

**Babergh & Mid Suffolk District  
Councils**

**Redgrave Neighbourhood  
Development Plan  
SEA Screening Opinion**

**Final report**

Prepared by LUC  
September 2020

**Babergh & Mid Suffolk District Councils**

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SEA Screening Opinion**

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# Chapter 1

## Introduction

1.1 Redgrave Parish Council is in the process of preparing a Neighbourhood Development Plan (NDP). Redgrave is located within Mid Suffolk District, to the west of Diss and near to the border with Norfolk. 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 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 Consultation Version of the Redgrave 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 Regulations<sup>2</sup>.

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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 NDP

2.1 Redgrave Parish Council has prepared the Pre-Submission (Regulation 14) version of the NDP which is being subject to public consultation between September and November 2020.

2.2 The Redgrave NDP covers the entire parish. The Pre-Submission NDP includes a vision for the long-term future of Redgrave along with seven objectives which aim to deliver the vision for Redgrave:

1. To provide for housing that meets the needs of the local population and achieve a better balance of available housing.
2. To improve the community infrastructure of Redgrave, in order to provide more places for people, young and old to undertake their work, leisure and community pursuits.
3. To protect and maintain Redgrave's rural village identity and ensure that new development respects its form and character.
4. To protect and enhance Redgrave's natural and historic assets.
5. To encourage low carbon initiatives and future sustainability.
6. To protect the existing business base of the village and ensure that the relationship between business and residents remains in harmony.
7. To seek to improve the physical infrastructure that serves the residents and businesses of Redgrave.

2.3 The NDP then sets out 16 planning policies (Policies RED1 - 16) to realise and deliver the vision and objectives. Policy RED1 is a new housing policy that provides for up to 24 dwellings to be developed in the parish, of which 16 already have planning permission. The remaining eight dwellings will be delivered at a site known as 'Churchway', which is allocated through policy RED2. Policy RED1 also acknowledges the potential contribution of windfall sites and infill plots to the housing target, as well exceptional sites outside the settlement boundary where there is a demonstrable need for the dwelling.

2.4 Policies RED3-16 address a range of topics including housing types and the protection of community facilities, with

many of the policies being criteria-based policies covering topics such as landscape, important views and the protection of natural assets. Together these policies seek to ensure that new development is high quality and sensitively designed so as not to have adverse impacts on the surroundings.

## Baseline Information

2.5 This section summarises baseline information for the parish of Redgrave, drawing from the information set out in the Pre-Submission NDP.

### Context

2.6 Redgrave is a village and civil parish in the Suffolk District of Mid Suffolk, eastern England. It is located to the west of Diss, near to the border with Norfolk.

### Biodiversity, flora and fauna

2.7 Redgrave is known for its valuable and important wildlife. The Parish is home to Redgrave and Lopham Fen which is a 127 hectare Site of Special Scientific Interest (SSSI). It is also designated as a National Nature Reserve (NNR), a Ramsar site and a Nature Conservation Review site and is part of the Waveney and Little Ouse Valley Fens Special Area of Conservation (SAC). It is managed by the Suffolk Wildlife Trust.

2.8 It is the largest remaining area of river valley fen in England and consists of a number of different fen types, including saw-sedge beds, as well as having areas of open water, heathland, scrub and woodland. It is also one of only three sites in the UK where the fen raft spider *Dolomedes plantarius* is known to be found.

2.9 There are Impact Risk Zones (IRZs) around the SSSI which flag up various scales and types of developments as a potential risk, and some of these extend into Redgrave Parish including the main built up area of the village.

2.10 The habitats present at Redgrave and Lopham Fen are characteristic of areas of valley mire. This ecosystem creates a zonation of vegetation types, producing a diverse range of habitat. Dry marginal woodland becomes fen grassland, dominated by purple moor-grass, which grades into mixed fenland of reed and sedge beds. This grassland is particularly notable at Redgrave and Lopham Fen for its areas of saw sedge *Cladium mariscus*. Sandy ridges covered in heath vegetation protrude into these areas of fenland. Without management these communities become invaded by sallow and develop into scrubland. To maintain site diversity, this has been allowed to occur in some areas of the Fen.

2.11 The fen habitats maintain a community of plants and animals, with the site being particularly known for its diversity of invertebrate species. Surveys have identified 19 species of

dragonfly and 27 species of butterfly at the Fen. Further surveys have also found 26 species of mammals, including otter, pipistrelle bats and introduced species such as the Chinese water deer. The site has also recorded four species of amphibian and four species of reptile and a 2006 survey recorded 96 species of bird visiting the Fen.

