

Habitats Regulations Assessment of the RAF Halton Supplementary Planning Document

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December 2023



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Acronyms & Abbreviations

AA	Appropriate Assessment
AGT	Aylesbury Garden Town
AIOSI	Adverse Impact on Site Integrity
AONB	Area of Outstanding Natural Beauty
CJEU	Court of Justice of the European Union
DIO	Defence Infrastructure Organisation
DTA	David Tyldesley and Associates
GI	Green Infrastructure
HRA	Habitat Regulation Assessment
IRZ	Impact Risk Zone
JNCC	Joint Nature Conservation Committee
LSE	Likely Significant Effect
NE	Natural England
NNR	National Nature Reserve
NPPF	National Planning Policy Framework
NVC	National Vegetation Classification
PRoW	Public Right of Way
SAC	Special Area of Conservation
SAMM	Strategic Access Management and Monitoring
SANG	Suitable Area of Natural Greenspace
SIP	Site Improvement Plan
SPA	Special Protection Area
SPD	Supplementary Planning Document
SSSI	Site of Special Scientific Interest
VALP	Vale of Aylesbury Local Plan
ZOI	Zone of Influence

1 Introduction

1.1 Background

- 1.1.1 The purpose of supplementary planning documents (SPD) is to build upon and provide more detailed advice or guidance on policies in an adopted local plan. The National Planning Policy Framework (NPPF) defines SPDs as:
- 1.1.2 ‘Documents which add further detail to the policies in the development plan. They can be used to provide further guidance for development on specific sites, or on particular issues, such as design. Supplementary planning documents are capable of being a material consideration in planning decisions but are not part of the development plan¹’.
- 1.1.3 Buckinghamshire Council is in the process of preparing an SPD for the RAF Halton site². The purpose of this SPD is to provide guidance on the future sustainable development of this strategic site including a masterplan setting out the site layout and disposition of land uses, specifically in relation to policy D-HAL003 RAF Halton of the Vale of Aylesbury Local Plan³.

1.2 Habitats Regulations Assessment

- 1.2.1 The application of HRA to land-use plans is a requirement of the Conservation of Habitats and Species Regulations 2017 (as amended)⁴. HRA applies to plans and projects in England and Wales.
- 1.2.2 Where a plan is likely to have a significant effect on a habitats site (either alone or in combination) and is not directly connected with or necessary to the management of the habitats site, Regulation 105 of the Habitats Regulations notes that the plan-making authority for that plan must, before the plan is given effect, make an Appropriate Assessment of the implications for the site in view of that site’s conservation objectives. These tests are referred to collectively as a HRA.

¹ Ministry of Housing, Communities & Local Government (September 2023). National Planning Policy Framework. Available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2> [Date Accessed: 21/11/23].

² Buckinghamshire Council. November 2023. RAF Halton Supplementary Planning Document. Draft for Consultation.

³ Buckinghamshire Council. Vale of Aylesbury Local Plan (VALP) 2013 – 2033. September 2021. Adopted Plan. <https://www.buckinghamshire.gov.uk/planning-and-building-control/planning-policy/local-development-plans-and-guidance/local-development-plans> Available at: [Date Accessed: 21/11/23].

⁴ The Conservation of Habitats and Species Regulations 2017 SI No. 2017/1012, TSO (The Stationery Office), London. Available at: <https://www.legislation.gov.uk/uksi/2017/1012/contents> [Date Accessed: 21/11/23] as amended by The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019. Available at: <https://www.legislation.gov.uk/ukdsi/2019/9780111176573> [Date Accessed: 21/11/23].

1.2.3 The Habitats Regulations⁵ provide a definition of a European site at Regulation 8. These sites include Special Areas of Conservation (SAC), Sites of Community Importance, Special Protection Areas (SPA) and sites proposed to the European Commission in accordance with Article 4(1) of the Habitats Directive. In addition, policy in England and Wales notes that the following sites should also be given the same level of protection as a European site⁶. European sites together with sites set out in national policy (listed below) are referred to in England and Wales as a habitats site⁷.

- A potential SPA (pSPA)
- A possible / proposed SAC (pSAC)
- Listed and proposed Ramsar Sites (wetland of international importance)
- In England, sites identified or required as compensation measures for adverse effects on statutory habitats sites, pSPA, pSAC and listed or proposed Ramsar sites.

1.3 Purpose of this report

1.3.1 HRA is an iterative process, designed to run alongside and inform the plan making process to ensure adverse impacts on habitats sites are avoided in the first instance or, where this is not possible, effective mitigation is designed to ensure no adverse impact on site integrity.

1.3.2 Lepus Consulting has prepared this report to inform the HRA of the SPD on behalf of Buckinghamshire Council. This HRA report has been prepared in accordance with the Habitats Regulations and has been informed by the following guidance:

- Planning Practice Guidance: Appropriate Assessment⁸
- The Habitat Regulations Assessment Handbook - David Tyldesley and Associates (referred to hereafter as the DTA Handbook), 2013 (in particular Part F: 'Practical Guidance for the Assessment of Plans under the Regulations')

1.3.3 Buckinghamshire Council, as the competent authority, will have responsibility to make the integrity test. This can be undertaken in light of the conclusions set out in this report, having regard to representations made by Natural England under the provisions of Regulation 105(2) of the Habitats Regulations.

⁵ Conservation of Habitats and Species Regulations 2017 SI No. 2017/1012, TSO (The Stationery Office), London. Available at: <https://www.legislation.gov.uk/uksi/2017/1012/contents> [Date Accessed 21/11/23] as amended by The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019. Available at: <https://www.legislation.gov.uk/ukdsi/2019/9780111176573> [Date Accessed: 21/11/23].

⁶ Ministry of Housing, Communities & Local Government (2023). National Planning Policy Framework. Para 181. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1182995/NPPF_Sept_23.pdf [Date Accessed: 21/11/23].

⁷ Habitats site: 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. Ministry of Housing, Communities & Local Government (2021). National Planning Policy Framework. Para 181. Available in Annex 2 (Glossary) at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1182995/NPPF_Sept_23.pdf [Date Accessed: 21/11/23].

⁸ Ministry of Housing, Communities and Local Government (July 2019) Planning Practice Guidance Note, Appropriate Assessment, Guidance on the use of Habitats Regulations Assessment.

2 RAF Halton SPD

2.1 Background Context

- 2.1.1 Site D-HAL003 is currently an active military site, although it has been confirmed by the Defence Infrastructure Organisation (DIO) that the site will be decommissioned in 2027. The site is considered to be well located with respect to transport links and local services, providing an opportunity for a mixed-use redevelopment. The boundary for Site D-HAL003 is shown in **Figure 2.1**. The site comprises approximately 82ha of partially developed land and lies to the south east of Aylesbury Town, and to the north east of the market town of Wendover. The site is adjacent to the Chilterns AONB and sits at the foot of Wendover Woods.
- 2.1.2 The Vale of Aylesbury Local Plan (VALP) 2013-2033 was adopted by Buckinghamshire Council as a Development Plan Document on the 15th September 2021⁹.
- 2.1.3 D-HAL003 RAF Halton is identified as one in a suite of 'major sites' within VALP Policy D2.
- 2.1.4 Due to the proximity of the RAF Halton site to Aylesbury, the development is proposed to follow the same principles as Aylesbury Garden Town (AGT) as set out in Policy D1. In line with the VALP Policies D-HAL003 and I1, at least 50% of the site area will be publicly accessible green and blue infrastructure. This will incorporate the open spaces and habitats already present on the site, including existing woodland and grassland, tree avenues, hedgerow and will create new green corridors and parkland that will link to the green infrastructure network of the wider countryside.
- 2.1.5 Site D-HAL003 is proposed to deliver at least 1,000 homes, and through development of the SPD the site will also include the following key features:
- Mixed use local centre on Chestnut Avenue including the reuse of St George's Church
 - New two form entry primary school with playing fields to the north east adjacent to the Registered Park and Garden
 - Enhancement or restoration of the Registered Park and Garden parkland associated with Halton House
 - Sports and leisure corridor incorporating the Nuffield Pavilion (which is retained for community/sports use), allotments, play space and open space comprising of existing parkland and woodland
 - Retention of the old station building within a public square, and creation of an extended east-west tree-lined avenue.
 - Higher density residential neighbourhood close to the local centre and fronting Upper Icknield Way and Chestnut Avenue
 - Provision of a museum facility to incorporate the Trenchard museum collections and interpretation of the nearby WWI trenches
 - Traffic calming and new pedestrian/cycle crossing points on Upper Icknield Way and Chestnut Avenue to create pedestrian-friendly streets

⁹ Buckinghamshire Council. Vale of Aylesbury Local Plan (VALP) 2013 – 2033. September 2021. Adopted Plan.

<https://www.buckinghamshire.gov.uk/planning-and-building-control/planning-policy/local-development-plans-and-guidance/local-development-plans> Available at: [Date Accessed: 21/11/23].

- Improvements to the junction of Upper Icknield Way and Chestnut Avenue to enable easy pedestrian and cycle connectivity
- Listed Groves and Henderson barracks converted to residential or other appropriate use Parade ground becomes a new public park with play space and community use of the former Trenchard Museum along with potential for vehicle parking space.
- Natural parkland and grassland habitat with enhanced walking/cycling access to Wendover Woods
- North-south green corridor of parkland and play space with views over Aylesbury Vale
- Moderate and lower density residential development of Maitland barracks and upper parade ground, including conversion of locally listed buildings
- Former stables and cinema buildings could both be converted to either community or leisure use within a parkland setting should they not be suitable for conversion to residential. They could be converted to non-residential uses such as a cycle hire hub, co-working hub café.

2.1.6 The SPD takes the proposals from the VALP and outlines the aspirations of the area as well as responses and key issues that will influence the new development. The SPD will be a material consideration, which expands on policies set out in the VALP, to help guide the preparation and assessment of future planning applications within the site.

