

NDP REPORT TO PARISH COUNCIL November 2017

Below are a series of emails which will hopefully describe the journey after the Bletsoe NDP had been submitted by Samantha Boyd of Woods Hardwick. You will see there has been a lot of consultation both with the Sonia Gallaher of Bedford Borough Council and Edward James of Historic England.

From: Samantha Boyd
Sent: 04 July 2017 12:40
To: Trevor Roff; Ann Gibbons - Bletsoe Online
Cc: Russell Gray
Subject: FW: Bletsoe Neighbourhood Plan

Hi Trevor, Ann

Please see the response from Bedford Borough Council regarding the need for Strategic Environment Assessment (SEA) of Bletsoe NP. The Borough have concluded that an SEA is required due to the impact that proposed allocation 685 Land North of the Old Rectory, would have on the Historic Environment. The response from Historic England states they consider it likely that, despite the relatively small scale nature of the development proposed for this Site, there will be significant effects upon the historic environment as a result.

If site 685 is removed, this may change the need for a Strategic Environmental Assessment, but a further request for screening will be required. If the site is to remain, an SEA will need to accompany the NP for consultation and will need to be subject of a Scoping Opinion from BBC. The wording of Policy 4 should also be amended to reflect the Historic England response.

Once you have had chance to review the attached comments, please advise how you wish to proceed.

Kind regards,
Samantha Boyd
Senior Planner
Woods Hardwick Planning Ltd

From: Sonia Gallaher
Sent: 30 August 2017 09:37
To: Samantha Boyd
Cc: Gareth Draper Kim Wilson
Subject: Bletsoe SEA Scoping

Dear Samantha,

Apologies for the delay in responding to your email.

As stated in our previous correspondence the draft Bletsoe Neighbourhood Plan requires a Strategic Environmental Assessment (SEA). The SEA is to be prepared in accordance with paragraphs (2) and (3) of regulation 12 of the Environmental Assessment of Plans and Programmes Regulations 2004. This information is available here -

<http://www.legislation.gov.uk/uksi/2004/1633/regulation/12/made>

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[The Environmental Report shall include the information referred to in Schedule 2 of the Regulations which is available here -](#)

<http://www.legislation.gov.uk/uksi/2004/1633/schedule/2/made?view=plain>

Reg 12 Paragraph 5 states that in deciding the scope and level of detail of the information to include in the report, the responsible authority (i.e. the parish council) should consult the consultation bodies (Historic England, Environment Agency and Natural England. The letter from Historic England, refers to advice on Strategic Environmental Assessment which is available on their website here – [https://content.historicengland.org.uk/images-](https://content.historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/heag036-sustainability-appraisal-strategic-environmental-assessment.pdf/)

[books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/heag036-sustainability-appraisal-strategic-environmental-assessment.pdf/](https://content.historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/heag036-sustainability-appraisal-strategic-environmental-assessment.pdf/) and may help with your scoping. It is noted that while it was only Historic England that considered there were environmental impacts and that an SEA was required, consultation with the Statutory Bodies is still required once the Scoping Report has been completed. The contacts for the two other statutory bodies are:

Natural England – consultations@naturalengland.org.uk
Environment Agency – Neville Benn – [Neville.benn@environment-](mailto:Neville.benn@environment-agency.gov.uk)

[agency.gov.uk](mailto:Neville.benn@environment-agency.gov.uk) Phone 02030251906

The key stages of neighbourhood plan preparation and their relationship with the strategic environmental assessment process are shown here -

https://www.gov.uk/government/uploads/system/uploads/attachment_data/

file/580028/sea2_033_20150209_fixed.pdf

Further guidance which may be useful is available on the [Gov.uk](https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal#Strategic-environmental-assessment-process) website here - <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal#Strategic-environmental-assessment-process>

This guidance is quite difficult to absorb. We have found a guide to the SEA process produced by Wiltshire which may help to describe what is required. This is available here - <http://www.wiltshire.gov.uk/environmental-assessment-of-neighbourhood-plans.pdf>

Further funding for Technical Support is available through Locality. The support is available through a range a technical support packages provided by AECOM of up to £6,000. Please see the website for further details, but the application for support has a final submission date of 31 March 2018. The website is - <https://mycommunity.org.uk/funding-options/neighbourhood-planning/technical-support/>

Please contact me if you require any further information.

Many thanks

Sonia Gallaher
Senior Planning and Transportation Officer

Email from Trevor Roff to Sonia Gallaher – 25 September 2017

Bletsoe Neighbourhood Plan

Sonia, I do hope that you can help.

