

**Babergh & Mid Suffolk District
Councils**

**Thorndon Parish Council
Neighbourhood
Development Plan
SEA Screening Opinion**

Final report

Prepared by LUC
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Babergh & Mid Suffolk District Councils

Thorndon Parish Council Neighbourhood Development Plan SEA Screening Opinion

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Chapter 1

Introduction

1.1 Thorndon Parish Council is in the process of preparing a Neighbourhood Development Plan (NDP). Thorndon Parish is located within the Suffolk District of Mid Suffolk, approximately three miles to the south east of the town of Eye. 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 Thorndon 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 Thorndon Parish Council has prepared the Draft (Regulation 14) version of the NDP which is being subject to public consultation between 15th February and 30th March 2020.

2.2 The Thorndon NDP covers the entire parish, including the main settlement of Thorndon as well as the hamlet of Hestley Green to the south-east

2.3 The Draft NDP includes a vision for the long-term future of Thorndon along with 10 objectives, which are divided into the following themes:

1. Housing
2. Natural Environment
3. Built Environment and Design
4. Services and Facilities
5. Transport and Highways

2.4 The NDP then sets out 20 planning policies (THN 1-20) to realise and deliver this vision which are structured in line with the same themes listed above.

2.5 Policy THN 2: Housing Development states that the Plan provides for the development of around 100 additional dwellings in the parish between 2018 and 2036, which are to be met through the following:

1. Implementation of planning permissions that had not been completed as of April 2018.
2. Site allocations identified in Policies THN 3, THN 4, THN 5, THN 6 and THN 7 in the Plan.
3. 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.
4. In exceptional circumstances, dwellings outside the Settlement Boundary where it can be demonstrated that the dwelling is essential for the operation of agriculture, horticulture, forestry, outdoor recreation and other exceptional uses for which it can be satisfactorily demonstrated that it needs to be located in the countryside.

2.6 The five sites that are allocated for housing development in policies THN 3-7 provide for a total of 41 new dwellings. Two of these sites, THN 3 and THN 4, which allocate a total of approximately 25 new homes, already have planning permission.

Baseline Information

2.7 This section summarises baseline information for the parish of Thorndon, drawing from the information set out in the Base Village Data³ document that accompanies the Thorndon NDP.

Context

2.8 Thorndon is a village and civil parish in the Suffolk District of Mid Suffolk, eastern England. It is located around three miles south of the town of Eye. The village benefits from close proximity to the towns of Stowmarket and Diss, which both have main line rail links to London, major retail outlets and a number of social and business activities.

2.9 The built up area of the village has developed in a linear shape, predominantly along three roads: The Street, Stoke Road and Thwaite Road. Density of housing is fairly high within the settlement compared to the surrounding area. The parish includes the hamlet of Hestley Green to the south-east.

Biodiversity, flora and fauna

2.10 There are no internationally or nationally designated nature conservation sites within Thorndon Parish. However, there is a County Wildlife Site located within the parish approximately 600m east from the built up area of Thorndon and there are several areas of Priority Habitat distributed throughout the parish. The most notable of these is a network of deciduous woodland, good quality semi-improved grassland and coastal and floodplain grazing marsh to the north of the built-up area of Thorndon.

2.11 The whole of the parish falls within Impact Risk Zones associated with a SSSI (Major Farm, Braiseworth), which is located approximately 2.5km to the north-west of the built-up area of Thorndon. These IRZs do not flag residential development as a potential risk.

Population

2.12 Thorndon village is made up of 650 residents in approximately 280 dwellings, 90% of which are white British people with the remaining 10% being Black or Asian. The due

rural location of the village contributes to an ageing population with many villagers being over 60.

2.13 Agriculture and construction related occupations are the most predominant among residents of Thorndon, followed by manufacturing and retail.

Human health

2.14 The 2011 census showed that 90% of Thorndon's population is of very good or good health and life expectancy is increasing. Provision of age-related services is likely to become an increasing consideration for the parish as the proportion of over 65s is growing.

2.15 Whilst there are no specific facilities for medical, dental or care services in Thorndon, the settlements of Eye, Debenham and Mendlesham can supply these services and can be accessed using public transport.

