

Stradbroke Neighbourhood Plan

Strategic Environmental Assessment Screening Determination

(Regulation 11 of the Environmental Assessment of Plans and Programmes Regulations 2004)

March 2018

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STRADBROKE NEIGHBOURHOOD PLAN

STRATEGIC ENVIRONMENTAL ASSESSMENT DETERMINATION

1. Introduction

In some circumstances a neighbourhood plan could have significant environmental effects and may fall within the scope of the Environmental Assessment of Plans and Programmes Regulations 2004 and require a strategic environmental assessment.

One of the basic conditions that will be tested by the independent examiner is whether the making of the Plan is compatible with European Union obligations. Whether a neighbourhood plan requires a strategic environmental assessment and the level of detail needed will depend on what is proposed in the draft Neighbourhood Plan and the characteristics of the local area.

The purpose of the Stradbroke Neighbourhood Plan is to provide for the sustainable development of Stradbroke to make it a key service centre village for residents and surrounding villages. To do this, it seeks to phase the provision of good quality housing, educational facilities, business and local retail opportunities through a set of place and people-focused objectives.

This determination refers to:

- A Screening Report for Consultation prepared on behalf of Stradbroke Parish Council by Navigus Planning, which can be viewed at: www.midsuffolk.gov.uk/StradbrokeNP
- The responses to this from the statutory consultees (See Appendix).

This assessment relates to the Draft Stradbroke Neighbourhood Plan P 2016 - 2036 Presubmission consultation.

Section 2 sets out the legislative background. Section 3 sets out the criteria for determining the likely significance of effects. Section 4 summarises the assessment and Section 5 sets out the conclusions based on the screening assessment and the responses of the statutory consultees. The determination is set out in Section 6.

2. Legislative Background

European Union Directive 200142/EC requires a Strategic Environmental Assessment to be undertaken for certain types of plans or programmes that would have a significant environmental effect. The Environmental Assessment of Plans and Programmes Regulations 2004 (the Regulations) require that this is determined by a screening process, which should use a specified set of criteria (set out in Schedule 1 of the Regulations). The results of this process must be set out in an SEA Screening Statement, which must be publicly available. In accordance with Regulation 9 of the SEA Regulations 2004, Stradbroke Parish Council (the qualifying body) has requested Mid Suffolk District Council (MSDC) as the responsible authority, to determine whether an environmental report on the emerging Stradbroke Neighbourhood Plan is required due to significant environmental effects. In making this determination, MSDC should have regard to Schedule 1 of the Regulations.

Pre-Submission Consultation (Regulation 14 stage) on the Draft Neighbourhood Plan was undertaken between 20 January 2018 and 2 March 2018. In line with the advice contained within the National Planning Policy Framework (NPPF), Planning Practice Guidance, the plan's potential scope should be assessed at an early stage against the criteria set out in Schedule 1 to the Environmental Assessment of Plans and Programmes Regulations 2004. Stradbroke Parish Council has therefore consulted the statutory consultees (Historic England / Natural England / Environment Agency) on the Screening Report prepared by Navigus Planning and asked for their views on whether an SEA is required.

An SEA can be required in some limited situations where a sustainability appraisal is not needed. Neighbourhood Planning is one of these situations. Sustainability Appraisals (SAs) may incorporate the requirements of the Strategic Environmental Assessment Regulations, which implement the requirements of the 'Strategic Environmental Assessment Directive' on the assessment of the effects of certain plans and programmes on the environment.

A Sustainability Appraisal ensures that potential environmental effects are given full consideration alongside social and economic issues and it is good practice to do one to understand how a plan is to deliver sustainable development. However, NPPF Planning Practice Guidance states that there is no legal requirement for a neighbourhood plan to undertake a sustainability appraisal as set out in section 19 of the Planning and Compulsory Purchase Act 2004. It is down to the qualifying body to demonstrate whether its plan is likely to have significant environmental effects. This is the purpose of the SEA Screening Report.

3. Criteria for determining the likely significance of effects referred to in Article 3(5) of Directive 2001/42/EC

Criteria for determining the likely significance of effects referred to in Article 3(5) of Directive 2001/42/EC are set out in the following table:

- 1. The characteristics of plans and programmes, having regard, in particular, to:
- 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,
- the degree to which the plan or programme influences other plans and programmes including those in a hierarchy
- the relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development,
- environmental problems relevant to the plan or programme,
- 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).

