



BLETSOE NEIGHBOURHOOD PLAN

Strategic Environmental Assessment Report

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Environmental Assessment and the Environmental Assessment of Plans &
Programmes Regulations 2004 to accompany the publication of the Submission
version of the Bletsoe Neighbourhood Plan.**

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NON TECHNICAL SUMMARY

- 1 The purpose of this report is to provide an assessment of any significant environmental effects resulting from the policies and proposals in the draft version of Bletsoe Neighbourhood Plan (BNP). The Neighbourhood Plan will contain a number of policies for the use and development of land within the Parish of Bletsoe to 2035. These policies together with the adopted policies of the Development Plan for Bedford Borough Council (BBC) will form part of the Development Plan on which planning decisions will be made. The Development Plan for BBC is currently made up of the following documents:
 - Saved Local Plan 2002 policies;
 - Saved Minerals and Waste Local Plan 2005 policies;
 - The Core Strategy and Rural Issues Plan 2008 (CSRIP);
 - Bedford Town Centre Area Action Plan 2008;
 - The Allocations and Designations Local Plan 2013 (ADLP);
 - The Minerals and Waste Local Plan: Strategic Sites and Policies (2014).
- 2 A draft neighbourhood plan must be in general conformity with the strategic policies of the development plan in force if it is to meet the basic conditions. A draft neighbourhood plan is not tested against the policies in an emerging Local Plan however the reasoning and evidence that informs the Local Plan process is likely to be relevant to the basic conditions against which a neighbourhood plan is tested.
- 3 The basic conditions are set out in paragraph 8 (2) of Schedule 4B to the Town and Country Planning Act 1990 and applied to neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004.
- 4 BBC have commenced preparation of a new Local Plan (BBLP), therefore some of the current adopted Development Plan documents will eventually be superseded by the new local plan once adoption has taken place. The BBLP Draft Plan for Submission was published for consultation between 22 January and 29 March 2018 however issues were raised regarding the deliverability of key allocation for a new settlement at Colworth Park to the north of the Borough. On 16 May 2018, the Borough Council's Executive agreed that Officers should carry out additional work on the evidence base to support an amended Plan for Submission, which the Council intends to publish for a second Regulation 19 consultation in September

2018. The revised BBLP Draft Plan for Submission deleted the allocation at Colworth Park and reduced the time of the plan period to take account of the homes that could not be delivered through the new settlement. The BBLP 2030 Plan for Submission was submitted for examination on 14th December 2018.

- 5 The new Local Plan will set the spatial and growth strategy for the Borough to 2030 and contains strategic and development management policies that will replace those in the current development plan documents. Once adopted BNP will need to be reviewed to ensure it remains broadly in compliance with adopted policy, national policy and guidance in accordance with current legislation and guidelines at the time. Ultimately the timing of this will depend on whether BNP is at examination stage before the BBLP is adopted.

- 6 The vision for the BNP to 2035 is:

Bletsoe will remain a peaceful rural village that seeks to meet the housing, economic and infrastructure needs of its residents. Any future development must therefore be sensitive and must respect the character of the village that makes it so special.

- 7 In pursuit of this vision, the following BNP objectives are proposed:

- To deliver housing which both sustains the current and meets the future needs of the community;
- To protect and enhance existing and future open spaces;
- To manage both existing and future traffic and transport provision and encourage safe and sustainable movement;
- To ensure the Village benefits from sufficient facilities and services;
- To protect and enhance all listed buildings and the Scheduled Monument within the Parish.

- 8 Eight policies are proposed in BNP. These include policies for the allocation of two sites to allow for small scale new development, through to relevant development management issues appropriate to the Parish of Bletsoe. The Parish Council has prepared a number of separate consultation documents which have informed the choice of policies and site allocations. These reports are published as part of the evidence base for BNP.

- 9 The main environmental issue relevant to BNP is how small scale growth can be managed within the village without harming its quaint rural character, historic environment and the sensitivity of the surrounding countryside. The Draft BBLP

does not indicate any proposals for the expansion of Bletsoe through new allocations but its spatial strategy instead relies on rural villages bringing forward growth through neighbourhood planning. Growth is, however, planned for the larger northern areas of Bedford Borough, therefore the A6 will become much busier meaning Bletsoe will likely be used as a short cut route to the outlying villages. The Parish Council itself can do nothing to prevent this, but can ensure there is local policy in place so as not to make matters considerably worse.

- 10 To enable environmental assessment of the performance of the Neighbourhood Plan, the following framework for the assessment has been adopted. The proposed framework has been consulted upon with the Statutory Consultees as part of the SEA Scoping Request where it was concluded the main effect of BNP is the potential impact on heritage assets as confirmed by Historic England in an email dated 13 March 2018. The consultees made no adverse comments on the selection of the proposed SEA objectives nor did they suggest a wider scope. The SEA objectives are therefore as follows:
 - Objective 1: Housing
 - Objective 2: Landscape and Biodiversity
 - Objective 3: Historic Environment
- 11 The local community is keen to plan for small scale growth providing it prevents potential harm to the historic and rural character of the village. The objective of minimising any adverse effects of small scale growth in the village will also result in some positive effects, however in general the BNP policies area assessed as having a neutral environmental impact with a small number of positive effects and the potential for a small number of negative effects.
- 12 In terms of positive effects, the emerging policies are designed to protect the rural and historic character of the village. Policy BNP1 sets the general principles of sustainable development. Policies BNP 2 and 3 each refer to individual site allocations all of which are located outside of the existing Settlement Policy Area and Conservation Area boundaries. The policies consider the character and scale of each proposed site allocation and establish appropriate scale and design principles considered relevant to the site. Policy BNP4 addresses village character, the Conservation Area and its setting, by establishing Village Design Criteria for all forms of new development. Policy BNP7 complements existing national and local policy by acknowledging the contribution made to the character of the village from the existing open spaces. Infrastructure policies BNP5, 6 and 8 are all intended to

protect the village from harmful development while also assisting in ensuring existing facilities are retained and upgraded where possible.

