

**Babergh & Mid Suffolk District
Councils**

**Copdock & Washbrook
Parish Council
Neighbourhood
Development Plan
SEA Screening Opinion**

Final report

March 2020

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Neighbourhood Development Plan
SEA Screening Opinion**

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1.	Draft SEA Screening Opinion	H Briggs	K Nicholls	J Owen	23.03.2020
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Chapter 1

Introduction

1.1 Copdock and Washbrook Parish Council is in the process of preparing a Neighbourhood Development Plan (NDP). Copdock and Washbrook Parish is located on the edge of Ipswich and is flanked to the east by the A12. LUC has been appointed by Babergh and Mid Suffolk District Councils to consider whether there is a need for Strategic Environmental Assessment (SEA) to be undertaken for the NDP.

1.2 SEA may be required for a Neighbourhood Plan, if it is likely to have significant environmental effects. Sustainability Appraisal (SA) is similar to SEA but includes assessment of the likely significant effects of a plan or programme on economic and social factors, as well as environmental factors. Planning Practice 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 Copdock and Washbrook 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 Copdock and Washbrook Parish Council has prepared the Draft (Regulation 14) version of the NDP which is being subject to public consultation between 29th February and 11th April 2020.

2.2 The Copdock and Washbrook NDP covers the entire parish, including the main settlement of Copdock and Washbrook and the hamlets of Mace Green, Coles Green, Folly Lane and Washbrook Street.

2.3 The Draft NDP includes a Vision for the long-term future of Copdock and Washbrook Parish, which is to be achieved through 16 objectives that cover the following six themes:

1. Housing
2. Business and Employment
3. Natural Environment
4. Built Environment and Design
5. Infrastructure and Service
6. Highways and Movement

2.4 The NDP then sets out 21 planning policies (C&W 1-21) to realise and deliver this vision. The policies are structured in line with the six themes listed above.

2.5 Policy C&W 2: Housing Development states that the NDP provides for the development of around 274 additional dwellings in the parish between 2018 and 2036, which are to be met through:

- the implementation of planning permissions that had not been completed as of 1st April 2018; and
- site allocations identified in Policies C&W 3 and C&W 4;
- small brownfield “windfall” sites and infill plots within the Settlement Boundary that come forward during the plan period and are not identified in the Plan; and
- in exceptional circumstances, dwellings outside the Settlement Boundary where it can be demonstrated that the dwelling is essential for the operation of existing employment, agriculture, horticulture, forestry and outdoor recreation businesses and other exceptional uses for which it can satisfactorily be demonstrated that it needs to be located in the countryside.

2.6 The two sites that are allocated for housing development in policies C&W 3 and C&W 4 provide for a total of 241 dwellings. The site allocated in policy C&W 3 (approximately 15 dwellings) already has planning permission. C&W 4 (approximately 226 dwellings) does not have planning permission.

Baseline Information

2.7 This section summarises baseline information for the parish of Copdock and Washbrook, drawing from the information set out in the Copdock and Washbrook Draft NDP and the supporting evidence documents³, which includes a Housing Needs Assessment and Site Options Assessment by AECOM and a Landscape Appraisal by Alison Farmer Associates.

Context

2.8 The village of Copdock and Washbrook has been merged since 1994 for political and local authority purposes. The village is a civil parish located within Babergh district, in the county of Suffolk. The village is located approximately 1km to the south-west of Ipswich, with the A14 acting as a separating barrier. The village maintains a generally rural environment even though it is so close to the outskirts of Ipswich.

Biodiversity, flora and fauna

2.9 There are no internationally or nationally designated nature conservation sites within Copdock and Washbrook Parish. However, there are a number of County Wildlife Sites within 200m of the parish boundaries to the north (Sproughton Park), to the south-west (Brimlin Wood and Wenham Thicks, also designated as Ancient Woodland), to the south (Bentley Long Wood, also designated as Ancient Woodland) and south-east (Brockley Wood, also designated as Ancient Woodland). Additionally, there are two further County Wildlife Sites within 500m of the parish boundaries to the south-east (Old Hall Wood, also designated as Ancient Woodland) and to the north-east (Belstead Brook Woodland). There is also a large Site of Special Scientific Interest (SSSI) (Hintlesham Woods) approximately 2km west of the parish.

2.10 The Neighbourhood Plan area is located within the 13km "Zone of Influence" of the Stour and Orwell SPA (Special Protection Area) and Special Area of Conservation (SAC) to the east. Unless mitigated against, Natural England considers that additional residential development within the zone of influence could have a detrimental impact on the designations due to an increase in recreational trips.