The Borough Council has decided that a Strategic Environmental Assessment (SEA) is required due to the impact that proposed allocation 685, Land North of the Old Rectory, would have on the Historic Environment. Given that the emerging Neighbourhood Plan has been derived from community engagement, and there is a good level of support for including Site 685, the Parish Council do not consider that this site can be excluded at this stage.

I am aware that the appointed planning consultant, Samantha Boyd from Woods Hardwick Planning Limited, has been in liaison with you and, as a full SEA involves a lengthy and detailed area of work, has endeavoured to confirm the scope of the SEA with you; if the SEA can focus only on the issue that Historic England raised it would reduce the level of work and thus the costs.

It has now been ascertained that the cost of the full SEA will be between £5,000 and £6,000 and Bletsoe Parish Council does not have the resource to cover this level of cost. It has secured the maximum of grant available for developing the Neighbourhood Plan and has also committed some funding from its limited Parish Council budget. It has to be acknowledged that Bletsoe is a very small Parish with a total Precept of only £10,754 in 2017/2018. It is not possible, therefore, to allocate funding to the level required to fund the SEA without financial support.

This issue has now been ongoing since April 2017 and this is causing a delay in progressing the Neighbourhood Plan for Bletsoe. A resolution is required to enable the good work to date to move to a satisfactory conclusion.

In the circumstances, could you please:

- [1] Review the decision about whether an SEA is required - the initial view, prior to consultation, was that an SEA would not be required (your e-mail of 12 May 2017 refers)?
- (2) Agree to fund the SEA from Borough Council resources (either fully, or if not possible, by way of a reasonable contribution)?
- (3) Agree to reduce the scope of the work required to cover only the impact of site 685 on the historic environment, rather than a full SEA as envisaged by

your e-mail to Woods Hardwick on 30 August 2017?

(4) Undertake the SEA as part of the planning application process when the land comes forward post Neighbourhood Plan adoption, if this is possible?

(5) Offer any suggestions about possible alternative funding sources?

Your help would be gratefully appreciated.

Kind regards,

Trevor Roff

Response from Sonia Gallaher – 28 September

Trevor,

Further to your email, please find a response below to your questions:

(1) Review the decision about whether an SEA is required - the initial view, prior to consultation, was that an SEA would not be required (your e-mail of 12 May 2017 refers)?

Following your request for screening, the statutory consultation responses show that for the plan you had submitted for the screening opinion, an SEA is required. If we carried out the process again for the same plan, the facts and the outcome would not change; we would expect the views of Historic England to remain the same.

(2) Agree to fund the SEA from Borough Council resources (either fully, or if not possible, by way of a reasonable contribution)?

Bedford Borough Council has in the past received funding when a Neighbourhood Area was designated and this funding is being used to help support parish Councils. This funding has now been capped and Bedford Borough has not been able to claim any funding since April 2016. While further funding is available for local authorities, this however cannot be claimed until a Neighbourhood Plan has successfully passed an examination and a date has been set for a referendum. As a result we have very limited funding available to support NP groups and prioritise work that can benefit all groups, for example through the running of workshops.

(3) Agree to reduce the scope of the work required to cover only the impact of site 685 on the historic environment, rather than a full SEA as envisaged by your e-mail to Woods Hardwick on 30 August 2017?

The scope of the SEA is to be determined by the parish council in consultation with the statutory bodies (Natural England, Environment Agency and Historic England) so this is something that you could pursue. It may be possible to reduce the cost of the exercise this way.

[4) Undertake the SEA as part of the planning application process when the land comes forward post Neighbourhood Plan adoption, if this is possible?
One of the requirements for the submission of a Neighbourhood Plan is that an SEA report is submitted, or if it is has been determined that an SEA is not required, the screening opinion letter stating that this was not necessary. Therefore is it not possible to leave this to be considered as part of a planning application. The plan would not pass its examination where a screening opinion shows that an SEA is required but none has been provided to support the plan.

[5) Offer any suggestions about possible alternative funding sources?
As I had stated in my email to Samantha Boyd on 30 August, there is further funding available for Technical Support managed through Locality of up to £6,000 and one of the areas of support involves the preparation of an SEA. Alternatively, there are other consultancies that can undertake this work and you may like to consider obtaining further quotes to see if you can secure a more competitive price.

For your information, a copy of the SEA screening letter and email response to Samantha Boyd is attached.

Regards

**Sonia Gallaher
Senior Planning and Transportation Officer
Planning Policy
Bedford Borough Council**

From: Samantha Boyd
Sent: 04 October 2017 11:53
To: Sonia Gallaher
Subject: FW: Bletsoe Neighbourhood Plan

Hi Sonia

Further to your email below regarding the SEA requirement for Bletsoe Neighbourhood Plan (BNP). we having been discussing a way forward with the Steering Group. The production of a Strategic Environmental Assessment is a costly exercise and unfortunately is unlikely to be within the Parish Councils budget.

