



Lavenham Neighbourhood Plan

Strategic Environmental Assessment and Habitats Regulation Assessment Screening Determination

Statement of reasons for Babergh District Council's
determination

February 2015

**Neighbourhood Planning
Strategic Environmental Assessment Screening Report**

Contents

1. Introduction	2
2. Legislative Background	2
3. Criteria for Assessing the Effects of Supplementary Planning Documents	3
4. Assessment	5
5. Screening Outcome	10
6. Appendix 1	11

Neighbourhood Planning Strategic Environmental Assessment Screening Report

1. Introduction

- 1.1 This screening report is designed to determine whether or not the content of the Lavenham Neighbourhood Plan requires a Strategic Environmental Assessment (SEA) in accordance with the European Directive 2001/42/EC and associated Environmental Assessment of Plans and Programmes Regulations 2004.
- 1.2 The purpose of the Lavenham Neighbourhood Plan is to provide for the sustainable development of Lavenham through the achievement of a better balanced community. It seeks to do this by providing appropriately sized homes with an expectation that these will be provided in smaller developments to enable easier integration within the community and a greater ability for the local infrastructure to adapt to changes. The neighbourhood plan covers a 20-year period from 2015 to 2035, and sets a minimum number of 100 new houses to be largely delivered on land abutting the village.
- 1.3 The legislative background set out below outlines the regulations that require the need for this screening exercise. This report has been sent to the three statutory consultees of the Environment Agency, English Heritage and Natural England to elicit their views on its contents. The results of this consultation are included in Appendix 2 and this screening determination has been issued indicating the outcome of the screening stage.

2. Legislative Background

- 2.1 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.
- 2.2 In accordance with Regulation 9 of the SEA Regulations 2004, Lavenham Parish Council (the qualifying body) has requested Babergh District Council (BDC), as the responsible authority, to consider whether an environmental assessment of the emerging Lavenham Neighbourhood Plan is required due to significant environmental effects. In making this determination, the District Council has had regard to Schedule 1 of the Regulations. The draft Neighbourhood Plan has not yet reached the pre-submission stage but it is at an advanced stage and has been made available for consultation previously. Therefore as per paragraph 029 of the 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. BDC are therefore consulting the statutory consultees (English Heritage/Natural England/Environment Agency) on whether an environmental assessment is required.

Neighbourhood Planning Strategic Environmental Assessment Screening Report

2.3 A SEA alone can be required in some limited situations where a sustainability appraisal is not needed, and Neighbourhood Planning is one of these situations. Sustainability Appraisals 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 the Planning Practice Guidance states that there is no legal requirement for a neighbourhood plan to have 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 how its plan or order will contribute to achieving sustainable development.

2.4 This report details the assessment of the Lavenham Neighbourhood Plan against the need for an SEA to be produced to accompany the Plan. It concludes that an SEA is not required to accompany the Lavenham Neighbourhood Plan. Supporting information is provided in Appendix 1.

Neighbourhood Planning Strategic Environmental Assessment Screening Report

3. Criteria for Assessing the Effects of Supplementary Planning Documents

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

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

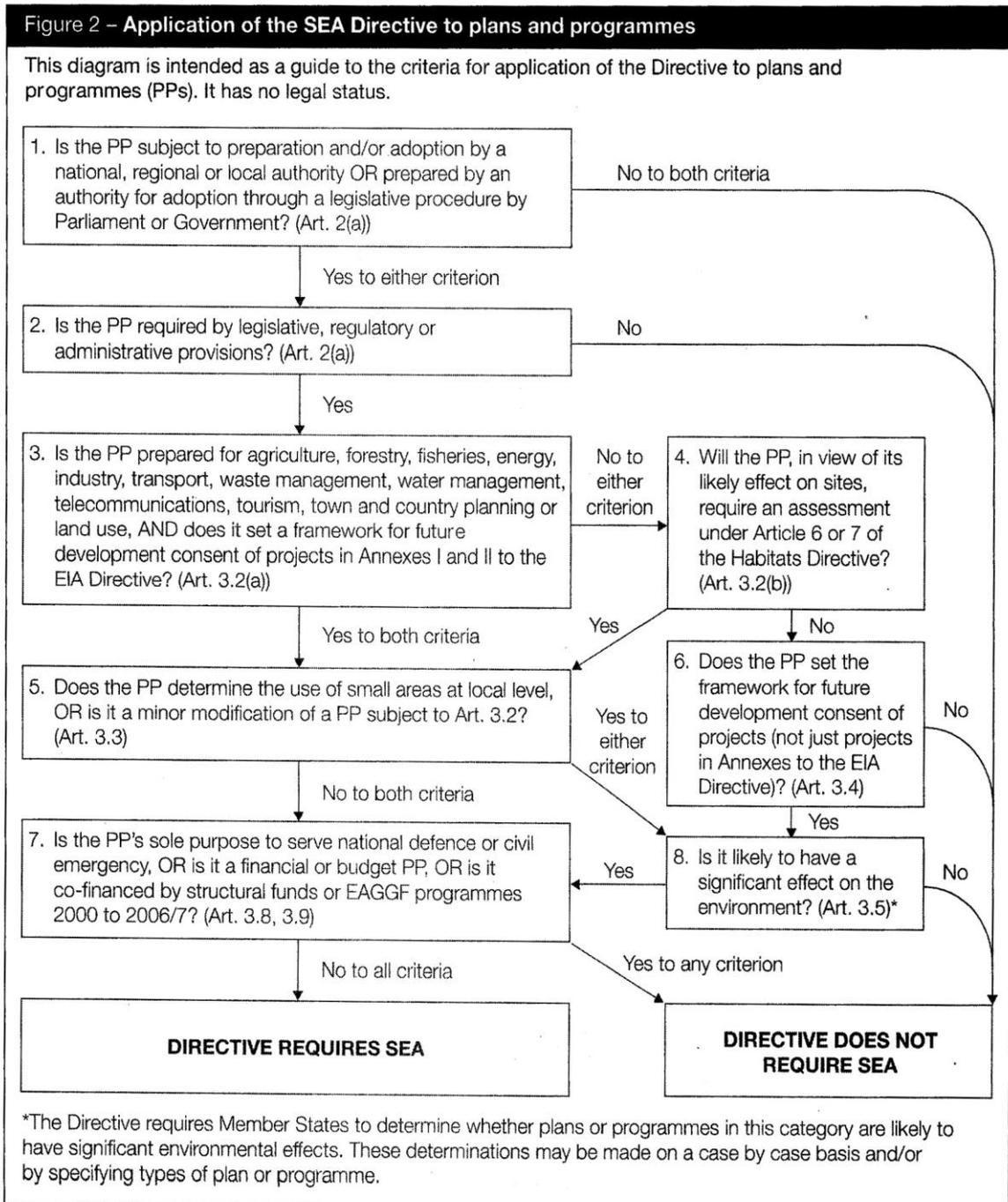
- the probability, duration, frequency and reversibility of the effects,
- the cumulative nature of the effects,
- the trans-boundary nature of the effects,
- the risks to human health or the environment (e.g. due to accidents),
- the magnitude and spatial extent of the effects (geographical area and 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