2.11 There are multiple areas of Deciduous Woodland distributed throughout the parish, with several of these being located adjacent to the built-up areas of Copdock and Washbrook. The streams (Spring and Belstead Brook) to the north-west of Washbrook contribute to creating ecological corridors within the parish.

2.12 The whole of the parish falls within Impact Risk Zones (IRZs) for national designations (SSSIs) in the area that flag residential development of 50 dwellings or more as a potential risk.

Population

2.13 At the time of the last Census (2011), Copdock and Washbrook Parish had a population of 1,114 people, 557 of whom were in employment. Home working is popular in the parish, with sixteen percent of those in employment working from home in 2011 and the proportion of residents working from home is higher than for Babergh District as a whole.

2.14 The village is home to many elderly residents but in recent years larger developments have been completed around the main street of the village to accommodate younger residents with families.

Human health

2.15 There are no health facilities in the village with residents having to travel to Capel St Mary or Pinewood (Ipswich) for doctors and dentist facilities.

Soil

2.16 The majority of the parish is comprised of Grade 2 agricultural land. The northern region of the parish around Washbrook is comprised of Grade 3 land, although it is not clear if it is Grade 3a (classed as high quality) or the lower quality Grade 3b. There is also Grade 3 agricultural land in the south-west of the parish.

Water

2.17 There is land adjacent to the north of the built-up area of Washbrook that is located within Flood Zone 3 due to the presence of Belstead Brook. There is also land in the southernmost part of the parish that is located within Flood Zone 3. Flood Zone 3 comprises land assessed as having a 1 in 100 or greater annual probability of river flooding (>1%), or a 1 in 200 or greater annual probability of flooding from the sea (>0.5%) in any year.

2.18 The whole of the parish is located within Source Protection Zone 3.

³ <http://www.cwnpsg.onesuffolk.net/home/consultation-documentation/>

Air quality and climatic factors

2.19 There are no Air Quality Management Areas (AQMAs) declared within Copdock and Washbrook Parish. However, there are four AQMAs within 5km of the parish boundaries to the north-east within Ipswich.

2.20 The following transport issues have been identified that may contribute to poorer air quality and increased CO₂ emissions:

- The dual carriageway encourages some drivers to travel at excessive speeds with adverse safety and environmental implications.
- The route, being relatively unconstrained, provides a rat-run for some drivers seeking to avoid delays at the A12/A14 roundabout junction to the east of Washbrook.
- The existing dual carriageway deters movement on foot and by bicycle.

Material assets

2.21 There are two Local Green Spaces designated in the NDP, which are the Play area off Mill Lane and Fen View open space and play area. The play area at the Village Hall would also meet the Local Green Space criteria but it is included within the wider area identified for sport and recreation facilities in Policy C&W 20.

2.22 There are several bus stops within Copdock and Washbrook and also in the south of the parish on London Road. It has been suggested that the existing dual carriageway within the parish deters the use of buses due to having to cross the busy road. The 93 bus provides a regular service from the village to Ipswich and Colchester. The nearest railway station is located around 3.5km to the north-east of the parish in Ipswich.

2.23 The parish contains multiple Public Rights of Way that provide access to the surrounding countryside and into Ipswich to the north-east. There is a cycle route that passes from west to east through the parish and there is also a further cycle route north of Washbrook that provides access to Ipswich.

2.24 There is a primary school located within the built-up area of Washbrook. It has been identified in the NDP that it is operating over capacity and further growth in the village will require adjustments to intake from the wider catchment area.

2.25 There is some land in the south of the parish to the east of London road that is located within a 250m mineral

safeguarding buffer due to the presence of a Proposed Mineral Extraction Site. Additionally, the majority of the parish is located within a Mineral Consultation Area and there is a further safeguard area approximately 200m to the north-west of the built-up area of Washbrook.

Cultural heritage

2.26 Copdock and Washbrook does not contain a Conservation Area, but there are 24 listed buildings within the parish boundaries, two of which are Grade II* listed (Church of St Mary and Church of St Peter). Additionally, the parish is known to be rich in archaeological finds and records. Old London Road follows the line of a Roman Road.

2.27 Outside of the parish boundaries, there is a Registered Park and Garden (Chantry Park) approximately 2km to the north-east. There is also a Scheduled Monument (Moated site) approximately 600m from the south-west boundary of the parish.