2. Characteristics of the effects and of the area likely to be affected, having regard, in particular, to:

- the probability, duration, frequency and reversibility of the effects,
- the cumulative nature of the effects,
- the trans-boundary nature of the effects,
- the risks to human health or the environment (e.g. due to accidents),
- the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected),
- the value and vulnerability of the area likely to be affected due to:
- special natural characteristics or cultural heritage,
- exceeded environmental quality standards or limit values,
- intensive land-use,
- the effects on areas or landscapes which have a recognised national, Community or international protection status.

Source: Annex II of SEA Directive 2001/42/EC

4. Assessment

The diagram below illustrates the process for screening a planning document to ascertain whether a full SEA is required

 Is the PP 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)) 		No to	o both criteria
	Yes to either criterion		
2. Is the PP required by legislative, regulatory or administrative provisions? (Art. 2(a))		No	
	Yes		
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))		No to either criterion	 4. Will the PP, in view of its likely effect on sites, require an assessment under Article 6 or 7 of the Habitats Directive? (Art. 3.2(b))
	Yes to both criteria	Yes	↓ No
 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 to either criterion	
	No to both criteria	\backslash	Directive)? (Art. 3.4)
 Is the PP's sole purpose to serve national defence or civil emergency, OR is it a financial or budget PP, OR is it co-financed by structural funds or EAGGF programmes 2000 to 2006/7? (Art. 3.8, 3.9) 		< Yes	8. Is it likely to have a significant effect on the environment? (Art. 3.5)*
	No to all criteria	Yes	to any criterion
	IVE REQUIRES SEA		DIRECTIVE DOES NOT REQUIRE SEA

The table below assesses in broad terms whether the Neighbourhood Plan will require a full SEA. The questions below are drawn from the previous diagram which sets out how the SEA Directive should be applied. The reasons draw on the Screening Report prepared by Essex Place Services and the outcome of consultation with the statutory consultees.

Stage	Y/N	Reason
1. Is the Neighbourhood Plan 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))	Y	The preparation and adoption of the Plan is allowed under The Town and Country Planning Act 1990 as amended by the Localism Act 2011 and the Neighbourhood Planning Act 2017. The Plan is being prepared by Stradbroke Parish Council (as the "relevant body") and will be 'made' by Mid Suffolk District Council as the local authority subject to passing an independent examination and community referendum. The preparation of neighbourhood plans is subject to the following regulations: The Neighbourhood Planning (General) Regulations 2012 (as amended) and the Neighbourhood Planning (referendums) Regulations 2012.
2. Is the Neighbourhood Plan required by legislative, regulatory or administrative provisions? (Art. 2(a))	Y	Whilst the Neighbourhood Plan is not a requirement and is optional under the provisions of the Town and Country Planning Act 1990 as amended by the Localism Act 2011, it will be 'made' and form part of the statutory development plan for Mid Suffolk District. It is therefore important that the screening process considers whether it is likely to have significant environmental effects and hence whether a full SEA is required under the Directive.
3. Is the Neighbourhood Plan 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))	Y	Neighbourhood plans can cover some of the topics identified in this list and they could set the framework for development of a scale that would fall under Annex II of the EIA Directive. However, for neighbourhood plans, developments which fall under Annex I of the EIA Directive are 'excluded development' as set out in Section 61k of the Town and Country Planning Act 1990 (as amended by the Localism Act).
4. Will the Neighbourhood Plan, 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))	Ν	A screening assessment for a Habitats Regulations Assessment (HRA) has been prepared separately. It has been determined that an HRA is not needed.
5. Does the Neighbourhood Plan 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)	Y	The Plan allocates several sites within the Neighbourhood Area for a range of uses, including housing and community uses.

