

**Strategic Environmental Assessment  
and Habitat Regulations Assessment  
Screening Report**

**Brickhill Neighbourhood Plan**

March 2024

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# 1 Introduction

- 1.1 This screening report is used to determine whether or not the content of the Brickhill Neighbourhood Plan (NP) requires a full Strategic Environmental Assessment (SEA) or Habitats Regulations Assessment (HRA) in accordance with the European Directive 2001/42/EC and associated Environmental Assessment of Plans and Programmes Regulations 2004. These require a SEA and HRA to be undertaken for:
- i. Plans which are prepared for town and country planning or land use and which set the framework for future development consent of projects listed in the Environmental Impact Assessment (EIA) Directive; or
  - ii. Plans which have been determined to require an assessment under the Habitats Directive.
- 1.2 Plans which determine ‘the use of a small area at local level’ or which only propose ‘minor modification to a plan’ might be exempt if they are unlikely to have significant environmental effects. Neighbourhood Plans containing land allocations for development that are not included in the local authority’s plan, are more likely to require a SEA. The main determining factor as to whether SEA is required on a NP is if it is likely to have a significant effect on the environment.
- 1.3 Section 2 of this report outlines the regulations that set the need for this screening exercise. Process and criteria of the assessment are set out in Section 3. A brief summary of the draft Brickhill NP is provided in Section 4.
- 1.4 The screening assessment of the likely significant environmental effects of the NP is set out in Section 5 and the decision on the screening is provided in Section 6.

## 2 Legislative Background

2.1 The basis for Strategic Environmental Assessments legislation is European Directive 2001/42/EC and was transposed into English law by the Environmental Assessment of Plans and Programmes Regulations 2004, or SEA Regulations. Regulation 9 sets out the process as follows:

“Determinations of the responsible authority

9. (1) The responsible authority shall determine whether or not a plan, programme or modification of a description referred to in –
- a. paragraph (4) (a) and (b) of regulation 5;
  - b. paragraph (6) (a) of that regulation; or
  - c. paragraph (6) (b) of that regulation, is likely to have significant environmental effects.

- (2) Before making a determination under paragraph (1) the responsible authority shall –
- a. take into account the criteria specified in Schedule 1 to these Regulations; and
  - b. consult the consultation bodies.

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

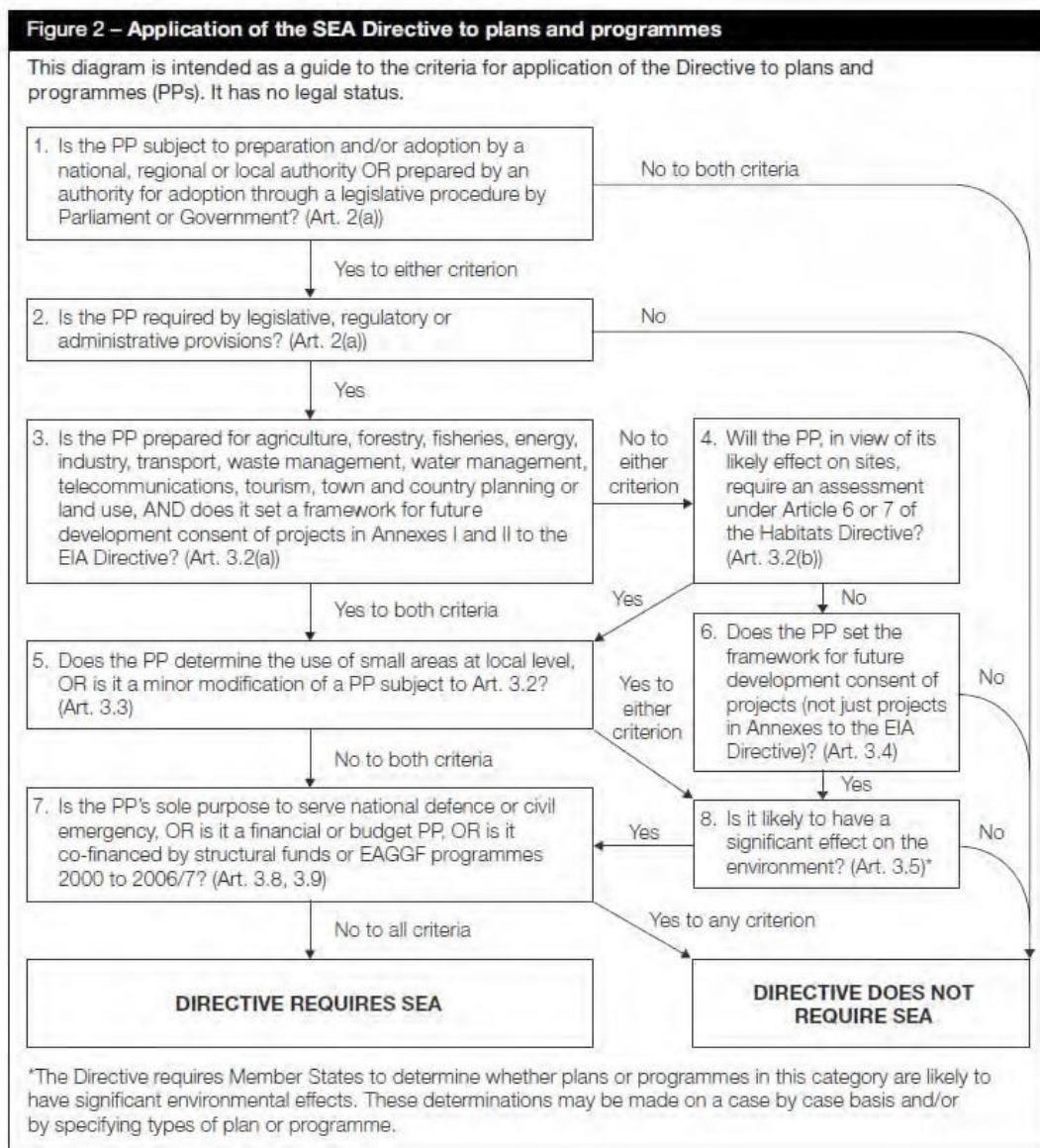
The regulations define that a responsible authority as:

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

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

### 3 Screening assessment process

- 3.1 The screening opinion assessment is undertaken in two parts: the first part will assess whether the plan falls into a category of plans requiring SEA; and the second part of the assessment will consider whether the NP is likely to have a significant effect on the environment, using criteria drawn from Schedule 1 of the EU SEA Directive and the UK Environmental Assessment of Plans and Programmes Regulations 2004.
- 3.2 The government guidance ‘A practical guide to the Strategic Environmental Assessment Directive 2005; sets out the following approach to be taken in determining whether SEA is required, shown in the figure below.



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

1. The characteristics of plans and programmes, having regard, in particular, to
  - the degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources,
  - the degree to which the plan or programme influences other plans and programmes including those in a hierarchy,
  - the relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development,
  - environmental problems relevant to the plan or programme,
  - the relevance of the plan or programme for the implementation of Community legislation on the environment (e.g. plans and programmes linked to waste management or water protection).
  
2. Characteristics of the effects and of the area likely to be affected, having regard, in particular, to
  - the probability, duration, frequency and reversibility of the effects,
  - the cumulative nature of the effects,
  - the transboundary nature of the effects,
  - the risks to human health or the environment (e.g. due to accidents),
  - the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected),
  - the value and vulnerability of the area likely to be affected due to:
    - special natural characteristics or cultural heritage,
    - exceeded environmental quality standards or limit values,
    - intensive land-use,
    - the effects on areas or landscapes which have a recognised national, Community or international protection status.

Source: Annex II of SEA Directive 2001/42/EC

3.4 The three statutory consultation bodies (Historic England, Environment Agency and Natural England) are to be consulted to determine whether they agree with the findings and conclusions of this screening opinion, in establishing whether the Brickhill NP requires a SEA and whether it may have a significant environmental effect.

## 4 Summary of Brickhill Neighbourhood Plan

4.1 The Brickhill NP sets out a vision and planning framework for Brickhill up to the end of 2030. The aim of the policies in the Brickhill NP is to help achieve Plan's the vision for Brickhill.