Neighbourhood Planning Strategic Environmental Assessment Screening Report

4. Assessment

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



Neighbourhood Planning Strategic Environmental Assessment Screening Report

4.2 The table below shows the assessment of 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.

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 NP is allowed under The Town and Country Planning Act 1990 as amended by the Localism Act 2011. The NP is being prepared by Lavenham Parish Council (as the "relevant body") and will be "made" by Babergh District Council as the local authority subject to passing an independent examination and community referendum. The preparation of NPs is subject to the following regulations: The Neighbourhood Planning (General) Regulations 2012 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 if "made", form part of the statutory Development Plan for the District. It is therefore important that the screening process considers whether it is likely to have significant environmental effects and hence whether 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))	N	The Neighbourhood Plan does not set the framework for future development consent of projects in Annexes I and II to the EIA Directive. Lavenham has been identified as a 'Core village' under the Babergh Core Strategy (2014). Core Villages will act as a focus for development within their functional cluster and, where appropriate, site allocations to meet housing and employment needs will be made in the Site Allocations document. This process for these site allocations has evolved in the Babergh Core Strategy with a policy that enables residential development to be approved (subject to meeting the policy criteria) on greenfield sites which are well related to Core or Hinterland villages. The Neighbourhood Plan does not allocate sites, but focuses on shaping how development comes forward under this Babergh Core Strategy policy CS11 and CS 15. The draft neighbourhood plan identifies a minimum number of 100 new homes over the plan period, which is a refinement of Babergh Core Strategy policy CS2 which proposes minimum of 1,050 over the Core and Hinterland Villages across the district. Development will be approved where proposals score positively against matters in the higher level plan; the Babergh Local Plan (2011-2031) Core Strategy and Policies. There is an aspiration to relocate the primary school and redevelop the site, however no site has been identified and finances are not confirmed. The Parish Council and Suffolk County Council are content with this aspiration. The Neighbourhood Plan does include a site for a Community Land Trust but this is a

**Neighbourhood Planning
Strategic Environmental Assessment Screening Report**

		<p>separate issue and does not rely on the neighbourhood plan for its deliverability.</p>
<p>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))</p>	<p>N</p>	<p>The NP is unlikely to have a substantial effect on the identified network of protected sites. A Habitat Regulations Assessment Screening Report was carried out as part of the Babergh Local Plan (2011-2031) Core Strategy and Policies. This report concludes that the Babergh Core Strategy alone, or in combination with other plans, is unlikely to have an adverse impact on any of the identified sites within approximately 20km of the boundary of the district.</p> <p>There are 21 European sites within 20 km of Babergh District (see appendix 1 for location of sites in relation to Lavenham Parish, description of sites and their distances to Lavenham). Some areas are covered by more than one designation. These are listed below:</p> <ul style="list-style-type: none"> • Blackwater Estuary SPA and Ramsar site; • Staverton Park and the Thicks, Wantisden SAC; • Stour and Orwell Estuaries SPA and Ramsar site; • Deben Estuary SPA and Ramsar site; • Sandlings SPA; • Hamford Water SPA and Ramsar site; • Breckland SAC and SPA; • Abberton Reservoir SPA and Ramsar site; • Colne Estuary SPA and Ramsar site; • Essex Estuaries SAC; • Orfordness- Shingle Street SAC; • Alde-Ore Estuary SPA and Ramsar site; and • Alde, Ore and Butley Estuaries SAC. • Redgrave & South Lopham Fens Ramsar site <p>Babergh District Council committed to the implementation of a series of measures to ensure that the Core Strategy policies will not have a likely significant effect on the European sites. These measures included:</p> <ol style="list-style-type: none"> 1. Reducing/ preventing an increase in recreational demand on the estuaries (from the resident population) (see Policies CS13 and CS14); 2. Monitoring Programme. Reporting on this monitoring plan will be tied in with the annual monitoring programme described under Policy CS22; and 3. Planned Mitigation Measures - if during the monitoring programme it is found that recreational pressure is increasing, then this will trigger the requirement to consider whether additional mitigation is required. <p>Amongst the sites above, only the Stour and Orwell Estuaries SPA / Ramsar Site fall within the district (with</p>