Soil

2.16 The majority of the parish is comprised of grade 3 agricultural land (there is no data available distinguishing whether the land is grade 3a which comprises Best and Most Versatile agricultural land). However, there are substantial areas of grade 2 agricultural land to the north and south of the built-up area of Thorndon within the parish boundaries.

Water

2.17 There is land to the north of the built-up area of Thorndon that is located within Flood Zone 3 due to the presence of a watercourse (Dove) adjacent to the north-western boundary of the parish. 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 River Dove acts as the main focus for natural drainage, with minor tributaries connected to manmade drainage ditches that move surface water into the Dove and eventually the Waveney river catchment. Ditch maintenance and clearance is a regular agenda item for Parish Council consideration.

2.19 Surface drainage and foul water is managed by Anglian water, with most houses having access to mains sewerage services.

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

³ <https://thorndon.suffolk.cloud/assets/Gallery-1/Thorndon-Parish-Council/Thorndon-Neighbourhood-Plan/Thorndon-NP-Plan-Documents/Thorndon-Neighbourhood-Plan-Evidence-Appraisal.pdf>

Air and Climatic Factors

2.21 There are no Air Quality Management Areas (AQMAs) that have been declared within or close to Thorndon Parish.

2.22 The NDP evidence base indicates that there is an issue of traffic congestion outside the primary school during peak times.

Material assets

2.23 The parish has a number of areas available for public access and recreation, with Fen View play area, Kerrison playing field, All Saints Churchyard and The Bowling Green all being designated as Local Green Spaces in the NDP.

2.24 The main built-up area of Thorndon contains several bus stops, which provide regular services to the nearby settlements of Eye, Mendlesham and Diss. The parish is not in close proximity to any railway stations.

2.25 The parish contains a number of Public Rights of Way that provide access to the surrounding countryside and there is also a local cycleway that passes through the centre of the parish.

2.26 The parish has one primary school (Thorndon Church of England Primary School) which is located in the eastern side of the built-up area of Thorndon. There were 41 planning approvals between 2015 and 2017 equating to a 14.9% increase in the number of houses, which could potentially result in a need for increased primary school places. Hartismere High School is the nearest secondary school to the parish and is located around 4km to the north.

2.27 The northern part of the parish is located within a Mineral Consultation Area.

Cultural heritage

2.28 There are 33 Grade II listed buildings within the Neighbourhood Plan as well as two Grade II* listed buildings (Church of All Saints and Short's Farmhouse). Ranging from large farmhouses to cottages, the listed buildings within the

parish reflect the history of the area and remain an important part of the village's character. Outside of the parish there is a Scheduled Monument (Moated site NE of Occold Hall) around 1.5km to the north-east of the built-up area of Thorndon.

Landscape

2.29 Thorndon Parish lies within a large area of central Mid-Suffolk that is identified as South Suffolk and High Suffolk Claylands. There is an area to the north-west of the built-up area of Thorndon that falls within an Environmentally Sensitive Area classified as The Broads. This designation protects the grassland characteristics of the riverside area from overly intensive farming operations and is linked to The Broads National Park, which is 27km to the north-east.

2.30 There are no nationally designated landscapes in close proximity to Thorndon with the closest being the Suffolk Coast and Heaths AONB and Suffolk Heritage Coast around 30km to the east.

2.31 There are higher areas along Hall Road, Wetheringsett Road and Thwaite, but retained and managed hedgerows break up the landscape around the parish.

