

Strategic Environmental Assessment (SEA) of the Wootton Neighbourhood Plan

Environmental Report

September 2020

Quality information

Prepared by	Checked by	Verified by	Approved by
Mark Fessey Associate Director Lauren Egan, Graduate consultant	Nick Chisholm-Batten, Associate Director	Nick Chisholm-Batten, Associate Director	Steve Smith, Technical Director

Revision History

Revision	Date	Details	Submitted to:
V1	11/09/20	Draft for internal review	Wootton Parish Clerk
V2	25/09/20	Draft incorporating comments from the Steering group.	Wootton Parish Clerk

Prepared for:
Wootton Neighbourhood Plan Neighbourhood Plan Steering Group

Prepared by:
AECOM Limited

© 2020 AECOM Limited. All Rights Reserved.

This document has been prepared by AECOM Limited ("AECOM") in accordance with its contract with Locality (the "Client") and in accordance with generally accepted consultancy principles, the budget for fees and the terms of reference agreed between AECOM and the Client. Any information provided by third parties and referred to herein has not been checked or verified by AECOM, unless otherwise expressly stated in the document. AECOM shall have no liability to any third party that makes use of or relies upon this document.

Table of Contents

Non-Technical Summary	i
1 Introduction.....	1
2 What is the plan seeking to achieve?	2
3 What is the scope of the SEA?	6
Part 1: What has plan-making/ SEA involved to this point?	7
4 Introduction to Part 1	8
5 Establishing growth scenarios	9
6 Assessing growth scenarios	14
7 Developing the preferred approach	17
Part 2: What are the assessment findings at this stage?	18
8 Introduction to Part 2	19
9 Assessment of the pre-submission version of the WNDP	20
Part 3: What are the next steps?	25
10 Plan finalisation	26
11 Monitoring.....	26
Appendix I: Meeting the Regulations.....	27
Appendix II: The scope of the SEA.....	31

Non-Technical Summary

Background

AECOM is commissioned to lead on Strategic Environmental Assessment (SEA) in support of the emerging Wootton Neighbourhood Development Plan (WNDP).

The WNDP is being prepared by a Steering Group on behalf of Wootton Parish Council in the context of the Bedford Borough Local Plan, which was adopted by the Borough Council on 15 January 2020. Once 'made' the WNDP will have material weight when deciding on planning applications, alongside the Bedford Borough Local Plan.

SEA is a mechanism for considering and communicating the likely effects of an emerging plan, and alternatives, with a view to avoiding and mitigating negative effects and maximising positive effects. Central to the SEA process is publication of an Environmental Report alongside the draft plan that presents certain required information. The aim is to inform the consultation and, in turn, plan finalisation.

Preparing the Environmental Report essentially involves answering three questions:

1) What has plan-making / SEA involved **up to this point?**

- including in relation to 'reasonable alternatives'.

2) What are the SEA findings **at this stage?**

- i.e. in relation to the draft plan.

3) What happens **next**

Structure of this report

This report is the Environmental Report for the WNDP, hence the three questions are answered in turn. Firstly though there is a need to set the scene further by answering the question: *What's the scope of the SEA?*

What is the scope of the SEA?

The scope of the SEA is reflected in a list of topics and objectives, which, taken together indicate the parameters of the SEA and provide a methodological 'framework' for assessment. The SEA framework is presented below:

The SEA framework

SEA topic	SEA objective
Air quality	Improve air quality in the Neighbourhood Plan Area and minimise and/ or mitigate all sources of environmental pollution
Biodiversity	Protect and enhance all biodiversity and geodiversity.
Climate change (mitigation and adaptation)	Reduce the level of contribution to climate change made by activities within the Neighbourhood Plan Area Support the resilience of the Neighbourhood Plan Area to the potential effects of climate change, including flooding
Historic environment	Protect, conserve and enhance the historic environment within the Neighbourhood Plan area
Landscape	Protect and enhance the character and quality of landscapes and villagescapes
Land, soil and water resources	Ensure the efficient and effective use of land, protect soil quality and avoid the loss of high-quality agricultural land. Use and manage water resources in a sustainable manner.
Population and communities	Cater for existing and future residents' needs as well as the needs of different groups in the community, and improve access to local, high-quality community services and facilities. Reduce deprivation and promote a more inclusive and self-contained community. Provide everyone with the opportunity to live in good quality, affordable housing, and ensure an appropriate mix of dwelling sizes, types and tenures.
Health and wellbeing	Improve the health and wellbeing residents within the Neighbourhood Plan area.
Transportation	Promote sustainable transport use and reduce the need to travel.

Plan making/SEA up to this point

An important element of the required SEA process involves assessing 'reasonable alternatives' in time to inform development of the draft plan, and then publishing assessment findings in the Environmental Report. As such, Part 1 of this Environmental Report explains how work was undertaken to develop and assess a 'reasonable' range of alternative approaches to the allocation of land for housing, or **growth scenarios**.

Table A introduced the growth scenarios, whilst Table B presents the assessment (see discussion of methodology, below). Presented subsequently is the Steering Group's response to the assessment, i.e. reasons for supporting the preferred growth scenario, which is Scenario 7.

Growth scenarios assessment methodology:

Within each row of Table B (i.e. for each of the topics that comprise the SEA framework) the columns to the right hand firstly rank the scenarios in order of preference and then, secondly, highlight instances of a predicted positive (**green**), minor positive (**light green**), minor negative (**amber**) or negative (**red**) significant effect on the baseline. Also, ' = ' is used to denote instances where the alternatives perform on a par (i.e. it not possible to differentiate between them).

Table A: The reasonable growth scenarios

Location	Site	Growth scenarios						
		1	2	3	4	5	6	7
North	317 (part)	50	50	50	50	50	50	50
West (Keeley Lane)	463 (part)		25	25				25
	312			25				25
	653			20				20
West of the Village (Hall End)	314*				50		50	
	652					25	25	25
Total homes		50	75	120	100	75	125	145

Table B: Growth scenarios assessment findings

Topic	Rank and significant effects						
	Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Scenario 6	Scenario 7
	317	317 463	317 463 312 653	317 314	317 314 652	317 652	317 463 312 653 652
Air quality	★1	★1	3	★1	2	2	4
Biodiversity	★1	★1	2	★1	3	3	4
Climate change (mitigation and adaptation)	★1	★1	★1	★1	2	2	2
Health and wellbeing	★1	★1	3	★1	2	2	4
Historic environment	★1	2	2	★1	2	2	3
Land, soil and water resources	★1	2	2	★1	★1	★1	2
Landscape	=	=	=	=	=	=	=
Population and communities	3	3	2	4	4	2	★1
Transportation	=	=	=	=	=	=	=

Discussion

The following bullet points consider the merits of the competing growth scenarios in respect of the established SEA framework. The narrative seeks to both differentiate the scenarios in relative terms and evaluate each scenario in isolation in terms of 'significant effects':

- **Air quality** – air quality is a significant concern in Bedford Town Centre, where there is an area-wide air quality management area (AQMA), and there are also concerns regarding traffic congestion locally, which could potentially serve to indicate a degree of poor air quality. As such, there is a need to minimise car trips and, in particular, car trips through parts of the village where traffic congestion is an issue (particularly where there are also 'sensitive receptors', e.g. school children). In light of these points, it is appropriate to highlight sites 312, 652 and 653 as performing relatively poorly, as these sites are relatively distant from the village centre. Significant negative effects are not predicted, however, given no reason to suggest the likelihood of impacts to air quality within an AQMA.
- **Biodiversity** - none of the sites in question intersect an area of priority habitat; however, two of the sites – 652 and 653 are adjacent to the small woodland patch (unnamed) located to the east of Hall End Lane (north of the Chequers public house), which is shown by the nationally available dataset (magic.gov.uk) to comprise broadleaved woodland priority habitat. Of these two sites, 652 is the more constrained, as there is also an area of trees onsite that links to the aforementioned woodland, and which would likely be lost as a result of development. In other respects all of the sites in question appear to be fairly unconstrained. Only site 463 intersects a hedgerow (with all other *bounded by* hedgerows), and the aerial imagery potentially serves to suggest that the hedgerow is a relatively recent feature. Significant negative effects are not predicted.

Finally, there is also the need to consider whether Site 317, which is a constant across all scenarios, would lead to significant positive effects, recognising that the effect of allocation will be that land is gifted to the Parish Council for community use. The potential to deliver biodiversity enhancements, alongside new accessible open space, is understood to be a priority, and the area of land in question is significant, at around 17.5ha. On this basis, minor significant positive effects are predicted for scenarios not involving Site 652.

- **Climate change** - both climate change mitigation and adaptation are relevant considerations here. In respect of mitigation, a primary consideration is the need to minimise per capita emissions from transport by minimising the need to travel and supporting a modal shift away from car dependency, i.e. by supporting a shift to 'sustainable' modes of transport (walking, cycling, public transport, electric vehicles). In this respect, sites 312, 652 and 653 perform relatively poorly, for the reasons discussed above, under 'air quality'.

With regards to climate change adaptation a key consideration is flood risk, and in this respect Site 652 is subject to a degree of constraint, in that it intersects an area of surface water flood risk (according to the nationally available dataset).¹ The risk is mostly shown to be 'low' or 'medium'; however, there is also the need to consider the possibility of development leading to increase flood risk downstream, where existing properties intersect land shown to be at 'high' risk of surface water flooding.

In conclusion, it is appropriate to highlight scenarios involving Site 652 as performing relatively poorly; however, significant negative effects are not predicted, for the following reasons:

- Climate change mitigation - whilst the Borough Council declared a climate emergency in 2019, there is no target date for achieving net zero greenhouse gas emissions; also, it is recognised that climate change mitigation is a global issue (such that local actions have limited significance);
- Climate change adaptation (flood risk) - it will be for the Environment Agency to comment in detail, but surface water flood risk generally gives rise to limited concern, relative to fluvial (river) flood risk.

- **Health and well-being** – delivering new community facilities (e.g. a permanent doctor's surgery) is a priority locally; however, none of the sites in question would deliver any significant upgrades to community facilities, either alone or in combination, other than the significant new area of open space discussed above. This potentially reflects the limited scale of the proposed allocations; however, on the other hand, no 'reasonable' site options are identified that are of a scale to deliver significant upgrades to community infrastructure.

Another important consideration relates to safety of pedestrians and cyclists; in this respect, it is noted that there is no pedestrian footpath along that part of Hall Lane closest to the Keeley Lane junction, which could pose an issue for residents of sites 312, 652 and 653, including school children walking to Wootton Upper School. It is also noted that Hall Lane forms part of the John Bunyan long distance footpath, such that it is likely to be already fairly heavily used by pedestrians. However, significant negative effects are not predicted.

¹ See <https://flood-warning-information.service.gov.uk/long-term-flood-risk/map>

- **Historic environment** – all of the sites in question, other than Site 314, are in proximity to at least one listed building, with Site 463 likely to be that which is most constrained, as it is in proximity to the cluster of five listed buildings at Keeley Green (also a single listed farmhouse on its western edge). With regards to adjacent sites 312 and 653, there would likely be impacts to the landscape setting of just one listed farmhouse; however, this farmhouse is quite prominent from Keeley lane, and it is also noted that the cluster of buildings at Tinker's Corner (the junction of Keeley Lane and Hall Lane) is potentially associated with a degree of historic character. With regards to Site 652, the homes would presumably be well-screened from Hall Lane; however, the access point will likely change the character of the lane - which has a distinct rural character - in proximity to the two listed buildings; also, it is noted that two public footpaths cross the site and a third is adjacent. In conclusion, the highest growth option performs relatively poorly, but significant negative effects are not predicted. It will be for Historic England to comment in detail.
- **Land, soil and resources** – all of the land in question (both that proposed for housing and that proposed for new open space) has been surveyed in detail to establish the quality of the agricultural land (which is quite unusual), with the finding that all sites comprise grade 3b quality land (which *is not* classified as best and most versatile), except Site 463, which comprises grade 3a quality land (which *is* classified as best and most versatile). The wider picture is that land in the vicinity of Wootton is primarily associated with 'grade 3' quality land according to the low resolution national dataset, although there are also areas of 'grade 2' quality land nearby. On this basis, it is not appropriate to suggest that higher growth options perform worse than lower growth options. With regards to effect significance, scenarios involving Site 463 are predicted to result in minor significant negative effects, noting that whilst the proposal is to deliver homes on the northern part of the site only, the effect of allocation will be that agricultural uses also cease on the southern part of the site.
- **Landscape** – all of the sites in question are likely to be associated with a landscape sensitivity, and it is a challenge to confidently differentiate between them. There is a notable density of public footpaths in the area, including the John Bunyan Trail, hence it is likely to be the case that there are significant views across all of the sites in question from a public footpath, and/or from either Hall Lane (which has a notable rural character) or Keeley Lane. Site 317 will lead to the delivery of new 'green infrastructure' that is certainly a positive, from a landscape perspective, noting the location of Wootton within the Forest of Marston Vale; however, this site is a constant across all of the growth scenarios.

A key question is whether higher growth scenarios should be flagged as problematic. On one hand all of the sites in question are located within the existing 'landscape framework' provided by Hall Lane and Keeley Lane, and the highest growth scenario (Scenario 7) *could potentially* support a strategic approach to planning for green infrastructure and views within this area. However, on the other hand, the Bedford Borough Landscape Capacity Study does identify the need to conserve the "dispersed, open/loose settlement character" and recommends: *"Retain the separate identity of surviving dispersed settlements and 'Ends' of historic origin, restricting further coalescence with villages such as at Wootton."* A further consideration is that a lower growth scenario could lead to increased pressure for future growth elsewhere within the parish, outside of the Hall Lane / Keeley Lane landscape framework.