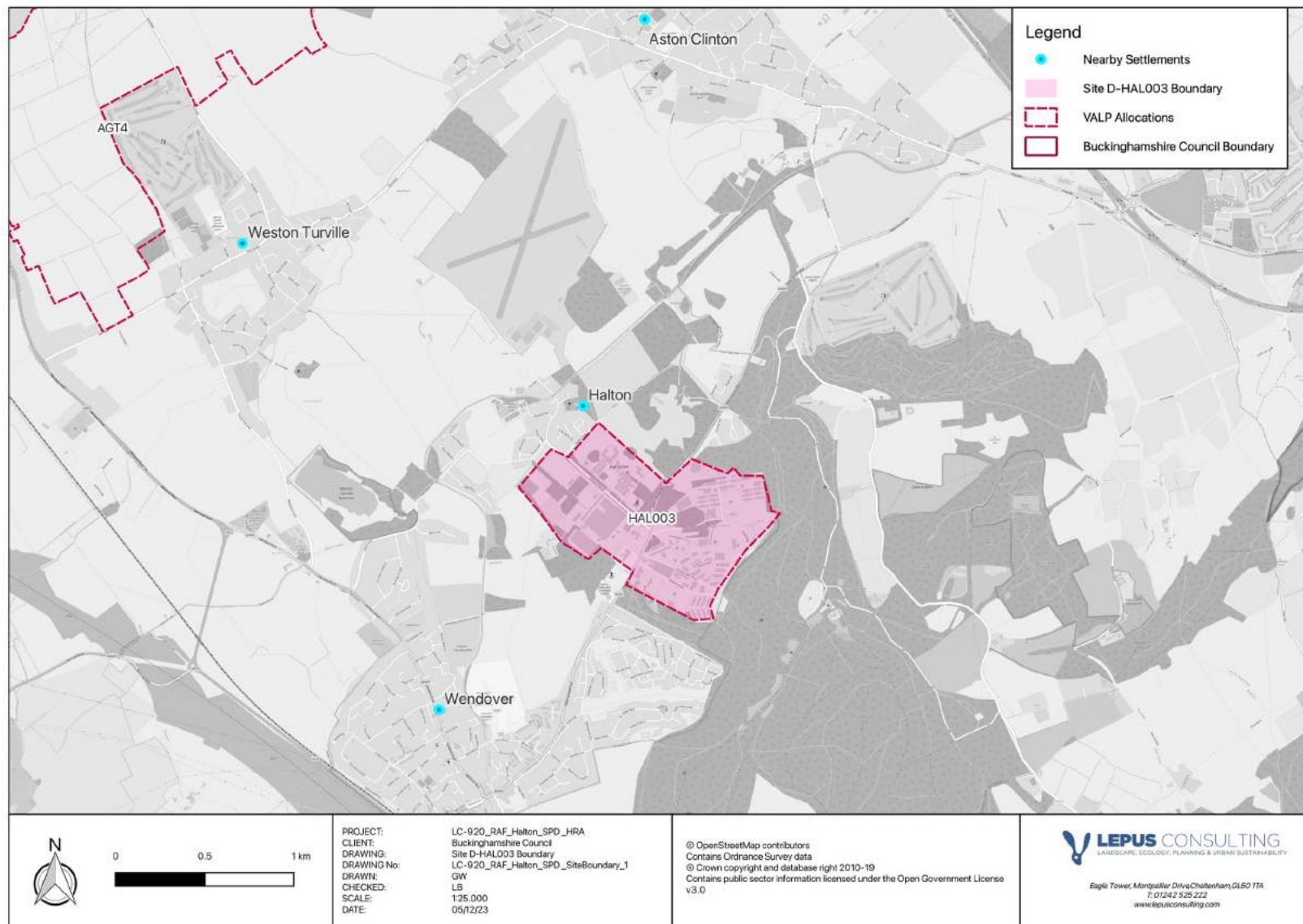


Figure 2.1: Proposed site D-HAL003 boundary area

3 Methodology

3.1 Overview

- 3.1.1 HRA is a rigorous precautionary process centred around the conservation objectives of a Habitat site's qualifying interests. It is intended to ensure that habitats sites are protected from impacts that could adversely affect their integrity. A step-by-step guide to the methodology followed for the HRA, as outlined in the DTA Handbook, is illustrated in **Figure 3.1**. This report focuses on Stage 1 and Stage 2 only. It is unlikely that a land use plan would meet the derogation tests under the Habitats Regulations at Stage 4.

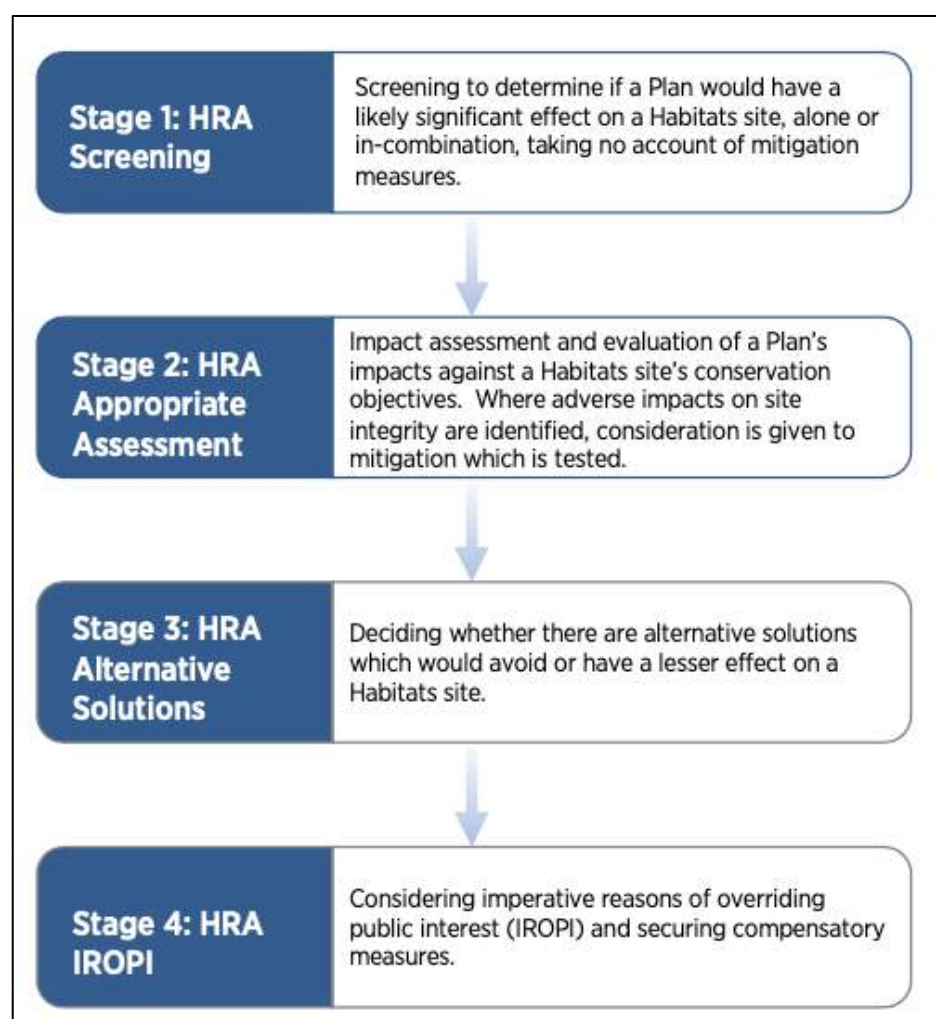


Figure 3.1: Stages in the Habitats Regulations Assessment process¹⁰

¹⁰ Tyldesley, D., and Chapman, C. (2013) The Habitats Regulations Assessment Handbook (October) (2018) edition UK: DTA Publications Limited. Available at: www.dtapublications.co.uk [Date accessed: 21/11/23].

3.2 Stage 1: Screening for Likely Significant Effects

- 3.2.1 The first stage in the HRA process comprises the screening stage. The purpose of the screening process is to firstly determine whether a plan is either (1) exempt (because it is directly connected with or necessary to the management of a habitats site), (2) whether it can be excluded (because it is not a plan), or (3) eliminated (because there would be no conceivable effects), from the HRA process. If none of these conditions apply, it is next necessary to identify whether there are any aspects of the plan which may lead to LSE's at a habitats site, either alone or in-combination with other plans or projects.
- 3.2.2 Where elements of the SPD will not result in a LSE on a habitats site (alone or in-combination) these are screened out and are not considered in further detail in the process. Where LSEs are identified, either alone or in-combination, the HRA process moves to an Appropriate Assessment of LSEs (Stage 2).
- 3.2.3 The European Court Judgement on the interpretation of the Habitats Directive in the case of People Over Wind and Sweetman vs Coillte Teoranta (Case C-323/17¹¹) determined that mitigation measures are only permitted to be considered as part of an Appropriate Assessment. The HRA screening process therefore took no account of incorporated mitigation or avoidance measures that are intended to avoid or reduce harmful effects on a habitats site when assessing the LSE of the SPD on habitats sites. These are measures, which if removed (i.e. should they no longer be required for the benefit of a habitats site), would still allow the lawful and practical implementation of a plan.

3.3 Stage 2: Appropriate Assessment and integrity test

- 3.3.1 Stage 2 of the HRA process comprises the Appropriate Assessment and integrity test. The purpose of the Appropriate Assessment (as defined by the DTA Handbook) is to “undertake an objective, scientific assessment of the implications for the European site qualifying features potentially affected by the plan in light of their consideration objectives and other information for assessment”¹².

¹¹ InfoCuria (2018) Case C-323/17. Available at: <http://curia.europa.eu/juris/document/document.jsf?docid=200970&doclang=EN> [Date Accessed: 08/09/23].

¹² Tyldesley, D. (2013) The Habitats Regulations Assessment Handbook. DTA Publications.

- 3.3.2 The Appropriate Assessment is undertaken in view of individual habitats site's conservation objectives. As part of this process decision makers should take account of the potential consequences of no action, the uncertainties inherent in scientific evaluation and they should consult interested parties on the possible ways of managing the risk, for instance, through the adoption of mitigation measures. Mitigation measures should aim to avoid, minimise or reduce significant effects on habitats sites. All mitigation measures must be deliverable and able to mitigate adverse effects for which they are targeted, recognising the multi-staged planning and approval procedural approach to plan making^{13,14,15}.
- 3.3.3 The Appropriate Assessment aims to present information in respect of all aspects of the SPD and ways in which it could, either alone or in-combination with other plans and projects, impact a habitats site.
- 3.3.4 The plan-making body (as the Competent Authority) must then ascertain, based on the findings of the Appropriate Assessment, whether the SPD will adversely affect the integrity of a habitats site either alone or in-combination with other plans and projects. This is referred to as the Integrity Test.

3.4 Dealing with uncertainty

- 3.4.1 Uncertainty is an inherent characteristic of HRA and decisions can be made only on currently available and relevant information. This concept is reinforced in the 7th September 2004 'Waddenzee' ruling¹⁶.
- 3.4.2 "However, the necessary certainty cannot be construed as meaning absolute certainty since that is almost impossible to attain. Instead, it is clear from the second sentence of Article 6(3) of the Habitats Directive that the competent authorities must take a decision having assessed all the relevant information which is set out in particular in the Appropriate Assessment. The conclusion of this assessment is, of necessity, subjective in nature. Therefore, the competent authorities can, from their point of view, be certain that there will be no adverse effects even though, from an objective point of view, there is no absolute certainty."

3.5 The Precautionary Principle

- 3.5.1 The HRA process is characterised by the Precautionary Principle. This is described by the European Commission as being as follows and is embedded in the Integrity Test.

¹³ Ltd (NANT Ltd) v Suffolk Coastal District Council, Court of Appeal, 17 February 2015. Available at: <https://www.eastsuffolk.gov.uk/assets/Planning/Suffolk-Coastal-Local-Plan/Core-Strategy-and-DMP/No-Adastral-New-Town-Ltd-v-SCDC.pdf> [Date Accessed: 21/11/23].

¹⁴ Opinion of Advocate General Kokott delivered on 9 June 2005. Commission of the European Communities v United Kingdom of Great Britain and Northern Ireland. Failure of a Member State to fulfil obligations - Directive 92/43/EEC - Conservation of natural habitats - Wild fauna and flora. Case C-6/04. Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A62004CC0006> [Date Accessed: 21/11/23].

¹⁵ R (o o Devon Wildlife Trust) v. Teignbridge DC [2015] EWHC 2159 (Admin). 28 July 2015. Available at: <https://vlex.co.uk/vid/r-devon-wildlife-trust-792693573> [Date Accessed: 21/11/23]

¹⁶ EC Case C-127/02 Reference for a Preliminary Ruling 'Waddenzee' 7th September 2004 Advocate General's Opinion (para 107).