Landscape

2.28 Copdock and Washbrook Parish lies within a large National Character Area, South Suffolk and North Essex Clayland. The two predominate landscape types in the Parish are Rolling Valley Farmlands along the Belstead Valley and Ancient Estate Claylands which forms the higher plateau landscape in the central and southern parts of the parish.

2.29 The closest landscape designation to the parish is the Suffolk Coast and Heaths AONB, which is located approximately 3.5km to the east. Additionally, Dedham Vale AONB is located approximately 8km south of the parish.

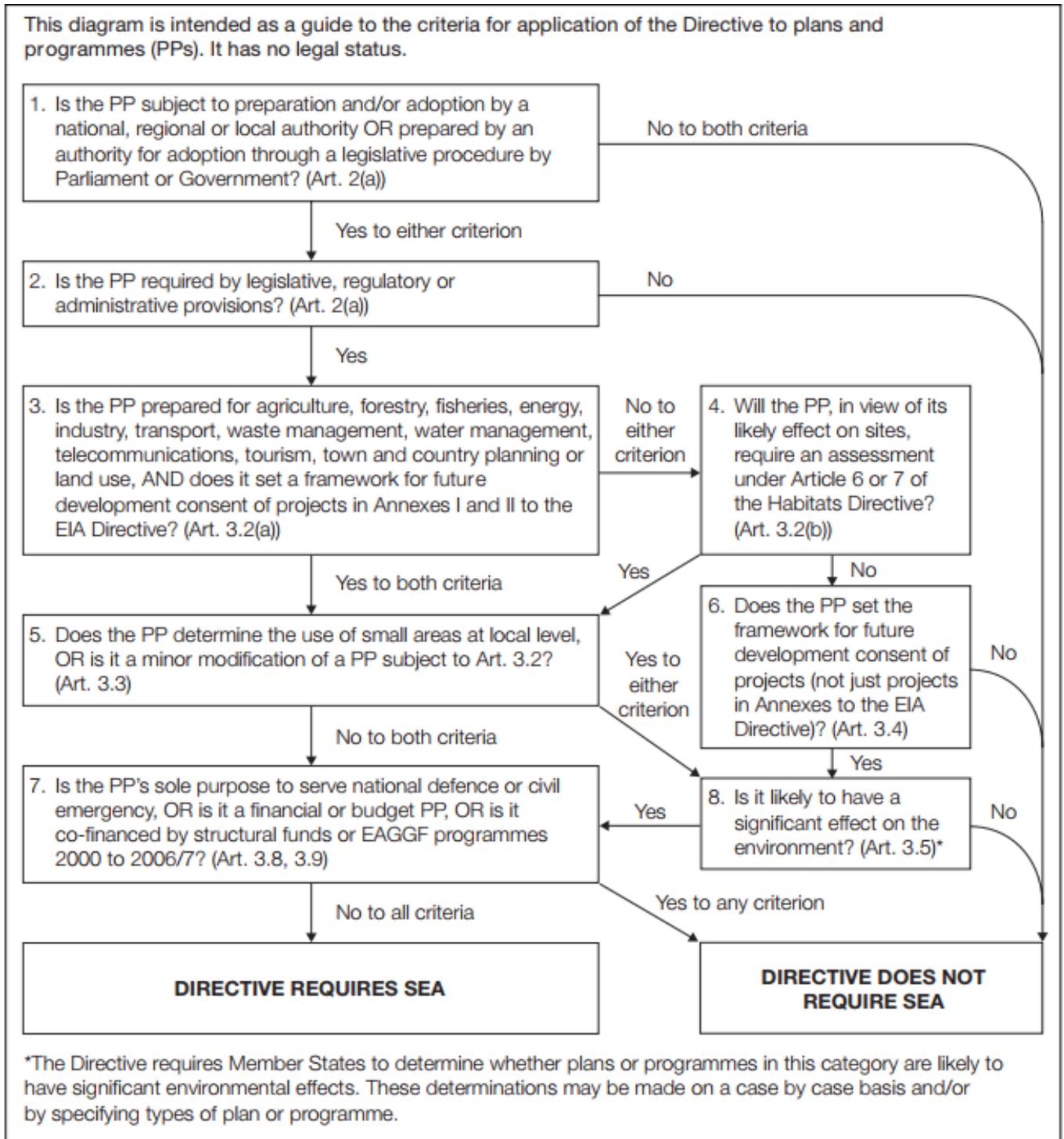
SEA Screening

2.30 An assessment has been undertaken to determine whether the Regulation 14 Draft Copdock and Washbrook 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 Copdock and Washbrook NDP will require a full SEA. The questions in the first column are drawn from the diagram above which sets out how the SEA Directive should be applied.