- 13 Bletsoe residents raised a number of issues and concerns in the initial consultation stages. Some of these concerns are not directly related to land use matters (although they may indirectly relate to the use of land). As such, they are not matters that can be addressed through a planning policy in BNP. They are however important matters and it is essential the issues identified as Non-policy actions are taken forward by the Parish Council.
- 14 The proposed policies are assessed as having some positive effects as they seek to prevent development that is out of scale and keeping with the character of the setting of the village. More importantly the site allocation policies make provision for a small number of new homes appropriate to the scale and identified housing need of the Parish and seek to establish design principles relevant to the characteristics of each particular site. The creation of Non-Policy actions will have positive effects as they seek to ensure the Parish Council continues to work with residents and other relevant bodies to realise the aspirations of the community, wherever possible.
- 15 The SEA is required to identify and assess any reasonable alternatives to the proposed policies. In respect of the proposed site allocations, alternative sites in various locations around the village have been assessed in Site Assessments Report, however the proposed allocations were assessed as most suitable for allocation. The outcome of the community consultation has ultimately driven the final choice of sites considered acceptable for allocation in BNP.
- 16 Overall the effects of BNP are generally assessed as neutral and positive and occasionally negative. A combination of the proposed mitigation measures of the policies and the use of national policy and BBC development plan policies to determine planning applications should effectively mitigate the negative impacts.
- 17 In addition, the scale and location of the proposed site allocations are such that there should be little or no cumulative harmful impacts on the objectives or the policies contained in any emerging neighbourhood plans in the adjoining Parishes.
- 18 The Parish Council are committed to monitoring the implementation of the Neighbourhood Plan through the collection of data on a bi-annual basis to report on the neighbourhood plan progress. A periodic review of BNP will be undertaken by the Parish Council in accordance with current legislation and guidelines at the time

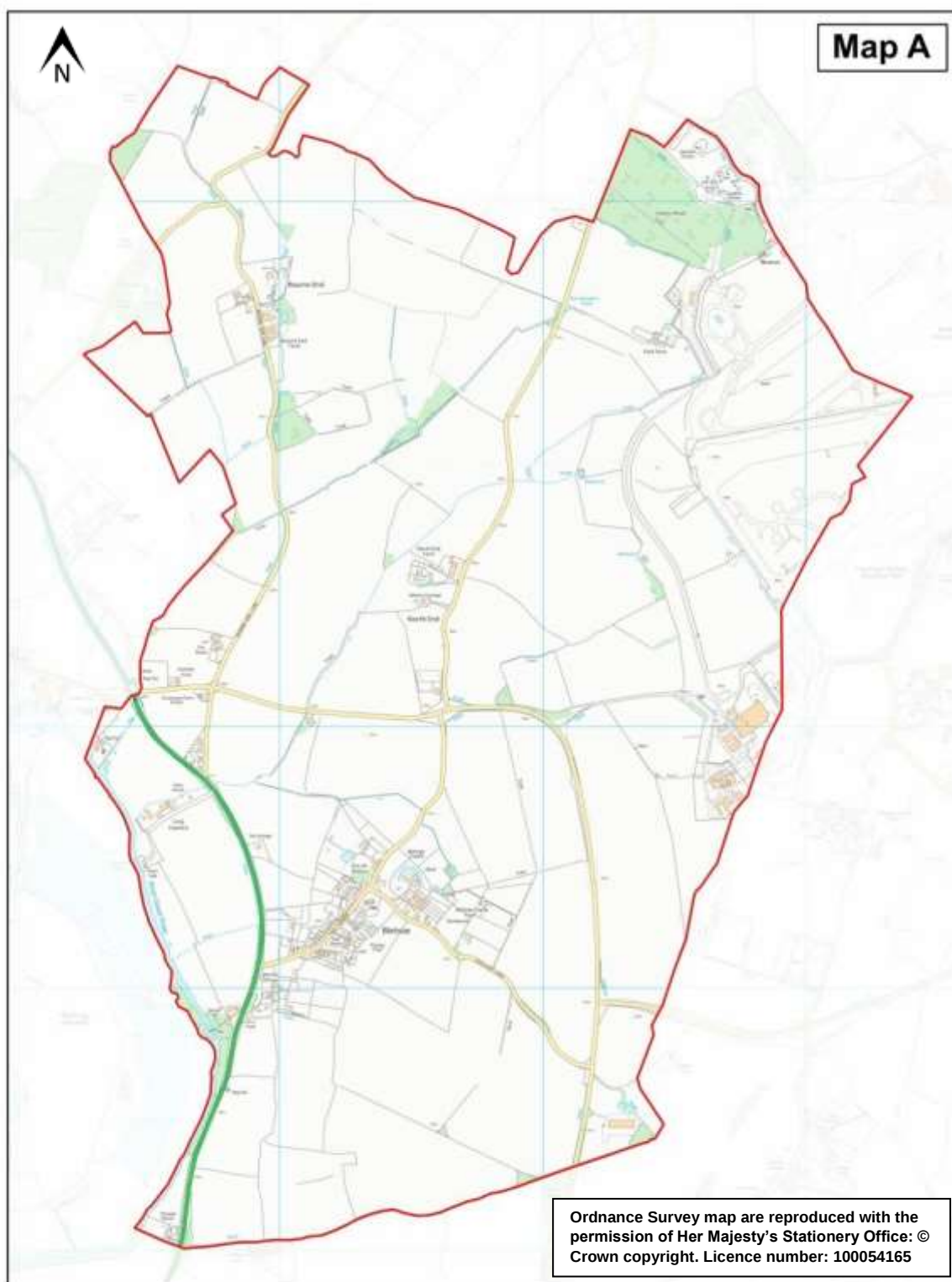
to ensure it remains up to date and broadly in compliance with national policy and locally adopted development plans.

- 19 As part of BNP evidence based a Habitats Regulations Assessment Screening Report has been undertaken and concluded there are no likely significant effects on any of the conservation objectives of any European sites from the policies within BNP. The HRA can be found in the evidence base documents at www.bletsoe.net

1 INTRODUCTION

- 1.1 The purpose of this report is to provide an assessment of any significant environmental effects resulting from the policies and proposals of the emerging Bletsoe Neighbourhood Plan (BNP), in accordance with Environmental Assessment of Plans or Programmes Regulations 2004. Map A on the following page shows the Neighbourhood Plan Area, which was designated by the local planning authority, Bedford Borough Council on 1 July 2013.
- 1.2 Bedford Borough Council (BBC) published its Screening Opinion on 4 July 2017, and set out the requirement for a Strategic Environmental Assessment (SEA) of the emerging Plan under the Environmental Assessment of Plans & Programmes Regulations 2004 (see Appendix A). On review of the Screening Opinion, the Parish Council then prepared a Scoping Request and consulted with the statutory consultees to agree the scope of the SEA (see Appendix B). The scope of the SEA has been narrowed down to three main objectives which are Housing; Landscape and Biodiversity and Historic Environment. The SEA Environmental Report (ER) will be published alongside the Neighbourhood Plan for consultation purposes.
- 1.3 The Neighbourhood Plan has been prepared by Bletsoe Parish Council and the community under the guidance of the Bletsoe Neighbourhood Plan Steering Group (BNPSG) in accordance with the Town & Country Planning Act 1990, the Planning & Compulsory Purchase Act 2004, the Localism Act 2011 and the Neighbourhood Planning Regulations 2015 (as amended).