- 3.5.2 “If a preliminary scientific evaluation shows that there are reasonable grounds for concern that a particular activity might lead to damaging effects on the environment, or on human, animal or plant health, which would be inconsistent with protection normally afforded to these within the European Community, the Precautionary Principle is triggered.”

4 Vale of Aylesbury Local Plan HRA

4.1 Introduction

- 4.1.1 Development of the Vale of Aylesbury Local Plan (VALP) was supported by the HRA process. The outputs were presented in a number of documents which contained the Council's findings and conclusions in respect of the HRA of the VALP as a whole. These assessments included consideration of the RAF Halton strategic allocation. Natural England was consulted at each stage of the HRA process. The following sections provide a summary of the HRA which was undertaken at each stage of the VALP planning making process.

4.2 Vale of Aylesbury Local Plan 2017 Submission HRA

- 4.2.1 The VALP 2017 Submission HRA¹⁷ summarised the outputs of a screening assessment. It focused on the Chilterns Beechwoods SAC and Aston Rowant SAC. It concluded no LSEs as a result of VALP upon any habitats site, either alone or in-combination with other plans and projects, and as such, ruled out the requirement for further assessment of the VALP under the Habitats Regulations.

4.3 RAF Halton HRA Update

- 4.3.1 The Submission HRA work was updated in 2017 to take into consideration spatial site options, including a site at RAF Halton, which were being considered by the Council¹⁸. This HRA found that the conclusions of the 2017 HRA (**Section 4.2**) remained valid.

4.4 Vale of Aylesbury Local Plan 2013 – 2033 HRA

- 4.4.1 The 2019 HRA¹⁹ took into consideration emerging case law including People over Wind and Holohan (see **Section 3.2**) and included an HRA screening and Appropriate Assessment. This report provided a screening assessment of LSEs at the Chilterns Beechwoods SAC and Aston Rowant SAC. The Appropriate Assessment focused on likely significant recreation and air quality impacts at the Chilterns Beechwoods SAC.
- 4.4.2 In terms of recreational pressure, the Appropriate Assessment concluded that 'providing that the specific proposals for green infrastructure detailed above are re-inserted into Policy I1 in the modified plan and applied to housing allocation HAL03, and there is a commitment by AVDC to ensure that scheme design seeks to provide natural greenspace that contributes to alleviating visitor pressure on the SAC, it is certain that the VALP will not result in adverse effects on the integrity of the Chilterns Beechwoods SAC as a result of recreational pressures, either alone or in- combination with other plans and projects'.

¹⁷ Land Use Consultants. VALP Habitat Regulations Assessment (2017). <https://www.buckinghamshire.gov.uk/planning-and-building-control/planning-policy/local-development-plans-and-guidance/local-development-plans/> Accessed: 21/11/23].

¹⁸ Land Use Consultants. RAF Halton Addendum (2017). Available at <https://www.buckinghamshire.gov.uk/planning-and-building-control/planning-policy/local-development-plans-and-guidance/local-development-plans/> [Date Accessed: 21/11/23].

¹⁹ Land Use Consultants. VALP Habitat Regulations Assessment Report 2019. Available at <https://www.buckinghamshire.gov.uk/planning-and-building-control/planning-policy/local-development-plans-and-guidance/local-development-plans/> [Date Accessed: 21/11/23].

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- 4.4.3 In relation to air quality impacts, the appropriate assessment concluded that there would be no adverse impact on site integrity. Natural England was consulted on the 2019 HRA report and responded as follows:
- 4.4.4 “Natural England agree with the conclusions reached within the Appropriate Assessment in regards to recreational disturbance. We agree with section 6.13, which states that provided the green infrastructure proposals detailed in Policy I1 are applied to the RAF Halton site, and that Aylesbury Vale District Council (AVDC) commit to providing natural greenspace to alleviate visitor pressure on the SAC, there will be no likely significant effect (either alone or in combination) on the integrity of the SAC. We also agree with the conclusions reached in regards to air pollution.”
- 4.4.5 In summary the HRA concluded that ‘... providing that the adopted VALP includes the previously omitted open space standards specified in Policy I1 and there is a commitment by AVDC to ensure that the SPD Masterplan provides natural greenspace that contributes to alleviating visitor pressure on the SAC, the VALP will not result in adverse effects on European Sites, either alone or in-combination with other plans and projects’.
- 4.5 Vale of Aylesbury Local Plan 2013-2033 Proposed Further Modifications Stage – HRA Addendum**
- 4.5.1 An HRA was undertaken in support of the VALP main modifications²⁰. This focused on an update to the air quality assessment in light of updated traffic modelling which resulted in an exceedance of the 1,000 AADT threshold along the A41. The Air Quality Assessment concluded that the effects of the VALP, as proposed to be modified, would not be significant with regard to annual mean NO_x concentrations and nutrient and acid nitrogen deposition. Natural England agreed with this conclusion.

²⁰ Land Use Consultants. VALP Proposed Further Modifications Stage – Habitat Regulations Assessment Addendum (2020).

5 Screening

5.1 RAF Halton SPD HRA Screening

- 5.1.1 The RAF Halton SPD is not directly connected with or necessary to the management of any habitats site. Neither can it be excluded or eliminated from the HRA process. Therefore, as required under Regulation 105 of the Habitats Regulations, an assessment of LSEs of the RAF Halton SPD upon habitats sites has been undertaken by Buckinghamshire Council²¹.
- 5.1.2 This assessment prepared by the Council concluded that there would be the potential for LSEs associated with increased recreational pressure at the Chilterns Beechwoods SAC as a result of the SPD. It noted that the VALP HRA findings regarding the need for recreational impact mitigation from the housing growth impacts on the Chiltern Beechwoods SAC led directly to the inclusion of policies and proposals on green infrastructure mitigation as set out in Policy I1 and D-AGT1 of VALP. As the SPD is expected to add further details on the type of Green Infrastructure (GI), location of GI and management of GI in terms of how the policy requirements will be met on the RAF Halton site, it concluded that there was a need for a greater level of detail on mitigation to be evaluated in HRA terms. As these details were not available at the time of the VALP HRA, it summarised that an Appropriate Assessment should be carried out for the SPD to evaluate if the mitigation details proposed are adequate or if there would be adverse recreational impacts on the integrity of the Chilterns Beechwoods SAC, either alone or in combination with other plans and projects, as a result of the RAF Halton SPD.
- 5.1.3 The screening assessment took no account of mitigation measures that the SPD may incorporate to mitigate adverse impacts upon habitats sites. It concluded that the SPD would be screened into the HRA process. The next stage of the HRA process is Stage 2 - Appropriate Assessment.

5.2 Screening Consultation

- 5.2.1 Natural England was consulted on the screening decision in October 2022 and indicated their agreement with the conclusions.

²¹ Buckinghamshire Council. December 2022. Site D-HAL003, RAF Halton SPD, Aylesbury Vale Area. Strategic Environmental Assessment and Habitats Regulations Assessment Screening. Final Outcome (Version 1.2).

6 Appropriate Assessment: Chilterns Beechwood SAC – Recreational Impacts

6.1 Introduction

- 6.1.1 Potential LSEs associated with increased recreational pressure from the RAF Halton SPD at the Chilterns Beechwoods SAC were screened into the HRA process for further assessment in an Appropriate Assessment by Buckinghamshire Council (see **Chapter 5**). The Appropriate Assessment presented here focuses specifically on recreational impacts upon this habitats site. All other habitats sites and potential pathways of impact have been screened out of the HRA process having been addressed in detail through the HRA of the VALP as summarised in **Section 4** and recognised in the screening assessment in **Section 5**.

6.2 Chilterns Beechwoods SAC

- 6.2.1 The Chilterns Beechwoods SAC comprises a number of components of woodland which represent a range of semi natural woodlands dominated by beech (*Fagus sylvatica*). These sites are scattered throughout the Chilterns Area of Outstanding Natural Beauty (AONB), with the exception of Bisham Woods SSSI.
- 6.2.2 The SAC is designated for two qualifying habitats; semi-natural dry grasslands and scrubland facies and Beech forests on neutral to rich soils, with its qualifying species being the stag beetle (*Lucanus cervus*) (**Appendix A**). All components of the SAC, with the exception of Bisham Woods and Tring Woodlands, lie wholly or partially within Buckinghamshire's administrative boundary. Bisham Woods and Tring Woodlands are located immediately adjacent to its boundary.
- 6.2.3 Sites of Special Scientific Interest (SSSIs) are protected areas in the United Kingdom designated for conservation. SSSIs are the building blocks of site-based nature conservation in the UK. A SSSI will be designated based on the characteristics of its fauna, flora, geology and/or geomorphology. Whilst typically analogous in ecological function, the reasons for its designation can be entirely different to those for which the same area is designated as a SAC, SPA or Ramsar.
- 6.2.4 **Table 6.1** provides a summary of the SSSI components which are coincident with the SAC and their distance from the RAF Halton site, these are also illustrated on **Figure 6.1**.

Table 6.1: Approximate distance of RAF Halton from SSSI components which are coincident with the Chilterns Beechwoods SAC

SSSI sites which are coincident with and together constitute the Chilterns Beechwoods SAC	Approximate distance from the RAF Halton
Ashridge Commons and Woods SSSI	7.6km to the east
Aston Rowant Woods SSSI	15.6km to south west
Bisham Woods SSSI	23.2km to the south
Bradenham Woods, Park Wood & The Coppice SSSI	11.1km to south
Ellesborough and Kimble Warrens SSSI	5km to the south
Hollowhill and Pullingshill Woods SSSI	23.1km to the south
Naphill Common SSSI	11.9km to south
Tring Woodlands SSSI	2.7km to the south east
Windsor Hill SSSI	7.7km to the south

