

**Babergh & Mid Suffolk District  
Councils**

**Glemsford Neighbourhood  
Plan  
SEA Screening Opinion**

**Final report**

Prepared by LUC  
December 2023

**Babergh & Mid Suffolk District Councils**

**Glemsford Neighbourhood Plan  
SEA Screening Opinion**

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# Chapter 1

## Introduction

**1.1** Glemsford Parish Council is in the process of preparing a Neighbourhood Plan covering the period 2023 to 2037. Glemsford is located within Babergh District, approximately 10 kilometres north of Sudbury. 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<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 Pre-Submission Draft version of the Glemsford Neighbourhood Plan (November 2023) 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>.

**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.

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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 Neighbourhood Plan

**2.1** Glemsford Parish Council has prepared the Pre-Submission Draft (Regulation 14) version of the Neighbourhood Plan which is being subject to public consultation between November 2023 and January 2024.

**2.2** The Pre-Submission Draft Neighbourhood Plan (November 2023) includes a vision for the long-term future of Glemsford along with 12 objectives relating to the following topics:

1. Housing
2. Employment
3. Natural Environment
4. Build and Historic Environment
5. Services and Facilities
6. Travel

**2.3** The Neighbourhood Plan then sets out 13 planning policies (GLEM1 – GLEM13) to realise and deliver the vision.

**2.4** The Neighbourhood Plan allocates one site for development in policy GLEM3 Land west of Park Lane. The site is allocated for 100 homes along with recreational open space.

**2.5** This allocation is also referred to in the general housing delivery policy (GLEM2) which specifies that growth in the parish will be achieved through the completion of new dwellings with planning permission as at 1 April 2023, the site allocation identified in Policy GLEM3 and small brownfield “windfall” sites and infill development within the Settlement Boundary. Policy GLEM4 sets out criteria that will apply to proposals for affordable housing on rural exceptions sites and criteria for employment sites are set out in Policy GLEM5 although no sites are allocated for employment use.

**2.6** Policy GLEM1 sets out the spatial strategy for the Glemsford Neighbourhood Plan area. It specifies that the focus for new development will be within the settlement boundary and sets out criteria that will apply to proposals for development outside of the settlement boundary. Other policies within the plan address a range of topics including new business and employment, landscape, biodiversity, local green spaces, design and Public Rights of Way.

## Baseline Information

**2.7** This section summarises baseline information for the parish of Glensford, drawing from the information set out in the Pre-Submission Draft Neighbourhood Plan as well as supporting evidence documents including<sup>3</sup>:

- The Glensford Questionnaire Results (2018)
- Glensford Landscape Character Appraisal (August 2019)
- Glensford Landscape Character Appraisal Appendix A - Views (August 2019)
- Glensford Neighbourhood Plan - Site Options and Assessment (May 2020)
- Glensford Design Guidance and Codes (September 2021)
- Glensford Masterplan and Development Principles (August 2022)
- The Glensford Local Green Space Appraisal (November 2023)

## Context

**2.8** Glensford is a rural parish comprised of the village of Glensford and the surrounding countryside. The parish is located approximately 10km north of Sudbury in the South Suffolk District of Babergh. The surrounding parishes consist of Boxford and Stanstead to the north, Long Melford to the south east, Cavendish to the east and Pentlow and Foxearth to the south.

## Biodiversity, Flora and Fauna

**2.9** There are no European designated biodiversity sites in Glensford Parish although there are two Sites of Special Scientific Interest (SSSIs). The first is Glensford Pits, which are disused water-filled gravel workings that include a length of the River Stour and which extend across the county border into Essex. The second is Court Wood which is ancient woodland and one of a group of 15 woods associated with the former Kentwell Estate.

**2.10** There are no County Wildlife Sites (CWSs) or Local Nature Reserves (LNRs) within Glensford.

**2.11** There are no Roadside Nature Reserves in the parish. There are areas of Ancient Replanted Woodland to the east and west of the village centre. Smaller areas of Priority Habitat for Deciduous woodland are scattered across the neighbourhood plan area.