Map A Bletsoe Neighbourhood Plan Area



Bletsoe Neighbourhood Plan Area

2 STRATEGIC ENVIRONMENTAL ASSESSMENT EXPLAINED

- 2.1 A Strategic Environmental Assessment (SEA) is a mechanism for considering and evaluating the likely environmental impacts of a plan, programme or strategy on the environment and should help to inform policy choices with a view to avoiding or mitigating adverse impacts and maximising the positives. It is a process that must be undertaken in line with the procedures set out by the European Directive 2001/42/EC, which was adopted into UK law as the Environmental Assessment of Plans or Programmes Regulations 2004 (the Regulations).
- 2.2 There are five important stages to SEA preparation which are;
- Stage A: setting the context and establishing the baseline
 - Stage B: deciding the scope of SEA and developing policy alternatives
 - Stage C: assessing the effects of the plan
 - Stage D: consultation on the draft plan and environmental report
 - Stage E: monitoring the implementation of the plan.
- 2.3 In terms of neighbourhood planning, to meet the requirements of the Regulations an Environmental Report (ER) must be published for consultation alongside the draft BNP and must present information on the likely significant effects of implementing the plan. When the draft BNP is finalised the contents of the ER must be taken into account, along with the consultation responses.
- 2.4 The ER should identify, describe and evaluate the likely significant effects on the environment of implementing the plan and reasonable alternatives. It should consider environmental characteristics likely to be affected, including designated sites, and likely significant effects on the environment, including secondary, cumulative, synergistic, short, medium, long term, permanent and temporary, positive and negative effects. Measures to avoid, mitigate or compensate for serious adverse impacts should be included, as must a description of proposed monitoring measures.
- 2.5 Figure 1 below summaries the stages as outlined above and the purpose of each stage.

Figure 1 SEA stages and tasks

SEA STAGES AND TASKS	PURPOSE
Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope	
Identifying other relevant plans, programmes and environmental protection objectives	To establish how the plan or programme is affected by outside factors, to suggest ideas for how any constraints can be addressed, and to help to identify SEA objectives
Collecting baseline information	To provide an evidence base for environmental problems, prediction of effects, and monitoring; to help in the development of SEA objectives.
Identifying environmental problems	To help focus the SEA and streamline the subsequent stages, including baseline information analysis, setting of the SEA objectives, prediction of effects and monitoring
Developing SEA objectives	To provide a means by which the environmental performance of the plan or programme and alternatives can be assessed.
Consulting on the scope of SEA	To ensure that the SEA covers the likely significant environmental effects of the plan or programme.
Stage B: Developing and refining alternatives and assessing effects	
Testing the plan or programme objectives against the SEA objectives	To identify potential synergies or inconsistencies between the objectives of the plan or programme and the SEA objectives and help in developing alternatives.
Developing strategic alternatives	To develop and refine strategic alternatives
Predicting the effects of the plan or programme, including alternatives	To predict the significant environmental effects of the plan or programme and alternatives
Evaluating the effects of the plan or programme, including alternatives	To evaluate the predicted effects of the plan or programme and its alternatives and assist in the refinement of the plan or programme.
Mitigating adverse effects	To ensure that adverse effects are identified and potential mitigation measures are considered.
Proposing measures to monitor the environmental effects of plan or programme implementation	To detail the means by which the environmental performance of the plan or programme can be assessed.

Stage C: Preparing the Environmental Report	
Preparing the Environmental Report	To present the predicted environmental effect of the plan or programme, including alternatives, in a form suitable for public consultation and use by decision-makers.
Stage D: Consulting on the draft plan or programme and the Environmental Report	
Consulting the public and Consultation Bodies on the draft plan or programme and the Environmental Report	To give the public and consultation Bodies an opportunity to express their opinions on the findings of the Environmental Report and to use it as a reference point in commenting on the plan or programme. To gather more information through the opinions and concerns of the public.
Assessing significant changes	To ensure that the environmental implications of any significant changes to the draft plan or programme at this stage are assessed and taken into account.
Making decisions and providing information	To provide information on how the Environmental Report and consultees' opinions were taken into account in deciding the final form of the plan or programme to be adopted.
Stage E: Monitoring the significant effects of implementing the plan or programme on the environment	
Developing aims and methods for monitoring	To track the environmental effects of the plan or programme to show whether they are as predicted; to help identify adverse effects.
Responding to adverse effects	To prepare for appropriate responses where adverse effects are identified.

- 2.6 Planning Practice Guidance (PPG) advises the methodology for SEA is intended to be proportionate to the task of assessing the modest development proposals of a Neighbourhood Plan, particularly those that are small and within a rural area such as Bletsoe. PPG Paragraph 030 Reference OD: 11-030-20150209 states “*The strategic environmental assessment should only focus on what is needed to assess the likely significant effects of the neighbourhood plan proposal. It should focus on the environmental impacts which are likely to be significant. It does not need to be done in any more detail, or using more resources, than is considered to be appropriate for the content and level of detail in the neighbourhood plan*”.
- 2.7 The ER responds to each of the relevant and appropriate SEA requirements in turn, beginning with a short description of the emerging Neighbourhood Plan, identifying

the key environmental features of the Parish and then assessing the impact of the strategic objectives and policies of the Neighbourhood Plan on those features, using relevant SEA objectives.

- 2.8 The Baseline information provides the basis for predicting and monitoring environmental effects and helps to identify environmental problems. Both qualitative and quantitative information can be used for this purpose where made available and sources of reference are listed in the information table. Given the nature of the neighbourhood plan area and the likely small scale development proposed as a result of the neighbourhood plan, a pragmatic approach to the level of information required has been adopted. The Baseline information was provided with the Scoping Request and is included at Appendix B.
- 2.9 The SEA objectives are derived from environmental objectives which are established in law, policy, or other plans or programmes, or from a review of the baseline information and the predicted environmental problems. The Regulations do not require the objectives to be developed for SEA itself, but they are used to help show whether the objectives of the plan or programme are beneficial for the environment, to compare the environmental effects of alternatives, or to suggest improvements. Each individual plan or programme has its own specific objectives.
- 2.10 For BNP the SEA objectives have been established following a review of the baseline information, issues that are of most concern for Bletsoe residents raised during the Issues and Options consultations and the responses to the Screening Opinion.

3 NEIGHBOURHOOD PLAN POLICIES AND OTHER PROGRAMMES

- 3.1 The BNP proposes 8 policies for the use and development of land in the Parish of Bletsoe for the period 2017 to 2035. These policies, together with the policies of Bedford Borough's Development Plan and the National Planning Policy Framework (NPPF), and advice given in the Planning Practice Guidance (PPG) will be used by the Borough Council in determining planning applications once the Neighbourhood Plan is 'made' (*adopted*).
- 3.2 Bedford Borough Council's (BBC) Development Plan is currently made up of the following documents:
- Saved Local Plan 2002 policies;
 - Saved Minerals and Waste Local Plan 2005 policies;
 - The Core Strategy and Rural Issues Plan 2008 (CSRIP);
 - Bedford Town Centre Area Action Plan 2008;
 - The Allocations and Designations Local Plan 2013 (ADLP);
 - The Minerals and Waste Local Plan: Strategic Sites and Policies (2014).
- 3.3 BBC have commenced preparation of a new Local Plan (BBLP), and some of the current adopted Development Plan documents will eventually be superseded by this once adoption has taken place.
- 3.4 The BBLP Draft Plan for Submission was published for consultation between 22 January 2018 and 29 March 2018, however the consultation raised issues regarding the deliverability of a key allocation for a new settlement at Colworth Park to the north of the Borough. On 16 May 2018, the Borough Council's Executive agreed that Officers should carry out additional work on the evidence base to support an amended Plan for Submission, which the Council intends to publish for a second Regulation 19 consultation in September 2018. The revised BBLP Draft Plan for Submission deleted the allocation at Colworth Park and reduced the time of the plan period to take account of the homes that could not be delivered through the new

settlement. The BBLP 2030 Plan for Submission was submitted for examination on 14th December 2018.