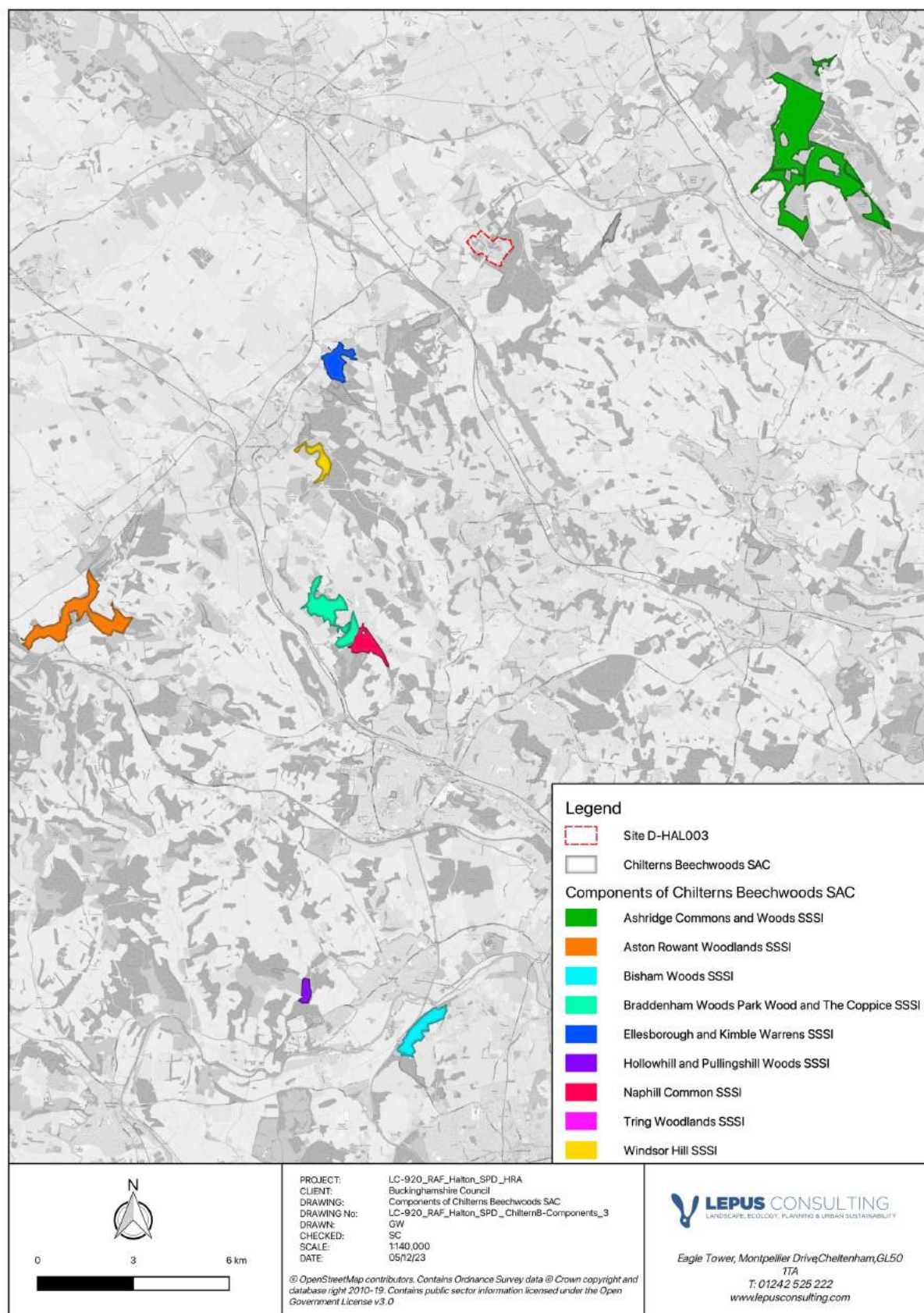


Figure 6.1: Location of Chilterns Beechwoods SAC and constituent SSSIs

- 6.2.5 Due to the varying locations of each component of the SAC the underlying soils also vary. As a result, each of the National Vegetation Classification (NVC) woodland classification types²² in which beech is a major component feature across the components of the SAC.
- 6.2.6 The SAC also supports a number of rare plants with restricted distribution including coralroot bittercress (*Cardamine bulbifera*), southern woodrush (*Luzula forsterii*), red helleborine (*Cephalanthera rubra*) and lesser hairy-brome (*Bromus benekenii*). The Chilterns Beechwoods represent a stronghold for one of the UK's rarest plants, ghost orchid (*Epipogium aphyllum*). Another notable feature is the prominence of box (*Buxus sempervirens*) at Ellesborough and Kimble Warrens SSSI²³.
- 6.2.7 Dry grasslands and scrublands on chalk or limestone form a qualifying habitat of the SAC. This is associated with thin, well-drained, lime-rich soils associated with chalk and limestone. Within the SAC these are restricted and found at the Windsor Hill SSSI and Ellesborough and Kimble Warrens SSSI components of the SAC. These support a diversity of grasses and scarce invertebrates²⁴.
- 6.2.8 The qualifying species of the SAC is the stag beetle (*Lucanus cervus*). This species is saproxylic and therefore reliant on dead and decaying wood for the larval stages of its lifecycle. Deadwood habitat is found within the SAC in the form of fallen branches and tree stumps. Records indicate the beetle has been recorded at the Bisham Woods SSSI and Hollowhill and Pullingshill Woods SSSI components of the SAC²⁵. This represents the northern range of the beetle.
- 6.2.9 In Natural England's Site Improvement Plan (SIP)²⁶ it is noted that the SAC is vulnerable to a number of threats and pressures (see **Appendix A**) including public access and disturbance (the stag beetle). There are a number of SSSI units within the SAC designation which are in an unfavourable – recovering – condition, including at Bisham Woods SSSI, Tring Woodlands, Windsor Hill SSSI and Ellesborough and Kimble Warrens SSSI. The reasons given for the unfavourable condition do not relate to recreational pressures.
- 6.2.10 Natural England defines zones around each SSSI which may be at risk from specific types of development, these are known as Impact Risk Zones (IRZ). A review indicates that none of the SSSIs which underpin the SAC have an IRZ which covers RAF Halton in relation to residential development²⁷.

²² Rodwell, J.S. (ed.) 1991. British Plant Communities. Volume 1. Woodlands and scrub. Cambridge University Press.

²³ Natural England (2019) Chiltern Beechwoods SAC Conservation Objectives Supplementary Advice. <http://publications.naturalengland.org.uk/file/5422856020426752> [Date Accessed: 21/11/23].

²⁴ Natural England (2019) Chiltern Beechwoods SAC Conservation Objectives Supplementary Advice. <http://publications.naturalengland.org.uk/file/5422856020426752> [Date Accessed: 21/11/23].

²⁵ Natural England (2019) Chiltern Beechwoods SAC Conservation Objectives Supplementary Advice. <http://publications.naturalengland.org.uk/file/5422856020426752> [Date Accessed: 21/11/23].

²⁶ Natural England (2015) Chiltern Beechwoods SAC Site Improvement Plan. <http://publications.naturalengland.org.uk/file/5908864568393728> [Date Accessed: 21/11/23].

²⁷ It is noted that the site falls within an IRZ for other SSSIs not associated with the Chilterns Beechwoods SAC.

6.3 Recreational pressures at the SAC

- 6.3.1 Public access and disturbance threats at the SAC are noted in Natural England's SIP to be related to increased visitor pressures and disturbance on the stag beetle. Natural England's Supplementary Advice notes that, given its location within the Chilterns AONB, the Chilterns Beechwoods SAC has become a popular recreational destination for walking and cycling. Surveys undertaken by the Chilterns AONB indicated that in 2007 just over 55 million leisure visits were made to and within the Chilterns AONB²⁸, this figure is likely to have risen since these surveys were undertaken.
- 6.3.2 Elsewhere in the UK, public access and disturbance threats have been considered in terms of buffer distances and zones. Urbanisation impacts are often experienced when development is located in close proximity of a designation boundary. For recreational impacts, buffers are defined by recreational survey data and are often dependent on a number of factors including the recreational draw of a site, accessibility and the availability of other recreational resource in an area. With the exception of the Ashridge Common and Woods SSSI and Tring Woodlands SSSI, a bespoke recreational zone of influence is not currently available for the other SSSI components of the Chilterns Beechwoods SAC.
- 6.3.3 With the exception of the Bisham Woods SSSI, all components of the Chilterns Beechwoods SAC lie within the AONB. The Chilterns AONB Management Plan notes that 80,000 people live within the AONB and a further 1.6 million within 8km²⁹. The Management Plan aims to attract visitors within 8km of the AONB. The Management Plan notes that this is the area over which visitors are predominantly drawn to the AONB as a whole.
- 6.3.4 The characteristics and recreational draw of each of component of the SAC varies depending on its location, facilities provided, promotion and accessibility. The following sections provide an overview of the characteristics of each component, its ecological condition, location in relation to the RAF Halton strategic site and levels of accessibility. Where work has been undertaken to establish a recreational Zone of Influence (ZOI) this has also been detailed.

Ashridge Commons and Woods SSSI

- 6.3.5 Ashridge Commons and Woods SSSI is located 7.6km to the east of RAF Halton, predominately within the administrative boundary of Dacorum Borough Council (70% of the designated area) with the remainder located in Buckinghamshire Council's administrative area.
- 6.3.6 The area of the Chilterns Beechwoods SAC, which is coincident with Ashridge Commons and Woods SSSI, broadly corresponds with areas of the Ashridge Estate, for which the National Trust is the main landowner.

²⁸ The Chilterns AONB. 2007. Chilterns AONB Visitor Survey. Available at: <https://www.chilternsaonb.org/about-us/publications/> [Date Accessed: 25/01/21]

²⁹ Lepus Consulting. March 2021. Dacorum Local Plan. HRA Desk Study and Site Walkover Survey. Chilterns Beechwoods SAC: Ashridge Commons and Woods SSSI and Tring Woodlands SSSI.

- 6.3.7 A number of areas of woodland within the SSSI comprise ancient woodland. The SSSI citation for Ashridge Commons and Woods indicates that the site comprises a mixture of ancient semi-natural and secondary woodland, plantation, scrub, and a more open component dominated by bracken, and grassland³⁰. The woodland ground flora is noted to be associated with the underlying soils, with sparse flora in areas on the acidic plateau soils and more diverse communities on the more base rich soils. It also notes the diverse range of woodland bird species that are supported on site by the varied woodland stand types, areas of scrub (dominated by bracken and scattered trees) and small areas of unimproved calcareous and acidic grassland.
- 6.3.8 Ashridge is open to the public with a number of routes for walking, cycling, horse-riding and running promoted by the National Trust across the site. There is a visitor centre, toilets, a shop and a café on site located at the end of Monument Drive, and mobility vehicles are available for advance booking. Dogs are permitted on site on the lead. Free parking is provided along Monument Drive. The site can also be accessed from another 23 car parks which offer free parking in the local area, by foot, bike or horse from neighbouring residential areas and via the rights of way network which links to the site. There are three major trails that cross the site, the Chiltern Way, the Hertfordshire Way and the Icknield Way. In addition, the estate is freely accessible to the public with a substantial portion being designated as 'registered common land' or 'other access land' under the Countryside and Rights of Way Act 2000.
- 6.3.9 Dacorum Borough Council is currently preparing and updating the evidence base to support its Emerging Local Plan, which includes an HRA. As part of the HRA, research has been carried out to look at the impacts of recreational pressure on Chilterns Beechwoods SAC and in particular recreational impacts upon the Ashridge Commons and Woods SSSI and Tring Woodlands SSSI components. This research included visitor surveys, ecological surveys and car parking surveys.
- 6.3.10 These surveys identified current recreational impacts on the qualifying features of the Ashridge Commons and Woods SSSI component of the SAC, including evidence of severe damage occurring over many areas. These impacts include trampling and vegetation wear, soil compaction and erosion, nutrient enrichment (e.g. dog fouling), litter, invasive species, risk of fire (e.g. from BBQs), harvesting and impacts associated with the management of the site more generally.
- 6.3.11 The visitor surveys highlighted that the Ashridge Estate is an attractive 'honey-pot site' and draws visitors from a particularly wide area, primarily by car. Using postcode data, a recreational ZOI³¹ was established which extends for a distance of 12.6km from the Ashridge Estate. The RAF Halton site is located approximately 7.6km from this component of the SAC and therefore entirely within the ZOI (see **Figure 6.2**).

³⁰ Natural England. Ashridge Commons and Woods SSSI Citation. Available at: <https://designatedsites.naturalengland.org.uk/PDFsForWeb/Citation/1000452.pdf> [Date Accessed: 21/11/23].

³¹ The recreational ZOI is the area across which 75% of people will travel to use a site for recreational purposes.

