almost double the Mid Suffolk and England average).

2.13 The 2011 Census indicates that 72.8% of Needham Market's population was economically active with 40% in full time work. This was higher than the averages for Suffolk and for England as a whole. Less than 1% of the population was long term unemployed which was significantly lower than the Suffolk and England averages. According to figures from the Suffolk Data Observatory, the levels of qualification within the resident population are on a par with the Suffolk and England averages and the levels of deprivation in the town are low when compared to county and national averages.

Human Health

2.14 There is a General Practice and a dentist in the town. In the 2011 Census the health of the Needham Market population was considered to be mixed, with 44% of the

population in good health (lower than the Mid Suffolk and England averages). However, the remaining health figures of Good, Fair, Bad and Very Bad indicate that Needham Market residents are healthier than the England average but less healthy than elsewhere in Mid Suffolk.

Soil

2.15 There are some areas of best and most versatile agricultural land within the NDP area, with the fields to the south west of the town comprising Grade 2 agricultural land in places. The land surrounding the town is predominantly Grade 3 agricultural land (it is not known whether this is Grade 3a, which is best and most versatile land, or Grade 3b).

Water

2.16 Areas to the north of the B1113 are located substantially within Flood zones 2 and 3 – associated with the River Gipping. The River Gipping, located to the east of the town, characterises the landscape in this area with water meadows whilst Needham Lake is located to the east of the railway line. 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 Needham Market town is located within Source Protection Zones 2 and 3.

Air and Climatic Factors

2.18 There are no Air Quality Management Areas (AQMAs) declared within or near to Needham Market.

2.19 Traffic volume within the town is considered to be high and increasing along The High Street. The main road through Needham Market is busy due to limited parking options. These problems may become further exacerbated as a result of the permitted growth in the town.

2.20 The town is well served by a rail network that provides services to London via Ipswich and to Norwich, Cambridge and Peterborough and a regular bus service.

Material Assets

2.21 The town has extensive green space provision with a number of recreational facilities at Crowley park, the Camping Land and Needham Lake. The Needham Lakes recreation area and the Gipping Valley path are key features of the green space network in the town. Allotments are available to rent in

³ Impact Risk Zones (IRZs) are a Geographical Information Systems (GIS) tool developed by Natural England to make a rapid initial assessment of the potential risks posed by development proposals to SSSIs, SACs, SPAs and Ramsar

sites. They define zones around each site which reflect the particular sensitivities of the features for which it is notified and indicate the types of development proposal which could potentially have adverse impacts.

the town and a wide range of sporting and leisure pursuits are available.

2.22 The town is well served by Public Rights of Way that are well used and National Cycle Route 51 (a long-distance cycling route) runs through the Neighbourhood Plan area following the route of the River Gipping.

2.23 The town has a Primary School which now includes pupils up to year 6 following closure of Needham Market Middle School in 2015. With the closure of the Middle School, an increased number of young people of secondary school age attend schools outside the town. The emerging Joint Local Plan indicates that the expansion of Bosmere Primary School and contributions toward a new school would be required to facilitate housing growth planned through the Plan. Additional pre-school places will also be required to facilitate housing growth, which can be achieved by expanding existing facilities.

2.24 There is no secondary school provision in the town – local pupils tend to go to Stowmarket or Stowupland High Schools. Suffolk County Council has no plans for new High School provision in the town and this has been confirmed by Mid Suffolk District Council as one of the key reasons why Needham Market has not been allocated further housing growth in the emerging Joint Local Plan.

2.25 The A14 corridor, which Needham Market lies within, contributes to the strength of the Haven Gateway area and includes Claydon, Great Blakenham and Needham Market. This corridor accommodates most industrial premises in a combination of B1, B2 and B8 uses including food processing, computer supplies, gym and fitness and car and van hire.

2.26 The town of Needham Market is located within a Minerals Safeguarding Area (Policy 5, Suffolk County Council Minerals Core Strategy 2008) but there are no Minerals or Waste Site Allocations within the town.