4.1 Brickhill Parish Council has produced a draft Neighbourhood Plan with the following 10 policies:

- **Policy BR-SG1 Local Employment:** supporting office and other workspace (Use Class E) on brownfield sites and the retention of existing employment sites for employment use.
- **Policy BR-SG2 Local Facilities:** supporting new community facilities near the Brickhill Drive and Avon Drive neighbourhood centres and the expansion of existing community facilities.
- **Policy BR-SG3 Housing Mix and Standards:** supporting infill development within existing built frontages. Opposing the loss of single storey housing and other housing suitable for the elderly.
- **Policy BR-LE1 Green Environment:** development should not harm the ecology or trees and should achieve biodiversity gains. Seek opportunities to enhance recreational value of green open spaces.
- **Policy BR-LE2 Local Green Space:** designate three areas as Local Green Space: Falcon Avenue, Brickhill Drive/Foster's Brow, Brickhill Drive/Rooksmead pond.
- **Policy BR-LE3 Local Heritage:** Avoid harm to the historic lane in Falcon Avenue, which led to Clapham Park. Development should have no adverse impact on five non-designated heritage assets.
- **Policy BR-SD1 Place and Context:** Development should complement the local context and create safe environments through provision of active frontages to overload roads and spaces. Landscape design should be integral to any development.
- **Policy BR-SD2 Green Design:** Balance carbon and other environmental impacts by incorporating positive green features in design and landscaping, taking into account the Plan's Green Guidance Note.
- **Policy BR-TM1 Sustainable Transport:** Enhancing pedestrian connectivity, sustainable forms of transport and the inclusion of electric charging points.
- **Policy BR-TM2 Footpaths and Cycleways:** No significant adverse impact on footways and cycleways. Enhancing footpaths and cycleways where opportunities allow.

4.2 The draft plan does not have any allocations for development.

## 5 Assessment

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

Stage	Y/N	Reasons
1. Is the NP subject to preparation and/or adoption by a national, regional or local authority OR prepared by an authority for adoption through legislative procedure by Parliament or Government? (Article. 2(a))	Y	The Local Authority has a statutory obligation to make a Neighbourhood Plan once it has successfully passed the stages as set out in the Neighbourhood Planning Legislation Policy and Guidance.
2. Is the NP required by legislative, regulatory or administrative provisions? (Article. 2(a))	Y	While it is not mandatory for a neighbourhood plan to be prepared, however once made, it is part of the development plan for assessing planning applications.
3. Is the NP prepared for agriculture, forestry, fisheries, energy, industry, transport, waste management, telecommunications, tourism, town and country planning or land use, AND does it set framework for future development consent of projects in Annexes I and II to the EIA Directive? (Article. 3.2(b))	N	The NP is prepared for town and country planning and land use purposes, but does not specifically set a framework for future development consent of projects in Annexes I or II of the EIA Directive.
4. Will the NP, in view of its likely effect on sites, require assessment under Article 6 or 7 of the Habitats Directive? (Article. 3.2 (b))	N	There are no sites within Brickhill Parish that are covered by Articles 6 or 7 of the Habitats Directive.
5. Does the NP determine the use of small areas at local level OR is it a minor modification of a plan/programme? (Article 3.3)	Y If yes, go to Q8	Yes, the Neighbourhood Plan relates to the local area of the designated Neighbourhood Area.
6. Does the NP set the framework for future development consent of projects (not just projects in annexes to the EIA Directive)? (Article. 3.4)		N/A
7. Is the NP's sole purpose to serve national defence or budget PP, OR is it co-financed by structural funds or EAGGF programmes 2000 to 2006/7? (Article. 3.8 & Article. 3.9)		N/A
8. Is the NP likely to have a significant effect on the environment? (Article. 3.5)	N	See the following table.



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

Criteria for determining the likely significant effects (Annex II SEA Directive)	Summary of significant effects	Likely to have significant environmental effects Y/N
The characteristics of plans and programmes, having regard, in particular, to—		
1a The degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources.	The draft NP does not set out any allocations. There is policy relating to any new development that may arise over the period of the NP, which focuses on the use of brown field (previously developed land).	N
1b The degree to which the plan or programme influences other plans and programmes including those in a hierarchy	The plan will be complementary to the Bedford Borough Local Plan, which has been subject to Sustainability Assessment.	N
1c The relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development	The achievement of sustainable development is one of the basic conditions that a Neighbourhood Plan must meet. In addition the plan is informed by national policies, including those relating to environmental protection.	N
1d Environmental problems relevant to the plan.	There are no environmental problems relevant to the plan in this parish.	N
1e The relevance of the plan or programme for the implementation of Community legislation on the environment (e.g. plans and programmes linked to waste management or water protection or renewable energy generation)	The plan does not relate to waste management or water protection.	N
Characteristics of the effects and of the area likely to be affected, having regard, in particular, to—		
2a The probability, duration, frequency and reversibility of the effects	The plan includes policies to influence planning application decisions and requirements for new developments in the parish.	N
2b The cumulative nature of the effects	The plan covers a small area and given that it is not allocating sites and is a small area, it is considered that the cumulative effects are minimal.	N