- 6.3.12 Taking into consideration the precautionary principle (see **Section 3**), future housing growth within this ZOI has the potential to result in increased recreational pressure on this component of the SAC and its qualifying features, both on its own and when considered in combination with other development.
- 6.3.13 Buckinghamshire Council is currently in the process of developing a detailed mitigation strategy to ensure no adverse recreational impacts on the SAC. Guidance in relation to this issue is currently provided on the planning pages of the Council's website³².

Aston Rowant Woods SSSI

- 6.3.14 Aston Rowant Woods SSSI is located approximately 15.6km to the south west of the strategic site, partly within the administrative boundary of Buckinghamshire Council but predominantly within South Oxfordshire.
- 6.3.15 It comprises a large area of ancient beech woodland located on the escarpment of the Chilterns. The SSSI citation notes that the site 'consists of a series of contiguous areas of woodland on the chalk escarpment, plateau and dip slope of the Chilterns. Much of this site is ancient woodland and although parts have been modified by the planting of introduced trees and by sycamore invasion, a unusually wide range of semi-natural woodland stand types occur, dominated by oak and beech. The rich flora includes no fewer than 52 species indicative of old woods. Over a hundred species of fungi are recorded. Paths, rides and glades are numerous, and the presence of boggy hollows and standing and fallen dead timber provide diverse niches for invertebrates'³³.
- 6.3.16 The Ridgeway long distance path passes to the north of the site and the Bledlow Circular Ride runs through the eastern section of the site. Sections of the SSSI to the south west and north east of the site are open access, with a number of linear footpaths running through the site along with some forestry tracks around Kington Wood. Aston Rowant National Nature (NNR) Reserve lies to the immediate west of the SSSI. There is car parking to the south of the SSSI at Beacon Hill, signposted from the A40 near Stokenchurch. The A40 runs through the western section of the SSSI.

Bisham Woods SSSI

- 6.3.17 Bisham Woods SSSI is located approximately 23.2km to the south of the strategic site, partly within the administrative boundary of the Royal Borough of Windsor and Maidenhead.
- 6.3.18 Bisham Woods SSSI comprises an extensive area of predominantly broad-leaved woodland situated on a steep north-west facing slope overlooking the River Thames at Marlow³⁴.

³² <https://www.buckinghamshire.gov.uk/planning-and-building-control/building-or-improving-your-property/chiltern-beechwoods-special-area-of-conservation-faqs/>

³³ Natural England. Aston Rowant Woods SSSI Citation. Available at:
<https://designatedsites.naturalengland.org.uk/PDFsForWeb/Citation/1000426.pdf> [Date Accessed: 21/11/23]

³⁴ Natural England. SSSI Citation. <https://designatedsites.naturalengland.org.uk/PDFsForWeb/Citation/1002835.pdf> [Date Accessed: 21/11/23].

- 6.3.19 Bisham Woods SSSI is managed by the Woodland Trust. The woods are open access and contain a number of PRoW, including restricted byways, bridleways and footpaths serving pedestrians, horse riders and cyclists. There is limited parking in the form of pull-ins along Quarry Wood Road, Grubswood Lane and Marlow Road which limits access to this site³⁵. The Woodland Trust have prepared a Management Plan for the woodland covering the period from 2018 to 2023³⁶ and actively manage this habitat. This Management Plan recognises the potential threats associated with increased public access pressure at the woodland and, as such, maintains a well-managed network of paths and signage. It states that 'deadwood will be allowed to accumulate wherever possible, with all windblown trees and the majority of trees felled for safety reasons left to decompose naturally. In this way the deadwood habitat will continue to support a viable population of stag beetles, as well as many other invertebrates and fungi'.

Bradenham Woods, Park Wood and The Coppice SSSI

- 6.3.20 Bradenham Woods, Park Wood and The Coppice SSSI is located approximately 11.1km to the south of the strategic site, within the administrative boundary of Buckinghamshire Council.
- 6.3.21 The citation for the SSSI notes that the SSSI is 'primarily a woodland site, with extensive beechwoods of types characteristic of both the acid clay-with-flints of the Chiltern plateau, and the chalk and various deposits of the valley slopes'³⁷.
- 6.3.22 The Bradenham Estate is managed by the National Trust and includes Bradenham Woods and The Coppice, an extensive area of ancient beech wood. It is open access land with a network of footpaths and permitted bridleways promoted by the National Trust across the site. Free parking is available in Bradenham village opposite cricket pavilion and a small National Trust car park is located on Smalldean Lane approximately 1.5 miles northwest of Bradenham village.

Ellesborough and Kimble Warrens SSSI component of the SAC

- 6.3.23 Ellesborough and Kimble Warrens SSSI is located approximately 5km to the south of the strategic site, within the administrative boundary of Buckinghamshire Council.

³⁵ The Woodland Trust. Bradenham Woods, Park Wood and The Coppice SSSI. Available at: <https://designatedsites.naturalengland.org.uk/PDFsForWeb/Citation/1000478.pdf> [Date Accessed: 21/11/23].

³⁶ Woodland Trust. 2018. Bisham Woods Woodland Management Plan. Available at: <https://www.woodlandtrust.org.uk/media/46991/4424-bisham-woods.pdf> [Date Accessed: 21/11/23].

³⁷ Natural England. Aston Rowant Woods SSSI Citation. Available at: <https://designatedsites.naturalengland.org.uk/PDFsForWeb/Citation/1000426.pdf> [Date Accessed: 21/11/23].

- 6.3.24 The SSSI citation notes the site 'forms part of the Chiltern escarpment here deeply incised by three valleys: Ellesborough, Great and Little Kimble 'Warrens'. The vegetation comprises deciduous woodland, of which some is developing, but most is overmature; dense scrub, including abundant box *Buxus sempervirens*, here thought to be native; and both grazed and ungrazed chalk grasslands, of which some are species-rich and contain both local and national rarities. Mixed scrub is invading some of these grasslands. One of the valleys harbours an unusual sedge-fen community. The site contains one of the richest assemblages of calcicolous bryophytes in the Chilterns, and is notable for its range of invertebrates as well as its overwintering and breeding bird populations'³⁸.
- 6.3.25 Small parts of the site are open access and there are a number of PRoWs which run around the south and western sections of the SSSI. There is no parking on site but parking is available to the south of the adjoining Pulpit Wood. As with the majority of the Chilterns Beechwoods SAC components the site is steep in areas.

Hollowhill and Pullingshill Woods SSSI component of the SAC

- 6.3.26 Hollowhill and Pullingshill Woods SSSI is located approximately 23.1km to the south of the strategic site, within the administrative boundary of Buckinghamshire Council. Hollowhill Wood is owned by Buckinghamshire Council and managed by BBOWT; Pullingshill Woods is owned and managed by the Woodland Trust.
- 6.3.27 The SSSI citation indicates that there are contrasts between the acid gravelly soils of the plateau and both shallow and deeper chalky soils of the slopes are reflected in the presence of different types of beechwood. The ground flora includes some uncommon species, of which one is a national rarity³⁹.
- 6.3.28 Hollowhill Wood is open access with the Chilterns long distance way running along Pullingshill Wood's northern boundary. A variety of other permissive paths run through both woods, allowing for circular walks. BBOWT's website indicates that there is parking at the reserve entrance to Hollowhill Wood but no other facilities other than information boards in both woods.

³⁸ Natural England. Ellesborough and Kimble Warrens. SSSI Citation.

<https://designatedsites.naturalengland.org.uk/PDFsForWeb/Citation/1000639.pdf> [Date Accessed: 21/11/23].

³⁹ Natural England. Condition of SSSI Unit for Bisham Woods SSSI.

<https://designatedsites.naturalengland.org.uk/ReportUnitCondition.aspx?SiteCode=S1002835&ReportTitle=Bisham%20Woods%20SSSI>
[Date Accessed: 21/11/23].

- 6.3.29 The Woodland Trust's Management Plan for Pullingshill Wood notes that parking is available at several lay-bys alongside the minor road that runs north to south through the site. Access into the wood is possible from the minor roads around the perimeter of the wood, as well as from four entry points off public footpaths. There are several permissive paths and no paths have been surfaced. The central and eastern portions of the wood are reasonably level and open whilst the western edge drops away down a steep slope into a dry valley. The Woodland Trust assesses the site as being a moderately used site (defined by the Woodland Trust as 5±15 people using one entrance per day). They note that it is popular with local residents from Marlow (1 mile away) and is accessible from other areas of woodland, in particular the larger area of Marlow Common to the north⁴⁰.

Naphill Common SSSI component of the SAC

- 6.3.30 Naphill Common SSSI is located approximately 11.9km to the south of the strategic site, within the administrative boundary of Buckinghamshire Council. It is located to the immediate south of Bradenham Woods, Park Wood & The Coppice SSSI. It is a registered common with commoners' rights of estovers, grazing and firebote.
- 6.3.31 The SSSI citation notes that 'the structure and composition of the woodland are believed to be more natural in character than any other Chiltern woodland. Unlike most Chiltern woods, the number of tree and shrub species is large. There is a scattering of old pollards, a mixed canopy and an extensive and varied understorey. There are patches of acid heathlands in the more open areas of the common and diversity is further increased by wet rides and ponds'⁴¹.
- 6.3.32 In 2014 the Friends of Naphill Common prepared a management Plan for the site⁴². This noted that although the common never feels busy it is well used by local people and those walking in the wider area. Naphill is part of a series of sites which are connected via open access land and linear PRowWs.

Tring Woodlands SSSI component of the SAC

- 6.3.33 Tring Woodlands SSSI is located approximately 2.7km to the south east of the strategic site, within the administrative boundary of Dacorum Borough Council. The part of the Chilterns Beechwoods SAC component, which coincides with Tring Woodlands SSSI, is owned by Hertfordshire County Council and leased to Dacorum Borough Council who manage the site.
- 6.3.34 The market town of Tring is located to the north of this component of the SAC, approximately 300m beyond the A41. The woodland is located on an escarpment to the south of the town and is linked to Tring via Hastoe Hill road and a PRowW off the A41 underbridge.

⁴⁰ Woodland Trust. 2015. Woodland Management Plan 2015 – 2020. Available at: <https://www.woodlandtrust.org.uk/media/50771/4461-pullingshill-wood-and-marlow-common.pdf> [Date Accessed: 21/11/23].

⁴¹ Natural England. Naphill Commons. SSSI Citation. <https://designatedsites.naturalengland.org.uk/PDFsForWeb/Citation/1002879.pdf> [Date Accessed: 21/11/23].

⁴² Friends of Naphill Common. Management Plan for Naphill Common. Available at: http://www.naphillcommon.org.uk/Documents/Management_Plan_2014%20v%202.pdf [Date Accessed: 21/11/23].