Stage	Y/N	Reason
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)	Y	The Neighbourhood Plan is to be used by MSDC in helping determine future planning applications. The Neighbourhood Plan however focuses on shaping how development comes forward.
7. Is the PP's sole purpose to serve the national defence or civil emergency, OR is it a financial or budget PP, OR is it co-financed by structural funds or EAGGF programmes 2000 to 2006/7? (Art 3.8, 3.9)	Ν	Not applicable
8. Is it likely to have a significant effect on the environment? (Art. 3.5)	Y	 The environmental designations have been identified further in the Stradbroke baseline information in Section 4 and in the Appendix, which includes maps, distances and vulnerability. As identified in the SEA toolkit for neighbourhood planning¹, the Environmental Impact Assessment (EIA) Regulations identify a threshold for when an EIA may be needed and the Toolkit recommends this as a starting point for SEA Screening. For 'urban development' projects, one of the thresholds is where development includes more than 150 dwellings. The draft Neighbourhood Plan proposes to allocate four sites (policies STRAD15 - 18) and also allocates a site with planning permission for residential development (STRAD19). These allocations in total, propose to provide between 220 and 260 dwellings. Although spread across five sites, this is significantly in excess of the EIA Regulations threshold. The sites are also located close to one another, therefore any cumulative impacts are likely to be relatively high. As the area characteristics presented in Section 4 show, some of the site allocations could have an impact on the following environmental assets: STRAD15 is adjacent or very close to two County Wildlife Sites. STRAD18 is close to a priority habitat. All of the site allocations are identified as being in Grade 3 agricultural land therefore

¹ Locality (2016) Screening neighbourhood plans for strategic environmental assessment: A toolkit for neighbourhood planners

Stage	Y/N	Reason
		 could be 'best and most versatile agricultural land' (Grade 3a). A number of the site allocations have part of their area at risk from 1-in-30-year surface water flood risk. STRAD16-18 are all close to listed buildings and are adjacent to the Conservation Area and so development at the scale proposed could affect their setting. STRAD 16 is near to a Historic Environmental Record (HER) monument of archaeological value. In addition, the following policies could also have an impact on the environment although it is doubtful as to whether these will be significant: STRAD10 (Design principles) expects development to demonstrate good placemaking principles in its design and layout. STRAD10 (Local green spaces) identifies existing green spaces that are special to the community and protects them from development. STRAD11 (Design and heritage) encourages the use of high quality materials and the retention of traditional heritage features. STRAD12 (Light pollution) seeks to minimise the impact of light pollution from new development.

Assessment of likely significant effects

Under criterion 8 of the assessment in the table above, it was concluded that the Neighbourhood Plan may have a significant effect on the environment depending on the proposals within it and that a case by case assessment was required. The criteria for undertaking such an assessment are drawn from Article 3.5 of the SEA Directive and set out in Section 3 of this report.

5. Conclusion

The Screening Report for Consultation prepared by Navigus Planning considered that there could be significant environmental effects arising either individually or cumulatively from the draft Stradbroke Neighbourhood Plan policies. The reasons for reaching this opinion included:

- The location of proposed site allocations could have an impact on various environmental matters including:
 - County Wildlife Sites
 - Priority habitats
 - Protected species
 - o Best and most versatile agricultural land (Grade 3a)
 - Surface water flooding
 - Heritage assets, including the Conservation Area, listed buildings and HER designations.
- Certain policies in the draft Neighbourhood Plan addressing design (Policies STRAD2 and STRAD11) and landscaping (Policy STRAD2) could have an impact on the Plateau Clayland landscape

Any development proposal that would be likely to have a significant effect on a European site, either alone or in combination with other plans or projects, will be subject to assessment at the project application stage.

As such, it concluded that under Regulation 9(1) of the Environmental Assessment of Plans and Programmes Regulations 2004, the Stradbroke Neighbourhood Plan does require an SEA to be undertaken because it could have significant environmental effects. Consultation on the screening report was carried out with Natural England, Historic England and the Environment Agency. One response was received, from Historic England, who advised that:

"Given the likely significant effects (both positive and negative) upon the historic environment, Historic England hence concurs with the Screening Report's view that a Strategic Environmental Assessment will be required."

A copy of the response from Historic England is attached at Appendix 1.

6. Determination

In the light of the Screening Report for Consultation prepared by Navigus Planning and the response from Historic England it is determined that the Stradbroke Neighbourhood Plan requires a Strategic Environmental Assessment in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004.

Appendix



Historic England

EAST OF ENGLAND OFFICE

Miss Odile Wladon Stradbroke Parish Council Direct Dial: 01223 582746

Our ref: PL00285450



9 February 2018

Dear Miss Wladon

Thank you for your correspondence of 15th January 2018 regarding the above consultation. As the Government's adviser on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local planning process. Therefore we welcome this opportunity to review the Strategic Environmental Assessment (SEA) Screening Report prepared by Navigus Planning for Stradbroke's Neighbourhood Plan. For the purposes of this consultation, Historic England will confine its advice to the question, "Is it (the neighbourhood plan) likely to have a significant effect on the historic environment?" Our comments are based on the information supplied with the Screening Opinion.