Cultural Heritage

2.27 The town of Needham Market is an historic town with buildings dating back to the Medieval period. The High Street

and areas close to this are designated as a Conservation Area. A high number of listed buildings are located along The High Street including the Grade I listed The Parish Church (St John the Baptist), The Ancient House (Grade II*), The Limes Hotel (Grade II*) and a host of further Grade II listed buildings. None of these features appear on Historic England's Heritage at Risk Register.

Landscape

2.28 The landscape surrounding the town of Needham Market has been designated as a Special Landscape Area by Mid Suffolk District Council. The River Gipping and water meadows characterise the landscape to the east of the town, while the north west is characterised by Rolling Valley Claylands and the west and south by Ancient Plateau Claylands with sections of Rolling Valley Farmlands to the south, south-west and north east.

2.29 There are no internationally or nationally designated landscapes in or close to the town of Needham Market.

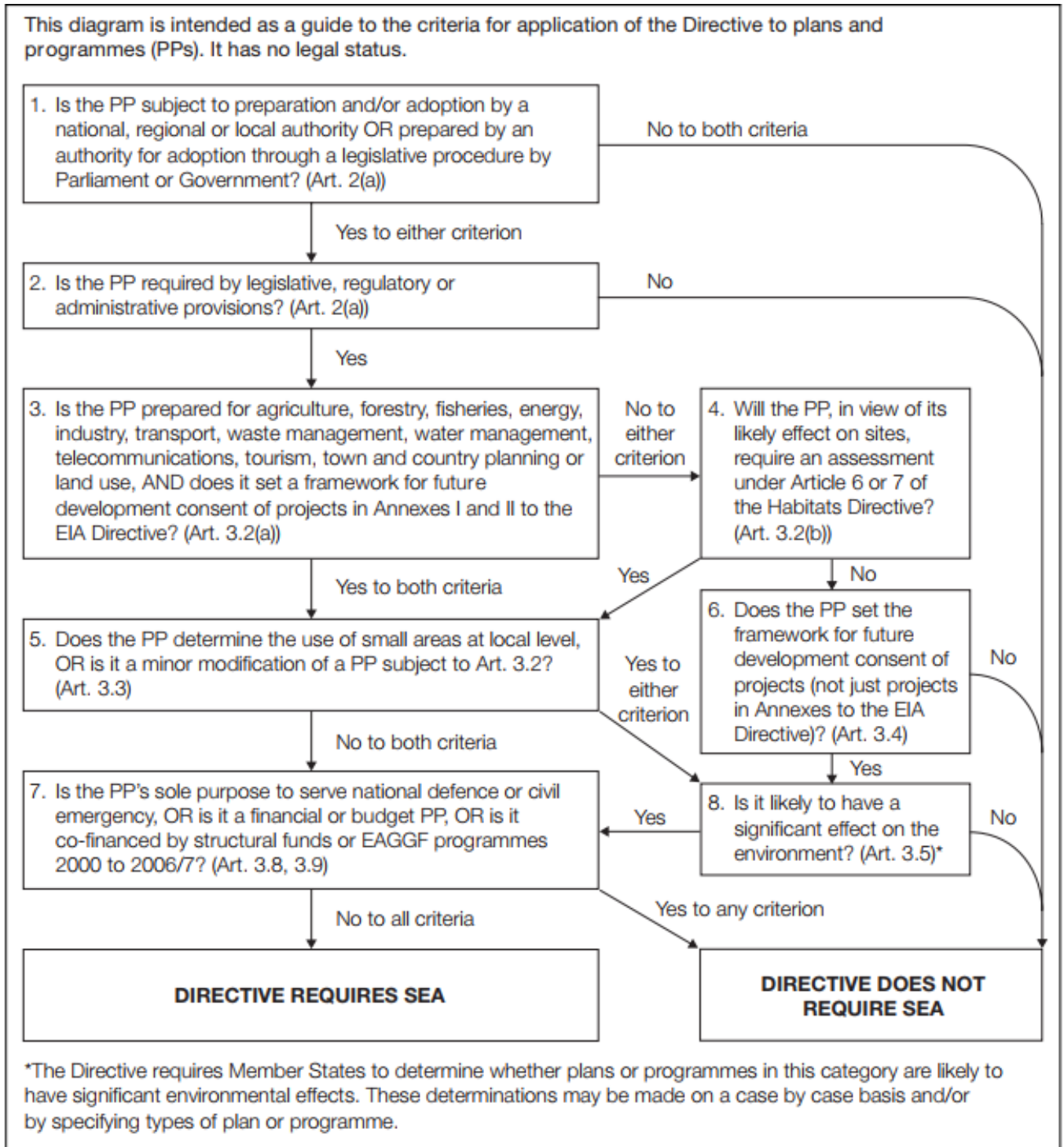
SEA Screening

2.30 An assessment has been undertaken to determine whether the Regulation 14 Draft Needham Market NDP 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 Directive⁴, 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).

⁴https://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



2.32 Table 2.1 below presents the assessment of whether the Needham Market NDP will require a full SEA.

2.33 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 Needham Market 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. Move to Q2.
2. Is the PP required by legislative, regulatory or administrative provisions? (Art. 2(a))	No	The NDP is being prepared under the Localism Act 2011 and in accordance with the Neighbourhood Planning (General) Regulations 2012. However, there is no requirement to produce a Neighbourhood Plan; it is an optional plan. Once made it will become part of the statutory development plan. Therefore, it should continue to be screened. Move to Q3.