We therefore seek your advice on the following:

Can we submit a more detailed assessment on Site 685 with regard to the impact on the SAM, nearby listed buildings and the conservation area to Historic England for further comments. If this overcomes the concerns raised, can we submit a second screening opinion, based on the revised information in the hope that Historic England conclude an SEA is not required for the BNP?

Site 685 is a small site with up to three dwellings proposed. It is located over 100m from Bletsoe Castle, over 120m from the Grade II* listed Church and outside the Conservation Area. Consultation on the first draft BNP and site assessments has been undertaken and site 685 was in the top three sites considered to be acceptable for allocation by residents. A development of up to three dwellings is unlikely to result in significant adverse impacts on the historic environment. When a planning application is submitted a detailed assessment can be undertaken and the development designed such that any impact is limited or mitigated.

Given the amount of work undertaken so far Bletsoe Parish Council are keen to continue with the Neighbourhood Plan.

Your advice on the above is greatly appreciated.

Kind regards,

Samantha Boyd
Associate
Woods Hardwick Planning Ltd

From: Sonia Gallaher
Sent: 05 October 2017 13:55
To: Samantha Boyd
Cc: Gareth Draper
Subject: RE: Bletsoe Neighbourhood Plan

Samantha,

Thank you for your email. Following the request for screening, an SEA was required based on the information submitted at that time. You are welcome to submit a second opinion for screening with additional information. As you know, the decision rests with Historic England and so I am unable to advise if the provision of further information will change that decision.

It is recommended that you contact Historic England to discuss what further information would be required in order to help assess the impact on the historic environment in Bletsoe. The relevant contact is outlined in the Historic England letter in my previous email. Further information about what to consider in relation to the historic environment and Neighbourhood Plans is also available on our Neighbourhood Plan webpage.

One of the basic conditions for the submission of a Neighbourhood Plan is to submit an SEA or a screening opinion letter stating that an SEA is not required. Therefore the issue would need to be resolved before the neighbourhood plan can be 'made'.

Many thanks

Sonia Gallaher
Senior Planning and Transportation Officer
Planning Policy
Bedford Borough Council

From: Samantha Boyd
Sent: 09 October 2017 08:52
To: Edward James
Cc: 'parishclerk@bletsoe.org.uk' <parishclerk@bletsoe.org.uk>
Subject: FW: Bletsoe Neighbourhood Plan

Hi Edward

Please see the comment below from Bedford Borough. Can you advise what further information you will require to be able to assess the impact of proposed Site 685 on the historic environment of Bletsoe.

Kind regards,
For and on behalf of Woods Hardwick Planning Ltd

Samantha Boyd
Associate
Woods Hardwick Planning Ltd

Email from Samantha Boyd after a request for info on costs. – 10 October 2017

Hi Ann,

Apologies for the delay in coming back to you. I have been trying to contact Historic England to discuss the scope of the SEA and whether or not we could just provide a more detailed assessment of the site and the impact on the historic environment in the NP rather than go through a full SEA. Bedford Borough Council have confirmed we are able to submit a Screening Opinion for a second time however they are dependent on the comments from Historic England so we need them to agree.

If a full Strategic Environmental Assessment is required our fees would be capped at £5,500 + VAT.

I will let you know the outcome of any response from Historic England.

Kind regards,
For and on behalf of Woods Hardwick Planning Ltd

Samantha Boyd
Associate
Woods Hardwick Planning Ltd

From: Samantha Boyd
Sent: 16 October 2017 11:12
To: Trevor Roff; Ann Gibbons
Cc: Russell Gray; parishclerk@bletsoe.org.uk
Subject: FW: Bletsoe Neighbourhood Plan

Dear all,

Below is the response from Historic England on site 685.

It would seem that HE are prepared to accept a more detailed review of the site assessment for 685. With this in mind we can update the Site Assessments and, as confirmed by Bedford Borough, resubmit the Screening Opinion. Historic England carefully included a caveat so there is no guarantee even if we go through this process again that they would still not require an SEA to be carried out.

Kind regards,

For and on behalf of Woods Hardwick Planning Ltd

Samantha Boyd
Associate Planner

Woods Hardwick Planning Ltd

From: James, Edward
Sent: 13 October 2017 15:43
To: Samantha Boyd
Subject: Re: Bletsoe Neighbourhood Plan

Dear Samantha,

Thank you for your emails, and I apologise for the slight delay in responding to you.