- 6.3.35 The SSSI citation for Tring Woodlands indicates that the site comprises ancient semi-natural beech woodland⁴³. It notes that areas of standard ash *Fraxinus excelsior* and pedunculate oak (*Quercus robur*) are associated with the beech woodland. With Holly (*Ilex aquifolium*) and yew (*Taxus baccata*) in its sparse shrub layer on upper slopes, with more variety including dogwood (*Cornus sanguinea*), field maple (*Acer campestre*), wayfaring tree (*Viburnum lantana*) and coppiced hazel (*Corylus avellana*) on the lower slopes. It also notes the presence of a small area of mixed larch plantation (*Larix decidua*) and a woodland bird community.
- 6.3.36 The site comprises broadleaved woodland with areas of neutral grassland in the surrounding area. The SSSI unit data indicates the ground flora is representative of NVC W12, with NVC W14 community species also recorded on site⁴⁴.
- 6.3.37 The SAC part of the woodlands near Tring can be accessed along public footpaths, bridleways, byways open to all traffic and a restricted byway. The woodland comprises Stubbing's Wood and Groves Wood. There is no open access across the woodland. With the exception of the byway which runs in a north / south direction between West Leith Farm and Hastoe in a sunken lane, the footpaths which cross the site are not well made. The topography of the site is undulating in nature. There are no facilities provided at the site or formal car parks serving the site. There is limited and infrequent informal road verge parking: under the A41 road bridge and to the south of the site off Gadmore Lane.
- 6.3.38 As part of Dacorum Borough Council's Emerging Local Plan evidence base to support the HRA, visitor surveys were also undertaken at the Tring Woodlands SSSI component of the SAC. A review of postcode data indicated that Tring Woodlands SSSI experiences fewer visitors and has a more local draw when compared to Ashridge Commons and Woods SSSI. Its ZOI is therefore much smaller with a radius of 1.7km. RAF Halton is located approximately 2.7km from Tring Woodlands and therefore outside the ZOI where recreational impacts from new housing development are considered likely. In their advice to Local Planning Authorities Natural England noted that, whilst Tring Woodlands SSSI was given consideration in the work undertaken in support of Dacorum's Local Plan, they will not be requiring any specific work as part of a strategic mitigation solution. Natural England accept that large housing developments within 1.7km of the SSSI, may need to provide bespoke mitigation, outside the scope of a strategic solution⁴⁵.

Windsor Hill SSSI component of the SAC

- 6.3.39 Windsor Hill SSSI is located approximately 7.7km to the south of the strategic site, within the administrative boundary of Buckinghamshire Council.

⁴³ Natural England. Tring Woodlands SSSI Citation. Available at:

<https://designatedsites.naturalengland.org.uk/PDFsForWeb/Citation/1000452.pdf> [Date Accessed: 21/11/23].

⁴⁴ Joint Nature Conservation Committee (JNCC) provide information on the National Classification System which is available at:

<https://jncc.gov.uk/our-work/nvc/> [Date Accessed: 21/11/23].

⁴⁵ Natural England letter affected LPAs. 14 March 2022. Developments to the emerging evidence relating to the recreational impacts upon Chilterns Beechwoods Special Area of Conservation (SAC) and the need for a Mitigation Strategy.

6.3.40 The SSSI citation for Windsor Hill SSSI notes that the site forms an 'extensive tract of the Chiltern escarpment above Princes Risborough containing fine examples of beechwoods, scrub and chalk grassland. The woodlands harbour a legally protected orchid species. The scrub includes an important colony of juniper and an ancient hedge. The grasslands contain a wide range of chalk plants and invertebrates, several of county importance'⁴⁶. Part of the SSSI is a BBOWT reserve and is well managed.

6.3.41 A review of OS mapping data indicates that there is no parking or facilities on site. There are a number of linear PRoW which cross the site in a north to south and east to west direction. As with other components of the SAC the site is steep in parts which make access challenging.

6.4 Components of the SAC sensitive to recreational impacts

6.4.1 As outlined in **Section 6.3**, each component of the SAC varies in character with some being more accessible than others. With the exception of areas of the SAC which lie within the National Trust's Ashridge and Bradenham Estates, components of the SAC are not promoted widely as key recreational destinations. With the exception of the Ashridge Estate, access is limited and the sites which form the SAC are therefore likely to draw a more local patronage of visitors.

6.4.2 The VALP HRA drew on established recreational zones of influence when assessing recreational impacts, and in particular the Thames Basin Heaths Special Protection Area (SPA) Delivery Framework⁴⁷. This framework was used as it provided useful context in assessing whether proposed housing locations in the VALP would have the potential to result in LSEs as a result of recreation. For the purposes of the VALP screening assessment, only those allocation sites within 7km of any Chilterns Beechwoods SAC were assessed. This was considered highly precautionary because the ground nesting birds for which the Thames Basin Heaths SPA is designated are far more sensitive to recreational disturbance than the woodland, grassland and stag beetle for which the qualifying interests for the Chilterns Beechwoods SAC is designated. The only component of the SAC within 7km of RAF Halton is Tring Woodlands SSSI (2.7km), however RAF Halton is located outside the Tring Woodland ZOI which has been established through detailed visitor survey data as part of the Emerging Dacorum Local Plan (see **Section 7.12**) and it is acknowledged that Natural England has indicated they will not be requiring any specific work at the SSSI as part of a strategic mitigation solution.

6.4.3 Dacorum Borough Council's Emerging Local Plan evidence base has established a ZOI for Ashridge Commons and Woods SSSI of 12.6km (see **Section 7.5**). RAF Halton sits wholly within this ZOI and therefore recreational impacts from a net increase in housing development are likely.

⁴⁶ Natural England. Windsor Hill SSSI Citation. Available at:

<https://designatedsites.naturalengland.org.uk/PDFsForWeb/Citation/1002446.pdf> [Date Accessed: 21/11/23].

⁴⁷ Thames Basin Heaths Joint Strategic Partnership Board (2009). Thames Basin Heaths SPA Delivery Framework. <https://www.bracknell-forest.gov.uk/sites/default/files/2021-08/thames-basin-heaths-spa-delivery-framework.pdf> [Date Accessed: 21/11/23].

- 6.4.4 No other components of the SAC are considered further in the HRA process due to both their distance from the strategic site at RAF Halton, current levels of accessibility and the nature and topography of these sites. It can therefore be concluded that development at RAF Halton would not have an adverse recreational impact upon the features for which these components of the SAC are designated. The remaining part of the Appropriate Assessment focuses upon recreational impacts upon the Ashridge Commons and Woods SSSI component of the SAC only.

6.5 Recreational impacts alone and in-combination

- 6.5.1 RAF Halton is a strategic allocation which, together with other allocations and commitments, contributes to the delivery of the housing requirement identified within the adopted VALP (Policy D2). Any development which delivers a net increase in residential dwellings within the Ashridge Commons and Woods SSSI ZOI has the potential to have an impact either alone or in-combination with other development within the ZOI upon this component of the Chilterns Beechwoods SAC. Therefore, without mitigation development at RAF Halton for 1,000 homes will have an adverse impact upon the integrity of the Chilterns Beechwoods SAC due to increased recreational pressure.

6.6 Mitigation measures

- 6.6.1 As outlined in **Section 6.3**, a strategic approach to mitigation is in the process of being developed by affected LPAs within the 12.6km ZOI, with LPAs at different stages in the process. The ZOI was drawn up on the basis of visitor survey data and is presented in **Figure 6.2**⁴⁸. The ZOI reflects the 75th percentile of those surveyed who were visiting from their home postcode location. Requirements for mitigation will apply to any residential development within the 12.6km ZOI which covers the whole of Dacorum Borough Council, and some land within the administrative area of Buckinghamshire Council, Central Bedfordshire Council and St. Albans City and District Council. In addition, there is a presumption against development within 500m of the designation boundary, known as the 'Avoidance Zone'.
- 6.6.2 Given that RAF Halton will deliver a net increase in residential units within the ZOI, an Appropriate Assessment must be undertaken and mitigation provided to ensure no adverse impact on site integrity. Mitigation must be effective, timely, reliable and guaranteed to be delivered in perpetuity. RAF Halton is not located within 500m of Ashridge Commons and Woods SSSI.

⁴⁸ Panter, C., Liley, D., Lake, S., Saunders, P., and Caals, Z. 2022. Visitor survey, recreational impact assessment and mitigation requirements for the Chilterns Beechwoods SAC and the Dacorum Local Plan, Report by Footprint Ecology for Dacorum Borough Council.

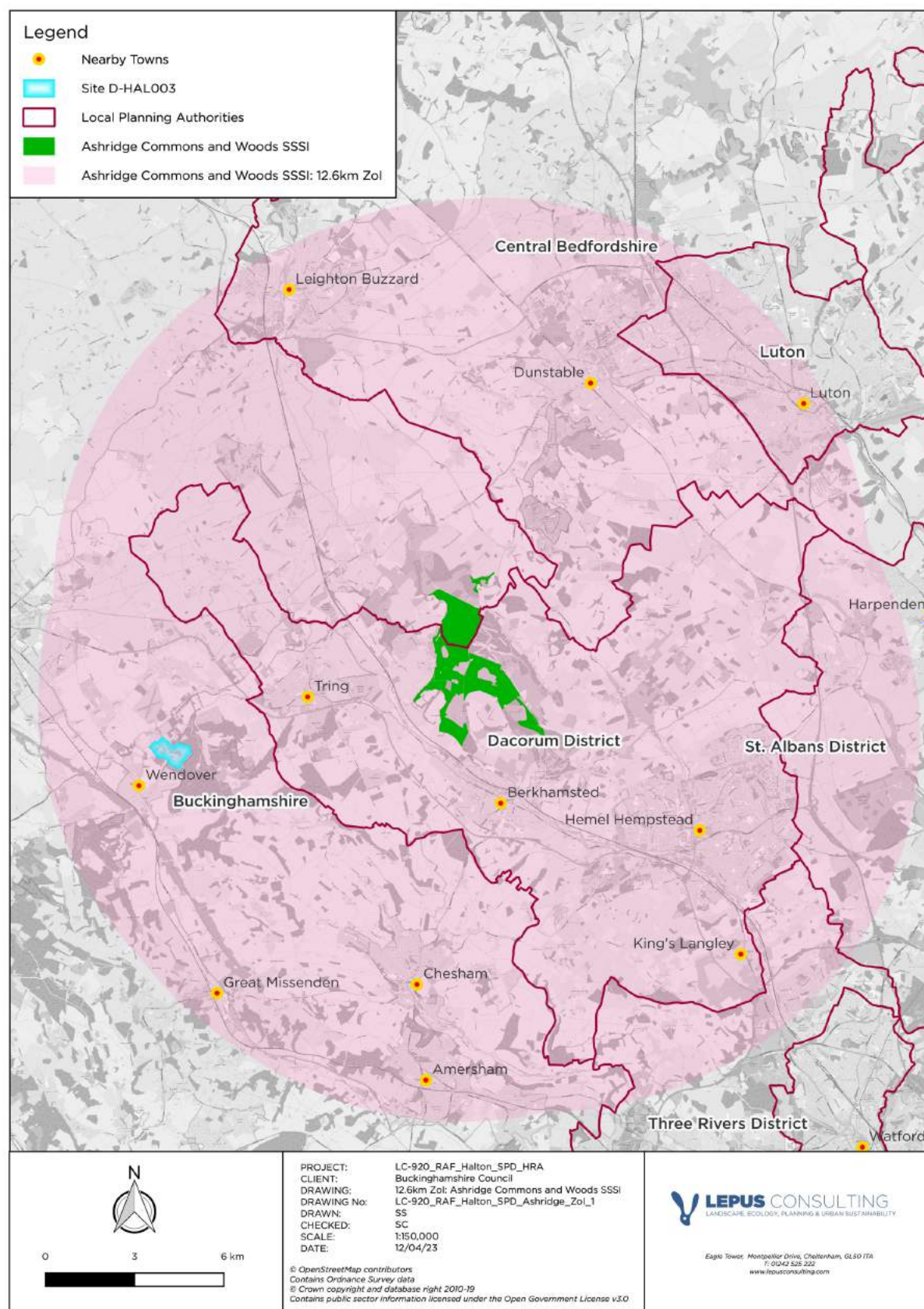


Figure 6.2: Chilterns Beechwoods SAC - Ashridge Commons and Woods SSSI Zone of Influence

6.6.3 Buckinghamshire Council is proposing two mitigation solutions to address adverse recreational impacts at this component of the SAC as set out below⁴⁹:

- Strategic Access Management and Monitoring involving access management and engagement work wholly within the boundary of the SAC and reflecting the scale of growth forecast within the 12.6km ZOI; and
- Suitable Alternative Natural Greenspace involving the provision of alternative recreation opportunities away from the SAC.