Table 2.1: Application of SEA Directive to the Copdock and Washbrook 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 (Babergh 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 developments allocated in the NDP are small to medium scale housing sites, which are not included in Annexes I or II of 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? (Art. 3.2 (b))	Uncertain	Habitats Regulations Assessment (HRA) screening of the NDP is being undertaken separately on behalf of Babergh District Council and the outcome of that work is unknown at the time of writing. Therefore, it is necessary at this stage to consider both scenarios under Q4. Yes: Move to Q5. No: Move to Q6.
5. Does the PP determine the use of small areas at local level, OR is it a minor modification of a PP subject to Art.3.2? (Art. 3.3)	Yes and No	The NDP allocates two housing sites, one of which (C&W 3) is small at 15 dwellings (this site already has planning permission) and the other (C&W 4) which is larger at 226 dwellings. It is not a minor modification of a PP. Move to Q8.
6. Does the PP set the framework for future development consent of projects (not just projects in Annexes to the EIA Directive)? (Art. 3.4)	Yes	The NDP allocates two sites for housing development, one for 15 dwellings and one for 226 dwellings, setting the framework for future development consent (although the smaller site does already have planning permission). The NDP also provides a framework for the development of small-scale housing schemes on rural exception sites outside the settlement boundary (subject to meeting criteria), although it does not allocate sites for this purpose. Move to Q8.
8. Is it likely to have a significant effect on the environment? (Art. 3.5)	Yes	See Table 2.2.
7. Is the PP's sole purpose to serve national defence or civil emergency, OR is it a financial or budget PP, OR is it	No	The purpose of the NDP is not to serve national defence or civil emergency. It is not a financial or budget PP and it is not

Stage	Yes/No	Reason
co-financed by structural funds or EAGGF programmes 2000 to 2006/7? (Article 3.8, 3.9)		co-financed by structural funds or EAGGF programmes 2000-2006/7. SEA IS 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 Copdock and Washbrook NDP meets these criteria.

Table 2.2: Likely Significant Effects

SEA Requirement	Comments
The characteristics of plans and programmes, having regard, in particular, to:	
1. the degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources	<p>Once made, the NDP will become part of the statutory development plan and will guide the delivery of development in Copdock and Washbrook Parish, including in terms of design. The NDP allocates two sites for residential development which are expected to accommodate a total of 241 dwellings. The smaller of the two sites (C&W 3 – 15 dwellings) already has planning permission although the larger site (C&W 4 – 226 dwellings) does not. The NDP also provides a framework for the development of small-scale housing schemes on rural exception sites outside the Settlement Boundaries (subject to meeting criteria) although it does not allocate sites for this purpose.</p> <p>The adopted Babergh Core Strategy (2014) identifies Copdock and Washbrook as a Hinterland Village in in Policy CS-2 Settlement Pattern. This policy seeks to direct development to towns and key service centres but also with some provision for meeting local housing needs in core and hinterland villages. The Core Strategy identifies that Hinterland Villages should accommodate some development to meet needs within them. However, Copdock and Washbrook also falls within the Babergh Ipswich Fringe area and therefore is identified as being suitable for higher levels of housing development.</p> <p>The emerging Babergh and Mid Suffolk Joint Local Plan identifies Copdock and Washbrook as a Hinterland Village and as falling within the Babergh Ipswich Fringe area. However, the new Local Plan is unlikely to adopted until 2021. The NDP suggests there has been limited regard to the emerging policies of the Joint Local Plan in the development of the Copdock and Washbrook NDP.</p>
2. the degree to which the plan or programme influences other plans and programmes including those in a hierarchy	The NDP has to be in general conformity with the local strategic framework (i.e. the adopted Babergh Core Strategy (2014) and the emerging Babergh and Mid Suffolk Joint Local Plan). The NDP must also have regard to the National Planning Policy Framework. The NDP does not have influence over other plans. Once made, the NDP will form part of the statutory development plan for Copdock and Washbrook Parish and will be used in conjunction with the emerging Babergh and Mid Suffolk Joint Local Plan (once adopted) to determine planning applications.
3. the relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development,	One of the Basic Conditions which the NDP must meet is to contribute to sustainable development.
4. environmental problems relevant to the plan or programme,	Baseline information relating to Copdock and Washbrook Parish was described earlier in this chapter. Key issues of relevance to the NDP are the presence of high quality agricultural land in the parish, the presence of land within Flood Zone 3 and Source Protection Zone 3, multiple areas of deciduous woodland priority habitat, multiple