**Neighbourhood Planning
Strategic Environmental Assessment Screening Report**

		<p>the European sites forming the eastern edge of Babergh District). The remainder of the European sites fall within 20 km of the District. The Core Strategy HRA screening report (see page 39) and Sustainability Appraisal (see page 112 and 175) found that the policies and site allocations in the emerging Local Plan are unlikely to have significant effects on the European sites. This was due to:</p> <ul style="list-style-type: none"> • The distance of the European Sites away from the district boundary ; • The rural nature of the district and good access to the countryside within the district itself; • The accessibility of the countryside (including its availability) meant that the new development proposed in the Local Plan is unlikely to have a negative impact; • The nature of the proposed policies themselves. <p>The HRA and Sustainability Appraisal report does note, however, that in order to reduce the likelihood of increased development within the district having an impact on the European Sites, Local Plan policies should seek to avoid the loss of recreational open space within the District, encourage sufficient access to existing open spaces, and make provision for new space within or nearby allocated residential sites. The Neighbourhood Plan complements this approach by seeking to protect and maintain and improve the existing network of accessible open spaces within the neighbourhood plan area.</p> <p>The HRA screening report and Sustainability Appraisal concluded that the Core Strategy would not lead to significant adverse effects. . The Lavenham Neighbourhood Plan is a lower level plan than the Core Strategy and focuses, amongst other things, on shaping development, protecting, maintaining and enhancing existing open space assets. The Sustainability Appraisal did recommend that policies be considered in the submission Core Strategy, Site Specific Allocations and Development Management DPDs that would mitigate the predicted effects against the environmental objectives. The Neighbourhood Plan itself does not propose specific residential development sites, but instead provides further local criteria for developers to meet which is in harmony with the BDC Core Strategy ambitions. Similarly to developments that are currently being proposed under the Core Strategy, 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. It therefore follows that a full SEA is not deemed to be required for the Lavenham Neighbourhood Plan.</p>
5. Does the Neighbourhood Plan determine the use of small areas at local level, OR is it a minor modification of a PP	N	Not site specific, but provides guidance on how areas should shaped during the plan period.

Neighbourhood Planning Strategic Environmental Assessment Screening Report

subject to Art. 3.2? (Art. 3.3)		
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 Babergh District Council 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)	N	
8. Is it likely to have a significant effect on the environment? (Art. 3.5)	N	<p>The environmental designations have been identified further in the Lavenham Baseline information which includes maps, distances and vulnerability (see appendix 1 for summary). Whilst it is inevitable that the level of development coming forward in the neighbourhood plan area will have some impact on the environment, it is the BDC Core Strategy itself which provides the planning framework for the actual level of growth and a full SEA has been undertaken on Core Strategy (2014) as part of the Sustainability Appraisal.</p> <p>The Lavenham NP focuses on shaping how development comes forward and the proposed minimum growth distribution is contained within the District Council's Core Strategy.</p>

Table 1

Habitats Regulations Assessment

- 4.4 In addition to the screening of Neighbourhood Plans in relation to SEA, there is a need to assess the likelihood of proposals within a Plan having an adverse impact on internationally designated wildlife sites. This Habitats Regulations Assessment (HRA) is required by the European Habitats Directive.
- 4.5 A Habitats Regulations Assessment may be required depending on the contents of the Neighbourhood Plan and the potential impact of the Plan on internationally designated wildlife sites within a reasonable distance from the Neighbourhood Plan area. For the purposes of assessment this will be taken to be sites within 20km of the Neighbourhood Area. As such, a case by case assessment of Neighbourhood Plans will need to be undertaken to see if a full HRA is required.
- 4.6 The approach to assessing the potential impact of a Neighbourhood Plan on an internationally designated wildlife site, and hence the need for an HRA include consideration of the reasons for designation and conservation objectives for each site. The key environmental conditions that support the site are assessed against the proposals within the Plan.

Neighbourhood Planning Strategic Environmental Assessment Screening Report

5. Screening Outcome

5.1 As a result of the assessment in section 4, it is unlikely there will be any significant environmental effects arising from the draft Neighbourhood Plan that were not covered in the [Sustainability Appraisal](#) (including 2013 [update](#)) of the Babergh Core Strategy. 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.

5.2 As such, the Lavenham Neighbourhood Plan does not require a full SEA to be undertaken. The outcome of this screening opinion will be subject to review by Natural England, English Heritage and Environment Agency. The screening opinion will also need to be reviewed if changes are made to the Neighbourhood Plan.

6. Conclusion

6.1 The scoping opinion was consulted between the period 19 January 2015 and 9 February 2015. Following consultation with the Statutory Consultees, the conclusion on the basis of the SEA Screening Assessment set out in Table 1 above, is that the Lavenham Neighbourhood Plan will not have significant effects in relation to any of the criteria set out in Schedule 1 of the SEA Regulations, and therefore does not need to be subject to a SEA report.