- 3.5 The new Local Plan will set the spatial and growth strategy for the Borough to 2030 and will contain policies that will replace those in the current Development Plan documents. A number of background and evidence base documents have been prepared in support of the new Local Plan and have been considered as part of the neighbourhood plan process.
- 3.6 Although a neighbourhood plan is not tested against the policies in an emerging Local Plan, the reasoning and evidence that informs the Local Plan process is likely to be relevant to the basic conditions against which a neighbourhood plan is tested. The basic conditions are set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990, applied to neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004 and how BNP has met the basic conditions is set out in the Basic Conditions Statement that forms part of a neighbourhood plan suite of documents.
- 3.7 Clarity on the detailed policies within BBLP will be provided once it is submitted and as a consequence BNP may need to be reviewed to ensure it remains broadly in compliance with the Local Plan policies once it is adopted.
- 3.8 Ultimately the timing of this will depend on whether BNP reaches examination and referendum stage before the BBLP is adopted. The final BNP version will need take any relevant matters not already considered into account.

The Neighbourhood Plan

- 3.9 The purpose of BNP is to shape development within the Parish and provide guidance to any parties wishing to submit planning applications for development within Bletsoe. Once made it will sit alongside the other Development Plan documents and will be a material consideration in the determination of planning applications.
- 3.10 Throughout the process of producing BNP the Steering Group has sought to involve the community as widely as possible through various methods of consultation, as explained in the Consultation Statement.

3.11 The initial launch event on the Neighbourhood Plan provided an explanation of what a neighbourhood plan is and the various stages and timeline for taking the plan forward. A number of key questions were posed with the intention of setting a vision and objectives for the Plan, such as:

- What do we need to retain a viable community in Bletsoe?
- What do we need to make Bletsoe an even better place to live?
- What do we value and what do we want to preserve?
- What is Bletsoe missing?
- What do you think should be changed or improved?

3.12 The results of the initial consultations enabled the formation of BNP vision as below.

Bletsoe will remain a peaceful rural village that seeks to meet the housing, economic and infrastructure needs of its residents. Any future development must therefore be sensitive and must respect the character of the village that makes it so special.

3.13 In pursuit of this vision, the following BNP objectives are proposed:

- To deliver housing which both sustains the current and meets the future needs of the community;
- To protect and enhance existing and future open spaces;
- To manage both existing and future traffic and transport provision and encourage safe and sustainable movement;
- To ensure the Village benefits from sufficient facilities and services;
- To protect and enhance all listed buildings and the Scheduled Monument within the Parish.

3.14 The emerging BNP policies range from three small site allocations for new development through to policies that refine existing development management policies specific to the Parish. The Parish Council has prepared separate studies on site assessments, housing needs and issues and options consultations to inform its choice of policies and these reports are published as part of the evidence for the Neighbourhood Plan.

4 EXISTING ENVIRONMENTAL CHARACTER

- 4.1 The Baseline environmental evidence for the neighbourhood plan is contained in the Scoping Report which is included in Appendix B of this report.

Bletsoe history

- 4.2 The settlement of Bletsoe is likely to have originated as a late Saxon manor reorganised in the mid-11th century by its Norman conquerors. Five hundred years later it had become the estate village that survived until the 1950's. In the last half-century, Bletsoe has ceased to be a basically agricultural community and has become mainly residential for local and regional commuters and retired people, who have an interest in retaining its special historic interest and traditional character.
- 4.3 Bletsoe lies in a long-settled river valley landscape six miles north of Bedford. A villa site west of the village may represent the centre of a Roman farming estate, and 4th century burials were found associated with it. The place-name suggests Saxon settlement slightly higher up the valley side, dispersed around the 'hoh' or hill-spur where one 'Blaecc' once lived.
- 4.4 Probably the most imposing building in the village is Bletsoe Castle. It may have originated as 11th Century Norman timber buildings within a circular bank and ditch later replaced in stone as the medieval manor house of the Beauchamps and Pateshulls. In the 15th century it was the birthplace of Margaret Beaufort, mother of King Henry VII. In the 16th century it was acquired by the St Johns who built themselves a new mansion visited by Elizabeth I and James I.
- 4.5 The earthworks north and east of Bletsoe Castle are the only remains of their formal gardens and the castle site and gardens are now scheduled as ancient monuments (AM).
- 4.6 In the early 17th century, a glimpse of the village layout in the 1620's could be understood from a written survey of the St John family's estate. It included reference to the Great Green, an open space in the centre of the village which originated as medieval communal grazing land.
- 4.7 The St Johns managed Bletsoe as an estate village, constructing rows of 18th and 19th century cottages for their workers. Latterly the Great Green has become a

series of hedged or walled compartments some laid out as allotments. After the estate was sold in the 1950s, these were gradually abandoned in the 1980s and 1990s until they became the highly appreciated and mostly publicly-owned grassy open spaces of today. The north west side of the green was developed in the 1960s. In the 1970s the addition of Bennetts Close rounded off the end of Memorial Lane; and in the 1980s Captains Close, a further row of housing, was added behind St Marys Close. The model farm barns at Castle Farm were converted to residential uses in the 1990s.

Bletsoe Character

- 4.8 The village has an elongated triangular form arranged around the central open spaces. The main road from the A6 (The Avenue) runs along one side of the former Great Green and rises towards the Parish church of St Mary. Beyond it are the Old Rectory and Bletsoe Castle. North End is half a mile or so along the road out of the village heading to Riseley. The two most significant spaces within the Conservation Area are the former Great Green, around which the village is arranged, and the village field, for itself and for views of the Parish church from the south east.
- 4.9 The centre of the village is less open visually than it was fifty years ago, due to the growth of trees and hedges. On the central green spaces, next to the former school is the David Bayes Memorial Garden. Two smaller areas between Old Way and The Avenue and in front of Old Pear Tree Cottage are privately owned; the largest, between the Avenue and Memorial Lane retains several apple trees from its days as an allotment is owned by the Parish Council.
- 4.10 Most of the historic village lies within the Conservation Area boundary where there are a number of listed buildings. It includes the Tudor/Stuart garden earthworks, an important part of the setting of Bletsoe Castle, a Scheduled Monument.
- 4.11 Bletsoe Castle lies on the east of the main road and can be seen when passing through the village. South of the castle on the same side of the road lies the church of St. Mary.
- 4.12 The Conservation Area boundary excludes a small cluster of buildings around the A6 turn as they are quite separated from the historic core of the village. Bletsoe Cottage and The Falcon Inn are protected individually as listed buildings.

