

Ravensden Neighbourhood Development Plan
Strategic Environmental Assessment Screening Report

February 2022

Prepared by Ravensden Neighbourhood Plan Steering Group for Ravensden Parish Council

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1. Introduction

1.1 This screening report has been prepared to determine whether or not the content of the Ravensden Neighbourhood Plan (NP) 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. These require an SEA to be undertaken for: (i) Plans which are prepared for town and country planning or land use and which set the framework for future development consent of projects listed in the Environmental Impact Assessment (EIA) Directive; or (ii) Plans which have been determined to require an assessment under the Habitats Directive.

1.2 Plans which determine ‘the use of a small area at local level’ or which only propose ‘minor modification to a plan’ might be exempt if they are unlikely to have significant environmental effects. Neighbourhood Plans containing land allocations for development that are not included in the local authority’s plan, are more likely to require an SEA. The main determining factor as to whether an SEA is required on a Neighbourhood Plan is if it is likely to have a significant effect on the environment.

1.3 Section 2 of this report outlines the regulations that set the need for this screening exercise. The process and criteria of the assessment are set out in Section 3. A brief summary of the draft Ravensden Neighbourhood Plan is provided in Section 4.

1.4 The screening assessment of the likely significant environmental effects of the Neighbourhood Plan is set out in Section 5 and the outcome of the screening is provided in Section 6. Section 7 contains the determination as to whether an SEA is required.

2. Legislative Background

2.1 The basis for Strategic Environmental Assessments legislation is European Directive 2001/42/EC which was transposed into English law by the Environmental Assessment of Plans and Programmes Regulations 2004, or SEA Regulations. The Regulations continue to apply after the end of the transition period following the UK's formal departure from the EU. Regulation 9 sets out the process as follows:

'Determinations of the responsible authority

(1) The responsible authority shall determine whether or not a plan, programme or modification of a description referred to in

- (a) paragraph (4) (a) and (b) of regulation 5;
- (b) paragraph (6)(a) of that regulation; or
- (c) paragraph (6) (b) of that regulation,

is likely to have significant environmental effects.

(2) Before making a determination under paragraph (1) the responsible authority shall –

- (a) take into account the criteria specified in Schedule 1 to these Regulations;
- and
- (b) consult the consultation bodies.

(3) Where the responsible authority determines that the plan, programme or modification is unlikely to have significant environmental effects (and, 3 accordingly, does not require an environmental assessment), it shall prepare a statement of its reasons for the determination.

The regulations define a responsible authority as:

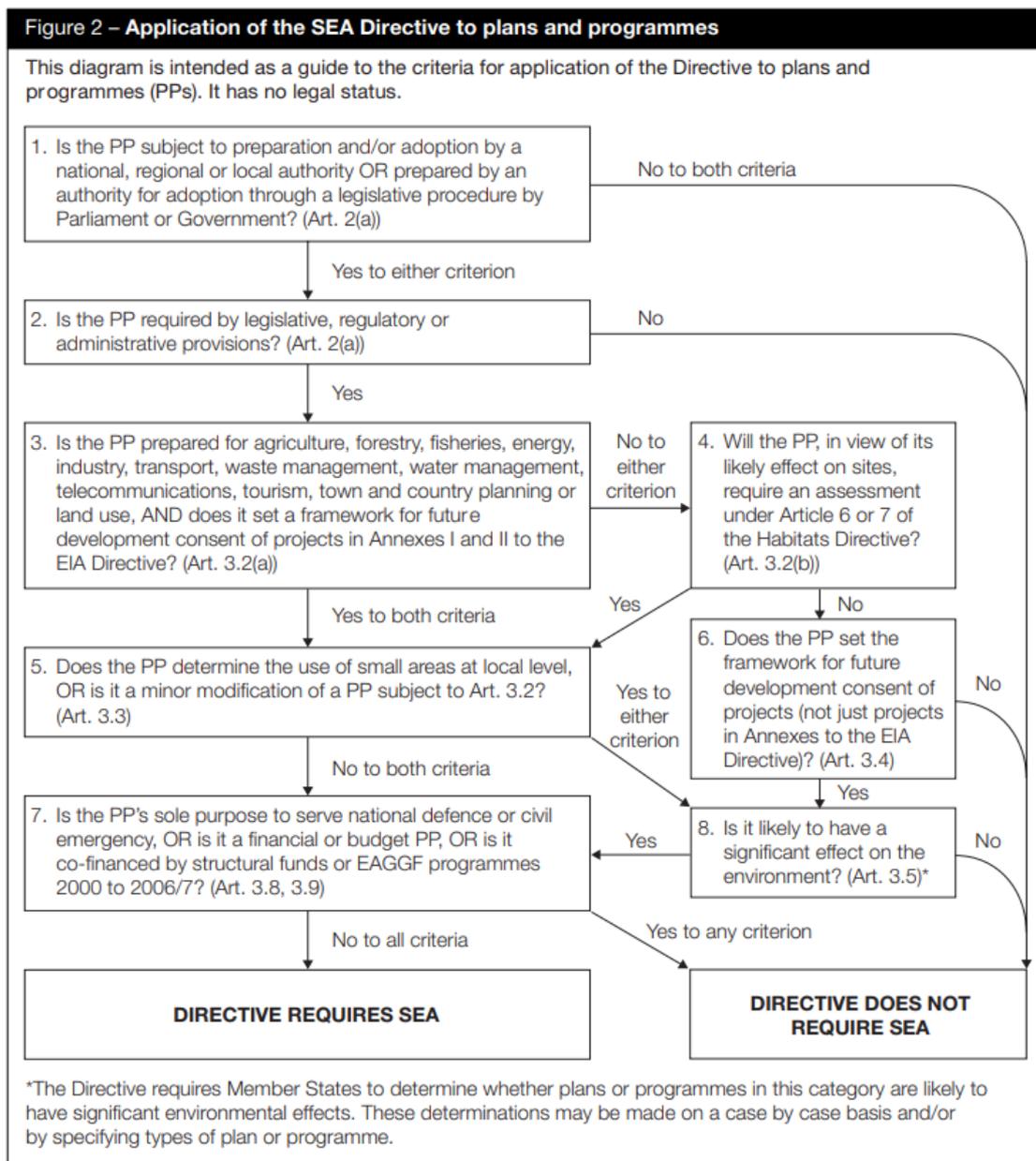
- (a) the authority by which or on whose behalf it is prepared; and
- (b) where, at any particular time, that authority ceases to be responsible, or solely responsible, for taking steps in relation to the plan or programme, the person who, at that time, is responsible (solely or jointly with the authority) for taking those steps'.

2.2 The Government has stated that Sustainability Appraisals are not needed for Neighbourhood Plans (NPPG). It must however be demonstrated how the NP contributes to achievement of sustainable development in the area.

3. Screening Assessment Process

3.1 The screening opinion assessment is undertaken in two parts: the first part will assess whether the plan falls into a category of plans requiring SEA; and the second part of the assessment will consider whether the NP is likely to have a significant effect on the environment, using criteria drawn from Schedule 1 of the EU SEA Directive and the UK Environmental Assessment of Plans and Programmes Regulations 2004.

3.2 The government guidance ‘A practical guide to the Strategic Environmental Assessment Directive 2005’; sets out the approach to be taken in determining whether an SEA is required.



3.3 The criteria for determining the likely significance of effects referred to in Article 3(5) of Directive 2001/42/EC and Schedule 1 of The Environmental Assessment of Plans and Programmes Regulations 2004 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 transboundary 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

3.4 The three statutory consultation bodies (Historic England, Environment Agency and Natural England) are required to be consulted to determine whether they agree with the findings and conclusions of this screening opinion, in establishing whether the Ravensden Neighbourhood Plan requires an SEA and whether it may have a significant environmental effect. The statutory bodies were consulted on 19th January 2022 and the responses received to the consultation are included in Section 8.