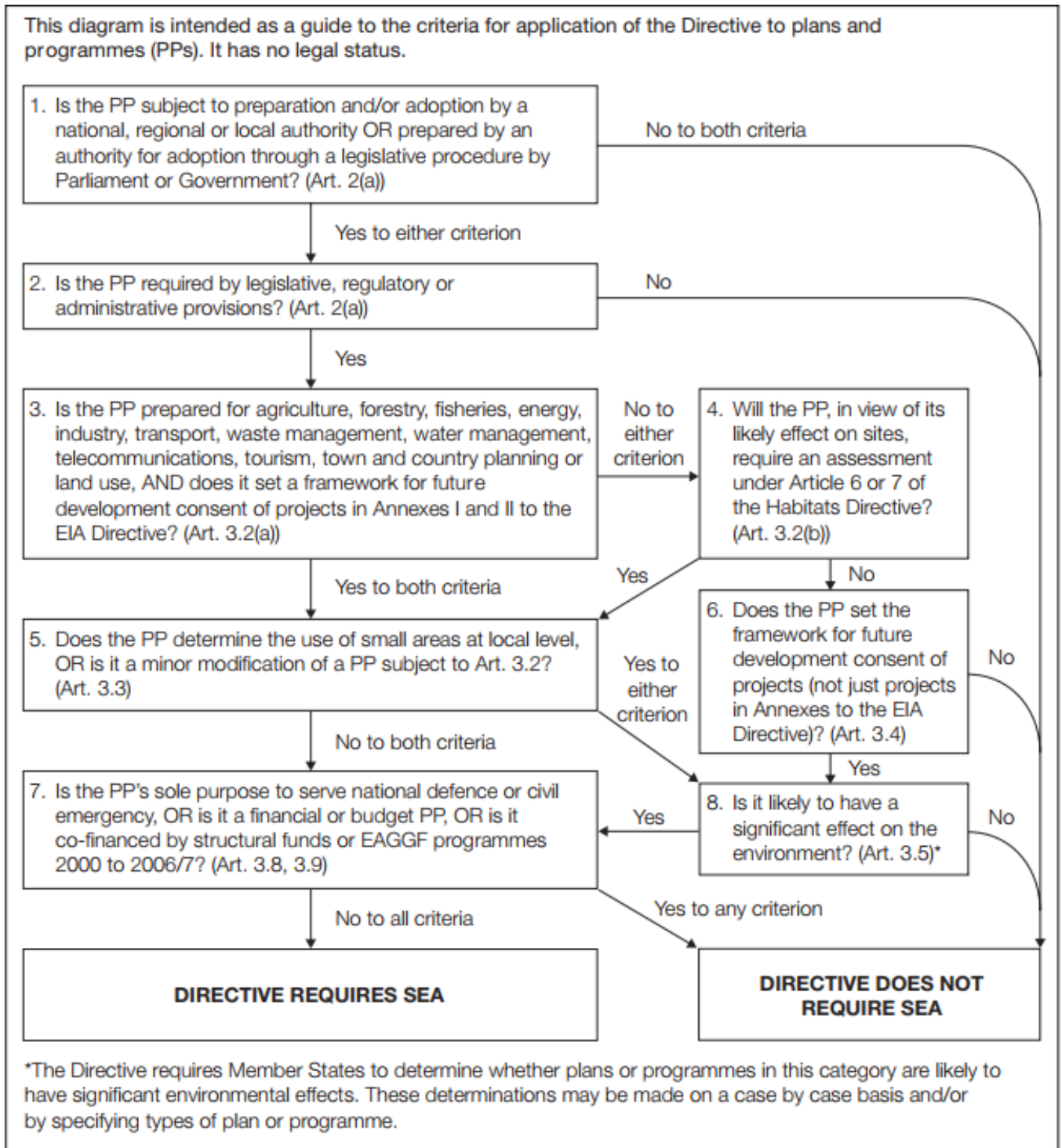
SEA Screening

2.32 An assessment has been undertaken to determine whether the Regulation 14 Draft Thorndon NDP requires SEA in accordance with the SEA Regulations.

2.33 **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



2.34 **Table 2.1** below presents the assessment of whether the Thorndon 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 Thorndon 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 developments allocated in the NDP are small scale housing allocations, 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	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. 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 small-scale sites for housing development. 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 five small-scale sites for housing development, setting the framework for future development consent. Two of these sites already have planning permission. The NDP also provides a framework for 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. Move to Q8.
8. Is it likely to have a significant effect on the environment? (Art. 3.5)	No	SEA IS NOT REQUIRED.