In conclusion, the scenarios are judged to perform on a par, and significant negative effects are not predicted.

- **Population and community** – matters relating to community infrastructure, open space, support for walking/cycling and pedestrian safety have already been discussed above. A further important consideration is the established local preference for delivering smaller scale housing schemes, of up to 25 homes. On this basis scenarios involving Site 314 are judged to perform poorly. It is also important to note that both Site 317 and Site 463 are allocated in part, with the remaining land remaining in the control of the land-owner, such that expansion of these sites in the future is a strong possibility. Finally, there is a degree of support for higher growth scenarios as these would provide for housing needs locally, as established by the Housing Needs Survey (2017). In light of these points, Scenario 7 is predicted to result in significant positive effects.
- **Transportation** - matters relating to ease of access to community facilities and safe pedestrian movements have already been discussed above. It is difficult to differentiate the site options further, in transport terms, with none of the sites in question known to be constrained in terms of achieving safe vehicular access. A local issue relates to the need to avoid traffic in the vicinity of Wootton Upper School, where there is congestion at peak times, with implications for pedestrian (school children) safety; however, it is not clear that any of the scenarios will lead to any notable issues/impacts.

In **conclusion**, the assessment shows all scenarios to be associated with pros and cons. It is for the Steering Group and Parish Council to weigh these 'in the balance' and, in turn, reach an overall conclusion on the best performing scenario – see discussion below.

The Steering group responded to the growth scenarios assessment is as follows:

“The Steering Group recognises that all scenarios are associated with pros and cons, but supports Scenario 7 on balance, particularly because of the benefits that this approach to growth will bring in ‘population and community’ terms. The Steering Group notes the drawbacks associated with Scenario 7, but concludes that these are acceptable and/or there is the potential to address issues and mitigate impacts through policy in the Neighbourhood Plan and through detailed work at the planning application stage. Specific points are as follows:

- Air quality - the Steering Group is confident that Scenario 7 will not lead to any significant concerns.
- Biodiversity - whilst it is accepted that there will be some limited loss of trees through development at Site 652, the overall effect of the Neighbourhood Plan should be to achieve a net gain in biodiversity at the Parish and wider ‘landscape’ scale, e.g. supporting connectivity between the important woodland patches that characterise land between Bedford and Milton Keynes.
- Flood risk – the Steering Group will seek to work closely with the Environment Agency to ensure avoidance or suitable mitigation of an surface water flood risk.
- Listed buildings and historic character - the Steering Group will seek to work closely with Historic England to ensure avoidance or suitable mitigation of any impacts to the setting of listed buildings.
- Walking and cycling to access services and facilities – the Steering Group recognises that the proposed allocations are not ideally located in this respect, but both Keeley Lane and Hall Lane are suitable for walking and cycling, and there is also a good network of public footpaths in the area.”

Assessment findings at this stage

Part 2 of the Environmental Report presents an assessment of the pre-submission version of the WNDP. Assessment findings are presented as a series of narratives under the SEA framework. The assessment reaches the following overall conclusion:

Overall the assessment identifies the potential for significant positive effects in relation to the ‘Population and community’ SEA topic, on the basis that the plan will provide for housing needs and also deliver significant new open space. Furthermore, the suite of proposed development management policies are supportive of population and communities objectives. Notable positive effects are also predicted in terms of ‘Biodiversity’ (on balance, noting that certain of the proposed allocations are associated with a degree of constraint), landscape (on balance, albeit recognising that all of the proposed allocations are associated with a degree of constraint) and ‘Transportation’ (on balance, albeit recognising that all of the proposed allocations are located beyond easy walking distance of services and facilities). No significant negative effects are predicted, although a notable tension is highlighted in terms of loss of best and most versatile agricultural land.

There is also a need to consider the potential effects of the WNDP in combination with other plans and programmes. This is an important consideration, as Wootton is situated in a nationally identified growth corridor, between Bedford and Milton Keynes. A primary consideration is the need to effectively plan for biodiversity, natural capital and ecosystem services, recognising the importance of land between Bedford and an expanding Milton Keynes in these respects. Land rises notably from the Marston Vale / A421 corridor up towards the Cranfield plateau, and this ridge of rising land is associated with a high density of woodlands, including ancient woodlands and one SSSI woodland, a notably high density of public rights of way and a good density of listed buildings. There is a need to consider the value of access to high quality countryside and large areas of accessible open space under a future scenario whereby the area has seen considerable housing growth.

Next steps

This Environmental Report accompanies the pre-Submission version of the WNDP for Regulation 14 consultation. Following consultation, any representations made will be considered by the Steering Group and Parish Council, when finalising the plan for submission. The ‘Submission’ version of the plan will then be submitted to Bedford Borough Council (alongside an Updated Environmental Report, if necessary). The plan and supporting evidence will then be published for further consultation, and then submitted for an Independent Examination. At Independent Examination, the Neighbourhood Plan will be considered in terms of whether it meets the Basic Conditions for Neighbourhood Plans and is in general conformity with the Bedford Borough Local Plan.

If the subsequent Independent Examination is favourable, the SNDP will be subject to a referendum, organised by Bedford Borough Council. If more than 50% of those who vote agree with the Neighbourhood Plan, then it will be ‘made’. Once made, the WNDP will become part of the Development Plan for Bedford Borough.

1 Introduction

1.1 Background

- 1.1.1 AECOM is commissioned to lead on Strategic Environmental Assessment (SEA) in support of the emerging Wootton Neighbourhood Development Plan (WNDP).
- 1.1.2 The WNDP is being prepared by a Steering Group in the context of the Bedford Borough Local Plan, which was adopted by the Borough Council on 15 January 2020. Once 'made' the WNDP will have material weight when deciding on planning applications, alongside the Bedford Borough Local Plan.
- 1.1.3 SEA is a mechanism for considering and communicating the likely effects of an emerging plan, and alternatives, with a view to avoiding and mitigating negative effects and maximising positive effects. SEA of the WNDP is a legal requirement.²

1.2 SEA explained

- 1.2.1 It is a requirement that SEA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004, which transposed into national law EU Directive 2001/42/EC on SEA.
- 1.2.2 In-line with the Regulations, a report (known as the **Environmental Report**) must be published for consultation alongside the draft plan that "*identifies, describes and evaluates*" the likely significant effects of implementing "*the plan, and reasonable alternatives*".³ The report must then be taken into account, alongside consultation responses, when finalising the plan.
- 1.2.3 More specifically, the Report must answer the following three questions:
 - 1) What has plan-making / SEA involved **up to this point**?
 - including in relation to 'reasonable alternatives'.
 - 2) What are the SEA findings **at this stage**?
 - i.e. in relation to the draft plan.
 - 3) What happens **next**?

1.3 This Environmental Report

- 1.3.1 This report is the Environmental Report for the WNDP. It is published alongside the draft – 'pre-submission' – version of the plan, under Regulation 14 of the Neighbourhood Planning Regulations (2012, as amended).
- 1.3.2 This report essentially answers questions 1, 2 and 3 in turn, to provide the required information.⁴ Each question is answered within a discrete 'part' of the report.
- 1.3.3 However, before answering Q1, two initial questions are answered to further set the scene:
 - What is the plan seeking to achieve?
 - What is the scope of the SEA?

² Regulation 15 of the Neighbourhood Planning Regulations (2012, as amended) requires that each Neighbourhood Plan is submitted to the Local Authority alongside either: A) an environmental report; or, B) a statement of reasons why SEA is not required, prepared following a 'screening' process completed in accordance with Regulation 9(1) of the Environmental Assessment of Plans and Programmes Regulations ('the SEA Regulations'). The WNDP was subject to formal screening in 2019, at which time it was determined that SEA is required.

³ Regulation 12(2) of the Environmental Assessment of Plans and Programmes Regulations 2004.

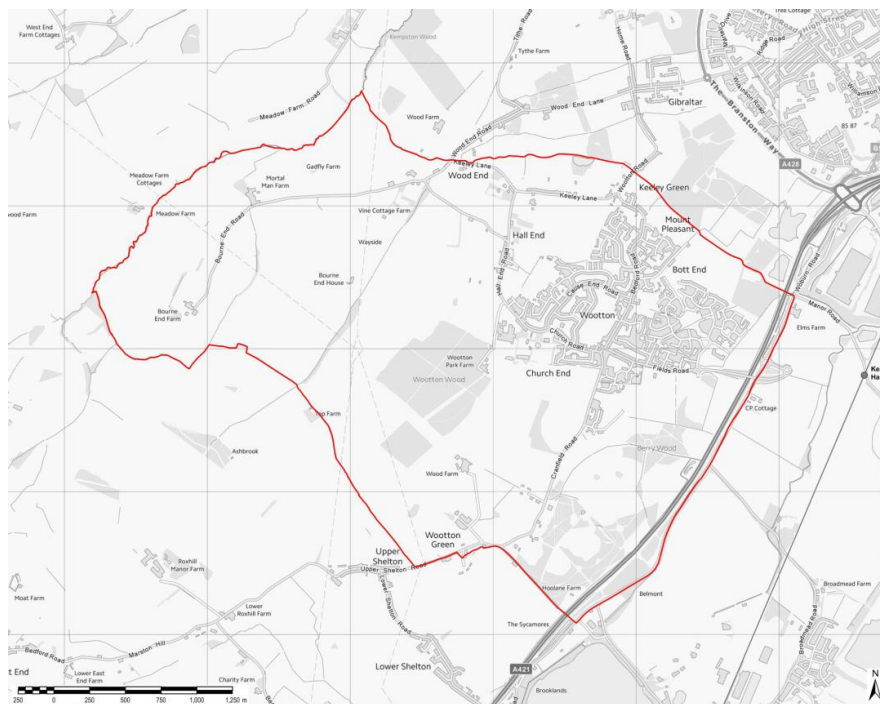
⁴ See **Appendix I** for further explanation of the regulatory basis for answering certain questions within the Environmental Report, and a 'checklist' explaining more precisely the regulatory basis for presenting certain information.

2 What is the plan seeking to achieve?

2.1 Introduction

- 2.1.1 This section considers the strategic planning policy context provided by the Bedford Borough Local Plan, before then presenting the WNDP vision and objectives. Figure 2.1 presents the plan area.

Figure 2.1: The plan area⁵



2.2 Relationship with the Bedford Borough Local Plan

- 2.2.1 NDPs are required to be in general conformity with the strategic policies of the Local Plan. In this way it is intended for the Local Plan to provide a clear overall strategic direction for development in Bedford Borough, whilst enabling finer detail to be determined through the NDPs where appropriate.
- 2.2.2 Figure 2.2 presents the key diagram from the recently adopted Local Plan, highlighting Wootton as a key service centre and the location of strategic housing commitment, i.e. a strategic growth location that gained planning permission ahead of the Local Plan, the location of which can be seen at Figure 2.3.
- 2.2.3 Figures 2.2 and 2.3 also show the proximity of Wootton to strategic housing commitments at Wixams and at Stewartby, and a new strategic allocation at Stewartby Brickworks.
- 2.2.4 Figure 2.2 also highlights a strategic employment commitment within the Parish, adjacent to the A421, the location of which can be seen in Figure 2.3. Figures 2.2 and 2.3 also show the proximity of Wootton to three further strategic employment commitments to the southwest of Bedford.
- 2.2.5 In short, Wootton is located on a strategic transport corridor that has seen significant growth over recent years and is expected to see further growth in the future as part of the Oxford to Cambridge Arc initiative. It is also important to note the extent of committed and proposed development to the west of Wootton, within Central Bedfordshire District (and Milton Keynes beyond). Most notably, the Policy S2 of the submitted Central Bedfordshire Local Plan proposes 'Marston Vale New Villages', a mixed-use development comprising of up to 5,000 dwellings and a minimum of 40 hectares of employment land.