6.2 Should the Neighbourhood Plan policies and proposals change significantly as the plan enters the pre-submission stage, a review of this screening opinion will be requested from the statutory consultees. This is raised in the 6th paragraph in the English Heritage response who will provide further advice on later stages of the process if required. The three statutory consultees will be involved and kept up-to-date with the plan's progress to alleviate any concerns.

6.3 There are no internationally designated wildlife sites within the Neighbourhood Area or within 20km of it. The Lavenham Neighbourhood Plan will not, therefore, have an adverse effect on the integrity of internationally designated sites either on its own or in combination with other plans and does not need to be subject to a Habitats Regulations Assessment.

Neighbourhood Planning Strategic Environmental Assessment Screening Report

Appendices

Appendix 1

Nature conservation information obtained from the Lavenham Baseline Information.
Refer to map 1.1 and map 1.2 for designation locations.

Statutory designations¹

Local Nature Reserves

[Lavenham Walk](#) is a 2 mile long ex railway line. The wildlife habitat is particularly important for chalk grassland and butterflies, and forms an important semi-natural habitat in an otherwise farmed landscape. Part of the site between Bridge Street and Lineage Wood forms part of the Lineage Wood Site of Special Scientific Interest (SSSI). The remainder of the site is a [County Wildlife Site](#). The whole site forms a popular walk on the edge of Lavenham.

Site of Special Scientific Interest

Sites of Special Scientific Interest (SSSI) are important as they support plants and animals that find it difficult to survive elsewhere in the countryside, and they represent the country's best wildlife and geological sites. SSSI are legally protected under the Wildlife and Countryside Act 1981.

[Lineage wood & railway track](#) SSSI: Lineage Wood (formerly known as Lavenham and Acton Woods and Old RailwayTrack) is one of the largest (59 ha.) remaining ancient woods in west Suffolk. Despite coniferization, the wood has retained a good system of floristically rich unimproved neutral grassland rides. Small remnants of the original wet Ash Fraxinus excelsior – Wych Elm Ulmus minor, Lineage elm variant, are found in nearby Hawks Grove and alongside the disused railway track unimproved calcareous grassland is also found on chalky boulder clay of the railway track.

Environmental Sensitive Areas (Suffolk River Valleys)

Environmentally Sensitive Areas (ESA) are one of a range of agri-environment schemes operating under the England Rural Development Programme. Incentives are offered to farmers to adopt agricultural practices which will safeguard and enhance parts of the country of particularly high landscape, wildlife or historic value. The [ESA](#) has no planning status and therefore cannot be used as a reason for refusing planning applications.

¹ Designation relates to, or having the nature of, a statute (such as Wildlife and Countryside Act, 1981, or the National parks and Countryside Act, 1949). The National Planning policy Framework states for plan-making that Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless: specific policies in this Framework indicate development should be restricted. For example, those policies relating to sites protected under the Birds and Habitats Directives (see paragraph 119) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of

Outstanding Natural Beauty, Heritage Coast or within a National Park (or the Broads Authority); designated heritage assets; and locations at risk of flooding or coastal erosion.

[See circular 05/2006](#)

Neighbourhood Planning Strategic Environmental Assessment Screening Report

Countryside Project Area (Stour Valley)

The Countryside Project Area is a desired area set out by the Stour Valley and Dedham Vale AONB as an area of value but it does not have any Planning status and therefore cannot be used as a reason for refusing planning applications.

Special Protection Areas

A Special Protection Area (SPA) is the land classified under Directive 79/409 on the Conservation of Wild Birds. The nearest SPA, the Stour and Orwell Estuaries SPA (23km to the south east of Lavenham) contains an internationally important assemblage of birds. Qualifying species include; Avocet (breeding), Northern pintail *Anas acuta* (wintering), Dark-bellied Brent goose *Branta bernicla bernicla* (wintering), Red knot *Calidris canutus* (wintering), Black-tailed godwit (Icelandic) *Limosa limosa islandica* (wintering), Grey plover *Pluvialis squatarola* (wintering), and Redshank *Tringa totanus* (wintering and passage). The vulnerability of the SPA is affected by pressure for increased port development and marine recreation in this area including tourism.

Special Areas of Conservation

A Special Area of Conservation (SAC) is the land designated under Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora. The nearest, the Rex Graham Reserve SAC (26km to the north west of Lavenham), hosts the priority habitat type "orchid rich sites". This is a disused chalk pit with developing dry grassland characterised by false oat-grass *Arrhenatherum elatius*. The site has been selected as it supports the largest population of military orchid *Orchis militaris* in the UK, comprising more than 95% of the current total population.

Ramsar Sites

A Ramsar site is the land listed as a Wetland of International Importance under the Convention on Wetlands of International Importance Especially as Waterfowl Habitat (the Ramsar Convention) 1973. The nearest Ramsar (23km to the south east of Lavenham), the Stour and Orwell Estuaries Ramsar includes extensive mud-flats, low cliffs, saltmarsh and small areas of vegetated shingle on the lower reaches. The site supports important numbers of breeding Avocet *Recurvirostra avosetta*, while in winter they hold major concentrations of waterbirds, especially geese, ducks and waders. The geese also feed, and waders roost, in surrounding areas of agricultural land outside of the area. The vulnerability of the Ramsar is affected by natural coastal processes exacerbated by fixed sea defences, port development and maintenance dredging.