**2.12** A number of protected species have been recorded in Glensford, in particular the Great Crested Newt and species of bat. The area provides breeding grounds for arable and grassland farmland birds. In addition, Lapwing and Yellow Wagtail (birds identified as in danger of extinction in the UK) have been recorded in Glensford.

## Population

**2.13** According to the 2011 Census, the population of Glensford was 3,382. This had risen to 3,704 in 2021. The mean age remains slightly higher than the figures for Babergh as a whole (43.1 years) and Suffolk (41.7 years). The population in 2021 was 50.1% male and 49.9% female compared with 51.7% male and 48.3% female in 2011.

**2.14** In terms of economic activity, 22.8% of Glensford's resident population work mainly from home. 30% of working residents work travel more than 20km to get to work, and 67% of workers use their car for commuting. Just over 58% of the overall population is economically active and all of those who are economically inactive (excluding children and students) are retired. 28% of those economically active residents work in senior managerial or technical or professional and associated professional positions with less than 12% engaged in elementary occupations.

**2.15** The Census data from 2021 provide an overall picture of the resident population of Glensford which appears to split evenly between households not deprived in any dimension with households deprived in at least one dimension<sup>4</sup>.

## Human Health

**2.16** In terms of the health of Glensford residents, 45% of people are classified as in very good health, 36% as good, 14% as fair, 3.7% as bad and 0.86% as very bad. These health statistics are broadly similar to those for Babergh District and for England as a whole; however, the 'very bad' figure for Glensford Parish is slightly lower than the averages for Babergh District at 0.9% and England at 1.0%.

**2.17** Glensford has an ageing population which is likely to lead to more cases of residents suffering from age-related conditions such as dementia.

## Soil

**2.18** The parish of Glensford lies in an area of 'lime-rich loamy and clayey soils with impeded drainage' and 'freely draining slightly acid and loamy soils' to the south. encompassing arable grasslands. The underlying bedrock is of chalk formations buried beneath 'superficial deposits.

<sup>3</sup> Evidence available at: <http://glensford.onesuffolk.net/new-page-3/>

<sup>4</sup> There are four dimensions of deprivation: Employment, Education, Health and Disability, and Household Overcrowding.

**2.19** The parish comprises mainly Grade 2 (very good) agricultural land with small areas of Grade 3 (good to moderate) agricultural land across the northern and southern parts of the parish. It is not known if the Grade 3 land is Grade 3a or 3b.

**2.20** The entirety of the parish is a 'Nitrate Vulnerable Zone' under the 2017 designations in England. However, this is the case for practically the entire county of Suffolk and the east of England.

### Water

**2.21** Glensford sits on a small hill between two river valleys and therefore some areas of Glensford are at risk of flooding from rivers. Whilst the majority of the parish lies within Flood Zone 1, there are areas of Flood Zone 2 and 3 following the course of the River Stour to the south of the parish and the River Glem to the east and north of the parish.

**2.22** There are also some areas of the parish at risk from surface water flooding. The areas at risk from surface water flooding follow the areas at risk from river flooding, with additional small areas of medium to high risk flooding in the northern part of the village. High risk means that each year this area has a chance of flooding of greater than 3.3%. Flooding from surface water is difficult to predict as rainfall location and volume are difficult to forecast. In addition, local features can greatly affect the chance and severity of flooding. Medium risk means that each year this area has a chance of flooding of between 1% and 3.3%. Low risk means that each year this area has a chance of flooding of between 0.1% and 1%.

### Air and Climatic Factors

**2.23** There are no Air Quality Management Areas (AQMAs) that have been declared within Glensford Parish, the nearest being in Sudbury which is approximately 10km to the south east.

**2.24** Climate data are not available at parish level, but within Babergh District as a whole, reductions in overall carbon emissions of 37% were achieved between 2005 and 2017. This reduction was mostly due to progress in reducing emissions from domestic sources, closely followed by industrial and commercial sectors, with minimal progress on transport emissions. Transport makes the largest contribution to carbon emissions in Babergh District.