SEA Requirement	Comments
	County Wildlife Sites within 500m of the parish boundaries (several of which are also Ancient Woodland) and multiple listed buildings. The parish falls within IRZs associated with national SSSI designations in the area that flag development of 50 dwellings or more as a potential risk. The parish also falls within the 13km zone of influence for recreation around the Stour and Orwell SPA and SAC. The Suffolk Coast and Heaths AONB is 3.5km to the east of the parish. There are four AQMAs within 5km of the parish boundaries to the north-east within Ipswich.
5. the relevance of the plan or programme for the implementation of Community legislation on the environment (e.g. plans and programmes linked to waste-management or water protection).	N/A
Characteristics of the effects and of the area likely to be affected, having regard, in particular, to:	
6. the probability, duration, frequency and reversibility of the effects,	The NDP allocates two sites for housing development, amounting to a total of 241 dwellings. The smaller site (C&W 3 – 15 dwellings) already has planning permission but the larger site (C&W 4 – 226 dwellings) does not. The Copdock and Washbrook NDP covers the period 2018-2036 and the effects of housing development that occurs during the plan period are expected to be long-term and permanent. Any effects associated specifically with construction are likely to be short-term and temporary.
7. the cumulative nature of the effects,	Cumulative effects could result from the NDP in combination with development that takes place in the surrounding towns and villages. As the emerging Babergh and Mid Suffolk Joint Local Plan is still in its development, it is not yet possible to assess with certainty the amount and location of development that may result from the Plan within and close to Copdock and Washbrook. It is noted that the smaller of the two housing allocations in the NDP already has planning permission.
8. the transboundary nature of the effects,	The NDP focuses on Copdock and Washbrook Parish only. Transboundary effects under the SEA Regulations refers to transboundary effects on other EU Member States; therefore they are not relevant to this NDP.
9. the risks to human health or the environment (e.g. due to accidents),	There are no anticipated risks to human health or the environment from the NDP.
10. the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected),	The NDP covers all of Copdock and Washbrook Parish. The population of the parish in the 2011 Census was 1,114 residents.
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, 	Copdock and Washbrook Parish is home to a number of Priority Species and Priority Habitats, there are a number of County Wildlife Sites within 500m of the parish boundaries and the whole of the parish is located within IRZs that flag residential development as a potential risk. The parish also falls within the 13km zone of influence for recreation in relation to the Stour and Orwell SPA/SAC. There are 24 listed buildings located within the parish. The majority of the parish is comprised of Grade 3 agricultural land. The remaining land within the parish is Grade 3 although it is not clear if it is Grade 3a (considered to be high quality) or the lower quality Grade 3b. The two housing allocations in the NDP, C&W 3 (15 dwellings) and C&W 4 (226 dwellings), are both within 100m of listed buildings. There are four AQMAs within 5km of the parish boundaries to the north-east within Ipswich, indicating that air pollution limits are being exceeded in these areas.
12. the effects on areas or landscapes which have a recognised national, Community or international protection status.	Suffolk Coast and Heaths AONB is approximately 3.5km to the east and Dedham Vale AONB is located approximately 8km to the south.

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 Copdock and Washbrook NDP is likely to have significant environmental effects when assessed against the topics listed in the SEA Regulations.

2.35 The NDP sets out a vision and detailed planning policies to shape development in the parish up to 2036. It allocates two sites for residential development, delivering a total of 241 homes. The smaller of these two sites (C&W 3 – 15 dwellings) already has planning permission; however, the larger site (C&W 4 – 226 dwellings) does not. 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 (e.g. increasing pollution in the AQMAs in Ipswich) and demand for water treatment.

2.36 The two housing allocations in the Copdock and Washbrook NDP lie within close proximity of sensitive features including an AONB and a number of listed buildings. Of particular significance is the fact that they both fall within IRZs associated with national biodiversity designations in the area, which flag residential development of 50 dwellings or more as a potential risk, and are both within the 13km 'Zone of Influence' for recreation around the Stour and Orwell SPA/SAC.

2.37 There are policies in the NDP and in the adopted Babergh Core Strategy that may provide mitigation, and mitigation may also be provided by the policies in the emerging Babergh and Mid Suffolk Joint Local Plan, although it is noted that, given its current stage of development, emerging policies may change. 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 Copdock and Washbrook NDP has the potential to have significant environmental effects and that SEA is therefore required.

Next steps

2.38 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.