Area of Outstanding Natural Beauty (Dedham Vale)

Areas of Outstanding Natural Beauty are designated areas where protection is afforded to protect and manage the areas for visitors and local residents. The nearest AONB is the Dedham Vale AONB (10km south east of Lavenham). Much of East Anglia's traditional grasslands have already been drained and ploughed for arable farming, so the hedgerows

Neighbourhood Planning Strategic Environmental Assessment Screening Report

and wildflower meadows of the Dedham Vale AONB are among some of England's most precious and vulnerable pastoral landscapes.

Historic Environment

The quality of Lavenham's buildings is reflected in the majority of the High Street, Water Street and Market Place areas being listed grade II or II*.

All Listed buildings totalling 206 including;

- 13 Grade I (including the National Trust property Guildhall and twelve other high quality timber-framed buildings along with the Church of St Peter & St Paul)
- 13 Grade I
- 24 Grade II*
- 167 Grade II
- 3 Grade II listed features
- 2 Scheduled Ancient Monuments

The village has two Scheduled Monuments: the Medieval Market Cross on Market Place and in the field of industrial archaeology an iron gasholder off Water Street.

Non-statutory designations²

County Wildlife Sites

County Wildlife Sites (CWS) play a key role in the conservation of Suffolk's biodiversity. Suffolk has over 900 County Wildlife Sites, amounting to 19,200 hectares and covering 5% of the county. County Wildlife Site designation is non-statutory, but it recognises the high value of a site for wildlife. Many sites are of county, and often regional or national, importance. They are often designated because they support characteristic or threatened species or habitats included in Local or National Biodiversity Action Plans. CWSs have been identified throughout Suffolk and range from small meadows, green lanes, dykes and hedges through to much larger areas of ancient woodlands, heathland, greens, commons and marsh.

² Local designated sites (which include 'Local Wildlife Sites' and 'Local Geological Sites') make an important contribution to ecological networks and are overseen by Local Sites systems. These systems vary considerably in terms of size (both the administrative area they cover and the number of sites selected) and cover contrasting landscapes in coastal, rural and urban situations. Local Sites systems encompass both biodiversity and geological conservation. Natural England has published advice on the development and management of systems to identify locally designated sites. The NPPF states that local planning authorities should set criteria based policies against which proposals for any development on or affecting protected wildlife or geodiversity sites or landscape areas will be judged.

Local planning authorities should set criteria based policies against which proposals for any development on or affecting protected wildlife or geodiversity sites or landscape areas will be judged. Distinctions should be made between the hierarchy of international, national and locally designated sites so that protection is commensurate with their status and gives appropriate weight to their importance and the contribution that they make to wider ecological networks

Neighbourhood Planning Strategic Environmental Assessment Screening Report

Outside of statutorily protected designations (such as Sites of Special Scientific Interest, Local and National Nature Reserves), CWSs are one of the most important areas for wildlife in Suffolk. Suffolk Wildlife Trust (SWT) monitors planning applications for any potential impact on County Wildlife Sites.

Special Landscape Areas

The adopted Babergh Local Plan (2006) Saved Policies designates significant areas of the district's landscape as 'Special Landscape Areas', particularly the river valleys. Given the status of these as a local level designation and as an inherently site specific matter, it is not considered appropriate for these to be addressed within the Core Strategy and Policies document. Adopted and saved Local Plan Policy CR04 therefore remains extant at this point in time. A review of the SLA approach, including whether to retain this designation and if so, which areas should be covered, will be dealt with in the future production of Babergh's new local plan documents.

Areas of visual or recreational value

Babergh Local Plan (2006) - Important open spaces, and areas of visual or recreational value are identified in Villages in the context of the Built-Up Area Boundaries. These locations are referred to as Areas of Visual and/or Recreational Amenity (AVRA). Like the BUABs, AVRAs were introduced in the 1995 Supplementary Planning Guidance for villages in the District and were incorporated into the 2006 Local Plan. A review of the AVRAs, including whether to retain this designation and if so, which areas should be covered, will be dealt with in the future production of Babergh's new local plan documents.

Historic Environment

The Suffolk County Historic Environment Record lists about 50 archaeological features in the parish. The earliest of these is a Bronze Age arrowhead, whilst a number of ring ditches and enclosures known from cropmarks are probably also of this age. Representing the Iron Age there is but one 'stray find', however the Romans have left us more with a pavement, two coins and a metalwork scatter. Medieval remains are a little more tangible in the form of the Parish Church, the culvert below Water Street, a moated site to the north-west, a well and the site of a Deer Park along with some pottery and floor tiles.