Strategic Access Management and Monitoring

6.6.4 Strategic Access Management and Monitoring (SAMM) measures are aimed at addressing recreational impacts at a designated site to make the site more resilient to recreational pressures. SAMM often comprise a number of projects which are tailored to individual site needs.

6.6.5 Buckinghamshire Council agreed to a SAMM Strategy on 4th November 2022 prepared with Natural England and also its partner authorities, Dacorum Borough Council, St Albans City and District Council and Central Bedfordshire Council. The Strategy is set out in the Statement of Common Ground for the Ashridge Commons and Woods Site of Special Scientific Interest⁵⁰. It identifies the projects required to mitigate the impacts of development within the 12.6km ZOI and the associated costs of these projects over 80 years.

6.6.6 SAMM projects are set out and costed within the SAMM Strategy and comprise measures to directly manage, avoid, mitigate and monitor impacts within the SAC boundary. These measures include financial contributions towards additional rangers, education, interpretation, physical work on sensitive sites and an access strategy. Financial contribution will be secured through a S106 bilateral agreement or unilateral undertaking and the SAMM projects will be delivered in perpetuity (defined as 80 years). The total cost of Strategic Access Management and Monitoring as of 2022 is £18,275,510. Total cost per dwelling which will apply to RAF Halton will be £566.23 per dwelling⁵¹. Development at RAF Halton will be required to make a financial contribution towards the SAMM element of mitigation. A commitment to this financial contribution for RAF Halton is set out in Section 4.3 (Infrastructure Requirements) of the SPD.

⁴⁹ Buckinghamshire Council. April 2023. Chiltern Beechwoods Special Area of Conservation Frequently Asked Questions. Available at: <https://buckinghamshire-gov-uk.s3.amazonaws.com/documents/FAQs-Chiltern-Beechwoods-SAC.pdf> [Date Accessed: 21/11/23].

⁵⁰ Buckinghamshire Council. November 2022. Chilterns Beechwoods Special Area of Conservation at Ashridge Commons and Woods Site of Special Scientific Interest and the Habitats Regulations Assessment. Statement of Common Ground Between Dacorum Borough Council; Buckinghamshire Council; Central Bedfordshire Council; and St. Albans City and District Council. Available at: <https://buckinghamshire.moderngov.co.uk/documents/s52744/Agreement%20to%20the%20Statement%20of%20Common%20Ground%20for%20the%20Ashridge%20Commons%20and%20Woods%20Site%20of%20Special%20Scien.pdf> [Date Accessed: 21/11/23].

⁵¹ Prices stated per dwelling for SAMM contribution in the Bucks North and Central area are correct as per p.10 of the April 2023 BC published document [Chiltern Beechwoods SAC FAQs \(buckinghamshire-gov-uk.s3.amazonaws.com\)](https://buckinghamshire-gov-uk.s3.amazonaws.com)

Suitable Alternative Natural Greenspace

- 6.6.7 Suitable Alternative Natural Greenspace (SANG) is the name given to greenspace that is of a quality and type suitable for use as mitigation to offset the impact of new residential development on Habitats protected sites which include Special Protection Areas (SPAs), Special Areas of Conservation (SACs) and Ramsar sites. The purpose of SANG is to provide an alternative greenspace to attract residents of new developments away from these protected and vulnerable sites.
- 6.6.8 Given the scale of RAF Halton it will be required to deliver bespoke SANG rather than making contributions towards strategic SANG⁵². SANG must be delivered ahead of occupation of any affected development that is directly linked to it. For larger scale SANG, delivery can be phased in a proportionate manner alongside new development, reflecting short, medium and longer term projects.
- 6.6.9 Detailed guidelines for SANG have been provided by Buckinghamshire Council⁵³. The identification of bespoke SANG must be agreed with the Competent Authority (Buckinghamshire Council) and Natural England.
- 6.6.10 Buckinghamshire Council's SANG guidance provides details on the following SANG aspects:
- Accessibility
 - Target groups of visitors
 - Paths, road and tracks
 - Artificial infrastructure
 - Landscape and vegetation
 - Restrictions on usage
 - Assessment of site enhancements as mitigation
 - Practicality of enhancement works
- 6.6.11 Requirements are also provided on the scale of SANG required (8ha/1000 head of population)⁵⁴. In addition, the guidelines set out a set of 'essential', 'should have' and 'desirable' criteria for SANG which have been derived on the basis of the visitor surveys. The guidance notes that SANG must be assessed against these criteria and should provide a minimum 2.3km – 2.5km circular walk. Buckinghamshire's SANG quality criteria are summarised in **Table 6.2** below.

⁵² Bespoke SANG can be delivered on a development site itself for the purposes of providing mitigation for scheme specifically. Strategic SANGs are either Council owned or maintained open spaces which are located throughout the Borough and towards which developments can contribute in order to deliver mitigation.

⁵³ Buckinghamshire Council. 2023. Guidelines for Suitable Alternative Natural Greenspace. Available at: [https://buckinghamshire.gov-uk.s3.amazonaws.com/documents/Buckinghamshire-Council-Guidelines-for-Suitable-Alternative-Natural-Greenspace.pdf](https://buckinghamshire.gov.uk.s3.amazonaws.com/documents/Buckinghamshire-Council-Guidelines-for-Suitable-Alternative-Natural-Greenspace.pdf) [Date Accessed: 21/11/23].

⁵⁴ Based on Thames Basin Heaths standard.

Table 6.2: Quality criteria for SANG as set out in Buckinghamshire Council's SANG Guidance

Requirement	Criteria
Essential	<ol style="list-style-type: none"> 1. Parking on all sites larger than 4 hectares (unless the site is intended for use within 400 meters only). 2. Circular walk of 2.3-2.5 kilometers. 3. Car parks easily and safely accessible by car and clearly sign posted. 4. Access points suitably located for the intended visitors to the Suitable Alternative Natural Greenspace. 5. Safe access routes on foot from the nearest car park and/or footpath. 6. Circular walk which starts and finishes at the car park. 7. Perceived as safe – no tree and scrub cover along the walking routes. 8. Paths stable, well maintained and free draining but mostly unsurfaced. 9. Perceived as semi-natural with little intrusion of artificial structures. 10. If larger than 12 hectares then a range of habitats are present. 11. Access largely unrestricted – plenty of space for dogs to exercise freely and safely off the lead. 12. No unmitigated unpleasant intrusions (e.g., sewage treatment smells etc.)
Should have	<ol style="list-style-type: none"> 13. Clearly sign-posted or advertised in some way. 14. Leaflets or website advertising their location to potential users.
Desirable	<ol style="list-style-type: none"> 15. Dog owners able to take dogs from the car park to the Suitable Alternative Natural Greenspace safely off the lead. 16. Gently undulating topography. 17. Access points with signage outlining the layout of the Suitable Alternative Natural Greenspace and routes available to visitors. 18. Naturalistic space with areas of open countryside and dense and scattered trees and shrubs. Provision of open water is desirable. 19. Focal point such as a viewpoint or monument within the Suitable Alternative Natural Greenspace.
Notes	<p>If it is not possible to meet all the essential criteria, for clearly evidenced reasons, those candidate Suitable Alternative Natural Greenspaces will be assessed on a case-by-case basis by Buckinghamshire Council in consultation with Natural England. The proposal will need to demonstrate equivalent effectiveness of mitigation being provided to ensure a robust, consistent approach continues. Any shortfall in Suitable Alternative Natural Greenspace criteria should be offset by other complementary means, such as increased hectareage or higher quality features.</p>

6.6.12 The DIO has commissioned a SANG Preliminary Management Plan Strategy for RAF Halton⁵⁵ (**Appendix C**). This has been prepared to demonstrate that suitable SANG can be delivered at RAF Halton in compliance with Buckinghamshire Council's guidelines. The Strategy illustrates how capacity can be achieved for 1,000 new homes at a SANG capacity of 8ha/1000. It also sets out how each quality criteria will be met including provision of a circular walking route. Finally, it outlines the requirements for a SANG Management Plan which will include information on implementation of the required quality criteria, costing and funding, maintenance in perpetuity and monitoring.

⁵⁵ WSP. 2023. RAF Halton Aylesbury. SANG + Preliminary Management Plan Strategy – High Level Position Statement Summary.

- 6.6.13 On the basis of this SANG Preliminary Management Plan Strategy it can be concluded that SANG can be delivered at RAF Halton which is of sufficient quality and quantity to provide alternative recreational space for the 1,000 homes. Natural England was consulted on this Strategy and confirmed their agreement with its contents. A commitment to delivery of SANG for RAF Halton as set out in the Strategy is set out in Section 4.3 (Infrastructure Requirements) of the SPD.

6.7 Conclusions

- 6.7.1 On the basis that financial contributions will be made towards SAMM and implementation of effective SANG is possible through the SANG Preliminary Management Plan Strategy, it can be concluded that appropriate mitigation can be delivered to ensure there is no adverse impact upon the integrity of the Chilterns Beechwoods SAC from development at RAF Halton alone.
- 6.7.2 All other development within the ZOI of Ashridge Commons and Woods SSSI component of the SAC will also need to ensure appropriate mitigation is in place through an Appropriate Assessment and delivery of the strategic mitigation strategy. As such it can be concluded that there will be no adverse impact upon the integrity of the Chilterns Beechwoods SAC from development at RAF Halton in-combination with other plans and projects.

7 Conclusions and Next Steps

7.1 Conclusions

- 7.1.1 This HRA report provides an assessment of the RAF Halton SPD. Buckinghamshire Council screened in likely significant recreational effects from development at RAF Halton on the Chilterns Beechwoods SAC.
- 7.1.2 This report includes an Appropriate Assessment which has explored the potential for recreational impacts upon all components of the Chilterns Beechwoods SAC, taking into consideration its conservation objectives and how recreational impacts may adversely affect its qualifying habitats and species. Following a detailed review of the characteristics, baseline information and location of each component of the SAC, the Appropriate Assessment focuses on recreational impacts upon the Ashridge Commons and Woods SSSI component. This is due to the location of RAF Halton with the established 12.6km recreational ZOI. Any development which delivers a net increase in residential dwellings within this ZOI has the potential to have an adverse recreational impact either alone or in-combination with other development upon this component of the Chilterns Beechwoods SAC.
- 7.1.3 The Appropriate Assessment takes into consideration the emerging strategic mitigation solution required to avoid, minimise or reduce adverse recreational impacts upon the integrity of this component of the SAC. These measures comprise a mixture of mitigation at the SAC, delivered through a SAMM Strategy, and measures to avoid impacts through provision of SANG. Detailed work has been undertaken on behalf of the DOI to demonstrate that SANG of an appropriate quality and quantity can be delivered to accommodate development at RAF Halton prior to the occupation of development and in perpetuity.
- 7.1.4 The Appropriate Assessment concludes that with mitigation in place, residential development at RAF Halton will have no adverse recreational impact upon the site integrity of the Chilterns Beechwoods SAC either alone or in-combination.