The supporting information (screening statement) supplied with the consultation indicates that within the plan area there is a range of designated historic environment assets within the neighbourhood plan area. There is also likely to be other features of local historic, architectural or archaeological value, and consideration should also be given to the wider historic rural landscape of Stradbroke Parish. It is also noted that the neighbourhood plan intends to allocate five sites for residential development, for a total of c.260 dwellings. A number of these sites are within the Stradbroke Conservation Area and are adjacent to listed buildings.

Given the likely significant effects (both positive and negative) upon the historic environment, Historic England hence concurs with the Screening Report's view that a Strategic Environmental Assessment will be required.

I should be pleased if you can send a copy of the determination as required by REG 11 of the Environmental Assessment of Plans and Programmes Regulations 2004.

Historic England strongly advises that the conservation and archaeological staff of the relevant local authorities are closely involved throughout the preparation of the plan and its assessment. They are best placed to advise on; local historic environment issues and priorities, including access to data held in the Historic Environment Record (HER), how the allocation, policy or proposal can be tailored to minimise potential adverse impacts on the historic environment; the nature and design of any required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of heritage assets.

Yours sincerely,

Edward James Historic Places Advisor, East of England Edward.James@HistoricEngland.org.uk





Stradbroke Neighbourhood Plan

Habitats Regulations Screening Determination

March 2018

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STRADBROKE NEIGHBOURHOOD PLAN

HABITATS REGULATIONS DETERMINATION 2018

1. Introduction

It is a requirement of European law that a plan or project is subject to an assessment to determine whether it will significantly affect the integrity of any European Site, in terms of impacting on the site's conservation objectives.

Submitted neighbourhood plans need to be accompanied by a statement explain how the proposed plan meets the "basic conditions" set out in Schedule 4B of the 1990 Town and Country Planning Act. These basic conditions include a requirement to demonstrate how the Plan is compatible with EU obligations, which includes the need to undertake a HRA. This is one of the matters that will be tested as part of the independent examination of the Plan.

Whether a neighbourhood plan requires a habitats regulation assessment and the level of detail needed will depend on what is proposed in the draft Neighbourhood Plan and the potential impacts on European sites designated for their nature conservation interest

This report therefore determines whether a Habitats Regulations Assessment (HRA) under Directive 92/43/EEC, also known as the Habitats Directive¹, is required for the Debenham Neighbourhood Plan.

This determination refers to:

- A Screening Report for Consultation prepared on behalf of Stradbroke Parish Council by Navigus Planning, which can be viewed at: www.midsuffolk.gov.uk/StradbrokeNP
- The responses to this from the statutory consultees (See Appendix).

This assessment relates to the Draft Stradbroke Neighbourhood Plan P 2016 - 2036 Presubmission consultation.

2. Legislative Background

HRA is the a two-stage process to consider whether a proposed development plan or programme is likely to have significant effects on a European site designated for its nature conservation interest. Firstly, plans or programmes must be screened to determine if they are likely to have a significant effect (and are not plans connected to the management of the European site(s) in question). If it cannot be demonstrated during at the screening stage that the plan or programme will not have significant effects of the European site(s), an 'Appropriate Assessment' (AA) must then be undertaken, which is a much more detailed study of the effects of the plan or programme. The two parts together form a full HRA.

¹ Directive 92/43/EEC 'on the conservation of natural habitats and of wild fauna and flora': <u>http://eur-lex.europa.eu/legal-</u> <u>content/EN/TXT/?uri=CELEX:31992L0043</u>.

Stradbroke NP HRA Screening Determination (Mar 18)

3. Assessment

In determining whether a proposed development plan or programme is likely to have significant effects, the local authority must incorporate the 'precautionary principle' into its decision. This means that if there is uncertainty as to whether the plan or programme would cause significant effects on a European site, the full AA would be required.

The purpose of the Stradbroke Neighbourhood Plan is to provide for the sustainable development of Stradbroke to make it a key service centre village for residents and surrounding villages. To do this, it seeks to phase the provision of good quality housing, educational facilities, business and local retail opportunities through a set of place and people-focused objectives.