3. Is the PP prepared for agriculture, forestry, fisheries, energy, industry, transport, waste management, water management, telecommunications, tourism, town and country planning or land use, AND does it set a framework for future development consent of projects in Annexes I and II to the EIA Directive? (Art 3.2(a))	Yes and No	The NDP is being prepared for town and country planning and land use, but it does not set a framework for future development consent of projects in Annexes I and II to the EIA Directive. The NDP does not allocate sites for housing, employment or any other type of development. Move to Q4.
4. Will the PP, in view of its likely effect on sites, require an assessment for future development under Article 6 or 7 of the Habitats Directive? (Art. 3.2 (b))	Unlikely	As the Plan does not allocate sites for housing or employment development it is considered unlikely that the Plan will require assessment under the Habitats Directive. No Move to Q6.
6. Does the PP set the framework for future development consent of projects (not just projects in Annexes to the EIA Directive)? (Art. 3.4)	No	The NDP does not allocate sites for development but does direct the design of future housing sites through the listing of design criteria. Move to Q8 for assessment of significant effects.
8. Is it likely to have a significant effect on the environment? (Art. 3.5)	No	See Table 2.2. SEA IS NOT REQUIRED.

2.34 Schedule 1 of the SEA Regulations sets out the criteria for determining the likely significance of effects.

2.35 Likely significance of effects are listed in Table 2.2 below along with comments on the extent to which the Needham Market NDP meets these criteria.

Table 2.2: Likely Significant Effects

SEA Requirements	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	Once made, the NDP will become part of the statutory development plan and will guide the delivery of development in Needham Market in terms of design and key infrastructure.