⁵ Contains Ordnance Survey Data (c) Crown copyright and database right 2019

Figure 2.2: Bedford Borough Local Plan Key Diagram

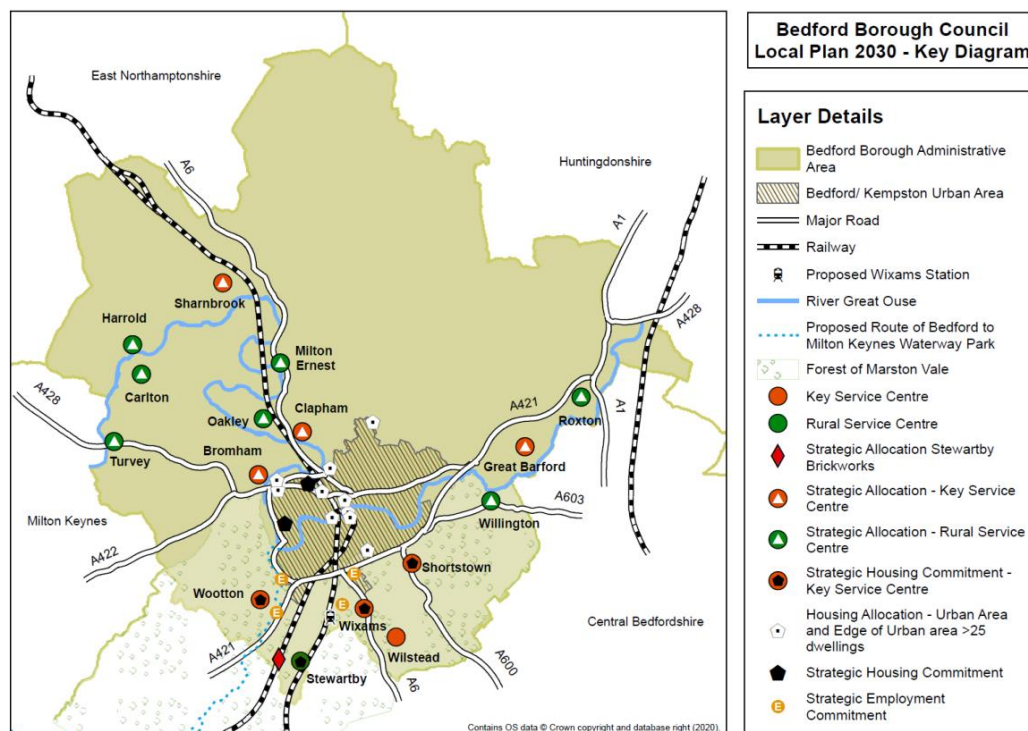
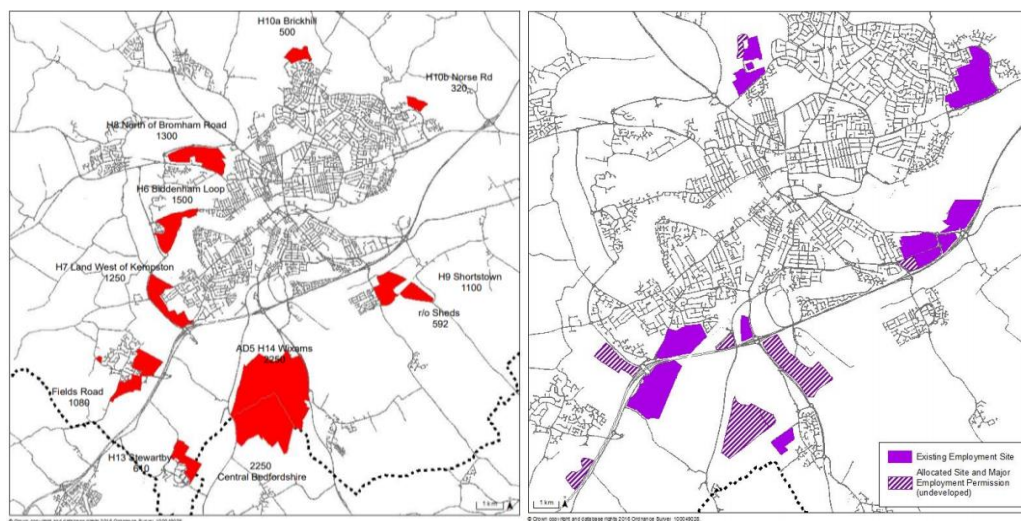


Figure 2.3: Committed strategic housing sites (left) and strategic employment sites (right)



2.2.6 Having made these initial points, the following headings discuss key policies within the Local Plan.

Policy 1: Reviewing the Local Plan 2030

2.2.7 This policy commits the Council to commencing a review of the Local Plan within one year of adoption, explaining that: *“The plan review will secure levels of growth that accord with government policy and any growth deals that have been agreed. The planning and delivery of strategic growth will be aligned with the delivery of planned infrastructure schemes including the A421 expressway... East West Rail link...”*

Policy 3S: Spatial strategy

2.2.8 Amongst other things, Policy 3S establishes a focus on:

- The completion of Wixams new settlement and strategic urban and village extensions to the west of Bedford, at Wootton, Stewartby and Shortstown (i.e. the ‘committed’ sites shown in Figure 2.2, above).
- A strategic village expansion utilising brownfield land at Stewartby (i.e. the strategic allocation to the south of Wootton, shown in Figure 2.2, above).

- Strategic residential development in key service centres in association with expanded education provision where necessary (N.B. Wootton is a key service centre).
- Strategic employment locations related to the primary road network in the context of increasing east-west connectivity through road and rail improvements (i.e. the existing and committed strategic employment locations shown in Figures 2.2 and 2.3).

Policy 4S: Amount and distribution of housing development

- 2.2.9 This policy assigns a housing requirement to ten key service centres and local service centres that must be provided for through an NDP. Importantly, Wootton is not listed by the policy, hence it follows that the WNDP is not set a housing requirement by the Local Plan. Importantly, the policy also states: *“The delivery of housing which meets the requirements of this policy will be monitored annually by the Council to ensure that the housing requirement is met. The Council reserves the right to identify opportunities to address any shortfall through the development plan process.”* Also, the supporting text to Policy 4S states: *“Growth in the key service centres will provide primarily new homes but also services for the local community.”*

Policy 7S: Development in the countryside

- 2.2.10 This policy identifies that new development sites outside of the defined Settlement Policy Areas (see Figure 2.4) will only be permitted if certain criteria are met. One of the defined criteria relates to the question of whether the site is allocated within an adopted ('made') NDP.

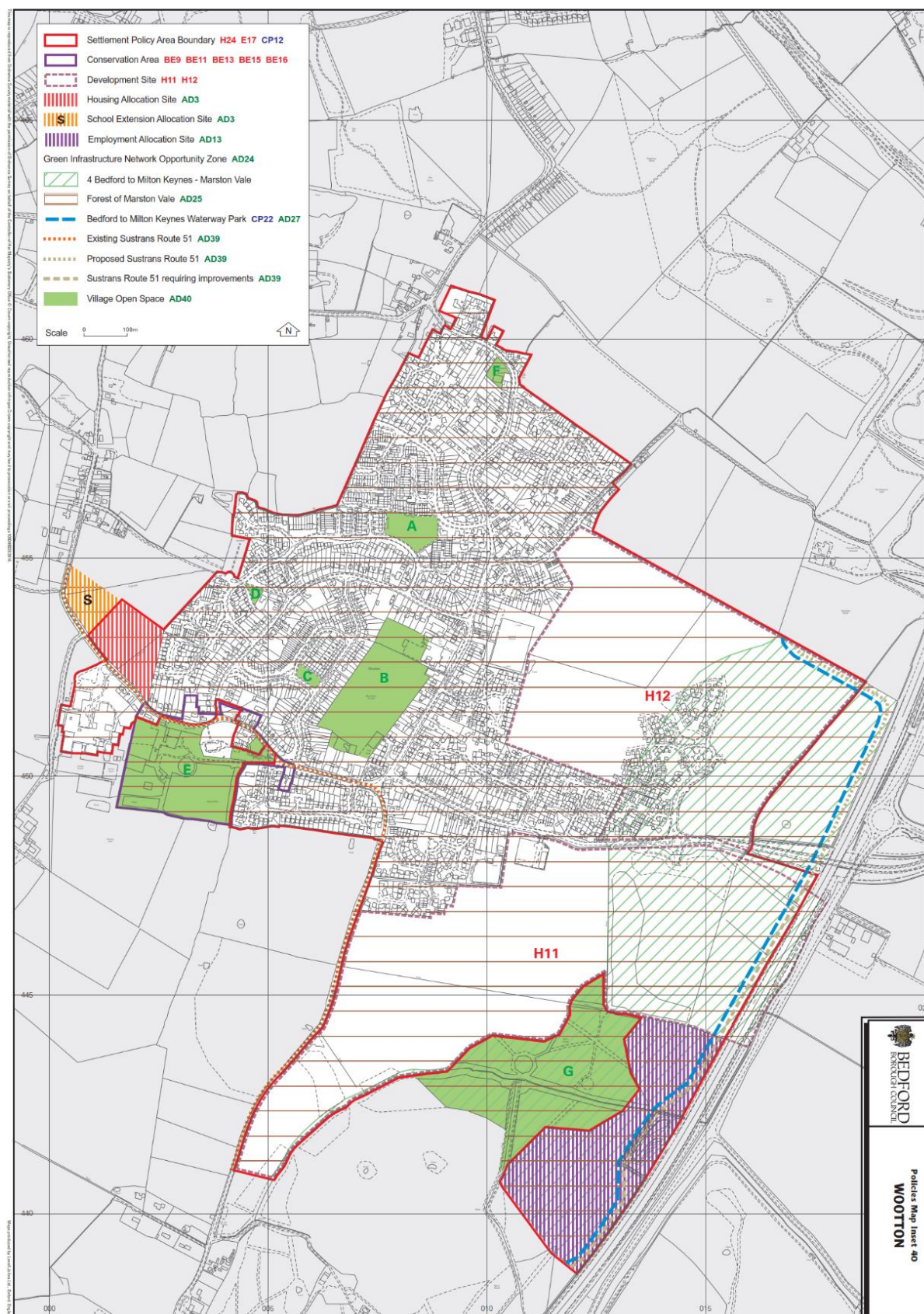
Other policies

- 2.2.11 A range of other policies within the Local Plan serve as an important strategic input to the establishment of growth scenarios. For example, Policy 2S (Healthy communities) recognises the importance of delivering and protecting a network of health facilities; and Policy 28S (Place-making) highlights the importance of allocations promoting local distinctiveness, integrating well with and complementing the character of the area, contributing to provision of green infrastructure, enhancing the landscape, reflecting a proactive approach to the historic environment, and avoiding adverse impacts on biodiversity assets.

2.3 Vision and objectives of the WNDP

- 2.3.1 The vision for Wootton is: *“Protect and strengthen Wootton’s strong local identity and integrity as a historic rural village, working together to improve quality of life for those living, studying and working in Wootton.”*
- 2.3.2 Six strategic plan objectives have been developed, aligned with the vision set out above, in order to guide the development of policies (N.B. the plan document also presents a series of more detailed objectives):
- 1) Provide housing which meets the needs of the diverse and growing community and to influence the location, scale, design and type of new housing to ensure that it fits with the distinctive character of Wootton’s built heritage and meets identified local housing needs.
 - 2) Protect the place defining characteristics of Wootton’s special local environment and enriched countryside, including the existing local green spaces, and to ensure that new development creates new space and contributes to the open space needs of the local community, including the preservation of the natural features in the distinctive landscape.
 - 3) Maintain and improve local facilities, amenities and services which provide a community focus and help sustain the vitality, health and quality of life of all residents.
 - 4) Protect and strengthen the economic benefits of Wootton as a key service area and to encourage and support local business and local measures to improve employment prospects in the village.
 - 5) Promote community infrastructure and access improvements (such as improve traffic management, car parking, pedestrian and cycle routes) needed to support new development (including change of use) shall avoid creating congestion, and/or worsening or creating highway safety impacts in the village.
 - 6) Preserve and enhance Wootton’s historic environment to protect and improve features which contribute to this environment.

Figure 2.4: Wootton Settlement Policy Area and other designations from the Local Plan policies map



3 What is the scope of the SEA?

3.1 Introduction

- 3.1.1 The aim here is to introduce the reader to the scope of the SEA, i.e. the sustainability topics / issues / objectives that should be a focus of the assessment of the plan and reasonable alternatives. Further information is presented in **Appendix II**.

Consultation

- 3.1.2 The SEA Regulations require that “*when deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies*”. In England, the consultation bodies are the Environment Agency, Historic England and Natural England.⁶ As such, these authorities were consulted in early 2020.⁷

3.2 The SEA framework

- 3.2.1 The SEA scope is summarised in a list of topics, objectives, issues and questions, known as the SEA framework. Table 3.1 presents a summary.

Table 3.1: The SEA framework (summary)

SEA topic	SEA objective(s)
Air quality	Improve air quality in the Neighbourhood Plan Area and minimise and/ or mitigate all sources of environmental pollution
Biodiversity	Protect and enhance all biodiversity and geodiversity.
Climate change (mitigation and adaptation)	Reduce the level of contribution to climate change made by activities within the Neighbourhood Plan Area Support the resilience of the Neighbourhood Plan Area to the potential effects of climate change, including flooding
Historic environment	Protect, conserve and enhance the historic environment within the Neighbourhood Plan area
Landscape	Protect and enhance the character and quality of landscapes and villagescapes
Land, soil and water resources	Ensure the efficient and effective use of land, protect soil quality and avoid the loss of high-quality agricultural land. Use and manage water resources in a sustainable manner.
Population and communities	Cater for existing and future residents’ needs as well as the needs of different groups in the community, and improve access to local, high-quality community services and facilities. Reduce deprivation and promote a more inclusive and self-contained community. Provide everyone with the opportunity to live in good quality, affordable housing, and ensure an appropriate mix of dwelling sizes, types and tenures.
Health and wellbeing	Improve the health and wellbeing residents within the Neighbourhood Plan area.
Transportation	Promote sustainable transport use and reduce the need to travel.

⁶ These consultation bodies were selected “*by reason of their specific environmental responsibilities, [they] are likely to be concerned by the environmental effects of implementing plans and programmes*” (SEA Directive, Article 6(3)).

⁷ The SEA Scoping Report is available on the Neighbourhood Plan website.

Part 1: What has plan-making/ SEA involved to this point?