There are a number of European Sites within the wider Suffolk area. These are listed below:

 Special Areas of Conservation (SACs) The Broads Benacre to Easton Bavents Lagoons Dews Ponds Minsmere to Walberswick Heaths and Marshes Alde-Ore and Butley Estuaries Staverton Park and The Thicks, Wantisden Orford Ness-Shingle Street Waveney and Little Ouse Valley Fens Rex Graham Reserve Norfolk Valley Fens 	 Special Protection Areas (SPAs): Breckland Broadland Benacre to Easton Bavents Sandlings Stour and Orwell Estuaries 	 RAMSAR sites: Broadland Minsmere-Walberswick Alde-Ore Estuary Deben Estuary Stour and Orwell Estuaries Redgrave and South Lopham Fens Chippenham Fen
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These are shown in Figure 3.

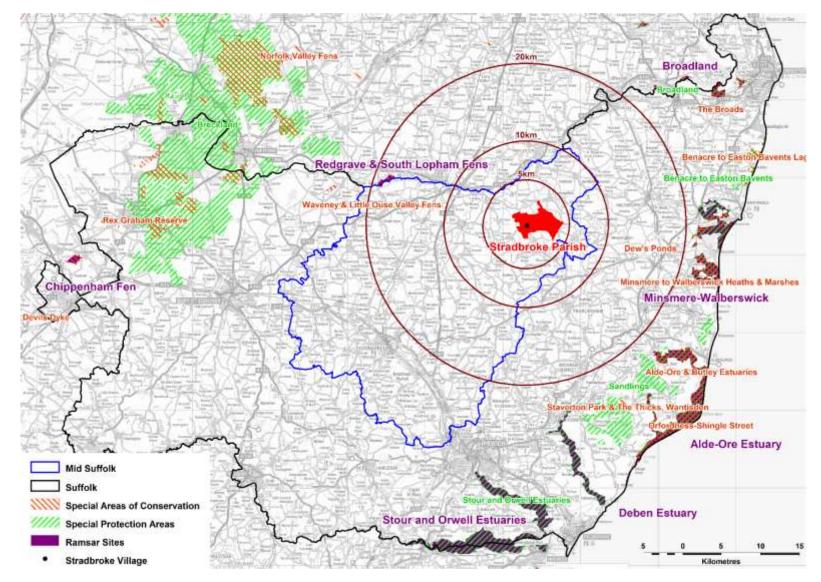


Figure 3: Location of the Stradbroke Neighbourhood Area within a 5km, 10km and 20km radius of SACs and SPAs

[Source: Stradbroke NP HRA Screening Report, Navigus Planning]

Of these European sites, none are within 10km of Stradbroke village where the growth proposed in the Neighbourhood Plan is to be located. The following sites are within 20km:

- Special Areas of Conservation (SACs)
 - Dews Ponds
 - Waveney and Little Ouse Valley Fens
- RAMSAR sites:
 - Redgrave and South Lopham Fens

The Stradbroke Neighbourhood Plan focuses, amongst other things, on shaping development, and protecting, maintaining and enhancing existing green space assets. Design principles (Policy STRAD2) ensure that development minimises its impact on the open countryside and environmental features through effective landscaping and seeking to minimise the loss of hedgerows.

Policies that seek to positively address the environmental aspects of sustainable development – specifically, local green spaces (Policy STRAD10) and light pollution (Policy STRAD12) – are likely to serve to have a positive effect on the wider environment, although the European sites are at a distance where such effects will not be felt. The scale of growth likely in the Neighbourhood Area is such that any effects are likely to be localised but not significant.

The Neighbourhood Plan is unlikely to have any significant effect on the identified network of protected sites.

In-combination effects

Existing plans and proposals must be considered when assessing new plans or programmes for likely significant effects as they may create 'in combination' effects.

A Habitat Regulations Assessment Screening Report was carried out as part of the Mid Suffolk Core Strategy and published in 2011. This report concludes that the Mid Suffolk Core Strategy is unlikely to have an adverse impact on any of the identified sites within approximately 20km of the boundary of the District.