Criteria for determining the likely significant effects (Annex II SEA Directive)	Summary of significant effects	Likely to have significant environmental effects Y/N
2c The transboundary nature of the effects	It is not considered that the effects will have any impact outside the borough or indeed the parish.	N
2d The risks to human health or environment (e.g. due to accidents)	The plan includes policies regarding future development and the designation of green space. It is not considered that this will cause a risk to human health or the environment due to accidents.	N
2e The magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected)	The population as calculated from the 2021 census was 9,900 and there were 4,100 dwellings. The area of the parish is 3.647 km <sup>2</sup> which equates to a population density of 2,719 people per km <sup>2</sup> .	N
2f The value and vulnerability of the area likely to be affected due to: <ul style="list-style-type: none"> <li>• Special natural characteristics or cultural heritage;</li> <li>• Exceeded environmental quality standards or limit values; or</li> <li>• Intensive land use</li> </ul>	The plan includes policies to ensure that heritage is either preserved or enhanced. There are no other special natural characteristics within the parish boundary.	N
2g The effects on areas or landscapes which have a recognised national, community or international protection status.	There are no areas or landscapes which have a recognised national, community or internationally protection status within the parish.	N

## 6 Screening Outcome

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

## 7 Determination

7.1 Based on the above information, the 'Responsible Body' (being Brickhill Parish Council) conclude that full Strategic Environmental Assessment and Habitat Regulations Assessment are not required.

### Useful references:

Bedford Borough Local Plan 2030

<https://www.bedford.gov.uk/media/4011/download?inline>

BBC Local Plan Sustainability Appraisal report

<https://edrms.bedford.gov.uk/OpenDocument.aspx?id=RKoAzFnTUaJP9GurwCiGQw%3d%3d&name=25a%20-%20Sustainability%20Appraisal%20Report%20September%202018.pdf>

BBC Local Plan Sustainability Appraisal report Appendices

<https://edrms.bedford.gov.uk/OpenDocument.aspx?id=Bju%2bcSEu9T9%2bnGNCOUtP9Q%3d%3d&name=25b%20-%20Sustainability%20Appraisal%20Report%20Appendices%20September%202018.pdf>

# Appendix 1: Response to Screening Opinion

## 1. Text of request for formal screening. Sent to Natural England, Historic England and the Environment Agency on 29<sup>th</sup> August 2023

Dear Sir or Madam,

I am writing on behalf of Brickhill Parish Council, Bedford, to request Historic England to review the attached SEA report for Brickhill parish, Bedford.

In addition to the SEA, I also attach:

1. the current version of the draft Neighbourhood Plan and
2. the Local Green Space Assessment document.

Please note that there are no sites for allocation for housing or development within the Neighbourhood Plan area (which is co-terminus with Brickhill Parish).

The parish council is currently carrying out an informal consultation with residents and landowners. We would be grateful for your feedback in time for the parish council meeting on 2nd November 2023, if that is possible.

If you have any questions, please do not hesitate to contact me.

Yours faithfully,

Mark Fitzpatrick  
Chair, Brickhill Parish Council

## 2. Copy of email reply from Natural England 10th October 2023

Date: 10 October 2023  
Our ref: 449083  
Your ref: Brickhill Neighbourhood Plan



Mr Mark Fitzpatrick  
Brickhill Parish Council

**BY EMAIL ONLY**  
[mark.x.fitzpatrick@gmail.com](mailto:mark.x.fitzpatrick@gmail.com)

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

T 0300 060 3900

Dear Mr Fitzpatrick

### **Brickhill Neighbourhood Plan - Neighbourhood Plan and SEA Screening Report**

Thank you for your consultation on the above dated and received by Natural England on 29 August 2023.

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

### **Screening Request: Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA)**

It is Natural England's advice, on the basis of the material supplied with the consultation, that:

- significant effects on statutorily designated nature conservation sites or landscapes are unlikely; and,
- significant effects on Habitats sites<sup>1</sup>, either alone or in combination, are unlikely.