4 Introduction to Part 1

4.1 Overview

- 4.1.1 Whilst work on the WNDP has been underway for several years, the aim here is not to provide a comprehensive explanation of work to date, but rather to explain work undertaken to develop and appraise **reasonable alternatives** in 2020.
- 4.1.2 More specifically, this part of the report presents information on the consideration given to reasonable alternative approaches to addressing a particular issue that is of central importance to the plan, namely the allocation of land for housing, or **growth scenarios**.

Why focus on growth scenarios?

- 4.1.3 The decision was taken to develop and assess reasonable alternatives in relation to the matter of allocating land for housing, or growth scenarios, in light of the WNDP objectives (see para 2.3.2), on the basis that housing growth is known to be a matter of key interest amongst local residents and other stakeholders, and on the basis that a choice exists where there is the likelihood of being able to differentiate between the merits of alternatives in respect of 'significant effects'. National Planning Practice Guidance is clear that SEA should focus on matters likely to give rise to significant effects.

Who's responsibility?

- 4.1.4 It is important to be clear that:
- **Establishing** growth scenarios - is ultimately the responsibility of the plan-maker, although the SEA consultant (AECOM) is well placed to advise.
 - **Assessing** growth scenarios - is the responsibility of the SEA consultant.
 - **Selecting** the preferred option - is the responsibility of the plan-maker.

4.2 Structure of this part of the report

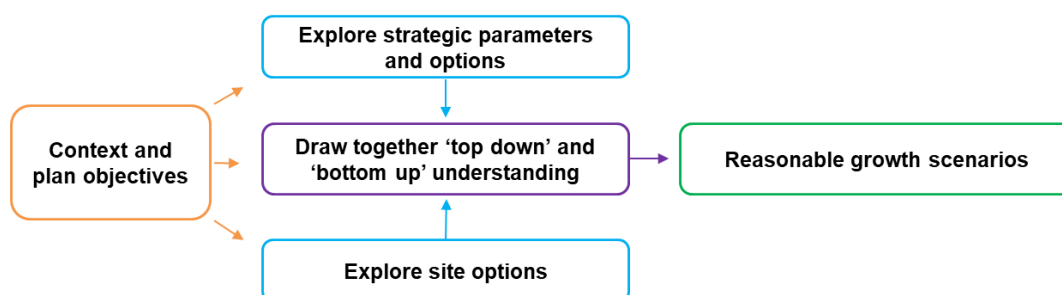
- 4.2.1 This part of the report is structured as follows:
- **Chapter 5** - explains the process of establishing growth scenarios;
 - **Chapter 6** - presents the outcomes of assessing growth scenarios;
 - **Chapter 7** - explains reasons for selecting the preferred option, in light of the assessment.

5 Establishing growth scenarios

5.1 Introduction

- 5.1.1 The aim here is to explain a process that led to the establishment of growth scenarios and, in turn, present “an outline of the reasons for selecting the alternatives dealt with”.⁸
- 5.1.2 Specifically, there is a need to: **1)** explain strategic parameters and options with a bearing on the establishment of growth scenarios; **2)** discuss work completed to examine site options; and **3)** explain how the ‘top down’ and ‘bottom up’ understanding was drawn together in order to arrive at growth scenarios.

Figure 5.1: Establishing the growth scenarios



5.2 Strategic parameters and options

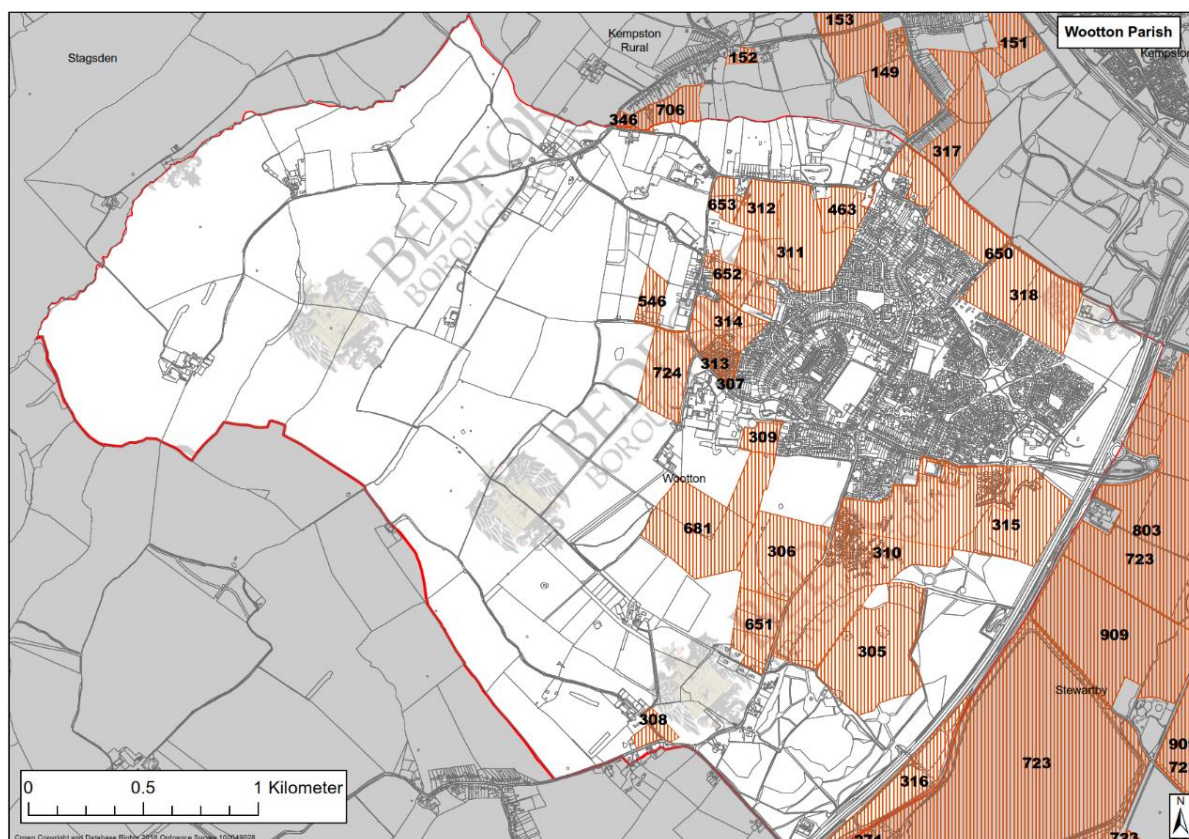
- 5.2.1 As discussed, there is no requirement for the WNDP to allocate sites to deliver housing; however, Policy 7S (Development in the countryside) is supportive of allocation of sites through the Neighbourhood Plans. In this sense Policy 7S is in-line with the National Planning Policy Framework (NPPF), including paragraph 59, which supports “significantly boosting the supply of homes” and paragraph 69, which states: “*Neighbourhood planning groups should also consider the opportunities for allocating small and medium-sized sites (of a size consistent with paragraph 68a) suitable for housing in their area.*”
- 5.2.2 Further context comes from the commitment for an early review of the Local Plan, aligned with the point made within Policy 4S regarding regular monitoring of the housing land supply and the Borough Council reserving the right to address any shortfall through the development plan process. These points potentially serve to suggest that there is merit in taking a proactive approach to housing supply through the WNDP.
- 5.2.3 Finally, there is a need to consider the local context, in particular the Housing Needs Survey (2017), which identified a need for 145 new homes, over-and-above new homes set to come forward at committed sites, in order to meet local needs. Aligned with this, there is a need to consider views expressed by local residents through public consultation in August 2018. Through the consultation there was quite strong support for the WNDP to allocate one or more sites to deliver a modest quantum of homes tailored to local needs, including bungalows and smaller homes.

5.3 Site options

- 5.3.1 A starting point for the examination of site options – i.e. sites potentially in contention for allocation through the WNDP – is the WNDP Site Assessment Report (SAR; October 2019), which examined each of the sites submitted as part of the Local Plan ‘Call for Sites’ process, which ended in 2017 – see Figure 5.1.
- 5.3.2 Those sites that remain uncommitted at the current time are considered below under three headings:
- Site options to the **north** of the village;
 - Site options to the **west** of the village;
 - Site options to the **south** of the village.

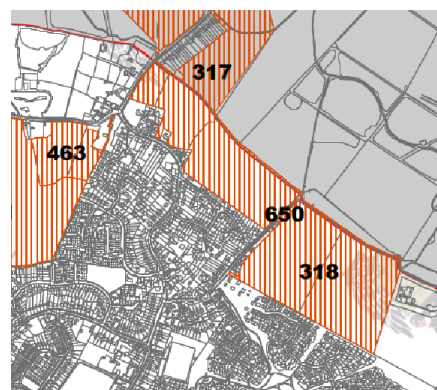
⁸ Schedule 2(8) of the SEA Regulations.

Figure 5.1: Long list of site options



Site options to the north of the village

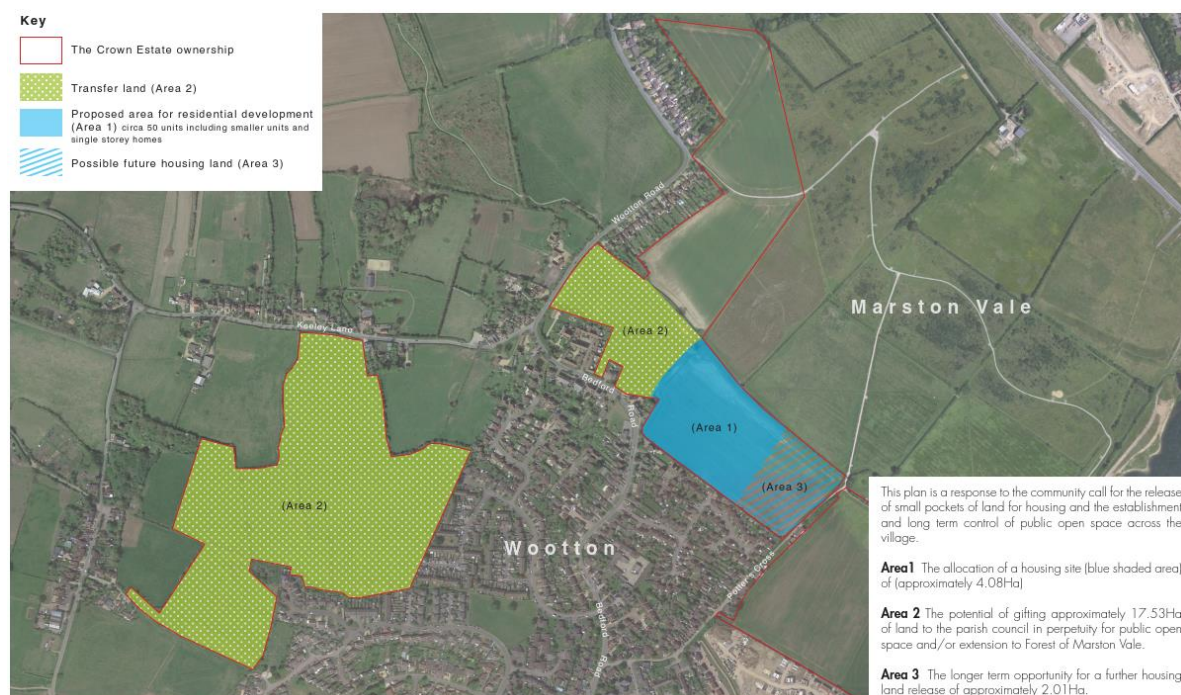
5.3.3 Beginning with Site 317, the SAR identifies significant suitability concerns; however, there is the potential for allocation of this site to deliver significant 'planning gain'. Specifically, the landowner has agreed to gift a very significant area of land (17.5 ha) to the Parish Council as a quid pro quo for A) allocating part of the site (4ha) for circa 50 homes; and B) identifying another part of the site (2ha) as a potential location for housing development in the future, i.e. beyond the plan period – see Figure 5.2. This is an attractive proposition and it follows that **Site 317** should be taken forward for further detailed consideration as part of the appraisal of growth scenarios.



5.3.4 Moving to the east, Site 318 is less suitable for allocation, including as it would involve extension of a recently completed strategic housing scheme that requires time to 'bed in'. Furthermore, this is a large site, such that allocation of the site in addition to Site 317 would amount to over-allocation. It follows that **Site 318** can be ruled-out at this stage.

5.3.5 Finally, **Site 650** performs poorly and can be ruled-out, with the SAR identifying significant concerns in respect of constraints, overall suitability and achievability (albeit the site was highlighted as the most preferable site for allocation through the public consultation in 2018). This is a very small and narrow site that is more appropriately considered in-combination with Site 318.

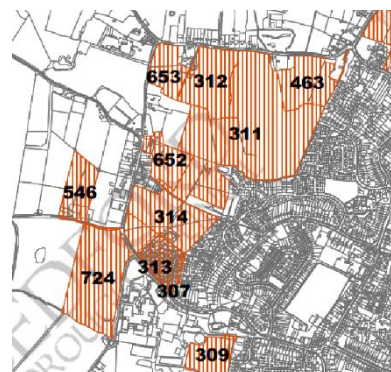
Figure 5.2: Crown Estate proposal to gift land to the Parish Council



Site options to the west of the village

5.3.6 Beginning with Site 311, which is a notably large site, this is one of the two parcels of land that the Crown Estate proposes to gift to the Parish Council as a quid pro quo for allocation of part of Site 317 for housing, as discussed above. It follows that **Site 311** can be ruled out as an allocation option. Furthermore, the SAR identifies significant concerns in respect of site suitability, including as the land includes ridge and furrow and is crossed by several public footpaths.