Mid Suffolk District Council is committed to the implementation of a series of measures to ensure that the Core Strategy policies will not have a significant effect on the European sites. These measures include:

- Protecting the environment from unsafe or unhealthy pollutants (see Policy CS4);
- Protecting the districts natural capital and applying an ecological network approach (see Policy CS4);
- Protecting, managing and enhancing the network of designated sites and ecological networks (see Policy CS5);
- Monitoring Programme. Reporting on this monitoring plan will be tied in with the annual monitoring programme described in Section 4 of the Core Strategy; and

 Planned Mitigation Measures. If during the monitoring programme it is found that recreational pressure is increasing, this will trigger the requirement to consider whether additional mitigation is required.

None of the sites above fall within the district. The Core Strategy HRA (see page 20) found that the policies in the Core Strategy, Core Strategy Focused Review and Stowmarket Area Action Plan (AAP) are unlikely to have significant effects on the European sites. This was due to:

- The distance of the European Sites away from the district boundary;
- The nature of the proposed policies themselves.

The Stradbroke Neighbourhood Plan is a lower level plan than the Core Strategy and focuses, amongst other things, on shaping development, protecting, maintaining and enhancing existing green space assets. Whilst the Neighbourhood Plan proposes to allocate specific residential development sites, it ensures that these are in general conformity with the District Council's Core Strategy. These development sites are being allocated to ensure that the District Council meets its housing requirements which are being established through the emerging Babergh and Mid Suffolk Joint Local Plan. Any development proposal that would be likely to have a significant effect on a European site, either alone or in combination with other plans or projects, will be subject to assessment at the project application stage.

The Mid Suffolk Core Strategy HRA screening report concluded that the Core Strategy would not lead to significant adverse effects. It is therefore concluded that no significant incombination effects are likely to occur due to the implementation of the Stradbroke Neighbourhood Plan.

4. Screening Conclusions

The screening assessment which was been undertaken concluded that no likely significant effects in respect of the European sites within 20km of Mid Suffolk district will occur as a result of the implementation of the Stradbroke Neighbourhood Plan. As such, the Neighbourhood plan does not require a full HRA to be undertaken. Natural England, Historic England and the Environment Agency were consulted on the report. One response was received from Historic England, who had no comment to make on the habitats regulation screening. A copy of this response is attached at Appendix 1.

The Screening Report and subsequent screening opinion may need to be reviewed if significant changes are made to the Neighbourhood Plan prior to the Submission Stage (Regulation 16).

5. Determination

In the light of the Screening Report for Consultation prepared by Navigus Planning and the response of Historic England it is determined that the Stradbroke Neighbourhood Plan does not require a habitat regulations assessment.

Appendix



Historic England

EAST OF ENGLAND OFFICE

Miss Odile Wladon Stradbroke Parish Council Direct Dial: 01223 582746

Our ref: PL00285450



9 February 2018

Dear Miss Wladon

Thank you for your correspondence of 15th January 2018 regarding the above consultation. As the Government's adviser on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local planning process. Therefore we welcome this opportunity to review the Strategic Environmental Assessment (SEA) Screening Report prepared by Navigus Planning for Stradbroke's Neighbourhood Plan. For the purposes of this consultation, Historic England will confine its advice to the question, "Is it (the neighbourhood plan) likely to have a significant effect on the historic environment?" Our comments are based on the information supplied with the Screening Opinion.

The supporting information (screening statement) supplied with the consultation indicates that within the plan area there is a range of designated historic environment assets within the neighbourhood plan area. There is also likely to be other features of local historic, architectural or archaeological value, and consideration should also be given to the wider historic rural landscape of Stradbroke Parish. It is also noted that the neighbourhood plan intends to allocate five sites for residential development, for a total of c.260 dwellings. A number of these sites are within the Stradbroke Conservation Area and are adjacent to listed buildings.

Given the likely significant effects (both positive and negative) upon the historic environment, Historic England hence concurs with the Screening Report's view that a Strategic Environmental Assessment will be required.

I should be pleased if you can send a copy of the determination as required by REG 11 of the Environmental Assessment of Plans and Programmes Regulations 2004.

Historic England strongly advises that the conservation and archaeological staff of the relevant local authorities are closely involved throughout the preparation of the plan and its assessment. They are best placed to advise on; local historic environment issues and priorities, including access to data held in the Historic Environment Record (HER), how the allocation, policy or proposal can be tailored to minimise potential adverse impacts on the historic environment; the nature and design of any required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of heritage assets.