### Material Assets

**2.25** The settlement is formed of several historic greens, with a linear settlement area to the south along Egremont Street and Hunts Hill and an important cluster of buildings in close proximity in the north-east.

**2.26** Glensford has a high number of listed buildings for its size. Two of the most notable are St Mary's Parish Church, a Grade I listed church with a 14<sup>th</sup> century tower, and Monk's Hall which dates partly from the 15<sup>th</sup> century.

**2.27** There are two Village Greens in Babergh: Fair Green and Tye Green. Grade II\* listed Peverells Manor sits on Tye Green. Clare Castle Country Park is located outside of the parish boundary to the south west.

**2.28** Although the village has lost a number of pubs in recent years, the parish still has two public houses. The Grade II listed Six Bells with self-catering accommodation is located in the north east of the parish. The Angel dates from the 16<sup>th</sup> century and is located in the south of the parish.

**2.29** There are around half a dozen bus services serving Glensford including two that run to Stour Valley Community School and Thomas Gainsborough School. Other services connect the village with Bury St Edmunds and Sudbury. In spite of the bus services there is a high proportion of car ownership in the parish, as recorded in the 2021 Census. The nearest mainline train stations to Glensford are located at Sudbury (9km) and Bury St Edmunds (20km). The majority of Glensford residents use their car to travel to work and for day to day needs such as shopping.

**2.30** Glensford has several Public Rights of Way and there is also a relatively extensive network of footpaths, both public and permissive, throughout the parish, however there are no bridleways.

**2.31** There is one primary school in the village, Glensford Primary Academy. Cavendish Church of England Primary school and Hartest Church of England Primary school are both within 10km. High School pupils are served by Stour Valley Community School, Ormiston Sudbury Academy or Thomas Gainsborough School in Great Cornard.

### Cultural Heritage

**2.32** There are 49 nationally listed buildings in Glensford Parish including the Grade I Church of St Mary's and four Grade II\* listings: Peverells, Angel House, 13-17 Chequers Lane and Monks Hall. There is also one Conservation Area. None of the listed buildings are on Historic England's Heritage at Risk register.

### Landscape

**2.33** There are no designated landscapes within or very close to Glensford, the nearest being Dedham Vale National Landscape (formerly known as an Area of Outstanding Natural Beauty) approximately 13km to the south east.

**2.34** According to the Joint Babergh and Mid Suffolk District Council Landscape Guidance August 2015, Glensford falls

within the Undulating Ancient Farmlands landscape character type. The landscape is characterised by open undulating farmland with blocks of ancient woodland. An area of the parish following the river valley was formerly identified in the Babergh Local Plan as a 'Special Landscape Area'.

### SEA screening

**2.35** An assessment has been undertaken to determine whether the Pre-Submission Draft Glemsford Neighbourhood Plan 2023-2037 requires SEA in accordance with the SEA Regulations.

**2.36** **Figure 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 Environment 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 1 Application of the SEA Directive to plans and programmes