4. Summary of Ravensden Neighbourhood Plan

4.1 Ravensden Neighbourhood Plan sets out a Vision which seeks to ensure the Parish will be a sustainable, safe and well-integrated place in which to live, work and spend leisure time, and which is resilient to climate change; which will contain compact settlements which meet local needs within a rural/semi-rural area and whose character and integrity are safeguarded through high quality design set in attractive and accessible countryside; and which is part of a thriving, cared-for natural and historic environment. The Neighbourhood Plan contains various objectives and a series of eleven policies to ensure new development is aimed towards achieving the Plan's Vision. The document is divided into chapters which introduce the context of neighbourhood planning, a description of the Parish, the community consultation which has taken place and the key issues which have arisen, the Vision and Objectives of the Neighbourhood Plan, planning policies, and arrangements for implementation, monitoring and review, together with other (non land-use) actions and aspirations.

4.2 Ravensden Neighbourhood Plan allocates 2 new small sites for housing, one for between 10-15 dwellings, and one for up to 5 dwellings (being a conversion of redundant agricultural barns) provided a suitable alternative vehicular access can be achieved. It clarifies the extent of, and additional and ongoing requirements for a much larger site (up to 165 dwellings) and an extension to a country park which was allocated in the Bedford Borough Local Plan 2030 (Policy 24) and for which outline planning permission was granted in 2020. It also allocates Local Green Spaces to protect the most important green spaces in the Parish. The location of the housing allocations and Local Green Spaces can be seen on the Policies Map and Insets at https://ravensdenplan.info/application/files/7116/4500/4209/Ravensden_Neighbourhood_Plan_Reg_14_Final.pdf Appendix 1.

4.3 A key policy in the Plan concerns development design and sustainability principles, which should be demonstrated in all development proposals wherever possible – Design Codes have been prepared as an Appendix to the Plan to add depth and illustration to that policy; and to enhance the character and local distinctiveness of each of the settlements and suggest measures to improve the overall cohesiveness and sustainability of the Parish. The Plan seeks

to retain the rural character of the Parish as well as protecting and enhancing its natural and historic assets.

4.3 The 11 Policies are described individually below.

- **RNP1: Cleat Hill and Mowsbury Special Policy Area:** this sets out how planning applications should be considered in this area (defined on the Inset Plan) and corrects an anomaly in the Borough Local Plan 2030 which treats the whole area as countryside despite its mostly built-up character.
- **RNP2: Ravensden Park and Country Park Extension:** Although the site was allocated in the Borough Local Plan 2030 (Policy 24), this policy gives greater clarity to the boundary between the housing and the country park as reflected in the outline planning permission, and sets out ongoing requirements for the entire site.
- **RNP3: Land adjoining Willow Farm, Butler Street:** (see Inset Map for site boundary). A proposed residential development site for 10-15 units with requirements including a mix of house types, sizes and tenures (including 30% affordable) to meet local needs. The policy sets out site-specific development criteria.
- **RNP4: Former Barns at Cleat Hill Farm:** a residential conversion opportunity (up to 5 units) provided a satisfactory new vehicular access to B660 can be achieved. The policy sets out site-specific requirements.
- **RNP5: Development Design and Sustainability Principles.** This contains criteria to help achieve better design and sustainability in all types of development, improve the character and appearance of each locality in the Parish and also integrate them better with each other. The Policy links to the Ravensden Design Codes.
- **RNP6: Local Greenspace:** This allocates 7 sites in the parish as Local Greenspace, which is intended to add a layer of protection from development. It comes out of the work on the Ravensden Green Infrastructure Plan.
- **RNP7: Heritage Assets:** A policy to protect listed buildings and scheduled monuments.
- **RNP8: Protection of Existing Community Facilities:** A policy to protect existing facilities or seek to ensure suitable replacement facilities are provided.
- **RNP9: Provision of new Community and Employment Facilities** – a policy containing locational and site specific requirements for any new facilities in the Parish.
- **RNP10: East-West Rail:** A policy which sets out a detailed list of mitigation requirements for both the construction and operational phases of the proposed new railway if it is built across the Parish.
- **RNP11: Developer Contributions and the Community Infrastructure Levy:** This specifies 3 projects which the Parish Council will prioritise for the use of its share of receipts from the Community Infrastructure Levy.
- **Other Actions and Aspirations:** The process of consulting local residents, preparing the Ravensden Green Infrastructure Plan and drafting the Neighbourhood Plan itself identified a range of issues which are not directly related to the use or development of land so cannot be contained in the statutory part of the Plan.