2.35 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 Thorndon 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 Thorndon Parish, including in terms of design. The NDP allocates five sites for residential development, which are expected to accommodate a total of around 41 dwellings. However, two of these sites (THN 3 and THN 4), which allocate approximately 25 new homes, 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 Boundaries (subject to meeting criteria) although it does not allocate sites for this purpose.</p> <p>The adopted Mid Suffolk Core Strategy (2008, review 2012) identifies Thorndon 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 Thorndon as a Hinterland Village. However, the new Local Plan is unlikely to be adopted until 2021 and therefore there has been limited regard to the emerging policies when preparing the Neighbourhood Plan. The NDP has been produced with regard to the settlement boundary that is proposed in the emerging Joint Local Plan, but has also altered it to more accurately reflect local circumstances.</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 (2008/2012) 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 Thorndon 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 Thorndon 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, several areas of priority habitat, a SSSI IRZ, and a County Wildlife Site within or near to the parish and a number of designate heritage assets in the parish. Additionally, there is an issue of congestion outside the primary school during peak times, which could be having adverse impacts on air quality.</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:	

Sea Requirement	Comments
6. the probability, duration, frequency and reversibility of the effects,	The NDP allocates five sites for housing development, amounting to a total of 41 dwellings, in addition to the 55 dwellings with planning consent as of April 2018. However, two of the sites allocated (THN 3 and THN 4), which together allocate approximately 25 new homes, already have planning permission. The Thorndon 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,	<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 Thorndon is rural and Thorndon village itself is some distance from the nearest settlement (Eye is around three miles to the north). 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 Thorndon Parish. It is noted that the Thorndon NDP proposes five housing sites, amounting to 41 dwellings, although two of these sites (THN 3 and THN 4, which together allocate approximately 25 new homes) already have planning permission. These allocations are in addition to the 55 further homes with planning consent as of 2018.</p> <p>The Adopted Mid Suffolk Core Strategy (2008) identifies Thorndon 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 Thorndon 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 Thorndon Parish. The population of the parish in the 2011 Census was 648 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, 	<p>Thorndon Parish is home to a number of Priority Species and Priority Habitats, there is a County Wildlife Site within 600m of the built-up area of Thorndon and there is land within a landscape designation in the north-west of the parish (Environmentally Sensitive Area – The Broads), which is linked to The Broads National Park around 27km to the north-east. The whole of the parish is located within an SSSI Impact Risk Zone, although it does not flag residential development as a potential risk. There are 35 buildings and structures within the parish of Thorndon that are included on Historic England's National List, two of which that are Grade II* listed. There is also a substantial area of grade 2 agricultural land around the built up area of Thorndon, with remaining land in the parish being grade 3, although it is unclear if it is grade 3a or the lower quality grade 3b.</p> <p>Considering the allocation sites that do not already have planning permission, THN 5 (five dwellings), is located within 200m of areas of Priority Habitat to the south. This allocation is also located within 100m of The Broads Environmentally Sensitive Area, but this designation is designed to protect the area from intensive farming practices rather than residential development. In addition, there are two listed buildings within 200m of the proposed allocations THN 6 (six dwellings) and THN 7 (six dwellings).</p>
12. the effects on areas or landscapes which have a recognised national, Community or international protection status.	There are no nationally or internationally protected landscapes in close proximity to Thorndon Parish. The Broads National Park is approximately 27km away.

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

2.37 The NDP sets out a vision and detailed planning policies to shape development in the parish up to 2036. It allocates five small sites for residential development, delivering a total of 41 homes. However, two of these sites (THN 3 and THN 4), which together allocate approximately 25 new homes, already have planning permission. It is assumed that the environmental effects of the development on the sites with planning permission would have been assessed during the planning application process, with conditions attached to the consent as appropriate to ensure that adverse effects on the environment do not result. Although these sites are allocated in the NDP they are, in effect, part of the baseline conditions for the preparation of the NDP. They are included as allocations in the NDP because they already have planning consent.

2.38 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. However, the overall scale of development that will result from the allocations that do not already have planning permission is small, and there are policies in the NDP and in the adopted Mid Suffolk Core Strategy that may provide mitigation. Mitigation may also be provided by the policies in the emerging Babergh and Mid Suffolk Joint Local Plan, although given its current stage of development, emerging policies may change.

2.39 On this basis, it is considered that the Thorndon NDP does not have the potential to have significant environmental effects and that SEA is not therefore required.

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.