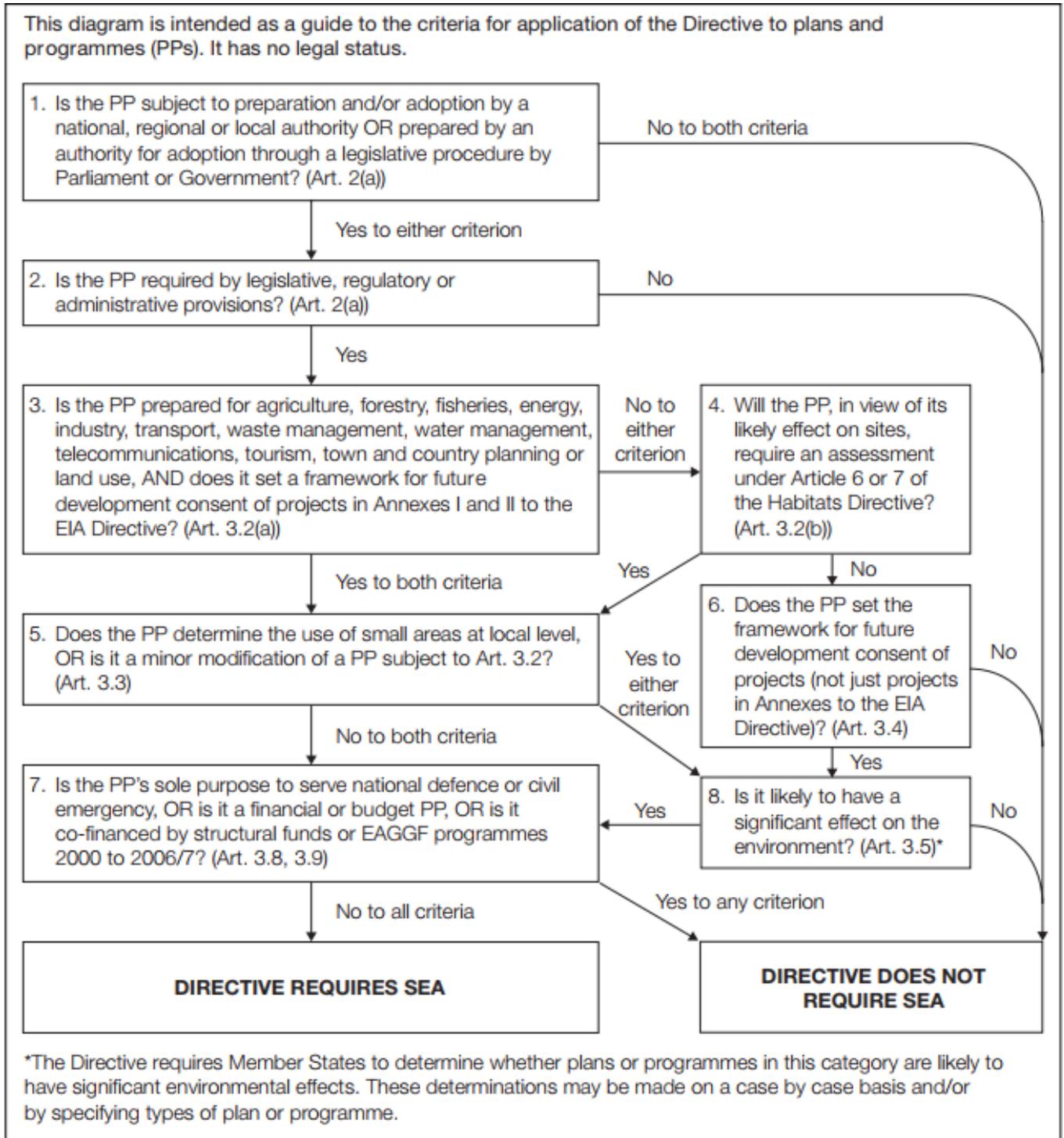


Table 2.1: Application of SEA Directive to the Glemsford Neighbourhood Plan

| 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? (Art. 2(a))   | Yes        | The Neighbourhood Plan is being prepared under the Localism Act 2011 and will be adopted ('made') by the Local Authority (Babergh District Council) as part of the statutory development plan.<br><br><b>Move to Q2</b>   |
| 2. Is the PP required by legislative, regulatory or administrative provisions? (Art. 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.<br><br><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 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.<br><br><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))   | No         | HRA screening of the Neighbourhood Plan has been undertaken separately on behalf of Babergh District Council and has concluded that the Neighbourhood Plan is not likely to have significant effects on European sites, either alone or in combination.<br><br><b>No: Move to Q6</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 Neighbourhood Plan allocates one site for housing development and includes policies against which proposals for development within the Parish will be assessed. The Neighbourhood Plan also provides a framework for the 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)  | Yes        | See <b>Table 2.2.</b><br><br><b>SEA IS REQUIRED</b>   |