5.3.7 The next port of call is the cluster of three sites (other than Site 311) to the south of Keeley Lane. As an initial point it is important to note that Keeley Lane is relatively well suited to safe access, and benefits from a footpath along its entire length. Having made this initial point, the following bullet points consider the three sites in turn:



- Beginning to the east, Site 463 is identified as performing relatively well by the SAR, in that it is assigned an 'amber' suitability rating, noting the potential to link well to the existing edge of the village (albeit quite distant from the village centre) and on the assumption of a modest scale scheme on part of the site. There are notable historic environment constraints, given proximity to the cluster of grade II listed buildings at Keeley Green and a stand-alone grade II listed building adjacent to the west, and also noting ridge and furrow evident on part of the site; however, on balance **Site 463** should be taken forward.
- Moving west, Site 312 is also identified as performing relatively well by the SAR, in that it is assigned an 'amber' suitability rating, on the assumption of a modest scale scheme on part of the site, albeit the site is notably less well linked to the existing edge of the village and, correspondingly, beyond easy walking distance of the village centre. There are historic environment constraints, including relating to an adjacent grade II listed building; however, on balance **Site 312** should be taken forward.
- Moving west, Site 653 performs less well, in that the SAR identifies significant concerns in respect of suitability, noting poor accessibility to the existing services and facilities in the village, historic environment constraints (adjacent grade II listed building) and potential access challenges given the adjacent 'Tinkers Corner' junction. On balance **Site 653** should be taken forward, noting the potential for this site to be allocated in combination with adjacent site 312, potentially leading to benefits.

5.3.8 The next cluster of sites comprises those falling between the existing edge of Wootton and Hall End:

- Beginning with **Site 307** and **Site 313**, one of these sites comprises a recently completed housing scheme whilst the other comprises land that is committed to deliver a school extension.
- With regards to Site 314, this is a relatively large site and is identified as performing relatively well by the SAR, in that it is assigned an 'amber' suitability rating, noting the potential to link well to the existing edge of the village, with village facilities in relatively close proximity (relative to the Keeley Lane sites). However, the site is adjacent to a recently completed site and development would close the gap between the southwestern edge of Wootton and Hall End. On balance **Site 314** should be taken forward.
- Finally, Site 652 is identified as performing relatively well by the SAR, in that it is assigned an 'amber' suitability rating; however, it is distant from the main village (on the assumption that an all-weather footpath cannot be delivered across the field to east) and gives rise to historic environment concerns as it contains one grade II listed building (the Chequers Pub) and is adjacent to another. There are clear issues, but on balance **Site 652** should be taken forward, noting that a potential strategic opportunity associated with completing the expansion of the village as far as Hall End.

5.3.9 The final two sites to the west of the village perform less well as they are located beyond Hall End Road, and hence are inherently relatively poorly linked to the village:

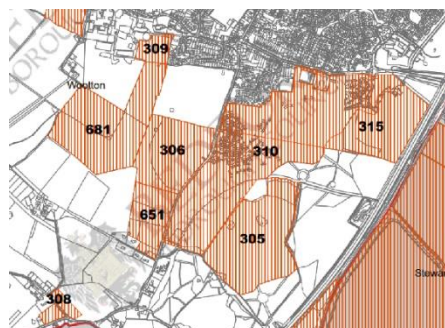
- In particular, **Site 546** performs poorly in terms of connectivity to the village.
- With regards to Site 724, this site would be adjacent to the secondary school, but is also adjacent to Wootton Wood (a locally designated ancient woodland), might impact on views across rising land towards Wootton Wood (including as experienced from the John Bunyan Trail long-distance path) and would require access onto Hall End Road in proximity to the school (which is associated with heavy traffic at peak times) and at a point where there is a problematic bend in the road. An application for 81 homes on the site was recently refused planning permission by the Borough Council on transport and pedestrian (school children) safety grounds, and a subsequent appeal was dismissed in September 2020 (19/00894/MAO). For these reasons **Site 724** can be ruled out.

Site options to the south of the village

5.3.10 These sites fall into two clusters.

East of Cranfield Road

5.3.11 Firstly, **Site 310** and **Site 315** are both committed (or, at least, mostly committed) and hence can be ruled out from further consideration. The very south-eastern-most part of Site 310 is uncommitted, but is appropriately considered alongside Site 305.



5.3.12 With regards to Site 305, the SAR records that there was relatively low objection to this site through public consultation in 2018 (75% objection); however, the SAR highlights significant concerns in respect of constraints to development and overall suitability, particularly noting distance and poor connectivity to the village centre. The site is owned by Bedford Borough Council, which is potentially a 'positive' in support of development, in terms of the ability to secure planning gain (e.g. delivery of new community infrastructure); however, the site is not appropriate for allocation through the WNDP on account of its scale and as it would further extend a strategic extension to the village that is currently building out. This extension to the village requires time to 'bed in', and might appropriately be bounded to the south by woodland creation, which would be in line with objectives relating to the Forest of Marston Vale and would serve to ensure a compact form to the village in perpetuity. In conclusion, **Site 305** can be ruled-out.

West of Cranfield Road

5.3.13 Beginning with **Site 309**, this site performs very poorly, and can be ruled-out, on account of comprising Local Green Space, as designated by the Local Plan. In addition, the site is located within the Conservation Area and is in close proximity to the Grade II* listed Wootton House.

- 5.3.14 Moving to the south, Site 306, Site 651 and Site 681 can be considered in combination. The SAR identifies significant concerns in respect of the suitability of all three sites, including on the basis of poor connectivity to the existing edge of the village. Also, in the view of the WNDP Forum, any growth in this area would require a comprehensive approach - with a view addressing constraints and opportunities, e.g. in respect of biodiversity, transport infrastructure and community infrastructure - which is beyond the scope of the WNDP. It follows that **Site 306, Site 651 and Site 681** can be ruled-out.
- 5.3.15 Finally, **Site 308** can be ruled out due to distance from the village, heritage constraints and biodiversity constraints, albeit it generated a degree of support through public consultation in 2018 (73% objection).

5.4 Growth scenarios

- 5.4.1 The discussion above has served to highlight the need to explore six sites further through the appraisal of growth scenarios. These sites fall into three clusters – see Table 5.1.

Table 5.1: Site options progressed to the growth scenarios

Location	Progress site option(s)
North	Site 317 (part)
West (Keeley Lane)	Site 463 (part), Site 312, Site 653
West of the Village (Hall End)	Site 314, Site 652

- 5.4.2 A starting point for the establishment of growth scenarios is Site 317, which is quite strongly supported. It follows that this site can reasonably feature as an allocation for 50 homes across all growth scenarios.
- 5.4.3 With regards to allocation of additional sites there are numerous potential combinations, but the following scenarios can be envisaged:
- Limited growth along Keeley Lane (Site 463)
 - Comprehensive growth along Keeley Lane (Sites, 463, 312 and 653)
 - Limited growth west of the village (Hall End) 1 (Site 314)
 - Limited growth west of the village (Hall End) 2 (Site 652)
 - Comprehensive growth west of the village (Sites 314 and 652)
 - A reasonable high growth scenario involving both comprehensive growth along Keeley Lane and limited growth west of the village.
- 5.4.4 There are further scenarios that could potentially be explored; however, there is a need to limit the number of scenarios subjected to appraisal, with a view to ensuring a manageable and accessible assessment and, in turn, effective consultation. It follows that there are seven reasonable growth scenarios.

Table 5.2: The reasonable growth scenarios

Location	Site	Growth scenarios						
		1	2	3	4	5	6	7
North	317 (part)	50	50	50	50	50	50	50
West (Keeley Lane)	463 (part)		25	25				25
	312			25				25
	653			20				20
West of the Village (Hall End)	314*				50		50	
	652					25	25	25
Total homes		50	75	120	100	75	125	145

* The capacity of Site 314 is not clear, but is assumed to be in the region of 50 homes. It is known that the site is not available for a scheme of 25 homes, but it is assumed that the site would be made available for 50 homes.

6 Assessing growth scenarios

6.1 Introduction

6.1.1 The aim of this chapter is to present assessment findings in relation to the seven growth scenarios.

6.2 Assessment findings

6.2.1 **Table 6.1** presents assessment findings in relation to the six growth scenarios.

6.2.2 With regards to methodology:

Within each row (i.e. for each of the topics that comprise the SEA framework) the columns to the right hand firstly rank the scenarios in order of preference and then, secondly, highlight instances of a predicted positive (**green**), minor positive (**light green**), minor negative (**amber**) or negative (**red**) significant effect on the baseline. Also, '=' is used to denote instances where the alternatives perform on a par (i.e. it not possible to differentiate between them).

Table 6.1: Assessment findings

Topic	Rank and significant effects						
	Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Scenario 6	Scenario 7
	317	317 463	317 463 312 653	317 314	317 314 652	317 652	317 463 312 653 652
Air quality	★1	★1	3	★1	2	2	4
Biodiversity	★1	★1	2	★1	3	3	4
Climate change (mitigation and adaptation)	★1	★1	★1	★1	2	2	2
Health and wellbeing	★1	★1	3	★1	2	2	4
Historic environment	★1	2	2	★1	2	2	3
Land, soil and water resources	★1	2	2	★1	★1	★1	2
Landscape	=	=	=	=	=	=	=
Population and communities	3	3	2	4	4	2	★1
Transportation	=	=	=	=	=	=	=

Discussion

The following bullet points consider the merits of the competing growth scenarios in respect of the established SEA framework. The narrative seeks to both differentiate the scenarios in relative terms and evaluate each scenario in isolation in terms of 'significant effects':

- **Air quality** – air quality is a significant concern in Bedford Town Centre, where there is an area-wide air quality management area (AQMA), and there are also concerns regarding traffic congestion locally, which could potentially serve to indicate a degree of poor air quality. As such, there is a need to minimise car trips and, in particular, car trips through parts of the village where traffic congestion is an issue (particularly where there are also 'sensitive receptors', e.g. school children). In light of these points, it is appropriate to highlight sites 312, 652 and 653 as performing relatively poorly, as these sites are relatively distant from the village centre. Significant negative effects are not predicted, however, given no reason to suggest the likelihood of impacts to air quality within an AQMA.
- **Biodiversity** - none of the sites in question intersect an area of priority habitat; however, two of the sites – 652 and 653 are adjacent to the small woodland patch (unnamed) located to the east of Hall End Lane (north of the Chequers public house), which is shown by the nationally available dataset (magic.gov.uk) to comprise broadleaved woodland priority habitat. Of these two sites, 652 is the more constrained, as there is also an area of trees onsite that links to the aforementioned woodland, and which would likely be lost as a result of development. In other respects all of the sites in question appear to be fairly unconstrained. Only site 463 intersects a hedgerow (with all other *bounded by* hedgerows), and the aerial imagery potentially serves to suggest that the hedgerow is a relatively recent feature. Significant negative effects are not predicted.

Finally, there is also the need to consider whether Site 317, which is a constant across all scenarios, would lead to significant positive effects, recognising that the effect of allocation will be that land is gifted to the Parish Council for community use. The potential to deliver biodiversity enhancements, alongside new accessible open space, is understood to be a priority, and the area of land in question is significant, at around 17.5ha. On this basis, minor significant positive effects are predicted for scenarios not involving Site 652.

- **Climate change** - both climate change mitigation and adaptation are relevant considerations here. In respect of mitigation, a primary consideration is the need to minimise per capita emissions from transport by minimising the need to travel and supporting a modal shift away from car dependency, i.e. by supporting a shift to 'sustainable' modes of transport (walking, cycling, public transport, electric vehicles). In this respect, sites 312, 652 and 653 perform relatively poorly, for the reasons discussed above, under 'air quality'.

With regards to climate change adaptation a key consideration is flood risk, and in this respect Site 652 is subject to a degree of constraint, in that it intersects an area of surface water flood risk (according to the nationally available dataset).⁹ The risk is mostly shown to be 'low' or 'medium'; however, there is also the need to consider the possibility of development leading to increase flood risk downstream, where existing properties intersect land shown to be at 'high' risk of surface water flooding.

In conclusion, it is appropriate to highlight scenarios involving Site 652 as performing relatively poorly; however, significant negative effects are not predicted, for the following reasons:

- Climate change mitigation - whilst the Borough Council declared a climate emergency in 2019, there is no target date for achieving net zero greenhouse gas emissions; also, it is recognised that climate change mitigation is a global issue (such that local actions have limited significance);
- Climate change adaptation (flood risk) - it will be for the Environment Agency to comment in detail, but surface water flood risk generally gives rise to limited concern, relative to fluvial (river) flood risk.

- **Health and well-being** – delivering new community facilities (e.g. a permanent doctor's surgery) is a priority locally; however, none of the sites in question would deliver any significant upgrades to community facilities, either alone or in combination, other than the significant new area of open space discussed above. This potentially reflects the limited scale of the proposed allocations; however, on the other hand, no 'reasonable' site options are identified that are of a scale to deliver significant upgrades to community infrastructure.

Another important consideration relates to safety of pedestrians and cyclists; in this respect, it is noted that there is no pedestrian footpath along that part of Hall Lane closest to the Keeley Lane junction, which could pose an issue for residents of sites 312, 652 and 653, including school children walking to Wootton Upper School. It is also noted that Hall Lane forms part of the John Bunyan long distance footpath, such that it is likely to be already fairly heavily used by pedestrians. However, significant negative effects are not predicted.