The proposed neighbourhood plan is unlikely to significantly affect any Site of Special Scientific Interest (SSSI), Marine Conservation Zone (MCZ), Special Areas of Conservation (SAC), Special Protection areas (SPA), Ramsar wetland or sites in the process of becoming SACs or SPAs ('candidate SACs', 'possible SACs', 'potential SPAs') or a Ramsar wetland. The plan area is unlikely to have a significant effect on a National Park, Area of Outstanding Natural Beauty or Heritage Coast, and is unlikely to impact upon the purposes for which these areas are designated or defined.

Guidance on the assessment of Neighbourhood Plans, in line with the Environmental Assessment of Plans and Programmes Regulations 2004 is contained within the [Planning Practice Guidance](#). This identifies three triggers that may require the production of an SEA:

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

<sup>1</sup> Habitats sites are those referred to in the [National Planning Policy Framework](#) (Annex 2 - glossary) as "any site which would be included within the definition at regulation 8 of the Conservation of Habitats and Species Regulations 2017 for the purpose of those regulations, including candidate Special Areas of Conservation, Sites of Community Importance, Special Areas of Conservation, Special Protection Areas and any relevant Marine Sites".

Natural England does not hold information on the location of significant populations of protected species, so is unable to advise whether this plan is likely to affect protected species to such an extent as to require an SEA. Further information is included in Natural England's [standing advice](#) on protected species.

Furthermore, Natural England does not routinely maintain locally specific data on all environmental assets. The plan may have environmental impacts on priority species and/or habitats, local wildlife sites, soils and best and most versatile agricultural land, or on local landscape character that may be sufficient to warrant an SEA. Information on ancient woodland, ancient and veteran trees is set out in Natural England/Forestry Commission [standing advice](#).

We therefore recommend that advice is sought from your ecological, landscape and soils advisers, local record centre, recording society or wildlife body on the local soils, best and most versatile agricultural land, landscape, geodiversity and biodiversity receptors that may be affected by the plan before determining whether a SEA is necessary.

Natural England reserves the right to provide further advice on the environmental assessment of the plan. This includes any third party appeal against any screening decision you may make. If a SEA is required, Natural England must be consulted at the scoping and environmental report stages.

Please send any new consultations, or further information on this consultation to [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk)

Yours sincerely

Sally Wintle  
Consultations Team

3. Copy of reply from Environment Agency 3rd November 2023



Brickhill Parish Council  
20 Nursery Gardens  
Bedford  
MK41 8DU

**Our ref:** AE/2023/128892/01-L01  
**Your ref:** Brickhill SEA Screening  
**Date:** 03 November 2023

Dear Sir/Madam

**BRICKHILL NEIGHBOURHOOD PLAN, STRATEGIC ENVIRONMENTAL ASSESSMENT SCREENING REPORT**

**BRICKHILL PARISH COUNCIL 20 NURSERY GARDENS BEDFORD MK41 8DU**

Thank you for consulting us on the Strategic Environmental Assessment Screening Report for the Brickhill Neighbourhood Plan.

**Water Quality**

We have identified that the Plan area boundary includes the Bedford Water Recycling Centre, which is currently operating very close to the permit limits, and has exceeded the Q90 permit compliance twice in the last 5 years. Providing the Plan does not allocate sites for growth development across the Plan period, we do not have any significant concerns. We would still expect to see consideration for any windfall developments captured in a relevant policy for Water Quality in the catchment of the Plan Area and serving WRC.

**Informative:**

We encourage you to seek ways in which your neighbourhood plan can improve the local environment. For your information, together with Natural England, Historic England and Forestry Commission we have published joint guidance on neighbourhood planning, which sets out sources of environmental information and ideas on incorporating the environment into plans. This is available at: [How to consider the environment in Neighbourhood plans - Locality Neighbourhood Planning](#)

We trust this advice is useful.

Environment Agency  
Iceni House Cobham Road, Ipswich, IP3 9JD.  
Customer services line: 03708 506 506  
[www.gov.uk/environment-agency](http://www.gov.uk/environment-agency)  
Cont/d..