- 4.13 The A6 is the main trunk road north and south of Bedford. It passes through Bletsoe Parish but is separated from the village. Bletsoe is accessed directly from the A6 but also from rural roads to the east and north of the village which lead to the villages beyond.
- 4.14 To the north of the Parish, along the banks of a watercourse, a small area of the Parish falls within flood zones 2 and 3. This is, however, far away from the village and the majority of residential areas. There is no evidence of severe surface water flooding in the village itself. There is also no evidence of any landfill sites within Bletsoe Parish.
- 4.15 Bletsoe Parish, and all of the land surrounding the village, falls into one overall landscape character type: NCA Profile: 88 Bedfordshire and Cambridgeshire Claylands. The majority of Bletsoe Parish falls within local landscape character area 2B Wooded Wolds (Bedford Borough Landscape Character Assessment 2014). The landscape strategy for this area is to conserve the rural landscape and rolling arable farmland.
- 4.16 There are some notable woodland sites in and around the village. To the north some way outside the village an area of good quality semi improved grassland (non priority) is noted. Within the village two small areas are identified as Priory Habitat Inventory (no main habitat but additional habitat exists)¹ but it is not intended to allocate either of these sites for development.
- 4.17 To the far north of the village there are two County Wildlife Sites, Pippin Wood and Galsey Wood, but these are located some distance from the village itself. To the south west of the NP area there is also a small County Wildlife Site along the roadside of Thurleigh Road. Just beyond the NP area to the west along the Upper Great Ouse River Valley there is a further County Wildlife Site. This area is also designated as a Green Infrastructure Opportunity Area².
- 4.18 There are also a number of Tree Preservation Orders (TPOs) on trees located within the village in Castle Barns at Coplowe Lane and The Avenue². A number of public footpaths cross the Parish as can be seen on Map D.

¹MagicMap <http://www.natureonthemap.naturalengland.org.uk/MagicMap.aspx>

²Bedford Borough Local Plan Proposals Maps

- 4.19 There are no European designated Sites such as SAC (Special Area of Conservation), SPA (Special Protections Areas) or Ramsar Sites (Wetlands) in the Parish, nor are there any SSSI (Site of Special Scientific Interest), SINC (Site of Importance for Nature Conservation) sites, or Ancient Woodlands³.
- 4.20 A small part of the NP area, to the west and beyond the village is noted as a Mineral Safeguarding Area comprising Cornbrash Limestone and River Valley/Glacial Sand and Gravel².
- 4.21 In terms of residents, the population at Domesday was a little over a hundred people, making it quite a significant settlement at that date. Population figures rose in the first half of the 19th century (to in excess of 400 reported between 1831 and 1861) then began to fall back as more local people drifted to larger towns like Bedford and Rushden to find work (falling to a reported 337 in 1891). In the early part of the 20th century, as work in agriculture declined, it is reported that the population fell to 219 by 1931 but that, in the latter part of the 20th century, figures rose again but to nowhere near the levels of 1831-1861. The population was reported to be 260 in the 2011 census⁴.

³<http://magic.defra.gov.uk/>

⁴www.ons.gov.uk/census/2011census

5 ENVIRONMENTAL OBJECTIVES

- 5.1 The Neighbourhood Plan must be in general conformity with national and local strategic policies and therefore it does not needlessly repeat them. Policies within the emerging BNP are designed to be relevant to Bletsoe in terms of its character and scale of the neighbourhood plan area, its character and vision and objectives of the Neighbourhood Plan.
- 5.2 To enable environmental assessment of the performance of the Neighbourhood Plan, the following framework for the assessment has been adopted. The proposed framework has been consulted upon with the Statutory Consultees as part of the SEA Scoping Report. The consultees made no adverse comments on the selection of the proposed SEA objectives nor did they suggest a wider scope. The SEA objectives are therefore as follows:

Objective 1: Housing

To deliver housing which both sustains the current and meets the future needs of the community

1A) Do the policies provide a range of housing types of various sizes and tenures?

1B) Do the policies direct new housing to the most appropriate locations?

Objective 2: Landscape and Biodiversity

To protecting and enhance existing and future open spaces

2A) Do the policies have regard to the local landscape character, the village setting, the local topography and views to and from the village to the countryside?

2B) Do the policies avoid development affecting areas of notable species?

Objective 3: Historic Environment

To protect and enhance listed buildings, ancient monuments and the conservation area

3A) Do the policies sustain and enhance the significance of designated heritage assets and their settings, i.e. Listed Buildings, the Conservation Area, archaeological sites and SMs?

3B) Do the policies sustain and enhance the significance of non-designated heritage assets?

- 5.3 This compact framework of SEA objectives focusses on the main local issues relevant to Bletsoe and informs the selection of policies, and their reasonable alternatives, to achieve the vision and objectives of the BNP.
- 5.4 SEA methodology is to be proportionate to the task of assessing modest proposals in a neighbourhood plan. Wider SEA objectives, of which there are many, are assessed by Bedford Borough Council as part of their local plan evidence base and those objectives that are not of significant relevance to Bletsoe Parish such as air quality and economy and enterprise. Therefore it is not considered proportionate to consider all SEA objectives.

6 ASSESSMENT OF NEIGHBOURHOOD PLAN OBJECTIVES AND POLICIES

- 6.1 Section 3 outlines the objectives of BNP which will support the overall vision for the Parish. The table below assesses each BNP objective against the SEA objectives for positive, neutral and negative effects.

Table A Assessment of BNP objectives

✓(positive),0 (neutral),X (negative)

Bletsoe Neighbourhood Plan Objectives	SEA Objectives		
	Housing	Landscape and Biodiversity	Historic Environment
Housing	✓	✓/0/X	0/X
Landscape & Green space protection	✓	✓	✓
Traffic and Transport	✓/0/X	✓/0/X	✓
Village facilities and services	✓/0	0	✓/0
Historic environment	0/X	✓/0	✓

- 6.2 The local community is keen to plan for small scale growth providing it prevents potential to harm to the historic and rural character of the village. The objective of minimising any adverse effects of small scale growth in the village will result in some positive effects, however in general the BNP policies will have neutral environmental impacts with a small number of positive effects and the potential for a small number of negative effects.
- 6.3 There is potential for negative effects if development proposals for housing is poorly located and designed. These effects may cause harm to the historic environment and the landscape and biodiversity features if they are not given sufficient consideration when selecting sites. New development of inappropriate scale could also add to traffic congestion on the local roads.
- 6.4 Given the small scale of the planned growth and the location of the proposed site allocations there are unlikely to be significant impacts on any designated nature sites, the historic environment or any other environmental attributes outside the neighbourhood plan area boundary.

6.5 The BNP contains 8 policies for the use and development of land in the Parish of Bletsoe to the period up to 2035. The policies have been formulated based on the outcome of consultation with residents, the Site Assessment Report and with regard to a number of constraints and features within the Parish.

6.6 The SEA process has allowed the consideration of each policy and refinement of wording to ensure each will have no significant environmental effects. The following section identifies and evaluates the likely significant effects of BNP policies against the SEA objectives taking into account the baseline and the scoping report. The table below assesses each policy for positive, neutral and negative effects.