Having reviewed our earlier response the key concerns that we had at the time revolved around whether the assessment had included due consideration of the setting of heritage assets when reaching its conclusions on the potential effects of the proposed allocation. The NPPF makes clear that the setting of a heritage asset comprises the surroundings in which it is experienced, and that the significance of a heritage asset can be harmed through development in its setting. In the second paragraph on the second page of the original letter we stated that the potential significant effects *“are specifically related to the potential impacts upon the setting of the highly significant Scheduled Monument, the setting of the Bletsoe Conservation Area, and the setting of the Grade II* Listed Church of St Mary the Virgin. In our opinion, although generally rigorous in its approach, the August 2016 ‘RAG’ Assessment of Sites does not appear to give due consideration to these factors when assessing this Site”*.

Site 685, although it is outside the boundary of the Bletsoe Conservation Area (BCA), is located adjacent to its boundary and to that of the Bletsoe Castle Scheduled Monument, both of which extend along the eastern side of the road out of the village to the north-east of the Site. The Site is adjacent to one of the principal routes into and through the village and is on the edge of the settlement. The site therefore seems likely to form part of the surroundings in which the BCA and other heritage assets are experienced, and the development of this Site would seem to have the potential to have an effect on this experience. Development would also therefore seem to have the potential to affect the significance of those heritage assets, and possibly others that I have not discussed. These factors have not been considered in the RAG assessment for the Site.

There also appeared to be a lack of consistency in the RAG assessment. The formulation of the historic environment questions in the assessment form for each site allocation does not include specific consideration of setting. For

instance, the questions are *“Is the site within a Conservation Area?”* and *“Does the site contain any features designated for Historic importance? e.g: listed buildings, scheduled monuments”* do not specifically consider that the Site under consideration may also be within the setting of heritage assets. For other allocations in the assessment – for instance Site 036 – setting is, however, discussed under these headings. There would therefore seem to be a discrepancy between the way Site 685 and others have been considered in the assessment, given its proximity to the heritage assets discussed.

We would be happy to receive an assessment with a revised methodology that deals with that perceived discrepancy and provides further information, and we would of course be pleased to review it. It is likely that existing document could be revised to achieve that without requiring an enormous amount of additional work. However, without wishing to prejudge the outcome of the additional work, the forum should be prepared for the potential outcome where the requirement for an SEA would remain unchanged.

I trust that this is of assistance, but please do get in touch with me if you have any further queries.

Kind regards,

Edward

Historic Places Adviser
Planning Group | East of England
Historic England

Email from Samantha Boyd of Woods Hardwick 31 October.

Hi Ann/Alison

Apologies for the delay in responding to you, we have been extremely busy of late.

Further to our recent discussions we have managed to persuade Historic England to review their request for a Screening Opinion. In the opinion of HE the development of site 685 would have an impact on the historic environment. They have suggested we amend the Site Assessments for site 685 to include robust assessment of the potential impact the allocation of this site would have on the Conservation Area, Bletsoe Castle and its setting and any other nearby historic assets. We will also need to update the draft Neighbourhood Plan (NP) with the outcome of the assessment and amend the relevant policy in line with HE original comments.

Following the amendments we will have to submit the Draft NP to Bedford Borough (BB) for a second Screening Opinion. BB will need to then consult with Statutory Consultees in order to make their final decision on whether SEA is required. HE included a caveat in their response to us confirming despite the above, they may still insist on an SEA. Because of this I think it would be wise to liaise with HE on our amendments before we formally submit to BB.

Obviously this will delay consultation on the draft NP further but hopefully BB will deal with the application quickly as they are aware of the issues.

Our fee for the above work is outside of the agreed fee dated 01/06/16 therefore I propose an additional fee of £2,500 (+VAT). This is based on my hourly rate of £85.00 (+VAT).

This fee allows for the following:

- Review of site 685 in terms of impact on heritage assets;
- Update Site Assessment document;
- Update Draft Neighbourhood Plan in terms of site 685 with the Site Assessment results;
- Liaise with Historic England;
- Submit Screening Opinion to Bedford Borough;
- Liaise with Bedford Borough if necessary.

I trust the above is acceptable, I look forward to hearing from you with our instructions.

Kind regards,
For and on behalf of Woods Hardwick Planning Ltd
Samantha Boyd
Associate Planner
Woods Hardwick Planning Ltd

If you have any questions about any of the above I would appreciate it if you could direct them to me prior to Monday's meeting so that I can give a full and informed response at the meeting. The agenda is already quite full and we are starting later than usual so it will help move things through more quickly.

The aim is to cost the PC as little as possible and, if a full SEA is required in the end, we would be in a position to apply for a grant on technical grounds.