Yours sincerely


**Mr Alasdair Hain-Cole**  
**Planning Officer**

Direct dial  
Direct e-mail [planning.eastanglia@environment-agency.gov.uk](mailto:planning.eastanglia@environment-agency.gov.uk)

#### 4. Additional email correspondence with Environment Agency

RE: FW: EA response to Brickhill NHP SEA Report

 Hain-Cole, Alasdair <Alasdair.Hain-Cole@environment-agency.gov.uk>  
To:  mark.x.fitzpatrick@gmail.com

 You forwarded this message on 01/03/2024 11:33.

Apologies Mark.

In terms of the LPA's responsibility in this process, please see Paragraph 031 of the Planning Practice Guidance. This section starts:

*It is the responsibility of the local planning authority to ensure that all the regulations appropriate to the nature and scope of a [neighbourhood plan](#) submitted to it have been met.*

This guidance can be found here: [Strategic environmental assessment and sustainability appraisal - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal)

To confirm from our perspective, we do not consider that an SEA is required in support of your Neighbourhood Plan.

**Kind Regards**

**Alasdair Hain-Cole**  
Sustainable Places Planning Advisor – East Anglia Area  
**Environment Agency** | Icenii House, Cobham Road, Ipswich, Suffolk, IP3 9JD  
**Mob: 0203 0258022**  
[alasdair.hain-cole@environment-agency.gov.uk](mailto:alasdair.hain-cole@environment-agency.gov.uk)

↩ Reply ↩ Reply All → Forward ⋮

Tue 13/02/2024 10:00



**From:** [mark.x.fitzpatrick@gmail.com](mailto:mark.x.fitzpatrick@gmail.com) <[mark.x.fitzpatrick@gmail.com](mailto:mark.x.fitzpatrick@gmail.com)>  
**Sent:** Monday, February 12, 2024 4:33 PM  
**To:** Hain-Cole, Alasdair <[Alasdair.Hain-Cole@environment-agency.gov.uk](mailto:Alasdair.Hain-Cole@environment-agency.gov.uk)>  
**Subject:** RE: FW: EA response to Brickhill NHP SEA Report

You don't often get email from [mark.x.fitzpatrick@gmail.com](mailto:mark.x.fitzpatrick@gmail.com). [Learn why this is important](#)

Alasdair,

In Bedford Borough, the Borough Council leave it to the town and parish councils (as I understand it) to perform the SEA and HRA. So that means it is Brickhill Parish Council will need to agree this.

Kind regards,

Mark (not Mike)

---

**From:** Hain-Cole, Alasdair <[Alasdair.Hain-Cole@environment-agency.gov.uk](mailto:Alasdair.Hain-Cole@environment-agency.gov.uk)>  
**Sent:** Monday, February 12, 2024 4:31 PM  
**To:** [mark.x.fitzpatrick@gmail.com](mailto:mark.x.fitzpatrick@gmail.com)  
**Subject:** RE: FW: EA response to Brickhill NHP SEA Report

Hi Mike,

We do not disagree with the conclusion of your screening assessment that a Strategic Environmental Assessment (and Habitats Regulations Assessment) is not required. However, this is for the Local Planning Authority to confirm.

**Kind Regards**

**Alasdair Hain-Cole**  
Sustainable Places Planning Advisor – East Anglia Area  
**Environment Agency** | Iceni House, Cobham Road, Ipswich, Suffolk, IP3 9JD  
**Mob: 0203 0258022**  
[alasdair.hain-cole@environment-agency.gov.uk](mailto:alasdair.hain-cole@environment-agency.gov.uk)

**From:** [mark.x.fitzpatrick@gmail.com](mailto:mark.x.fitzpatrick@gmail.com) <[mark.x.fitzpatrick@gmail.com](mailto:mark.x.fitzpatrick@gmail.com)>  
**Sent:** Friday, February 9, 2024 1:05 PM  
**To:** Hain-Cole, Alasdair <[Alasdair.Hain-Cole@environment-agency.gov.uk](mailto:Alasdair.Hain-Cole@environment-agency.gov.uk)>  
**Subject:** RE: FW: EA response to Brickhill NHP SEA Report

You don't often get email from [mark.x.fitzpatrick@gmail.com](mailto:mark.x.fitzpatrick@gmail.com). [Learn why this is important](#)

Alasdair,

A belated thank you for the additional context in your email below.

We've been reviewing the responses from the Environment Agency, Historic England and Natural England; I've been asked to contact you again to request confirmation that, from an Environment Agency perspective, you do not require a Strategic Environmental Assessment or a Habitats Regulations Assessment, as you haven't explicitly stated this in your replies.