The Lavenham Conservation Area Appraisal adopted as Supplementary Planning Guidance by Babergh District Council Strategy Committee 14 January 2010 has the following useful excerpts on building materials:

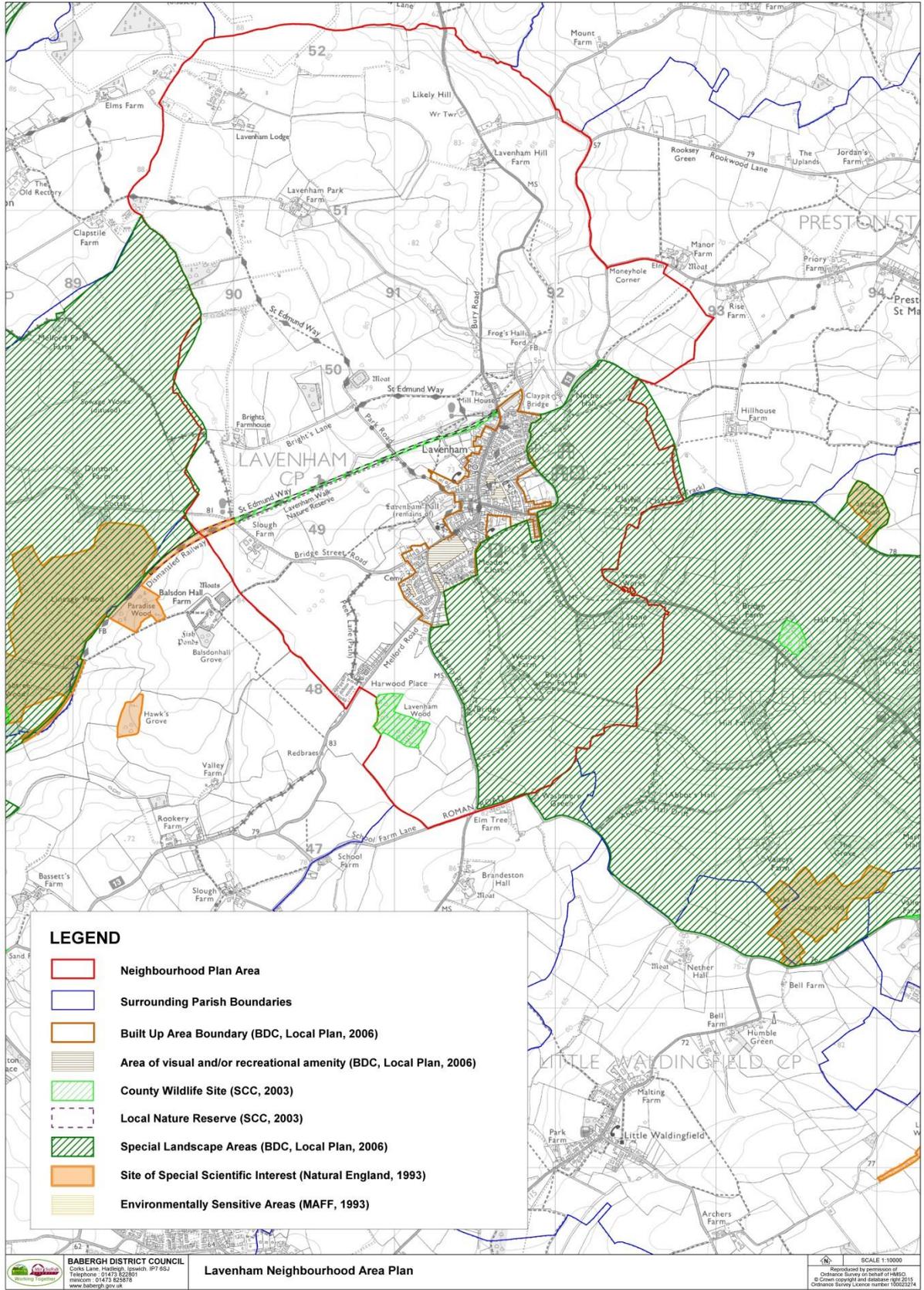
"The majority of buildings in the central area are of traditional construction. This is the Suffolk timber-framed vernacular of steep plaited roofs and gables, some with jetties, some rendered, many here with exposed straight framing designed to be seen. Timber-framing is better preserved concealed behind colour washed render, often with pargetting features, but here much was stripped off to expose the framing as became fashionable in the 19th Century. Whilst picturesque, this practice has consequences for the long term survival of these buildings and at some future time Lavenham is going to have to decide between

Neighbourhood Planning Strategic Environmental Assessment Screening Report

conserving the fabric of its buildings or continuing the visual effect they produce with exposed framing”.