2.12 There is a County Wildlife Site (Redgrave Lake) in the south of the parish.

### Population

2.13 The population of Redgrave fell from 553 to 459 between the 2001 and 2011 Censuses. By comparison, the population of Mid Suffolk District grew by 11% over the same period. The decline in population in Redgrave was in age groups under 60. The village has a proportionally older population than is typical for England and Mid-Suffolk; 5.7% of people are aged 20-29 in Redgrave compared to 9.4% in Mid-Suffolk and 13.7% in England. The proportion of over 60s in Redgrave is 32.4% compared to 27.9% in Mid-Suffolk and 22.4% in England overall.

2.14 Ethnic diversity is very low with only 2.6% of Redgrave's residents being of non-white ethnicities. Only 1% of residents have a language other than English as their first language. The 2011 Census showed that 64% of the population was in some form of employment (full-time, part-time or self-employed), with a small number unemployed or in full-time education. A further 23% were retired, providing care, long-term sick or disabled.

2.15 There is no predominant employment sector in the parish, with employment largely in manufacturing, construction, professional services and education.

### Human health

2.16 The majority of Redgrave's residents are in good or very good health (82.6%) with a small proportion (3.2%) in bad to very bad health. Information from the 2011 Census indicates that the proportion of the Redgrave population that is in very good health (45.3%) is slightly lower than the Mid Suffolk (47.9%) and England (47.2%) averages.

### Soil

2.17 Redgrave parish comprises mainly Grade 3 agricultural land; however, it is not known if any or all of this is Grade 3a (classed as best and most versatile agricultural land) rather the lower quality Grade 3b. There is an area of Grade 2 agricultural land in the centre and north east of the parish.

### Water

2.18 The Environment Agency's Flood Risk Maps for planning indicate that the majority of Redgrave Parish, particularly the

existing built up area of the village, lies within Flood Zone 1 and therefore has a lower probability of flooding. There is an area of Flood Zone 3 along the Little Ouse River which runs along the western boundary of the parish around 600m from the built up area of the village.

### Air and Climatic Factors

2.19 There are no Air Quality Management Areas (AQMAs) that have been declared within or near to Redgrave Parish.

2.20 Climate data are not available at parish level, but within Mid Suffolk District as a whole, reductions in overall carbon emissions of 28% were achieved between 2005 and 2018. This reduction was mostly due to progress in reducing emissions from large industrial installations followed by electricity from industrial and commercial sectors and domestic sources. There was minimal progress on reducing transport emissions, which make the largest contribution to carbon emissions in Mid Suffolk District.

2.21 In 2011, there were 351 cars or vans owned in Redgrave.

### Material Assets

2.22 For a village with a community of 250 dwellings, Redgrave is well served by community and recreational facilities, including an amenities hall, a public house which is owned by the community and acts as a business/IT and community hub, and a community shop as well as football and other sports and play facilities, social and hobby clubs and routes for walking, cycling and horse riding.

2.23 There are two business parks in Redgrave, Hall Farm which accommodates four businesses comprising a brewery, an electric bike company, a poultry solutions firm and a baker, and Redgrave Business Park which also accommodates four businesses being a carpet supplier, an upholsterer, a car parts firm and a double glazing manufacturer and supplier.

2.24 In terms of public transport, the options are limited to the bus service to and from Diss and to and from Bury St Edmunds. The service runs on weekdays with a reduced service on Saturdays. There are four buses a day to Bury St Edmunds and four to Diss. The only bus stop in the village is opposite the village sign on the Knoll. The bus service is generally not well-supported, which may be due to the difficulty of returning at a convenient time.

2.25 There are no schools or GP surgeries within Redgrave Parish.

2.26 Redgrave Parish lies within a Minerals Consultation Area.

### Cultural heritage

2.27 Most of the village of Redgrave falls within a designated Conservation Area, which contains around half of the parish's 49 listed buildings. In the south of the parish is Redgrave Park which originated in the 10th Century when Ulfketel, the Earl of East Anglia gave the manor to the Abbot of Bury St. Edmunds. Other than the three listed buildings within the Parkland – Folly Lodge, the Ice House and the Boat House – Redgrave Park does not have any formal landscape designations or planning protections.

2.28 The Suffolk County sites and monuments record lists more than 50 sites of archaeological interest in the parish. The earliest of the dated finds include some Mesolithic flint flakes and a quartzite mace head.

### Landscape

2.29 Redgrave is set within a heavy clay, largely flat landscape with ancient woodlands. The landscape is characterised by large agricultural fields with hedge boundaries and tree lines with long views towards and away from the main built up part of the village. There are two areas within the parish that are identified by Mid Suffolk District Council as Special Landscape Areas (SLAs) due to their high local landscape value. One area is to the north of the parish and includes Redgrave and Lopham Fen. The other is Redgrave Park to the south of the parish, a privately-owned landscape park with woodlands, pasture and 45 acres of fishing lake.