⁹ See <https://flood-warning-information.service.gov.uk/long-term-flood-risk/map>

- **Historic environment** – all of the sites in question, other than Site 314, are in proximity to at least one listed building, with Site 463 likely to be that which is most constrained, as it is in proximity to the cluster of five listed buildings at Keeley Green (also a single listed farmhouse on its western edge). With regards to adjacent sites 312 and 653, there would likely be impacts to the landscape setting of just one listed farmhouse; however, this farmhouse is quite prominent from Keeley lane, and it is also noted that the cluster of buildings at Tinker's Corner (the junction of Keeley Lane and Hall Lane) is potentially associated with a degree of historic character. With regards to Site 652, the homes would presumably be well-screened from Hall Lane; however, the access point will likely change the character of the lane - which has a distinct rural character - in proximity to the two listed buildings; also, it is noted that two public footpaths cross the site and a third is adjacent. In conclusion, the highest growth option performs relatively poorly, but significant negative effects are not predicted. It will be for Historic England to comment in detail.
- **Land, soil and resources** – all of the land in question (both that proposed for housing and that proposed for new open space) has been surveyed in detail to establish the quality of the agricultural land (which is quite unusual), with the finding that all sites comprise grade 3b quality land (which *is not* classified as best and most versatile), except Site 463, which comprises grade 3a quality land (which *is* classified as best and most versatile). The wider picture is that land in the vicinity of Wootton is primarily associated with 'grade 3' quality land according to the low resolution national dataset, although there are also areas of 'grade 2' quality land nearby. On this basis, it is not appropriate to suggest that higher growth options perform worse than lower growth options. With regards to effect significance, scenarios involving Site 463 are predicted to result in minor significant negative effects, noting that whilst the proposal is to deliver homes on the northern part of the site only, the effect of allocation will be that agricultural uses also cease on the southern part of the site.

Landscape – all of the sites in question are likely to be associated with a landscape sensitivity, and it is a challenge to confidently differentiate between them. There is a notable density of public footpaths in the area, including the John Bunyan Trail, hence it is likely to be the case that there are significant views across all of the sites in question from a public footpath, and/or from either Hall Lane (which has a notable rural character) or Keeley Lane. Site 317 will lead to the delivery of new 'green infrastructure' that is certainly a positive, from a landscape perspective, noting the location of Wootton within the Forest of Marston Vale; however, this site is a constant across all of the growth scenarios. A key question is whether higher growth scenarios should be flagged as problematic. On one hand all of the sites in question are located within the existing 'landscape framework' provided by Hall Lane and Keeley Lane, and the highest growth scenario (Scenario 7) *could potentially* support a strategic approach to planning for green infrastructure and views within this area. However, on the other hand, the Bedford Borough Landscape Capacity Study does identify the need to conserve the "dispersed, open/loose settlement character" and recommends: *"Retain the separate identity of surviving dispersed settlements and 'Ends' of historic origin, restricting further coalescence with villages such as at Wootton."*¹⁰ A further consideration is that a lower growth scenario could lead to increased pressure for future growth elsewhere within the parish, outside of the Hall Lane / Keeley Lane landscape framework. In conclusion, the scenarios are judged to perform on a par, and significant negative effects are not predicted.

- **Population and community** – matters relating to community infrastructure, open space, support for walking/cycling and pedestrian safety have already been discussed above. A further important consideration is the established local preference for delivering smaller scale housing schemes, of up to 25 homes. On this basis scenarios involving Site 314 are judged to perform poorly. It is also important to note that both Site 317 and Site 463 are allocated in part, with the remaining land remaining in the control of the land-owner, such that expansion of these sites in the future is a strong possibility. Finally, there is a degree of support for higher growth scenarios as these would provide for housing needs locally, as established by the Housing Needs Survey (2017). In light of these points, Scenario 7 is predicted to result in significant positive effects.
- **Transportation** - matters relating to ease of access to community facilities and safe pedestrian movements have already been discussed above. It is difficult to differentiate the site options further, in transport terms, with none of the sites in question known to be constrained in terms of achieving safe vehicular access. A local issue relates to the need to avoid traffic in the vicinity of Wootton Upper School, where there is congestion at peak times, with implications for pedestrian (school children) safety; however, it is not clear that any of the scenarios will lead to any notable issues/impacts.

In **conclusion**, the assessment shows all scenarios to be associated with pros and cons. It is for the Steering Group and Parish Council to weigh these 'in the balance' and, in turn, reach an overall conclusion on the best performing scenario – see discussion below.

¹⁰ See <http://edrms.bedford.gov.uk/OpenDocument.aspx?id=kCUtyDy%2bKq%2foDKZkw4LWuw%3d%3d&name=47%20-%20Landscape%20Sensitivity%20Study.pdf>

7 Developing the preferred approach

7.1.1 This section presents the WNDP Steering Group's reasons for supporting Scenario 7.

7.1.2 The group has stated:

"The Steering Group recognises that all scenarios are associated with pros and cons, but supports Scenario 7 on balance, particularly because of the benefits that this approach to growth will bring in 'population and community' terms. The Steering Group notes the drawbacks associated with Scenario 7, but concludes that these are acceptable and/or there is the potential to address issues and mitigate impacts through policy in the Neighbourhood Plan and through detailed work at the planning application stage. Specific points are as follows:

- Air quality - the Steering Group is confident that Scenario 7 will not lead to any significant concerns.
- Biodiversity - whilst it is accepted that there will be some limited loss of trees through development at Site 652, the overall effect of the Neighbourhood Plan should be to achieve a net gain in biodiversity at the Parish and wider 'landscape' scale, e.g. supporting connectivity between the important woodland patches that characterise land between Bedford and Milton Keynes.
- Flood risk – the Steering Group will seek to work closely with the Environment Agency to ensure avoidance or suitable mitigation of an surface water flood risk.
- Listed buildings and historic character - the Steering Group will seek to work closely with Historic England to ensure avoidance or suitable mitigation of any impacts to the setting of listed buildings.
- Walking and cycling to access services and facilities – the Steering Group recognises that the proposed allocations are not ideally located in this respect, but both Keeley Lane and Hall Lane are suitable for walking and cycling, and there is also a good network of public footpaths in the area."

Part 2: What are the assessment findings at this stage?

8 Introduction to Part 2

8.1.1 This part of the report presents an assessment of the pre-submission WNDP.

Assessment method

8.1.2 The assessment identifies and evaluates 'likely significant effects' of the WNDP on the baseline, drawing on the SEA topics identified through scoping (see Table 3.1) as a methodological framework.

8.1.3 For each topic 'significant effects' of the current version of the plan on the baseline are predicted and evaluated. Account is taken of the criteria presented within Schedule 2 of the Regulations. So, for example, account is taken of the probability, duration, frequency and reversibility of effects as far as possible. These effect 'characteristics' are described within the assessment as appropriate.

8.1.4 Every effort is made to identify / evaluate effects accurately; however, this is inherently challenging given the high level nature of the plan. The ability to predict effects accurately is also limited by understanding of the baseline and the nature of future planning applications. Because of the uncertainties involved, there is a need to exercise caution when identifying and evaluating significant effects and ensure all assumptions are explained. In many instances it is not possible to predict significant effects, but it is possible to comment on merits (or otherwise) in more general terms.

8.1.5 The draft Neighbourhood Plan contains 21 policies, organised into six broad themes – see Table 8.1

Table 8.1: List of policies in the draft Wootton Neighbourhood Plan

Theme	Policy
Housing	W1: New Residential Development
	W2: Housing Delivery
	W3: Land between Potters Cross and Wootton Road
	W4: Land south of Keeley Lane
	W5: Land at The Chequers Public House, Hall End Road
	W6: Land at Tinkers Corner, Keeley Lane
	W7: Land on south side of Keeley Lane
	W8: Local Housing Needs
	W9: Allocation of Affordable Housing
	W10: Residential parking in new developments
Environment	W11: Local Green Spaces
	W12: Other Important Green Spaces
	W13: Protection of Views
	W14: Development Design Criteria
Village Facilities	W15: Village Facilities
	W16: The Provision of New Community Facilities
	W17: Supporting Communications Infrastructure
Local Economy	W18: Supporting the Development of Small Businesses
Sustainable Community	W19: Provision of Community Infrastructure
	W20: Developer Contributions and Community Infrastructure
Historic Environment	W21: Protection of Heritage Assets including Listed Buildings

9 Assessment of the pre-submission version of the WNDP

9.1 Air quality

Objective: Improve air quality in the Neighbourhood Plan Area and minimise and/ or mitigate all sources of environmental pollution

- 9.1.1 A number of policies in the Plan seek to protect residents' health and amenity from pollution (including air). **Policy W1:** 'New Residential Development' specifies that development proposals should demonstrate a preventative element with regards to 'noise, light or other pollution'. Additionally, **Policy W14:** 'Development Design Criteria' seeks to 'protect residential amenity from (...) noise pollution'.
- 9.1.2 However, Site allocation policies **W4:** 'Land south of Keeley Lane', **W5:** 'Land at The Chequers Public House, Hall End Road' and **W6:** 'Land at Tinkers Corner, Keeley Lane' will deliver growth at locations which are relatively distant from village centre services, potentially encouraging greater car use in order to meet a range of needs. This could have potential for minor negative effects in relation to air quality.
- 9.1.3 On balance, **neutral effects** are predicted.

9.2 Biodiversity

Objective: Protect and enhance all biodiversity and geodiversity

- 9.2.1 **Policy W14:** 'Development Design Criteria' seeks to preserve and enhance local wildlife habitats by strengthening the connectivity of green infrastructure networks in Wootton, acknowledging the complexity of ecological networks and their interlinkages.
- 9.2.2 Additionally, a number of policies seek to safeguard against damage to key wildlife corridors and their associated habitats. **Policy W1:** 'New Residential Development' also seeks the 'creation' of new local habitats and corridors as well as preserving existing assets, such as by aiming to use native vegetative species 'where possible' for hedgerow and tree boundaries for future sites. The supporting text for **Policy W11:** 'Local Green Spaces' references the importance of preserving the 'tranquillity or richness of its wildlife' in the Plan area.
- 9.2.3 With regards to site specific policies, only **Policy W5:** 'Land at The Chequers Public House' and **Policy W6:** 'Land at Tinkers Corner, Keeley Lane' are both adjacent to a small woodland patch (unnamed) located to the east of Hall End Lane, whilst the former contains an area of trees onsite that links to the aforementioned woodland, and which would likely be lost as a result of development.
- 9.2.4 However, **Policy W3** 'Land between Potters Cross and Wootton Road' will lead to significant positive effects, recognising that the effect of allocation will be that land is gifted to the Parish Council for community use. The potential to deliver biodiversity enhancements, alongside new accessible open space, is understood to be a priority, and the area of land in question is significant, at around 17.5ha.
- 9.2.5 Overall, it is anticipated that the Neighbourhood Plan will lead to **minor significant positive effects**. It is recommended that further work is undertaken to explore the potential to avoid or mitigate biodiversity impacts associated with the 'Land at The Chequers Public House' proposed allocation.

9.3 Climate change

Objectives: Reduce the level of contribution to climate change made by activities within the Neighbourhood Plan Area; and Support the resilience of the Neighbourhood Plan Area to the potential effects of climate change, including flooding

- 9.3.1 **Policy W17:** 'Supporting Communications Infrastructure' directly addresses the climate mitigation aspect of the SEA objective. Policy W17 encourages the reduction of carbon-intensive private car use to travel to work, by improving local infrastructure to support at-home working, whereby: 'All new major developments should be served by a superfast broadband (fibre-optic)'.

- 9.3.2 With regards to climate change adaptation, **Policy W1**: 'New Residential Development' seeks to *'incorporate high quality green infrastructure (GI)'* in the Plan area. Supportive text for **Policy W11**: 'Local Green Spaces' evidences the Green Infrastructure Plan, prepared by Bedfordshire Rural Communities Charity (BRCC) to indicate that local green spaces form an important part of GI networks in the Plan area.
- 9.3.3 **Policy W14**: Development Design Criteria notes that development should not be in *'areas at risk of flood or increase flood risk elsewhere'*. In this respect, the site depicted in **Policy W5**: 'Land at The Chequers Public' is subject to a degree of constraint, in that it intersects an area of surface water flood risk, however this risk is notably 'low to medium', and unlikely to be significant from a planning perspective (subject to further scrutiny by the Environment Agency).
- 9.3.4 Overall, **neutral effects** are predicted, although there is a degree of uncertainty at the current time. It is recommended that the Steering Group seeks to engage closely with Environment Agency.