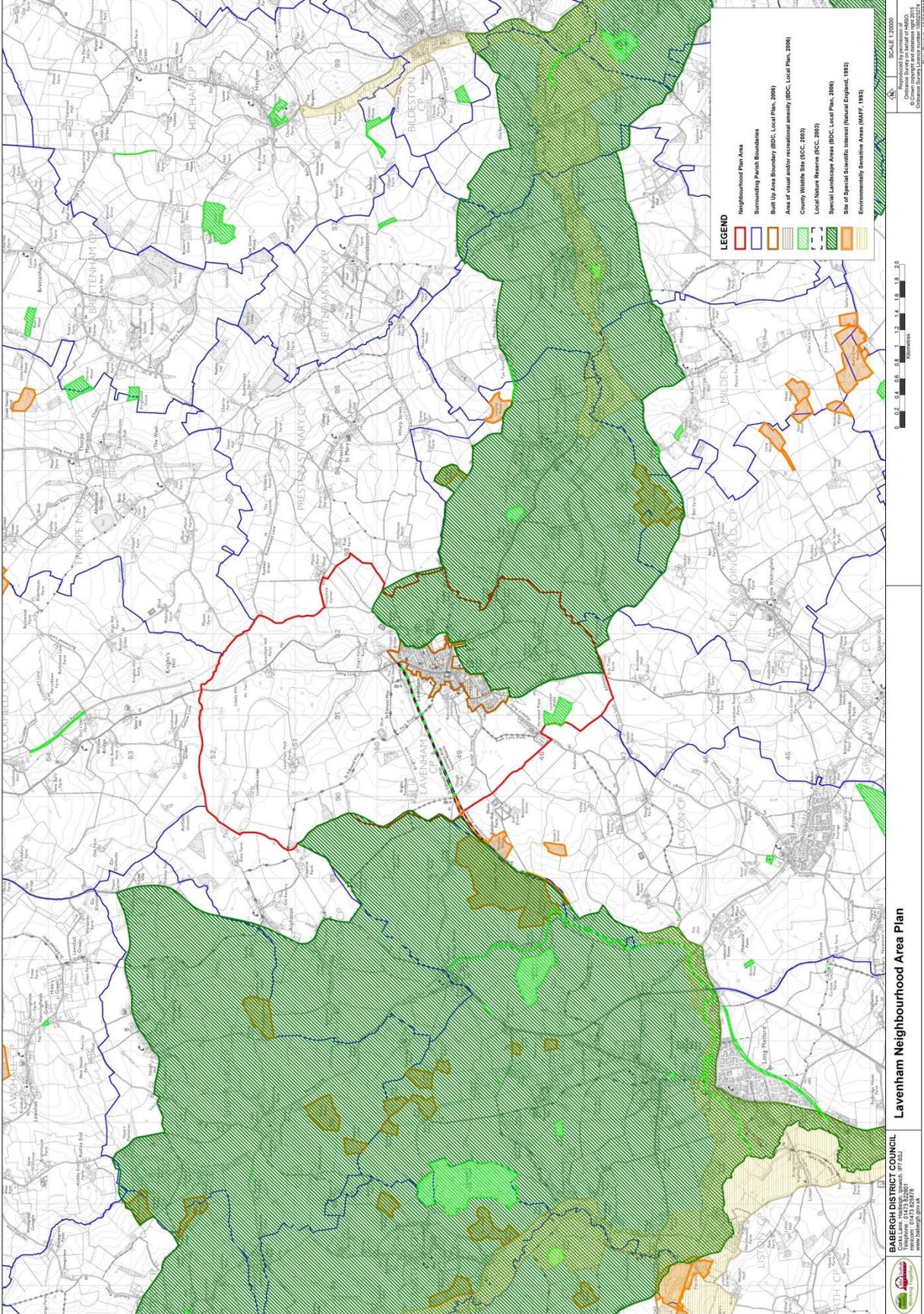
“The few newer buildings are mostly local brick Victorian terraced cottages for mill workers, variously Suffolk soft reds or whites, often rendered and painted to blend in with the colour-washed local vernacular. Other materials from Suffolk’s traditional palette can be found such as traditional weather-boarding and pantiles on outbuildings and flintwork as infill paneling on brick buildings. The Church is also constructed of flint with stone dressings and has a lead roof. Roof finishes correlate well with wall constructions, following a similar distribution. The majority of roofs are plaintiles, mostly on the older timberframed buildings, the rest generally slated, usually on the more recent brick buildings”.

Neighbourhood Planning Strategic Environmental Assessment Screening Report



Map 1.1

Neighbourhood Planning Strategic Environmental Assessment Screening Report



Neighbourhood Planning Strategic Environmental Assessment Screening Report

Appendix 2: SEA Consultation Responses

Responses to the consultation agreed with the conclusions of the above screening exercise. The responses from the three statutory bodies of Natural England, English Heritage and the Environment Agency are included below.

Neighbourhood Planning Strategic Environmental Assessment Screening Report



ENGLISH HERITAGE

EAST OF ENGLAND

Peter Freer
Enabling Officer – Community Led Planning
Babergh and Mid Suffolk District Councils

Our ref: HD/P 5377
Your ref:
Telephone 01223 582775

By email only

28 January 2015

Dear Mr Freer

Draft Lavenham Neighbourhood Plan
• **Strategic Environmental Assessment Screening Report**

Thank you for your letter dated 16 January 2015 and the enclosed Screening Report for the above plan. For the purposes of this consultation, English Heritage will confine its advice to the question, "Is it likely to have a significant effect on the environment?" in respect to our area of concern, cultural heritage. Our comments are based on the information supplied with the Screening Report as well as Revision 15 of the Lavenham Neighbourhood Plan (dated November 2014). It is for Babergh District Council to make the final decision in terms of whether SEA is required.

The Screening Report indicates that the Council considers that the Neighbourhood Plan will not significantly affect any 'special natural characteristics or cultural heritage' in the plan area. As a minor observation, it is unfortunate that Appendix 1 of the Screening Report only addresses natural environment and landscape designations, as it would have been helpful to include information on the historic environment.

It would appear that the Neighbourhood Plan focuses on shaping how development comes forward and will respond to policies and proposals in the Babergh Core Strategy / Local Plan rather than allocating land itself. We note that the draft neighbourhood plan allows for a minimum of 100 new homes but does not identify specific locations (although there would be at least five sites as the draft plan restricts proposals to no more than 24 homes). In the absence of specific locations, it is difficult to assess the precise environmental effect of this amount of housing, although it would seem likely that there would be some effect. We note the report's assertion that the Sustainability Appraisal process for the Babergh Core Strategy / Local Plan contains environmental assessment relevant to this neighbourhood plan, and we hope that sufficient assessment will be carried out at the appropriate point.