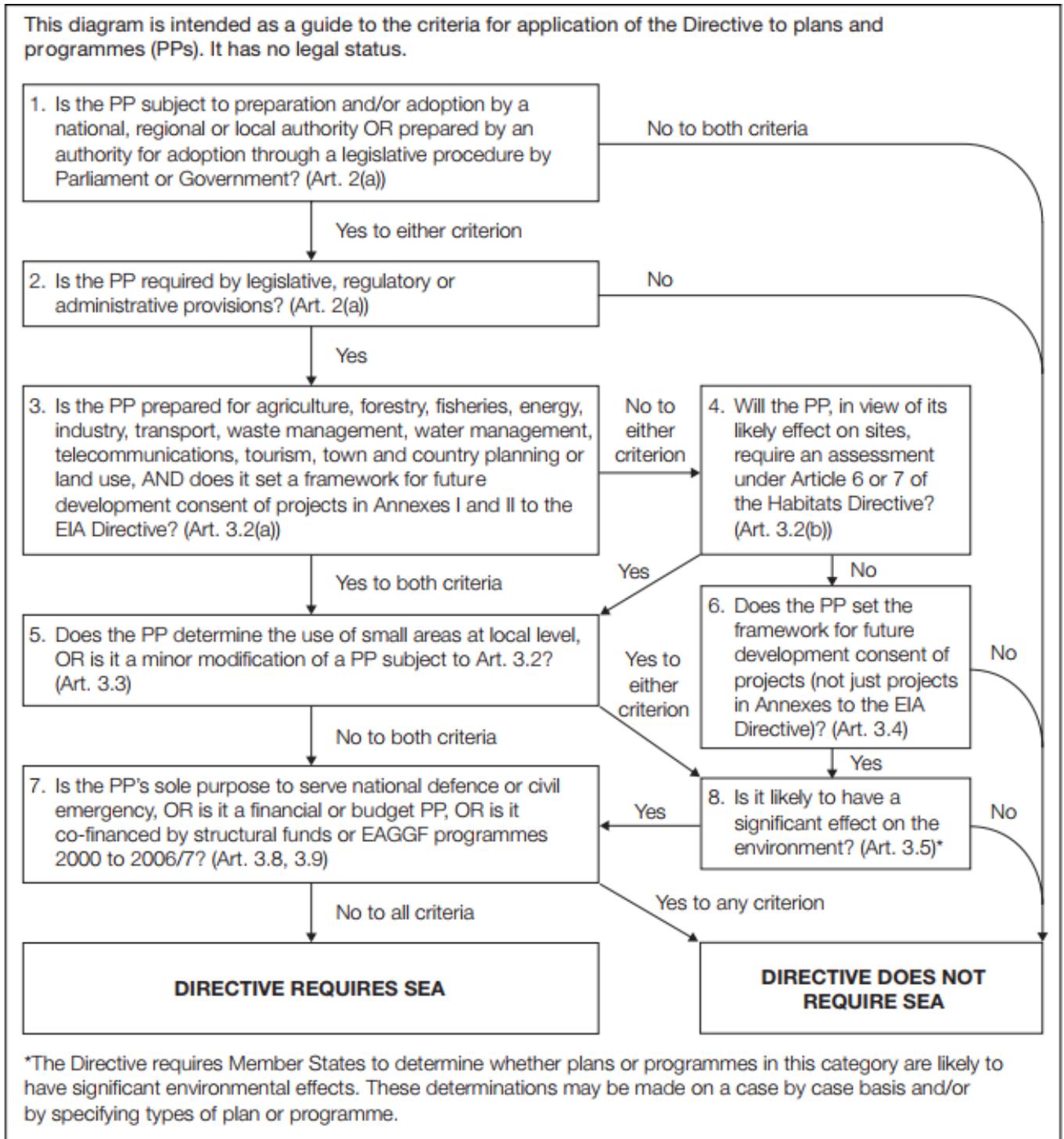
### SEA Screening

2.30 An assessment has been undertaken to determine whether the Regulation 14 Pre-Submission version of the Redgrave 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 Directive<sup>3</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).