Table B Assessment of BNP Policies

✓(positive),0 (neutral),X (negative)

Bletsoe Neighbourhood Plan Policies	SEA objectives		
	Housing	Landscape & Biodiversity	Historic Environment
BNP1 General Principles	0	✓/0	✓/0
BNP2 Land behind Captains Close	✓	0	✓/0
BNP3 Land North of the Old Rectory	✓	0	0/X
BNP4 Design Criteria	✓	✓	✓
BNP5 Vehicle & Cycle Parking	✓	✓/0	✓/0
BNP6 Transportation	✓/0	✓/0	0
BNP7 Local Green Space	✓	✓	✓
BNP8 Next Generation Broadband	✓/0	0	0

6.7 In terms of positive effects, the emerging policies are designed to protect and/or enhance the rural and historic character of the village.

6.8 Policy BNP1 sets the general principles of sustainable development and seeks to ensure new development is directed to within the settlement to maintain the character of the area. The policy does allow for certain types of developments in the rural area in accordance with the NPPF provided justification for the

development can be demonstrated. This policy will have either neutral or positive effects on the environment.

- 6.9 Policies BNP 2 and 3 each refer to individual site allocations all of which are located outside of the existing Settlement Policy Area and Conservation Area boundaries, but may be considered to be within its setting. The policies consider the character and scale of each proposed site allocation and establish appropriate scale and design principles considered relevant to the site including the potential to harm below ground archaeology.
- 6.10 The land behind Captains Close (Policy BNP2) is a 0.4ha site located just outside of the defined Settlement Policy Area, adjoining its boundary and existing development to the east. It is centrally located in the village and would form a logical extension to Captains Close in a westerly direction. Access to the site is through Captains Close which is owned and managed by Bedford Pilgrims Housing Association (BPHA) and this could affect delivery, however it has been confirmed in writing by BPHA that they are keen to work with Bletsoe Parish Council to deliver housing on this site. A public footpath runs through the site southeast-northeast from Captains Close to the A6. There may need to be a minor diversion of the right of way depending on the final layout of the development. There are no known major constraints which could prevent development of this site. It scored well in the Site Assessment process and the feedback from the September/October 2016 consultation identified the site as a preferred location for development. There would be some negative effects from this policy due to the development of existing greenfield land and the potential to affect the public footpath, however it is considered to be minimal and localised given the built up surroundings. There are also potential effects on the historic environment therefore the policy will require developers to seek expert advice and undertake a desk-based assessment to determine the extent and significance of the historic environment and the impact of proposed development would have on the historic environment. This will include an assessment of archaeological assets. A Transport Assessment has also been undertaken which concluded a suitable access can be achieved.
- 6.11 Policy BNP3 Land north of the Old Rectory is a small site of 0.3ha on the northern edge of the village. It adjoins the Conservation Area and lies on the opposite side of

the road to Bletsoe Castle. Whilst outside the Settlement Policy Area and separated from it, it is not isolated from the central core of the village and the site scored well in the Site Assessment process.

- 6.14 This site has the potential for negative effects on the historic environment given it's proximity the Scheduled Monument, the setting of the Bletsoe Conservation Area, and the setting of the Grade II* Listed Church of St Mary the Virgin, However it is small site and therefore only modest scale development is likely to come forward which can be designed to complement and enhance the historic setting. The policy requires new development to pay special attention to the setting of the Bletsoe Castle Scheduled Monument and the setting of Bletsoe Conservation Area and the historic environment in general, including the potential for below ground archaeology. The policy will require developers to seek expert advice and undertake a desk-based assessment to determine the extent and significance of the historic environment and the impact of proposed development would have on the historic environment, particularly the setting of Bletsoe Castle. This will include an assessment of archaeological assets. Planning applications will need to be judged against this criteria which will avoid any significant effects or suggest mitigation where required. A Transport Assessment has been undertaken which concluded a suitable access can be achieved.
- 6.15 Consultation feedback identified there is support for a small development of up to 3 dwellings on this site provided the design and siting of the development is integrated in the landscape with appropriate screening and is sensitive to the adjacent historic assets.
- 6.16 Policy BNP4 addresses Village character, the Conservation Area and its setting, by establishing Village Design Criteria for all forms of new development.
- 6.17 Policy BNP5 complements existing national and local policy by acknowledging the contribution made to the character of the village from the existing open spaces.
- 6.18 Infrastructure policies BNP5 Vehicle and Cycle Parking, BNP6 Transportation and BNP8 Next Generation Broadband intend to protect the village from harmful development while also assisting in ensuring existing facilities are retained and upgraded where possible.

- 6.19 A number of Non-Policy Actions are proposed in the BNP which will also have positive effects.
- 6.20 The proposed policies will have positive effects as they seek to prevent development that is out of scale with the character of the setting of the village. More importantly the site allocation policies make provision for a small number new homes appropriate to the scale and needs of the village, but seek to establish design principles relevant to the characteristics of each particular site.
- 6.21 Some adjoining parishes are beginning preparation of their neighbourhood plans and they may propose development of a greater scale than Bletsoe. These plans will need to consider cumulative effects however the scale of development proposed by BNP is of such modest scale there are unlikely to be cumulative effects on adjoining neighbourhood plan areas or proposed large scale development in the emerging BBLP.

7 ASSESSMENT OF REASONABLE ALTERNATIVES

- 7.1 SEA requires the assessment of reasonable alternatives to proposed policies. In terms of the site allocations, alternative sites were assessed in the Site Assessment Report.
- 7.2 For the Parish of Bletsoe a number of potential development sites have already been submitted to Bedford Borough Council as part of their Call for Sites exercise undertaken in conjunction with the preparation the new Local Plan to 2035, all of which are located outside of the existing Settlement Policy Area. Map B indicates the existing Settlement Policy Area boundary.
- 7.3 All details of the sites submitted during the initial Call for Sites in 2014 were subject to an initial consultation in December 2014 with Bletsoe residents during the early stages of the Neighbourhood Plan preparation as explained within the BNP Consultation Statement.
- 7.4 A second 'Call for Sites' was later carried out by the Borough Council which closed on 14th December 2015. The second round of the Call for Sites brought forward additional sites in the Parish of Bletsoe and a further Issues and Options Consultation on the Neighbourhood Plan, taking place in September/October 2016, included consultation on the additional sites and alternative proposals for sites that had already been submitted.
- 7.5 Additionally through the Call for Sites exercise proposals for new settlements have been submitted to Bedford Borough Council both of which overlap the boundary of the Bletsoe Neighbourhood Area Plan, but are largely located within the adjoining parishes of Thurleigh and Milton Ernest. Both sites are located some distance from the village of Bletsoe itself.
- 7.6 The site assessment methodology aimed to balance sustainability and deliverability objectives in a way which ensures that the BNP intentions are met. Each site has been assessed against its suitability, availability and achievability, (as set out in National Planning Policy Framework paragraph 47).
- 7.7 For simplicity the Site Assessment Report referred to all sites assessed by their Call for Sites reference number and can easily be identified on Map C below. All of the

sites were assessed using a Red, Amber or Green (RAG) rating (Green = 3 points, Amber = 2 and Red =1), and scored appropriately based upon the following key areas:

- Location; is it in a suitable location for development and would it contribute to the creation of sustainable, and mixed communities;
- Policy restrictions; e.g. designations, protected areas, existing planning or other policy or strategy;
- Physical problems or limitations; e.g. access, infrastructure, ground conditions, flood risk, hazardous risks, pollution or contamination;
- Potential impacts – including effect upon landscape features and conservation;
- Environmental conditions which would be experienced by prospective residents.