**2.37** 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 Glemsford Neighbourhood Plan meets these criteria.

Table 2.2: Likely Significant Effects

| SEA Requirement  | Comments  |
|--|---|
| The characteristics of plans and programmes, having regard, in particular, to:   |   |
| 1. The degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources. | <p>Once made, the Neighbourhood Plan will become part of the statutory development plan and will guide the delivery of development in Glensford Parish, including in terms of design. The Neighbourhood Plan allocates one site for residential development and sets policy criteria for other forms of development.</p> <p>The previously adopted Babergh Core Strategy (2014) identified Glensford as a Core Village in Policy CS2. Policy CS2 also sought to direct development to towns/urban areas and to the Core Villages and Hinterland Villages. The Core Strategy provided for a total of 1,050 dwellings at the Core and Hinterland Villages over the Plan period to 2031.</p> <p>The recently adopted Babergh and Mid Suffolk Joint Local Plan Part 1 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, which is unlikely to be adopted until late 2025.</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 Glensford 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 Glensford 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, proximity to two Sites of Special Scientific Interest (Glensford Pits and Court Wood SSSIs) and several designated heritage assets.</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 allocates one site for housing and sets policy criteria for housing and other forms of development.</p> <p>The Neighbourhood Plan covers the period up to 2037. Effects of the Neighbourhood Plan are expected to be mostly indirect, with direct effects from the one site allocation. Most impacts will be long-term and permanent although any impacts associated with construction at the allocated site could be short-term and temporary.</p>   |
| 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 – albeit the parish of Glensford is rural, but located relatively close to the nearest settlement (Sudbury) around 10km south east.</p>   |

| SEA Requirement  | Comments   |
|--|--|
|  | The previously adopted Babergh Core Strategy (2014) identified Glensford as a 'Core village' in the settlement hierarchy, with the expectation that new development should meet local needs. The adopted Part 1 Babergh and Mid Suffolk Joint Local Plan does not identify a minimum housing requirement for Glensford.  |
| 8. The transboundary nature of the effects,  | The Neighbourhood Plan focuses on Glensford Parish only. Transboundary effects under the SEA Regulations refers transboundary effects on other EU Member States; hence, 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 Glensford Parish. The population of the Parish, according to the 2021 census estimates, was 3,704 people.  |
| 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> </ul> intensive land-use, | Glensford is home to a number of Priority Species and Priority Habitats, and there are 49 listed buildings within the parish. There are several sensitive locations within close proximity to the parish, including Glensford Pits SSSI and Court Woods SSSI, as well as patches of ancient woodland. The parish also contains Grade 2 and Grade 3 agricultural land. However, there are no internationally designated nature conservation sites within the parish or nearby, and no nationally designated landscapes. |
| 12. The effects on areas or landscapes which have a recognised national, Community or international protection status.   | There are no designated landscapes within or very close to Glensford Parish, the nearest being Dedham Vale National Landscape approximately 13km to the south east.  |

## SEA Screening Conclusion

**2.38** A screening assessment has been undertaken by applying the criteria from the SEA Directive and Schedule 1 of the SEA Regulations to determine whether the Glemsford Neighbourhood Plan is likely to have significant environmental effects when assessed against the topics listed in the SEA Regulations.

**2.39** The Neighbourhood Plan sets out a vision, objectives and 13 planning policies to shape development in the parish up to 2037 and decision makers will need to consider the criteria of these policies when determining future applications in the parish. The Neighbourhood Plan does directly impact on land use through the allocation of one site for 100 new homes. The site does not yet have planning consent.

**2.40** 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.

**2.41** The proposed housing allocation at Land west of Park Lane, in the Glemsford Neighbourhood Plan lies within close proximity of sensitive features including priority habitats, and a number of listed buildings.

There are policies in the Neighbourhood Plan and in the adopted Babergh and Mid Suffolk Joint Local Plan (Part 1) that may provide mitigation. However, given the scale of the allocated site that does not have existing planning permission and the sensitivity of the area in which it is located, **it is considered that the Glemsford Neighbourhood Plan has the potential to have significant environmental effects and that SEA is therefore required.**

## Next Steps

**2.42** This SEA screening option 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.