5. Assessment

5.1 The first part of the assessment is to establish the need for the SEA. The table below shows the assessment determining whether the NP falls into a category of plans requiring SEA. The references to Articles are from Directive 2001/42/EC of the European Council on the assessment of the effects of certain plans and programmes on the environment.

Stage	Y/N	Reasons
1. Is the NP subject to preparation and/or adoption by a national, regional or local authority OR prepared by an authority for adoption through legislative procedure by Parliament or Government? (Article. 2(a))	Y	The Local Authority has a statutory obligation to make a Neighbourhood Plan once it has successfully passed the stages as set out in the Neighbourhood Planning Regulations.
2. Is the NP required by legislative, regulatory or administrative provisions? (Article. 2(a))	Y	While it is not mandatory for a Neighbourhood Plan to be prepared, however once made, it is part of the development plan for assessing planning applications.
3. Is the NP prepared for agriculture, forestry, fisheries, energy, industry, transport, waste management, telecommunications, tourism, town and country planning or land use, AND does it set framework for future development consent of projects in Annexes I and II to the EIA Directive? (Article. 3.2(b))	N	The NP is prepared for town and country planning and land use purposes but does not explicitly set a framework for future development consent of projects in Annexes I or II of the EIA Directive.
4. Will the NP, in view of its likely effect on sites, require assessment under Article 6 or 7 of the Habitats Directive? (Art. 3.2 (b))	N	An appropriate Assessment screening has been carried out to show that an assessment is not required.

5. Does the NP determine the use of small areas at local level OR is it a minor modification of a plan/programme (Article 3.3)	Y <i>If yes, go to Q8</i>	Yes, the Neighbourhood Plan relates to the local area of the designated Neighbourhood Area.
6. Does the NP set the framework for future development consent of projects (not just projects in annexes to the EIA Directive)? (Article. 3.4)		N/A
7. Is the NP's sole purpose to serve national defence or budget PP, OR is it co-financed by structural funds or EAGGF programmes 2000 to 2006/7? (Article. 3.8 & Article. 3.9)		N/A
8. Is the NP likely to have a significant effect on the environment? (Article. 3.5)	N	See the following table

5.2 The next step in the screening assessment is to establish whether the NP is likely to have a significant effect on the environment. The criteria for determining the likely significance of effects are drawn from the Annex II of SEA Directive 2001/42/EC and is also set out in Schedule 1 of The Environmental Assessment of Plans and Programmes Regulations 2004.

Criteria for determining the likely significant effects (Annex II SEA Directive)	Summary of significant effects	Likely to have significant environmental effects Y/N
<u>Plan Characteristics</u>		
1a. 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 NP provides for up to 20 new dwellings on 2 separate sites.	N
1b. The degree to which the plan or programme influences other plans and programmes including those in a hierarchy.	The NP will be complementary to the Bedford Borough Development Plan, including the Bedford Borough Local Plan 2030 which has been subject to SEA.	N
1c. The relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development.	The achievement of sustainable development is one of the basic conditions that a Neighbourhood Plan must meet.	N
1d. Environmental problems relevant to the plan.	There are no environmental problems relevant to the NP in this Parish	N
1e. 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 or renewable energy generation)	The plan does not relate to waste management or water protection. Amongst other things, the Design and Sustainability Policy encourages energy efficiency such as the installation of renewable and low carbon sources.	N

<u>Effects and Area Characteristics</u>		
2a. The probability, duration, frequency, and reversibility of the effects	The plan includes allocations for up to 20 dwellings. It is highly likely that these sites will be developed. It clarifies the internal boundary and sets ongoing requirements for an allocation of up to 165 dwellings and an extension to a country park, allocated in the Bedford Borough Local Plan 2030 (for which an SEA was prepared), and on which development has started.	N
2b. The cumulative nature of the effects	The plan covers a small area and considering that the plan covers a period up to 2030, the cumulative effects are considered to be minimal.	N
2c. The transboundary nature of the effects	It is not considered that the proposals will have any material impact outside the parish. Any effects will be mitigated within the area.	N
2d. The risks to human health or environment (e.g. due to accidents)	The allocations are only for housing and local greenspace and it is not considered that they will cause a risk to human health or the environment. On the contrary, implementation of the design and sustainability and local greenspace policies will reduce risks to health or the environment. The policy relating to East West Rail NSIP will mitigate many of the health and environment risks associated with that scheme if it is implemented.	N
2e. The magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected)	The population estimated from the 2011 census was 720 and the dwellings estimate was 338. The area of the parish is 930 hectares which equates to a population density of 0.8 people per hectare.	N