7.8 As observed in the Site Assessment Report the alternative sites will likely have greater negative effects, in particular where sites are located in the core of the village, within the Conservation Area or in closer proximity to historic assets than the sites assessed as suitable. Some sites were considered to be too detached from the village and discounted at the initial assessment stage due to their negative effects in terms of sustainability.

7.9 Some sites proposed small scale residential development which is a positive effect based on the objective of BNP to provide new homes to assist with local need.

7.10 The following section identifies and evaluates the likely significant effects of reasonable alternatives against the SEA objectives taking into account the baseline and the scoping report.

7.11 As can be seen in Table C below each of the discounted sites are likely to have more than one negative effect. For some sites the negative effect may be minor whereas in other cases landscape & biodiversity effects or heritage effects are greater due to the location of the site. Map B identifies the Conservation Area boundary.

7.12 Site 031 is a combination of two sites (Site 685 and Site 035). Site 685 is the smallest of the three parcels and is proposed to be allocated under Policy BNP4.

The sites are bound agricultural fields to the north, east, and west, and located on the northerly edge of the village. It is outside of the SPA and adjoins the Conservation Area Boundary. Bletsoe Castle and its grounds are on the opposite side of the road. The site as whole would form a large extension to the village on the northern edge which could have negative effects on the landscape, biodiversity interests and the historic environment. The smaller parcel of the sites (Site 685) was considered by residents to be suitable for small scale development of up to three dwellings subject to landscaping and special regard to the setting of the historic environment. A larger development site here would likely have negative effects, particularly on the historic setting of the village.

- 7.13 Land at Coplowe Land (Site 032) is located outside of the SPA but within the Conservation Area boundary. It lies between a public footpath and an identified Village Open Space (see Map D below) and St Mary's Church, a Grade II listed building. The development of this site would enclose the church restricting views of the church currently enjoyed from the Village Open Space and from Coplowe Lane which would affect its setting. Both the national and local policy seek to protect the historic environment therefore the site is unlikely to be a suitable extension to the village and because development here would conflict with National and Local Policy.
- 7.14 Being some 2km north of the village North Farm (Site 033) is considered to be isolated from the village and therefore will have negative effects in terms of sustainability. The provision of housing would be a positive benefit but being so remote from the village it would not be a sustainable location for new development of the scale proposed. The development of the site would likely have negative impacts on landscape and biodiversity and the historic rural nature of the surroundings.
- 7.15 Land South of the Grange (037) and the Waiting for the Sun (Site 034) are located to the west of the village and disconnected from it. Access to both sites would need to be created from the A6 potentially causing further congestion on the busy road. On a positive note both of these sites would provide housing however the sites are isolated from the village and therefore have negative effects in terms of sustainability and landscape and biodiversity effects due to large scale incursion into greenfield land.

- 7.16 Land West of Bletsoe Castle (Site 036) site lies between the most important historic building, Bletsoe Castle (a Scheduled Monument) and the main road through the village. Development of this site would affect the setting of the Conservation Area, Bletsoe Castle and its surrounding open space resulting in significant harm to heritage assets therefore the site is unlikely to be a suitable extension to the village. Development here would have negative effects on the environment.
- 7.17 Land at the Avenue (Site 517) is effectively the same as Site 030 and BNP proposed site allocation Policy BNP3 however site 517 proposed a development 8 dwellings. This site would likely have neutral effects with some negative effects on the environment given its location close to the A6 and at the main entrance to the village. During initial consultation residents favoured this site for a small development that should go some way towards enhancing the village gateway it was therefore allocated for a development of 3 dwellings, however during consultation of the draft Neighbourhood Plan residents raised a number of concerns in relation to this development, it was therefore decided to delete the allocation. .

Table C Assessment of Reasonable Alternatives

✓(positive),0 (neutral), X (negative)

Alternative sites (call for sites reference)	SEA Objectives		
	Housing	Landscape & Biodiversity	Historic Environment
North of Old Rectory (Site 031)	✓	0/x	0/x
Land at Coplowe Lane (Site 032)	✓	x	x
North End Farm (Site 033)	x	x	x
Waiting for the Sun (Site 034)	x	x	0
Land North of the Old Rectory (Site 035)	✓	0/x	0/x
West of Bletsoe Castle (Site 036)	✓	x	x
South of The Grange (037)	x	x	0
The Avenue (Site 517)	✓	0/-	0