9.4 Historic environment

Objective: Protect, conserve and enhance the historic environment within the Neighbourhood Plan area

- 9.4.1 **Policy W21**: 'Protection of Heritage Assets', including Listed Buildings, encourages the preservation and enhancement of features of particular historic interest in Wootton. Specifically, the policy notes the importance of preserving the integrity of the Conservation area. Additionally, buildings of notably *'important character'* should seek to be *'retained'*, as well as an acknowledgement of the *'positive elements of (their) setting and its relationship to (their) immediate surroundings'*. The supporting text for Policy W21 identifies the importance of both designated and non-designated heritage assets within the Plan area, and highlights that their value can be simultaneously 'individual' and 'cumulative' based on their overall contribution to the wider setting when considered alongside other assets in Wootton. This is highly beneficial in meeting the SEA objective regarding the diversity of assets and their personal contribution for residents.
- 9.4.2 In addition to Policy W21, which directly addresses the importance of heritage assets within the Plan area, a number of policies acknowledge the importance of visually sensitive development that does not negatively detract from key historic sites in the Plan area. **Policy W1**: 'New Residential Development' states that future development should seek to *'complement the traditional character and historic core of the village'*. **Policy W14**: 'Development Design Criteria' supports proposals which respond to the sensitivity of *'locally distinctive, built, historic and natural environment to preserve and enhance Wootton's historic environment to protect and improve features which contribute to this environment'*. Additionally, **Policy W16**: 'The Provision of New Community Facilities' indicates that proposals which protect and enhance Wootton's heritage features.
- 9.4.3 With regards to site specific policies, **Policy W7**: 'Land on south side of Keeley Lane' details Site 463, which is in proximity to a cluster of five listed buildings at Keeley Green (also a single listed farmhouse on its western edge). As this farmhouse is also quite prominent from Keeley lane, alongside the cluster of buildings at Tinker's Corner (the junction of Keeley Lane and Hall Lane), **Policies W4**: 'Land south of Keeley Lane' and **W6**: 'Land at Tinkers Corner, Keeley Lane' could be associated with a degree of disruption to historic character. Site 652, detailed in **Policy W5**: 'Land at The Chequers Public' noted that the key access point for the site will likely change the character of the lane - which has a distinct rural character – in proximity to the two listed buildings.
- 9.4.4 Finally, **Policy W15**: 'Village Facilities' lists a number of buildings, such as public houses, which demonstrate local historical significance and require adequate safeguarding. For example, the Village Hall, the Cock Inn Public House, the Fox and St Mary's Church Hall.
- 9.4.5 In sum, **neutral effects** are predicted, although there is a degree of uncertainty at the current time. It is recommended that the Steering Group seeks to engage closely with Historic England.

9.5 Landscape

Objective: Protect and enhance the character and quality of landscapes and village-scapes

- 9.5.1 **Policy W12:** 'Other Important Green Spaces' designates two areas of open space, between Wootton Road and Bedford Road and between Keeley Lane and Hall End Road, as '*valuable green space*'. The space/woodland area between Wootton Road and Bedford Road offers '*a significant landscape buffer between the Parish and the immediate surrounding areas*', whilst the area between Keeley Lane and Hall End Road will be retained and incorporated into community areas such as '*nature trails, community garden, community orchard, picnic and performance areas and/or wild British meadows*'. The supporting text for Policy W12 indicates that public consultations demonstrated 'overwhelming support' from residents for future development to protect important views, prevent the coalescence of settlements and preserve the characteristic countryside setting. **Policy W13:** 'Protection of Views' builds on the second of these, '*protect(ing) the profile and skyline of the settlement*' including views '*both into and out of*' Wootton, identified in the Village Design Statement. Text supporting Policy W13 emphasises the importance of retaining the '*village feel*' of Wootton.
- 9.5.2 Further, the supportive text for **Policy W12** highlights the Green Infrastructure Report, which identifies parcels of land for protection against development due to their community uses as parks, orchards and meadows (such as '*land between Hall End Road, Keeley Lane and Canons Close*').
- 9.5.3 Finally, **Policy W14:** 'Development Design Criteria' acknowledges the locally distinctive built and natural environment of Wootton, as well as supporting new development which '*enhance(s) the existing street scene and the residential amenity*' of the village. The supporting text for Policy W14 also notes the importance of development not just preserving the visual amenity of Wootton, but also '*positively contribute*' to the village and its setting.
- 9.5.4 With regards to the proposed allocations, there will inevitably be landscape and visual impacts; however, all of the sites in question are located within the existing 'landscape framework' provided by Hall Lane and Keeley Lane. See further discussion above, within Section 6.
- 9.5.5 Overall, given the breadth and depth of policies relating to landscape enhancement and preservation, **minor significant positive effects** are predicted.

9.6 Land, soil and water resources

Objectives: Ensure the efficient and effective use of land, protect soil quality and avoid the loss of high-quality agricultural land; and Use and manage water resources in a sustainable manner.

- 9.6.1 All of the land proposed for allocation (both that proposed for housing and that proposed for new open space) has been surveyed in detail to establish the quality of the agricultural land (which is quite unusual), with the finding that all sites comprise grade 3b quality land (which is *not* classified as best and most versatile), except Land on south side of Keeley Lane (Policy W7), which comprises grade 3a quality land (which is classified as best and most versatile). The wider picture is that land in the vicinity of Wootton is primarily associated with 'grade 3' quality land according to the low resolution national dataset, although there are also areas of 'grade 2' quality land nearby.
- 9.6.2 In conclusion, **minor significant negative effects** are predicted.

9.7 Population and community

Objectives: Cater for existing and future residents' needs as well as the needs of different groups in the community, and improve access to local, high-quality community services and facilities; Reduce deprivation and promote a more inclusive and self-contained community; Provide everyone with the opportunity to live in good quality, affordable housing, and ensure an appropriate mix of dwellings.

- 9.7.1 By virtue of their commitment to allocate residential housing, a number of policies in the Plan aim to meet identified housing need, which is directly indicated in **Policy W8:** 'Local Housing Needs'.

- 9.7.2 **Policy W2:** 'Housing Delivery' specifies provision to be made for up to for up to 145 new homes in Wootton. These policies are **Policy W3:** 'Land between Potters Cross and Wootton Road' (up to 50 dwellings), **Policy W4:** 'Land south of Keeley Lane' (up to 25 dwellings), **Policy W5:** 'Land at The Chequers Public House, Hall End Road' (up to 25 dwellings), **Policy W6:** 'Land at Tinkers Corner, Keeley Lane' (up to 20 dwellings) and **Policy W7:** 'Land on south side of Keeley Lane' (up to 25 dwellings). Importantly, the proposed strategy is broadly in accordance with the established local preference for delivering smaller scale housing schemes, of up to 25 homes.
- 9.7.3 **Policy W15:** 'Village Facilities' promotes the protection of a number of community facilities in the Plan area, supporting access to key services such as the Medical Health Centre and Wootton Upper School. If resulting in the loss of these facilities, Policy W15 specifies that proposals will only be supported if they *'would outweigh the loss of the existing facility'* which would be put at risk by proposed development. The supportive text notes large resident support for the retention of existing facilities in Wootton such as shops and pubs, *'reflecting the views expressed from the Neighbourhood Questionnaire'*. **Policy W16:** 'The Provision of New Community Facilities' seeks to support proposals which benefit residents' access to key services, and do not displace current facilities which hold local value. **Policy W20:** 'Developer Contributions and Community Infrastructure' encourages the active role that development can play in *'enhancing'* existing community facilities in the area. Finally, **Policy W19:** 'Provision of Community Infrastructure' states: *'All new developments will be expected to make appropriate provision for, or contribution towards identified community infrastructure and facilities'*.
- 9.7.4 With regards to reducing deprivation and promoting inclusivity in Wootton, supportive text for **Policy W8:** 'Local Housing Needs' evidences the results of the Wootton local consultation, where residents showed strong support for 'more affordable homes for sale or rent, for young people and the elderly (over 70% of respondents of Neighbourhood Questionnaire)'. Policy W8 subsequently identifies the provision of affordable housing and housing for vulnerable groups, specifically: *'housing designed to meet the needs of the elderly, the disabled and the vulnerable'*.
- 9.7.5 In sum, **significant positive effects** are predicted.

9.8 Health and wellbeing

Objective: Improve the health and wellbeing residents within the Neighbourhood Plan area.

- 9.8.1 **Policy W16:** 'The Provision of New Community Facilities' seeks to support proposals for the development of new community facilities which improve resident accessibility by foot or bicycle, subsequently promoting healthier forms of transportation for residents. Similarly, **Policy W15:** 'Village Facilities' also indicates that development which involves the loss of key village facilities will only be supported if *'accessible by public transport, walking and cycling'*.
- 9.8.2 Additionally, Policy W16 shows direct support for the protection of a number of community facilities in the Plan area, supporting access to key health services such as the Medical Health Centre.
- 9.8.3 With regards to site specific policies, an important consideration relates to safety of pedestrians and cyclists; in this respect, it is noted that there is no pedestrian footpath along that part of Hall Lane closest to the Keeley Lane junction, which could pose an issue for residents of sites 312, 652 and 653, including school children walking to Wootton Upper School. As such, corresponding Policies **W4:** 'Land south of Keeley Lane', **W5:** 'Land at The Chequers Public House, Hall End Road' and **W6:** 'Land at Tinkers Corner, Keeley Lane' are not likely to lead to beneficial effects with regards to health and wellbeing, though these are not predicted to be significantly negative.
- 9.8.4 Overall, given the breadth of proposals given in the Plan with regards to improving residents' overall health and wellbeing through community and local infrastructure developments, **neutral effects** are predicted.

9.9 Transportation

Objective: Promote sustainable transport use and reduce the need to travel.

- 9.9.1 **Policy W16:** 'The Provision of New Community Facilities' details measures for improving access to more healthy modes of transportation, such as those *'appropriate to the needs of the locality and conveniently accessible for residents of the village wishing to walk or cycle'*.

- 9.9.2 **Policy W10:** ‘Residential parking in new developments’ seeks to improve transport infrastructure within the Plan area through additional parking provision for new developments, assessed in line with the Borough Council’s new parking standard for developments. Further Policy W10 aims to ‘*avoid the creation of car-dominated environments*’ by sensitivity to the design and layout of car parking spaces in the Plan area.
- 9.9.3 In addition, a number of policies in the Plan highlight the need to maintain and improve transport infrastructure in the Plan area, particularly with regards to accessibility and congestion. **Policy W18:** ‘Supporting the Development of Small Businesses’ specifies access and traffic volume as a key factor when assessing the suitability of a proposal for new development. Policies W3- W7 (site specific policies) also identify ‘*the provision of vehicular access*’ on site. Supportive text for Policy W10 also identifies on-street-parking as a main contributor to congestion in the plan area, which it seeks to prevent. Finally, Policy W16 specifies that modifications to community infrastructure should ‘*not result in unacceptable traffic movements*’.
- 9.9.4 On balance, **minor significant positive effects** are anticipated in relation to transport. The proposed allocations do not give rise to any significant concerns, whilst proposed policies support sustainable transport networks (walking and cycle routes) whilst addressing congestion and parking issues.

9.10 Conclusions

- 9.10.1 Overall the assessment identifies the potential for significant positive effects in relation to the ‘Population and community’ SEA topic, on the basis that the plan will provide for housing needs and also deliver significant new open space. Furthermore, the suite of proposed development management policies are supportive of population and communities objectives. Notable positive effects are also predicted in terms of ‘Biodiversity’ (on balance, noting that certain of the proposed allocations are associated with a degree of constraint), landscape (on balance, albeit recognising that all of the proposed allocations are associated with a degree of constraint) and ‘Transportation’ (on balance, albeit recognising that all of the proposed allocations are located beyond easy walking distance of services and facilities). No significant negative effects are predicted, although a notable tension is highlighted in terms of loss of best and most versatile agricultural land.

Cumulative effects

- 9.10.2 There is also a need to consider the potential effects of the WNDP in combination with other plans and programmes. This is an important consideration, as Wootton is situated in a nationally identified growth corridor, between Bedford and Milton Keynes.
- 9.10.3 A primary consideration is the need to effectively plan for biodiversity, natural capital and ecosystem services, recognising the importance of land between Bedford and an expanding Milton Keynes in these respects. Land rises notably from the Marston Vale / A421 corridor up towards the Cranfield plateau, and this ridge of rising land is associated with a high density of woodlands, including ancient woodlands and one SSSI woodland, a notably high density of public rights of way and a good density of listed buildings. There is a need to consider the value of access to high quality countryside and large areas of accessible open space under a future scenario whereby the area has seen considerable housing growth.
- 9.10.4 Air quality is another consideration, given the designated AQMA in Bedford town centre. However, it is difficult to suggest that growth at Wootton in combination with growth elsewhere leads to a concern.

Part 3: What are the next steps?

10 Plan finalisation

- 10.1.1 This Environmental Report accompanies the pre-submission version of the WNDP for consultation.
- 10.1.2 Following consultation, any representations made will be considered by the Neighbourhood Plan Steering Group, when finalising the plan for submission.
- 10.1.3 The 'Submission' version of the plan will then be submitted to Bedford Borough Council (alongside an Environmental Report Update, if necessary). The plan and supporting evidence will be published for further consultation, and then submitted for Independent Examination.
- 10.1.4 At Independent Examination, the Neighbourhood Plan will be considered in terms of whether it meets the Basic Conditions for Neighbourhood Plans and is in general conformity with the Local Plan.
- 10.1.5 If the subsequent Independent Examination is favourable, the WNDP will be subject to a referendum, organised by Bedford Borough Council. If more than 50% of those who vote agree with the Neighbourhood Plan, then it will be 'made'. Once made, the WNDP will become part of the Development Plan for Bedford Borough, covering the defined Neighbourhood Plan Area.

11 Monitoring

- 11.1.1 The SEA regulations require 'measures envisaged concerning monitoring' to be outlined in this report.
- 11.1.2 It is anticipated that monitoring of effects of the Neighbourhood Plan will be undertaken by Bedford Borough Council as part of the process of preparing its Annual Monitoring Report (AMR).
- 11.1.3 The SEA has not identified any potential for significant negative effects that would require closer monitoring, led by the Parish Council.