SEA Requirements	Comments
to the location, nature, size and operating conditions or by allocating resources	<p>The NDP does not allocate sites for residential or other forms of development.</p> <p>The adopted Mid Suffolk Core Strategy (2008, review 2012) identifies Needham Market as a Town in Policy CS1 – Settlement Hierarchy. This policy seeks to direct development to towns and key service centres. The Core Strategy Focussed Review (2012) identifies an estimated housing delivery figure of 470 for Needham Market over the Plan period to 2027.</p>
2. the degree to which the plan or programme influences other plans and programmes including those in a hierarchy	<p>The NDP has to be in general conformity with the local strategic framework (i.e. the emerging Babergh and Mid Suffolk Joint Local Plan) and must 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 Needham Market and will be used in conjunction with the emerging Babergh and Mid Suffolk Joint Local Plan (once it has been 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 NDP must meet is to contribute to sustainable development.</p>
4. environmental problems relevant to the plan or programme,	<p>Baseline information relating to Needham Market was described earlier in this chapter. Key issues of relevance to the NDP are the ongoing problems associated with traffic congestion and access into the town, the presence of high quality agricultural land in places in the NDP area, large areas of land located in flood zones, the presence of a number of priority habitats/species, SSSIs and a Local Nature Reserve in or surrounding the NDP area and a high number of designated historic assets within the NDP area.</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).	<p>N/A</p>
<p>Characteristics of the effects and of the area likely to be affected, having regard, in particular, to:</p>	
6. the probability, duration, frequency and reversibility of the effects,	<p>The NDP does not allocate sites for housing or other forms of development. Instead, it sets out policies supporting the delivery of housing/redevelopment and employment opportunities subject to their accordance with design and infrastructure policy requirements.</p> <p>The NDP covers the period 2020-2036. Effects of the Plan are expected to be indirect (due to not allocating sites) but long-term and permanent.</p>
7. the cumulative nature of the effects,	<p>Cumulative effects could result from the NDP in combination with development that takes place in the surrounding towns and villages, although the NDP does not allocate sites for housing or other forms of development. As the emerging Babergh and Mid Suffolk Joint Local Plan is at an early stage in its development, it is not yet possible to assess the amount and location of development that may result from that Plan within and close to Needham Market. Through the</p>

SEA Requirements	Comments
	emerging Joint Local Plan, the town is allocated a housing delivery figure of 497 which has largely been met through existing commitments and windfall sites.
8. the transboundary nature of the effects,	The NDP focuses on Needham Market only. Transboundary effects under the SEA Regulations refers to transboundary effects on other EU Member States, therefore it is 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 Needham Market. The population of the parish in the 2011 Census was 4,528 people.
11. the value and vulnerability of the area likely to be affected due to: <ul style="list-style-type: none"> ■ special natural characteristics or cultural heritage, ■ exceeded environmental quality standards or limit values, ■ intensive land-use, 	There are no statutory landscape or biodiversity designations within the boundaries of Needham Market Town. However, Needham Lake Local Nature Reserve is located within the NDP area to the east of the town. The town is also within a SSSI Impact Risk Zone. There are numerous listed buildings within the centre of the town along The High Street including the Grade I listed The Parish Church (St John the Baptist), The Ancient House (Grade II*), The Limes Hotel (Grade II*) and a host of further Grade II listed buildings. There is also a small area of high-quality agricultural land located to the south west of the town.
12. the effects on areas or landscapes which have a recognised national, Community or international protection status.	There are no protected landscapes within or near to Needham Market. Needham Lake Local Nature Reserve is located within the NDP area to the east of the town but any effect on this feature is not anticipated to be significant.

SEA Screening Conclusion

2.36 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 Needham Market NDP is likely to have significant environmental effects on any of the topics listed in the SEA Regulations (i.e. biodiversity, flora, fauna, soil, water, air, material assets, cultural heritage, climatic factors, landscape, population, human health).

2.37 The NDP sets out a vision and detailed planning policies to shape development in the parish up to 2036 and decision makers will need to consider the criteria of these policies when determining future applications in the town. It does not directly impact on land use through the allocation of sites for housing or other forms of development.

2.38 On this basis, it is considered that the Needham Market NDP is unlikely to have significant environmental effects and that full SEA is therefore not required.

2.39 Please note, this conclusion is based on the assumption that the HRA Screening exercise that is being carried out separately will conclude that Appropriate Assessment under the Habitats Regulations is not required. Should this not be the case, the need for HRA will automatically trigger a requirement for SEA to be carried out on the NDP.

Next Steps

2.40 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.