<sup>3</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 2.1 Application of the SEA Directive to plans and programmes



**Table 2.1: Application of SEA Directive to the Redgrave 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. <b>Move to Q2.</b>
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. <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 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. <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))	Uncertain	HRA screening of the NDP is being undertaken separately on behalf of Mid Suffolk 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. <b>Yes: Move to Q5.</b> <b>No: Move to Q6.</b>
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 small-scale sites for housing development. It is not a minor modification of a PP. <b>Move to Q8.</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 NDP allocates a site for housing development, setting the framework for future development consent. The NDP also provides a framework for the development of conversions and new construction outside the Settlement Boundary where certain criteria are met, 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> <b>SEA IS REQUIRED.</b>

2.32 Schedule 1 of the SEA Regulations sets out the criteria for determining the likely significance of effects. These are listed in **Table 2.2** below along with comments on the extent to which the Redgrave 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 Redgrave Parish, including in terms of design. The NDP allocates one site for development which is expected to accommodate eight dwellings. The NDP also provides a framework for the development of conversions and new construction outside the Settlement Boundary where certain criteria are met, although it does not allocate sites for this purpose.</p> <p>The adopted Mid Suffolk Core Strategy (2008, review 2012) identifies Redgrave as a Secondary Village in Policy CS1 – Settlement Hierarchy. This policy seeks to direct development to towns and key service centres but also with some provision for meeting local housing needs in primary and secondary villages. The Core Strategy does not identify a specific housing delivery target for Secondary Villages over the Plan period to 2025.</p> <p>The emerging Babergh and Mid Suffolk Joint Local Plan identifies Redgrave as a Hinterland Village. While the new Local Plan is unlikely to be adopted until 2021, it has been taken into consideration in the preparation of the NDP. It is noted that the Preferred Options version of the Joint Local Plan makes provision for building 12,296 new homes across Mid Suffolk between 2018 and 2036 and that it is proposed that 10% of these will be in the Hinterland Villages. For Redgrave specifically, the Preferred Options document identifies a minimum figure of 12 new homes.</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 adopted Mid Suffolk Core Strategy (2008, review 2012) 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 Redgrave parish and will be used in conjunction with the emerging Babergh and Mid Suffolk Joint Local Plan (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 NDP must meet is to contribute to sustainable development.</p>
4. environmental problems relevant to the plan or programme,	<p>Baseline information relating to Redgrave Parish was described earlier in this chapter. Key issues of relevance to the NDP are the proximity of the parish to the internationally designated Redgrave and Lopham Fen (a Ramsar site and SAC), the presence of high-quality agricultural land in the parish, the presence of land within Flood Zone 3 and a number of 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).	<p>N/A</p>
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 NDP allocates one site for housing development, which will accommodate eight dwellings, in addition to the 16 dwellings with planning consent as of August 2020. The Redgrave 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.</p>

SEA Requirement	Comments
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 – albeit the parish of Redgrave is rural.</p> <p>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 Redgrave Parish. It is noted that the Redgrave NDP proposes allocating one housing site which would accommodate eight dwellings, in addition to the 16 further homes with planning consent as of 2020.</p> <p>The Adopted Mid Suffolk Core Strategy (2008) identifies Redgrave as a 'secondary village' in the settlement hierarchy, with the expectation that new development should meet local needs only.</p>
8. the transboundary nature of the effects,	The NDP focuses on Redgrave Parish only. Transboundary effects under the SEA Regulations refers 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 Redgrave Parish. According to the 2011 Census the population of the parish was 459.
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> <li>■ intensive land-use,</li> </ul>	The internationally designated Redgrave and Lopham Fen (SAC and Ramsar site) extends within the northern part of the parish and there is a County Wildlife Site within the south of the parish. The main built up area of the village of Redgrave is designated as a Conservation Area and there are numerous listed buildings both within and outside of that part of the parish. There is an area of high quality (Grade 2) agricultural land in the centre of the parish.
12. the effects on areas or landscapes which have a recognised national, Community or international protection status.	The parish does not lie within or near to an AONB or National Park. There are two areas within the parish that are identified by Mid Suffolk District Council as Special Landscape Areas (SLA) due to their high landscape value.

## SEA Screening Conclusion

2.33 A screening assessment has been undertaken by applying the criteria from the SEA Directive and Schedule 1 of the SEA Regulations to determine whether or not the Redgrave NDP is likely to have significant environmental effects when assessed against the topics listed in the SEA Regulations.

2.34 The NDP sets out a vision, objectives and planning policies to shape development in the parish up to 2036. It allocates one site for residential development, delivering eight homes in addition to the 16 homes on other sites for which planning permission has already been granted. 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.

2.35 The housing allocation in the Redgrave NDP lies within fairly close proximity of sensitive features including a Conservation Area and listed buildings. Of particular significance is the proximity of the proposed development to the nationally and internationally designated Redgrave and Lopham Fen and the fact that the allocated site is located within IRZs associated with the SSSI, which flag any development that could cause air pollution as a potential risk. The presence of high quality agricultural land and a County Wildlife Site within the parish add to its sensitivity.

2.36 There are policies in the NDP and in the adopted Mid Suffolk 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 sensitivity of the area in which the allocated site is located, **it is considered that the Redgrave NDP has the potential to have significant environmental effects and that SEA is therefore 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.