Appendix I: Meeting the Regulations

As discussed in Chapter 1 above, Schedule 2 of the Environmental Assessment of Plans Regulations 2004 (the Regulations) explains the information that must be contained in the Environmental Report; however, interpretation of Schedule 2 is not straightforward. Table AI.1 links the structure of this report to an interpretation of Schedule 2 requirements, whilst Table AI.2 explains this interpretation. Table AI.3 identifies how and where within the Environmental Report the regulatory requirements have/ will be met.

Table AI.1: Questions answered by this report, in-line with an interpretation of regulatory requirements

	Questions answered		As per regulations... the Environmental Report must include...
Introduction	What's the plan seeking to achieve?		An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes
	What's the SEA scope?	What's the sustainability 'context'?	- Relevant environmental protection objectives, established at international or national level - Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
		What's the sustainability 'baseline'?	- Relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan - The environmental characteristics of areas likely to be significantly affected - Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
		What are the key issues and objectives that should be a focus?	Key environmental problems / issues and objectives that should be a focus of (i.e. provide a 'framework' for) assessment
Part 1	What has plan-making / SEA involved up to this point?		- Outline reasons for selecting the alternatives dealt with (and thus an explanation of the 'reasonableness' of the approach) - The likely significant effects associated with alternatives - Outline reasons for selecting the preferred approach in-light of alternatives assessment / a description of how environmental objectives and considerations are reflected in the draft plan
Part 2	What are the SEA findings at this current stage?		- The likely significant effects associated with the draft plan - The measures envisaged to prevent, reduce and offset any significant adverse effects of implementing the draft plan
Part 3	What happens next?		A description of the monitoring measures envisaged

Table AI.2: Questions answered by this report, in-line with regulatory requirements

Schedule 2	Interpretation of Schedule 2		
The report must include...	The report must include...		
(a) an outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes;	An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes	i.e. answer - <i>What's the plan seeking to achieve?</i>	
(b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance	i.e. answer - <i>What's the 'context'?</i>	i.e. answer - <i>What's the scope of the SA?</i>
(c) the environmental characteristics of areas likely to be significantly affected;	The relevant environmental protection objectives, established at international or national level		
(d) any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;	The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan'	i.e. answer - <i>What's the 'baseline'?</i>	
(e) the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation;	The environmental characteristics of areas likely to be significantly affected		
(f) the likely significant effects on the environment including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance	i.e. answer - <i>What are the key issues & objectives?</i>	
(g) the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan;	Key environmental problems / issues and objectives that should be a focus of appraisal		
(h) an outline of the reasons for selecting the alternatives dealt with and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information	An outline of the reasons for selecting the alternatives dealt with (i.e. an explanation of the 'reasonableness of the approach')	i.e. answer - <i>What has Plan-making / SA involved up to this point?</i> [Part 1 of the Report]	
(i) a description of the measures envisaged concerning monitoring.	The likely significant effects associated with alternatives, including on issues such as... ... and an outline of the reasons for selecting the preferred approach in light of the alternatives considered / a description of how environmental objectives and considerations are reflected in the draft plan.		
	The likely significant effects associated with the draft plan	i.e. answer - <i>What are the assessment findings at this current stage?</i> [Part 2 of the Report]	
	The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the draft plan		
	A description of the measures envisaged concerning monitoring	i.e. answer - <i>What happens next?</i> [Part 3 of the Report]	

Table AI.3: 'Checklist' of how (throughout the SEA process) and where (within this report) regulatory requirements have been, are and will be met.

Schedule 2 of the regulations lists the information to be provided within the Env Report	
Regulatory requirement	Discussion of how requirement is met
1. An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes;	Chapter 2 ('What is the plan seeking to achieve') presents this information.
2. The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	These matters have been considered in detail through scoping work, which has involved dedicated consultation on a Scoping Report. The 'SEA framework' – the outcome of scoping – is presented within Chapter 3 ('What is the scope of the SEA?'). More detailed messages, established through a context and baseline review are also presented in Appendix II of this Environmental Report.
3. The environmental characteristics of areas likely to be significantly affected;	
4. Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.;	
5. The environmental protection, objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation;	The SEA framework is presented within Chapter 3 ('What is the scope of the SEA'). Also, Appendix II presents key messages from the context review. With regards to explaining " <i>how...considerations have been taken into account</i> ", Chapter 7 explains the Steering Group's 'reasons for supporting the preferred approach', i.e. explains how/ why the preferred approach is justified in light of alternatives assessment.
6. The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. (Footnote: These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects);	Chapter 6 presents alternatives assessment findings (in relation to housing growth, which is a 'stand-out' plan policy area). Chapters 9 presents an assessment of the draft plan. With regards to assessment methodology, Chapter 8 explains the role of the SEA framework/scope, and the need to consider the potential for various effect characteristics/ dimensions, e.g. timescale.
7. The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;	The assessment highlights certain tensions between competing objectives, which might potentially be actioned when finalising the plan. Also, specific recommendations are made in Chapter 9.
8. An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	Chapters 4 and 5 deal with 'Reasons for selecting the alternatives dealt with', in that there is an explanation of the reasons for focusing on particular issues and options. Also, Chapter 7 explains the Steering Group's reasons for selecting the preferred option (in-light of alternatives assessment).
9. Description of measures envisaged concerning monitoring in accordance with Art. 10;	Chapter 11 presents measures envisaged concerning monitoring.
10. A non-technical summary of the information provided under the above headings	The NTS is provided at the beginning of this Environmental Report.

The Env Report must be published alongside the Draft Plan	
Regulatory requirement	Discussion of how requirement is met
Authorities with environmental responsibility and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the Draft Plan or programme and the accompanying environmental report before the adoption of the plan or programme (Art. 6.1, 6.2)	At the current time, this Environmental Report is published alongside the 'pre-submission' version of the Neighbourhood Plan, with a view to informing Regulation 14 consultation.
The report must be taken into account, alongside consultation responses, when finalising the plan	
Regulatory requirement	Discussion of how requirement is met
The environmental report prepared pursuant to Article 5, the opinions expressed pursuant to Article 6 and the results of any transboundary consultations entered into pursuant to Article 7 shall be taken into account during the preparation of the plan or programme and before its adoption or submission to the legislative procedure.	This Environmental Report, and consultation responses received, will be taken into account by the Steering Group when finalising the plan.

Appendix II: The scope of the SEA

Introduction

This appendix presents additional information on the SEA scope, namely key issues under each of the SEA framework, headings. As set out in the Scoping Report, these key issues were identified following a review of the context and baseline.

Additionally, this appendix presents a summary of responses received as part of the scoping consultation.

Air quality

- Emissions associated with road transport (primarily NO₂) are the main pollutant of concern in Bedford.
- There are no AQMAs located within the Neighbourhood Plan area.
- The Bedford Town Centre AQMA, designated in 2009 for exceedances in NO₂, is the closest AQMA to Wootton, and the only AQMA within the Borough of Bedford.
- Traffic and congestion arising from planned new development within and surrounding the area have the potential to increase emissions and reduce air quality in the Neighbourhood Plan area.

Biodiversity

- There are no European or nationally protected sites for biodiversity within the Neighbourhood Plan area.
- The Wootton Wood County Wildlife Site is situated within the Neighbourhood Plan area.
- There are a range of Biodiversity Action Plan Priority (BAP) Habitats within and surrounding the Neighbourhood Plan area, including Ancient and Semi-Natural Woodland; Ancient Replanted Woodland; Deciduous Woodland; and Traditional Orchards.
- It will be important to ensure that habitats and the connections between them are supported and enhanced in development of the Plan area, particularly considering expected climate change impacts.

Climate change (mitigation and adaptation)

- Developments of new housing and infrastructure within the Neighbourhood Plan boundary have the potential to increase the local carbon footprint and overall greenhouse gas emissions in Wootton and Bedford Borough.
- Bedford has seen a 33.33% decrease in per capita emissions between 2005 and 2016, which remain lower than averages for the East of England and England in 2016.
- The area has virtually no risk of fluvial flooding and little risk of extended surface water flooding. The surface water flooding risk is generally restricted to water courses' channels, with an expanded section of high flood risk adjacent to the A421, likely to be due to run off.
- The Wootton Neighbourhood Plan should seek to increase the resilience of the Neighbourhood Plan area to the effects of climate change by supporting and encouraging adaptation strategies.

Health and wellbeing

- 83.35% of residents in the Neighbourhood Plan area consider themselves as having 'very good health' or 'good health', which is higher than the totals for Bedford (82.88%), the East of England (82.46%) and England (81.4%).
- The total number of residents within the Neighbourhood Plan area who report that their activities are limited 'a lot' (6.18%) is lower than the trends for Bedford (7.1%), the East of England (7.43%) and England (8.3%).
- 25.6% of adults in the Neighbourhood Plan area are obese and only 29.9% of adults engage in healthy eating practices.
- The area has its own health care facilities, including one GP practice which currently has two GPs and 7585 registered patients, which gives a ratio of approximately 3,793 patients per GP.

Historic environment

- The Neighbourhood Plan area contains 34 listed buildings and 145 recorded sites in the Historic Environment Record for Bedfordshire.
- Wootton contains a designated Conservation Area; however, no Conservation Area Appraisal has been prepared for this site.

Landscape

- The Forest of Marston Vale 'forest plan' holds material weight for any development proposals or planning application within the Neighbourhood Plan area. This may influence the type and density of the development that takes place so as not to hinder the local landscape. Additionally, aims to increase the 'forest plan' area's woodland coverage to 30% has the potential to provide positive landscape changes to the Neighbourhood Plan area.
- A 'Forest of Marston Vale' Supplementary Planning Guidance document will be produced to help guide development within the community forest's boundaries. This will have a direct influence on any development that takes place in Wootton.

Land, soil and water resources

- National provisional quality datasets indicate Grade 2 and Grade 3 land and areas of 'low', 'moderate' and 'high' likelihood of best and most versatile agricultural land within the Neighbourhood Plan area.
- All of the waterbodies in the Great Ouse Bedford catchment are classified as having a 'good' chemical status and the majority of the waterbodies are classified as having 'moderate' ecological status (nine out of thirteen).
- The whole of the Neighbourhood Plan area falls within the 'Great Ouse' Surface Water NVZ and the 'Bedford Great Oolite' Groundwater NVZ. However, new residential or employment development is unlikely to increase the risk of nitrate pollution which is more closely associated with agricultural land uses.

Population and communities

- The population of Wootton has slightly decreased since 2001, this is coupled with a majority of the population (26.54%) being categorised within the 60+ age group.
- The Neighbourhood Plan area is formed of three LSOAs. Bedford 020C and 020A make up the rural areas of the Parish and are amongst the 20% least deprived neighbourhoods in the country, while Bedford 020D comprises the more urban centre and is amongst the 50% least deprived neighbourhoods in the country.
- 74.1% of residents either own their home outright or with a mortgage, which is higher than the figures for Chelmsford, the East of England, and England.
- 28.99% of Wootton residents are currently economically inactive, which is similar to the borough, regional and national levels.

Transport

- There are no railway stations within the Neighbourhood Plan area. The nearest station is Kempston Hardwick, approximately 2 km to the east of Wootton.
- There are a number of bus services providing residents with regular access to close by cities, towns and villages.
- The A421 is the main road running through the Neighbourhood Plan area providing residents with access to a number of main roads, including the M1, A6 and A1.
- The nearest international airport is London Luton Airport, located approximately 30 km South of Wootton Parish.
- There are several Public Right of Way (PRoW) footpaths and walking trails running through Wootton Parish.
- The National Cycle Network Route 51 runs through the Neighbourhood Plan area.
- Just under 90% of households in the Neighbourhood Plan area have access to at least one car or van, which is higher than the borough, regional and national averages.
- The most popular mode of transport to work in the Neighbourhood Plan area is driving via a car or van.

- The total percentage of the working population in the Neighbourhood Plan area choosing to walk, cycle or catch a bus, minibus or coach to work is substantially lower than the totals for Bedford, the East of England, and England.

Scoping consultation responses

The draft SEA scoping report was shared with the Environment Agency, Historic England and Natural England for formal consultation between the period 15th June 2020 and 20th July 2020.

The responses received and how they have been considered and addressed are presented in Table II.1 below.

Table II.1: SEA scoping consultation responses

Consultee	Consultation response summary	How the response was considered and addressed
Environment Agency	No comments received	N/a
Historic England	Historic England strongly advises that the conservation and archaeological staff of the relevant local planning authorities are closely involved throughout the preparation of the plan and its assessment. They are best placed to advise on; local historic environment issues and priorities, including access to data held in the Historic Environment Record (HER), which should be consulted as part of the SEA process. In addition, they will be able to advise how any site allocation, policy or proposal can be tailored to minimise potential adverse impacts on the historic environment; the nature and design of any required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of heritage assets.	Conservation and archaeology staff at Bedford Borough Council will have the opportunity to comment during the current consultation.
Natural England	No specific comments	N/a
Bedford Borough Council	A range of detailed comments received, most notably suggesting consideration is given to the established Green Infrastructure Opportunity Zones and the Bedford Borough Landscape Sensitivity Study.	Consideration has been given to these sources of evidence as part of the appraisal.