Kind regards,

Mark

Mark Fitzpatrick  
Chair, Brickhill Parish Council

RE: FW: EA response to Brickhill NHP SEA Report



Hain-Cole, Alasdair <Alasdair.Hain-Cole@environment-agency.gov.uk>  
To Mark Fitzpatrick

Reply Reply All Forward ...

Tue 07/11/2023 16:27

Hi Mark,

Following on from our conversation yesterday, I just wanted to provide you with some more context to our response. The Environment Agency and Anglian Water joint position statement regarding Bedford Water Recycling Centre is currently under examination by the Planning Inspectorate as a supporting document for the Local Plan 2040. This can be viewed here: [OpenDocument.aspx \(bedford.gov.uk\)](#)

As we discussed, the Brickhill Neighbourhood Plan isn't currently proposing site allocations so it's not a concern but just something to be aware of, particularly when it comes to windfall development etc..

**Kind Regards**

**Alasdair Hain-Cole**  
Sustainable Places Planning Advisor – East Anglia Area  
**Environment Agency** | Icen House, Cobham Road, Ipswich, Suffolk, IP3 9JD  
**Mob:**  
[alasdair.hain-cole@environment-agency.gov.uk](mailto:alasdair.hain-cole@environment-agency.gov.uk)

---

**From:** Mark Fitzpatrick <[mark.x.fitzpatrick@gmail.com](mailto:mark.x.fitzpatrick@gmail.com)>  
**Sent:** Monday, November 6, 2023 10:06 AM  
**To:** Alasdair Hain-Cole <[Alasdair.Hain-Cole@environment-agency.gov.uk](mailto:Alasdair.Hain-Cole@environment-agency.gov.uk)>  
**Subject:** Re: FW: EA response to Brickhill NHP SEA Report

You don't often get email from [mark.x.fitzpatrick@gmail.com](mailto:mark.x.fitzpatrick@gmail.com). [Learn why this is important](#)

Alasdair,

Thanks for your response to the Brickhill Neighbourhood Plan SEA Report. In your letter you mention that the Plan boundary area includes the Bedford Water Recycling Centre. Could you please clarify this for me? I am not sure where that is - is it the water treatment works near Clapham or the sewage treatment works downstream of Bedford? Neither of these are in the Plan boundary.


kind regards,


Mark

Mark Fitzpatrick  
Chair, Brickhill Parish Council

## 5. Copy of email reply from Historic England 6th October 2023

Brickhill Neighbourhood Plan Strategic Environmental Assessment Screening

 McGivern, Ross <Ross.McGivern@HistoricEngland.org.uk>  
To markx.fitzpatrick@gmail.com  
Cc clerk@brickhillparishcouncil.gov.uk

 This message has been replied to or forwarded.

Reply Reply All Forward

Fri 06/10/2023 18:55

Dear Mr Fitzpatrick,

Thank you for inviting Historic England to comment on this consultation. As the Government's adviser on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local planning process. Therefore we welcome this opportunity to review the Screening Report for this plan. For the purposes of this consultation, Historic England will confine its advice to the question, "Is it (the Brickhill Neighbourhood Plan) likely to have a significant effect on the historic environment?". Our comments are based on the information supplied with the Screening Opinion.

The Screening Report indicates that the Council considers that the plan will not have any significant effects on the historic environment. We note that the plan does not propose to allocate any sites for development.

On the basis of the information supplied, and in the context of the criteria set out in Schedule 1 of the Environmental Assessment Regulations [Annex II of 'SEA' Directive], Historic England concurs with the Council that the preparation of a Strategic Environmental Assessment is not required.

The views of the other two statutory consultation bodies should be taken into account before the overall decision on the need for an SEA is made.

I should be pleased if you can send a copy of the determination as required by REG 11 of the Environmental Assessment of Plans and Programmes Regulations 2004.

We should like to stress that this opinion is based on the information provided by you with your correspondence. To avoid any doubt, this does not reflect our obligation to provide further advice on later stages of the SEA process and, potentially, object to specific proposals which may subsequently arise (either as a result of this consultation or in later versions of the plan) where we consider that, despite the SEA, these would have an adverse effect upon the environment.

Historic England strongly advises that the conservation and archaeological staff of the relevant local 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), how the 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.

Please do contact me, either via email or the number below, if you have any queries.

Ross McGivern (he/him)  
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