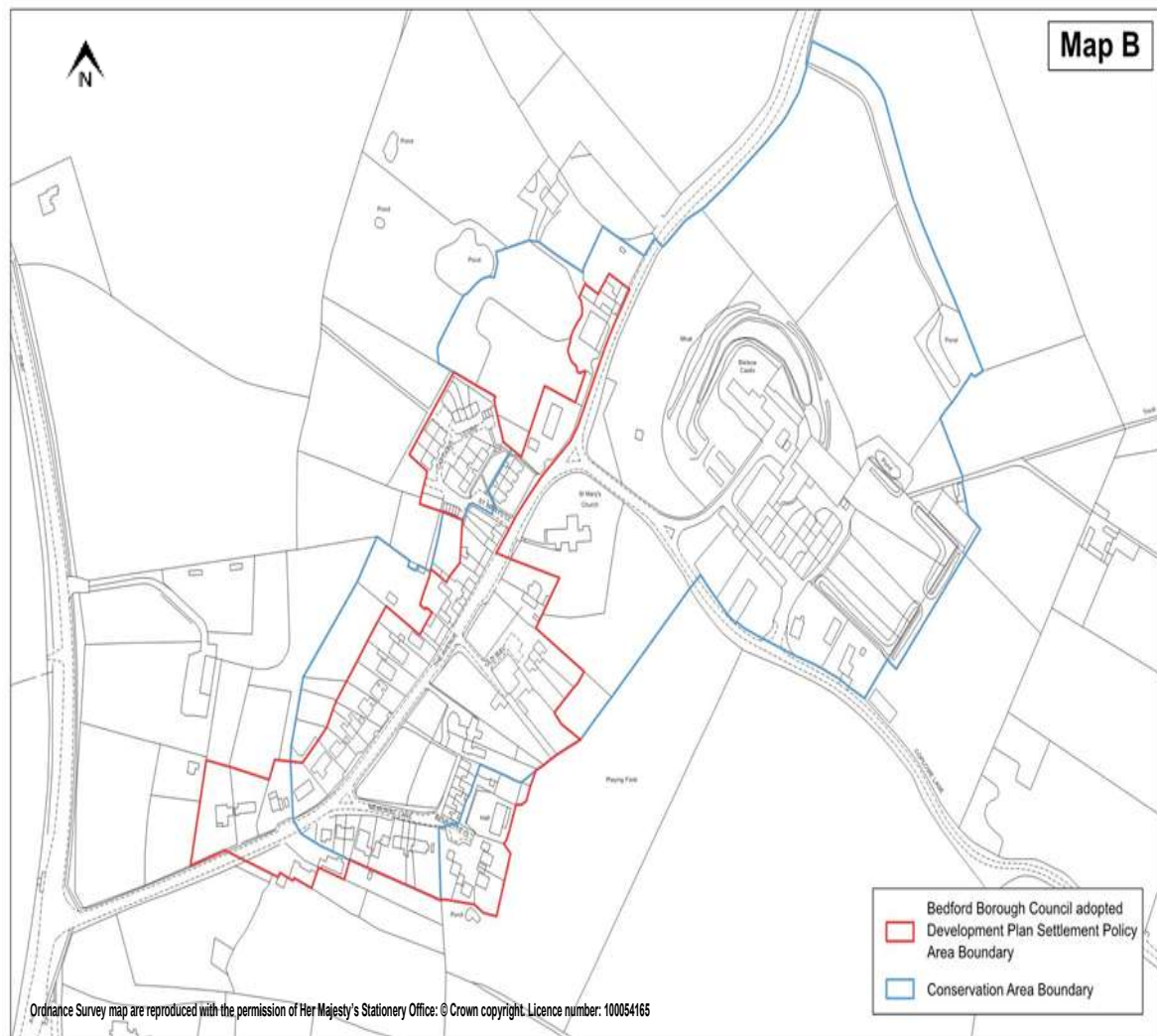
8 SUMMARY OF ASSESSMENT

- 8.1 The SEA report identifies the effects of the Neighbourhood Plan are considered to be neutral with some positive effects. The combination of site specific policies and mitigation measures together with national planning policy and relevant development plan policies will ensure that any planning application will be judged against the policies which will avoid any likely negative effects
- 8.2 The assessment indicates consideration of reasonable alternatives would result in greater negative or neutral impacts on the SEA objectives than the policies selected.
- 8.3 The modest scale and location of the site allocations are such that no cumulative effects are likely on adjoining neighbourhood plans or the wider objectives of the development plan.

9 MONITORING

- 9.1 The Parish Council are committed to monitoring the implementation of the Neighbourhood Plan through the collection of data on a bi-annual basis to report on the neighbourhood plan progress and to assess the positive and negative effects and any mitigation measures proposed to offset or reduce any significant adverse effects.
- 9.2 This will be done in conjunction with BBC where possible who already carry out various monitoring exercises and part of their statutory functions.
- 9.3 The Parish Council has committed to a periodic review of BNP in accordance with current legislation and guidelines at the time, to ensure it remains up to date, broadly in compliance with national policy and with locally adopted development plans.

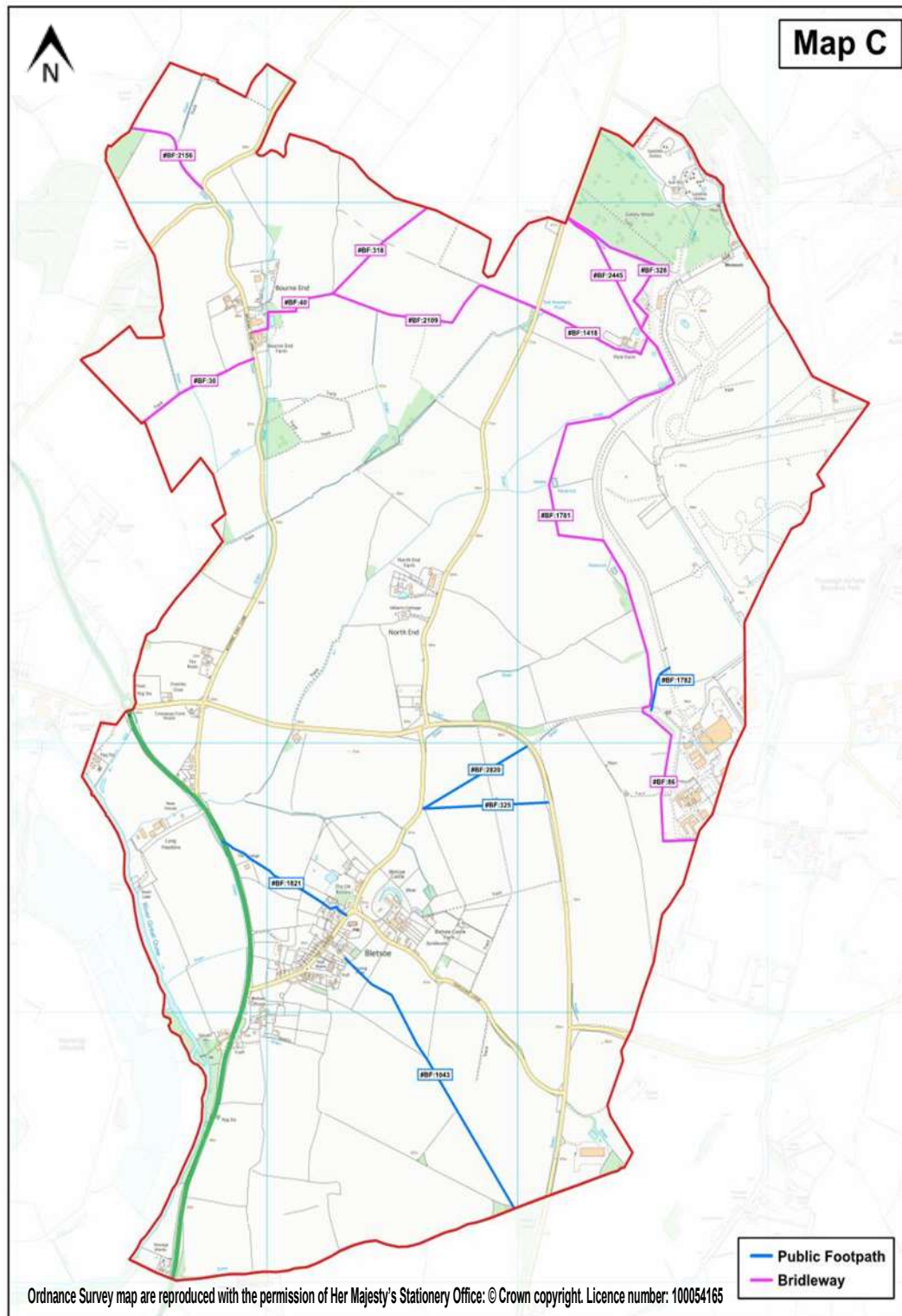
Map B - Reproduction of BBC Policy Map for Bletsoe



Map C - Sites put forward in the Call for Sites



Map D Bletsoe Footpaths



Bletsoe Public Rights of Way