<p>2f. 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; or Intensive land use</p>	<p>The plan includes policies to ensure that cultural heritage is either preserved or enhanced. There are no special natural characteristics that are related to the allocated development sites. The allocated development sites are distant from Tilwick SSSI and the nature of the proposals are such there will be no impact on that site or the purposes of its designation. (Natural England Risk Zone map). Neither development site is within the immediate setting of Mowsbury Hillfort SM or the Grade I listed All Saints Church. Neither of the proposed development sites is considered to represent an intensive use of land.</p>	<p>N</p>
<p>2g. The effects on areas or landscapes which have a recognised national, community or international protection status.</p>	<p>There are no national or internationally recognised areas or landscapes within the parish.</p>	<p>N</p>

6. Screening Outcome

6.1 The screening assessment undertaken in Section 5 concludes that it is unlikely there will be any significant environmental effects arising from the Ravensden Neighbourhood Plan.

7. Determination

7.1 Based on the above information, the 'Responsible Body' being Ravensden Parish Council, concludes that a Strategic Environmental Assessment is not required.

8. Responses received from Statutory Consultees

8.1 Natural England responded on 26 January 2022 – see attached letter below.

8.2 Historic England and the Environment Agency did not respond but a generally favourable response was received from Historic England at Regulation 14 stage – see Appendix B to the Consultation Statement.

Date: 26 January 2022
Our ref: 381129
Your ref: Ravensden NP



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Mr S Arnold
Ravensden Neighbourhood Plan Steering Group

BY EMAIL ONLY

Dear Mr Arnold

Ravensden Neighbourhood Plan – Strategic Environmental Assessment (SEA) & Screening and Habitats Regulation Assessment (HRA) Screening

Thank you for your consultation on the above dated and received by Natural England on 19 January 2022

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.

Screening Request: Strategic Environmental Assessment (SEA) Screening and Habitats Regulation Assessment (HRA) Screening.

It is our advice, on the basis of the material supplied with the consultation, that, in so far as our strategic environmental interests (including but not limited to statutory designated sites, landscapes and protected species, geology and soils) are concerned, that there are unlikely to be significant environmental effects from the proposed plan.

Natural England are satisfied with the conclusion of no likely significant effect on designated sites as a result of the neighbourhood plan.

Neighbourhood Plan

Guidance on the assessment of Neighbourhood Plans, in light of the Environmental Assessment of Plans and Programmes Regulations 2004 (as amended), is contained within the [National Planning Practice Guidance](#). The guidance highlights three triggers that may require the production of an SEA, for instance where:

- *a neighbourhood plan allocates sites for development
- *the neighbourhood area contains sensitive natural or heritage assets that may be affected by the proposals in the plan
- *the neighbourhood plan may have significant environmental effects that have not already been considered and dealt with through a sustainability appraisal of the Local Plan.

We have checked our records and based on the information provided, we can confirm that in our view the proposals contained within the plan will not have significant effects on sensitive sites that Natural England has a statutory duty to protect.

We are not aware of significant populations of protected species which are likely to be affected by the policies / proposals within the plan. It remains the case, however, that the responsible authority should

provide information supporting this screening decision, sufficient to assess whether protected species are likely to be affected.

Notwithstanding this advice, Natural England does not routinely maintain locally specific data on all potential environmental assets. As a result the responsible authority should raise environmental issues that we have not identified on local or national biodiversity action plan species and/or habitats, local wildlife sites or local landscape character, with its own ecological and/or landscape advisers, local record centre, recording society or wildlife body on the local landscape and biodiversity receptors that may be affected by this plan, before determining whether an SEA is necessary.

Please note that Natural England reserves the right to provide further comments on the environmental assessment of the plan beyond this SEA screening stage, should the responsible authority seek our views on the scoping or environmental report stages. This includes any third party appeal against any screening decision you may make.

For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Yours sincerely

Joanne Widgery
Consultations Team