Yours sincerely,

Edward James Historic Places Advisor, East of England Edward.James@HistoricEngland.org.uk



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Our ref: PL00285450

9 February 2018

Dear Miss Wladon

Thank you for your correspondence of 15th January 2018 regarding the above consultation. As the Government's adviser on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local planning process. Therefore we welcome this opportunity to review the Strategic Environmental Assessment (SEA) Screening Report prepared by Navigus Planning for Stradbroke's Neighbourhood Plan. For the purposes of this consultation, Historic England will confine its advice to the question, "Is it (the neighbourhood plan) likely to have a significant effect on the historic environment?". Our comments are based on the information supplied with the Screening Opinion.

The supporting information (screening statement) supplied with the consultation indicates that within the plan area there is a range of designated historic environment assets within the neighbourhood plan area. There is also likely to be other features of local historic, architectural or archaeological value, and consideration should also be given to the wider historic rural landscape of Stradbroke Parish. It is also noted that the neighbourhood plan intends to allocate five sites for residential development, for a total of c.260 dwellings. A number of these sites are within the Stradbroke Conservation Area and are adjacent to listed buildings.

Given the likely significant effects (both positive and negative) upon the historic environment, Historic England hence concurs with the Screening Report's view that a Strategic Environmental Assessment will be required.

I should be pleased if you can send a copy of the determination as required by REG 11 of the Environmental Assessment of Plans and Programmes Regulations 2004.

Historic England strongly advises that the conservation and archaeological staff of the relevant local authorities are closely involved throughout the preparation of the plan and its assessment. They are best placed to advise on; local historic environment issues and priorities, including access to data held in the Historic Environment Record (HER), how the allocation, policy or proposal can be tailored to minimise potential



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adverse impacts on the historic environment; the nature and design of any required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of heritage assets.

Yours sincerely,

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Our ref: PL00285450

29 March 2018

Dear Miss Wladon

Ref: Scoping Opinion Stradbroke SEA

Thank you for your email requesting a scoping/screening opinion for the Stradbroke Neighbourhood Plan Sustainability Appraisal. As the Government's adviser on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local and neighbourhood planning process. Therefore we welcome this opportunity to review this Scoping Report.

We would refer you to the guidance in Historic England Advice Note 8: *Sustainability Appraisal and Strategic Environmental Assessment,* which can be found here: ">https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/>">https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/>">https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/>">https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/>">https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/>">https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/>">https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/>"/>

This advice sets out the historic environment factors which need to be considered during the Strategic Environmental Assessment or Sustainability Appraisal process, and our recommendations for information you may need to include.

We are pleased to note the consideration of the historic environment in Section 3 of the Scoping Report, and consider that the maps provided are helpful. However, although it is difficult to disagree with paragraph 3.24, we suggest that this could be fleshed out to briefly identify the particular qualities that contribute to the parish and village's character and appearance. We would refer you to Stradbroke's Conservation Area Appraisal, which may be of use in providing this information: <<u>http://www.babergh.gov.uk/assets/Conservation-Area-Appraisals/Stradbroke2011CAA.pdf></u>

If you have any further questions, please contact the Historic Places Team who can be reached on 01223 582749.

Yours sincerely,



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Stradbroke Parish Council Mill Hill House Church Lane Wickham Skeith Eye IP23 8NA Our ref: Your ref: AE/2018/122571/01-L01

Date: 26 March 2018

Dear Odile Wladon

STRADBROKE NEIGHBOURHOOD PLAN - SEA SCOPING

Thank you for consulting us on the scoping draft report. We consider that the assessment would be improved if the following issues are addressed:

The "Water" section in Chapter 3 should cite the "Anglian River basin management plans: 2015" as baseline data and a description of the sustainability issues for the local river network - <u>https://www.gov.uk/government/collections/river-basin-management-plans-2015#anglian-river-basin-district-rbmp:-2015</u>

Development that would affect the tributary of the River Waveney in the north and the Chickering Beck to the west should not cause deterioration in classification (e.g. a quality element should not fall from High to Good).

Further information concerning sewage disposal and treatment which is key in this regard was given in our response to the draft plan. This evidence set can also be used to support a policy regarding private treatment plants consistent with MSDC policy SC3.

The Soil and Geology section could also reference our maps for Nitrate Vulnerable Zones caused by diffuse pollution from agriculture.

Yours sincerely

Mr GRAHAM STEEL Sustainable Places - Planning Advisor

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