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www.english-heritage.org.uk

Please note that English Heritage operates an access to information policy.
Correspondence or information which you send us may therefore become publicly available



Neighbourhood Planning Strategic Environmental Assessment Screening Report

Notwithstanding the above, on the basis of the information supplied, and in the context of the criteria set out in Schedule 1 of the Environmental Assessment Regulations [Annex II of 'SEA' Directive], English Heritage concurs with the Council that the preparation of an SEA is not required for this plan

The views of other statutory consultation bodies should be taken into account before the overall decision on the need for an SEA is made. I would be pleased if you can send a copy of the determination as required by Regulation 11 of the Environmental Assessment of Plans and Programmes Regulations 2004.

We should like to stress that this opinion is based on the information provided by you with your letter dated 16 January as well as Revision 15 of the neighbourhood plan. To avoid any doubt, this does not reflect our obligation to provide further advice on later stages of the SA/SEA process and, potentially, object to specific proposals which may subsequently arise in the Neighbourhood Plan where we consider that, despite the absence of SA/SEA, these would have an adverse effect upon the historic environment.

As you may be aware, we have already provided comments on the emerging plan to the Lavenham Neighbourhood Plan Working Group in our letter dated 22 December 2014, and have met with representatives of the group. We regard the historic environment of Lavenham to be of considerable quality and importance and are keen to remain engaged in the neighbourhood plan process. We look forward to further consultations on the neighbourhood plan from both the working group and Babergh District Council.

If you have any queries regarding this letter, please let me know.

Yours sincerely



Tom Gilbert-Wooldridge
Principal Historic Environment Planning Adviser
E-mail: tom.gilbert-wooldridge@english-heritage.org.uk

24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

Telephone 01223 582 700 Facsimile 01223 582 701
www.english-heritage.org.uk

Please note that English Heritage operates an access to information policy.
Correspondence or information which you send us may therefore become publicly available



Neighbourhood Planning Strategic Environmental Assessment Screening Report

Date: 02 February 2015
Our ref: 141738
Your ref:



Mr Peter Freer
Enabling Officer – Community Led Planning and Design
Babergh & Mid Suffolk District Councils

nhp@midsuffolk.gov.uk

BY EMAIL ONLY

Customer Services
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

Dear Mr Freer

THE ENVIRONMENTAL ASSESSMENT OF PLANS AND PROGRAMMES REGULATIONS 2004, REGULATION 9 SCREENING DETERMINATION: LAVENHAM NEIGHBOURHOOD DEVELOPMENT PLAN

Thank you for your consultation on the above dated 16 January 2015 which was received by Natural England on the 22 January 2015.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Where Neighbourhood Plans could have significant environmental effects, they may require a Strategic Environmental Assessment (SEA) under the Environment Assessment of Plans and Programmes Regulations 2004. Further guidance on deciding whether the proposals are likely to have significant environmental effects and the requirements for consulting Natural England on SEA are set out in the National Planning Practice Guidance at:

<http://planningguidance.planningportal.gov.uk/blog/guidance/strategic-environmental-assessment-and-sustainability-appraisal/sustainability-appraisal-requirements-for-neighbourhood-plans/>

As indicated in the material supplied with the consultation, the Plan does not allocate sites for development; on this basis, and considering the environmental interests within our remit including designated sites, Natural England agrees with the Council's conclusion that no SEA will be required.

I hope you will find these comments helpful. For clarification of any points in this letter, please contact Jack Haynes using the contact details given below. For any new consultations or issues, please contact consultations@naturalengland.org.uk.

We really value your feedback to help us improve the service we offer. We have attached a feedback form to this letter and welcome any comments you might have about our service.

Yours sincerely

Jack Haynes

Land Use Operations Norfolk & Suffolk Team

Page 1 of 2



Natural England is accredited to the Cabinet Office Service Excellence Standard

Neighbourhood Planning Strategic Environmental Assessment Screening Report

Email: jack.haynes@naturalengland.org.uk

Tel: 0300 060 1498

Page 2 of 2



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Neighbourhood Planning Strategic Environmental Assessment Screening Report

Response received from the Environment Agency.

From: Griffiths, Lizzie R <lizzie.griffiths@environment-agency.gov.uk> Sent: Wed 18/02/2015 09:41
To: Peter Freer (MSDC)
Cc:
Subject: RE: THE ENVIRONMENTAL ASSESSMENT OF PLANS AND PROGRAMMES REGULATIONS 2004, REGULATION 9 SCREENING DETERMINATION: LAVENHAM NEIGHBOURHOOD

Dear Peter,

Please accept my apologies for the delay in our response, I thought I had already responded to this. We do not consider there are likely to be any significant impacts resulting from the plan on matters within our remit.

We welcome the inclusion of Policy P12: River Brett. It should be noted that opportunities for river enhancement works should also be sought as part of developments proposed adjacent to the watercourse.

We trust this advice is useful.

Kind regards

Lizzie

Lizzie Griffiths
Sustainable Places - Planning Advisor
Environment Agency - Essex, Norfolk and Suffolk

01473 706820
lizzie.griffiths@environment-agency.gov.uk
Iceni House, Cobham Road, Ipswich, Suffolk. IP3 9JD

 Awarded to Essex, Norfolk and Suffolk Area

**Neighbourhood Planning
Strategic Environmental Assessment Screening Report**

END