7.2 Next steps

- 7.2.1 The purpose of this report is to inform the HRA of the SPD using best available information.
- 7.2.2 Buckinghamshire Council, as the Competent Authority, has responsibility to make the Integrity Test, which can be undertaken in light of the conclusions set out in this report.
- 7.2.3 This report will be submitted to Natural England, the statutory nature conservation body, for formal consultation. The Council must 'have regard' to their representations under the provisions of Regulations 105(2) prior to making a final decision as to whether they will 'adopt' the conclusions set out within this report as their own.

Appendix A: Chilterns Beechwoods SAC Conservation Objectives

Chiltern Beechwoods SAC⁵⁶

Conservation objectives:

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring:

- The extent and distribution of qualifying natural habitats and habitats of qualifying species
- The structure and function (including typical species) of qualifying natural habitats
- The structure and function of the habitats of qualifying species
- The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely
- The populations of qualifying species, and
- The distribution of qualifying species within the site.

Qualifying Features:

H6210. Semi-natural dry grasslands and scrubland facies: on calcareous substrates (Festuco-Brometalia); Dry grasslands and scrublands on chalk or limestone

H9130. Asperulo-Fagetum beech forests; Beech forests on neutral to rich soils

S1083. *Lucanus cervus*; Stag beetle

Threats and Pressures which could be affected by the SPD^{57, 58}:

- Public access and disturbance;
- Air Pollution; and
- Hydrology.

⁵⁶ Natural England (2018) Chiltern Beechwoods SAC Conservation Objectives. Available at: <http://publications.naturalengland.org.uk/file/4961243408629760> [Date Accessed: 21/11/23]

⁵⁷ Natural England (2015) Chiltern Beechwoods SAC Site Improvement Plan. <http://publications.naturalengland.org.uk/file/5908864568393728> [Date Accessed: 21/11/23].

⁵⁸ Natural England (2019) Chiltern Beechwoods SAC Conservation Objectives Supplementary Advice. <https://publications.naturalengland.org.uk/file/5422856020426752> [Date Accessed: 21/11/23].

Appendix B: Site of Special Scientific Interest Condition Data

Chilterns Beechwoods SAC

SSSI name	Conservation status of SSSI units ⁵⁹	Reason for unfavourable status where applicable.
Ashridge Commons and Woods SSSI	7 Favourable	n/a
Aston Rowant Woods SSSI	7 Favourable	n/a
Bisham Woods SSSI	1 Favourable	n/a
Bisham Woods SSSI	1 Unfavourable - recovering	Storm damage
Bradenham Woods, Park Wood & The Coppice SSSI	5 Favourable	n/a
Ellesborough and Kimble Warrens SSSI	1 Favourable	n/a
Ellesborough and Kimble Warrens SSSI	3 Unfavourable - recovering	Species dominance
Hollowhill and Pullingshill Woods SSSI	2 Favourable	n/a
Naphill Common SSSI	1 Favourable	n/a
Tring Woodlands SSSI	1 Unfavourable - recovering	Below FC targets for temporary open space, regeneration targets and canopy composition.
Windsor Hill SSSI	1 Favourable	n/a
Windsor Hill SSSI	1 Unfavourable - recovering	Storm damage

⁵⁹ Natural England. IRX <https://designatedsites.naturalengland.org.uk/>. Site condition data is provided for the SSSIs which legally underpin the European designation [Date Accessed: 21/11/23].

Appendix C: SANG Preliminary Management Plan Strategy



RAF HALTON - AYLESBURY

SANG + Preliminary Management Plan Strategy –
High Level Position Statement Summary

DRAFT RAF Halton SPD – SANG + Management Plan Strategy

Introduction

This document has been prepared to support the RAF Halton SPD providing certainty over the options available to the Defence Infrastructure Organisation (DIO), acting on behalf of the MOD, during the disposal of RAF Halton and the need to provide appropriate Suitable Alternative Natural Greenspace (SANG) capacity. The Land Parcel areas that have been highlighted have been considered due to the appropriateness of addressing Buckinghamshire's and Natural England's SANG guidelines.

It is important to note that a SANG Management Plan is a formal document that supports a Habitats Regulations Assessment (HRA) in assessing the impact of development pressures new housing presents and provides certainty that adequate SANG land is available to mitigate these impacts. This is an evolving assessment carried out through the planning process that considers the opportunities that exist within the grounds of RAF Halton which the DIO can make available during the sites disposal to future developers and satisfy the requirement for SANG.

In the circumstances of this SPD, SANG provision is a two-stage approach. This **first stage** is a document to demonstrate a SANG solution can be provided utilising, as a first step, land within the allocation site and, as a second step, land falling immediately outside but adjoining the SPD area and still within the same ownership in the situation sufficient land in step 1 cannot be identified. This **first stage** assists ongoing discussions between the DIO and the Local Planning Authority to support the delivery of the RAF Halton SPD masterplan for the allocated site. This document and plans are one way in which SANG could, in principle, be provided to mitigate against recreational impact on the Chilterns Beechwoods Special Area of Conservation. It should be noted that this may not be the final approach taken at planning application stage.

This is an iterative process that cannot be fully concluded until detailed proposals have been advanced and informed by a full technical appraisal of the site. The **second stage** of this Management Plan would be a more detailed submission that would form part of the future planning application(s) at the site. Therefore, the document below is proportionate to the masterplan nature of the SPD.

SANG Requirement

RAF Halton is allocated within the Vale of Aylesbury Local Plan (VALP) for at least 1,000 dwellings over the period 2013-2033, together with associated infrastructure and facilities, including a primary school, local centre, community hall and new access routes. The policy requires the conservation and enhancement of heritage assets and the retention of existing sports facilities on the site for use by new and existing residents.

This assessment focuses on land required to meet the needs of housing allocation HAL003 and the subsequent RAF Halton SPD. The RAF Halton SPD masterplan demonstrates between 1,000 and 1,200 units can be achieved within the allocated land. Based on Buckinghamshire Council and Natural England guidance this represents a SANG requirement of 19.2ha to 23.04ha, designed to capture a circular walk of between 2.3-2.5km in distance, that meets certain physical and perceived characteristics. This includes for example a sense of naturalness and a feeling of safety. Further detail is provided in the Table on page 14.

At least a proportion of the SANG will need to be open and accessible prior to occupation of the first dwelling delivered within the RAF Halton SPD land and remain in perpetuity for at least 80 years.

Site Information

RAF Halton is currently a RAF training base and it has been confirmed that it is to close in 2027.

The allocated site comprises 82 hectares and is located entirely within the Green Belt. The site is located south-east of Aylesbury Garden Town, on the edge of Wendover and the Chilterns Area of Outstanding Natural Beauty (AONB). Located immediately east of the village of Halton, and lying within Halton Parish, the site's character reflects its history as a RAF base which is to be respected and referenced in its redevelopment.

RAF Halton contains a number of designated and non-designated heritage assets including listed military accommodation buildings, World War 1 training trenches (which lie just outside of the allocation) and a disused railway line. It has a mature landscape and sports facilities which are to be incorporated as part of the development. The listed Halton House and its associated Registered Park and Garden of Special Historic Interest lie immediately to the north and the site is wrapped around to the north-east and east by Wendover Woods.

Chilterns Beechwoods Special Area of Conservation

The Chilterns Beechwoods Special Area of Conservation (SAC) is an extensive site covering nearly 1,300 hectares and is made up of several components within Dacorum, Buckinghamshire, South Oxfordshire, and Windsor and Maidenhead. It is protected for its beech forests, semi-natural dry grasslands and scrub, and its population of stag beetles. The HRA supporting the RAF Halton SPD provides further context on the importance of the SAC.

As part of developing the RAF Halton SPD evidence within the Habitats Regulations Assessment (HRA) (drafted by Lepus Consulting) needs considering. This is focused on whether the increase in population caused by the development proposed across the allocated land will harm the integrity of the Chilterns Beechwoods Special Area of Conservation.

Buckinghamshire Council is legally required through the Habitats Regulations Assessment to ensure the integrity of the SAC is not adversely affected by new planning proposals relating to the allocated land outlined within the RAF Halton SPD.

Much of the land surrounding the SAC is rural, although the impacted 12.6km Zone of Influence (see plans below) does contain the large settlements of Hemel Hempstead, Berkhamsted and Tring in Dacorum and Wendover, Chesham, Amersham and parts of Aylesbury in Buckinghamshire.

Consequently, environmental pressures from this large population may include:

- High levels of access to the SAC from the urban area
- Recreational pressure (trampling damage to vegetation)
- Nitrogen deposition (unhealthy environs close to highly travelled roads);
- Water supply (changes in water availability); and
- Wastewater discharge (changes in volume of sewage measured properties which classify water quality - such as acidity pH values, particulate matter, suspended sediment or dissolved solids).

These all require scrutiny within the HRA supporting the RAF Halton SPD.

Planning Context

The VALP 2017 Submission HRA summarised the outputs of a screening assessment. It focused on both the Chilterns Beechwoods SAC and Aston Rowant SAC. It concluded no 'Likely Significant Effect' (LSE) as a result of VALP upon any Habitats sites, either alone or in-conjunction with other plans and projects, and as such, ruled out the requirement for further assessment of the VALP under the Habitats Regulations.

The 2019 HRA took into consideration emerging case law including **People over Wind and Holohan** and included an HRA screening and Appropriate Assessment. This report provided a screening assessment of LSE at the Chilterns Beechwoods SAC and Aston Rowant SAC. The Appropriate Assessment focused on likely significant recreation and air quality impacts at the Chilterns Beechwoods SAC. The 2019 HRA concluded that *"...the adopted VALP includes the previously omitted open space standards specified in Policy 11 and there is a commitment by AVDC to ensure that the SPD Masterplan provides natural greenspace that contributes to alleviating visitor pressure on the SAC..."*.

Further to the above, to inform their emerging Local Plan HRA, Dacorum Council's consultants (Footprint Ecology) assessed the recreational pressures on the Chilterns Beechwoods Special Area of Conservation (SAC) at the Ashridge Estate. The report, published in March 2022, revealed that more action is needed to help protect the Ashridge Estate on the Hertfordshire-Buckinghamshire border, which is under increasing visitor pressure from the borough and surrounding areas. The assessment stated that if nothing is done, new development will lead to further visitor pressures and damage to the integrity of the SAC.

As a result of the above, the way Buckinghamshire Council need to deal with planning applications in the future that involve new homes (and some other types of development) is to consider SANG.

In addition to this, Buckinghamshire Council are legally required not to issue decisions on similar applications within the 12.6km Zone of Influence until appropriate mitigation is secured through a Mitigation Strategy (SANG Management Plan). This needs to set out targeted measures to protect the SAC and to accommodate the predicted pressures associated with future growth within the Zone of Influence that extends from Ashridge Commons and Woods.

For the RAF Halton SPD this means that future planning applications above 100 homes need to demonstrate that they can provide sufficient SANG, ideally within the wider DIO disposal land, subject to the disposal strategy. This approach aims to ensure new residents have alternative options of recreational destinations that will help to relieve visitor pressure on the SAC.

DRAFT

Plan Extract of Wider Context of RAF Halton Strategic Allocation (Source: Buckinghamshire Council RAF Halton Draft SPD)

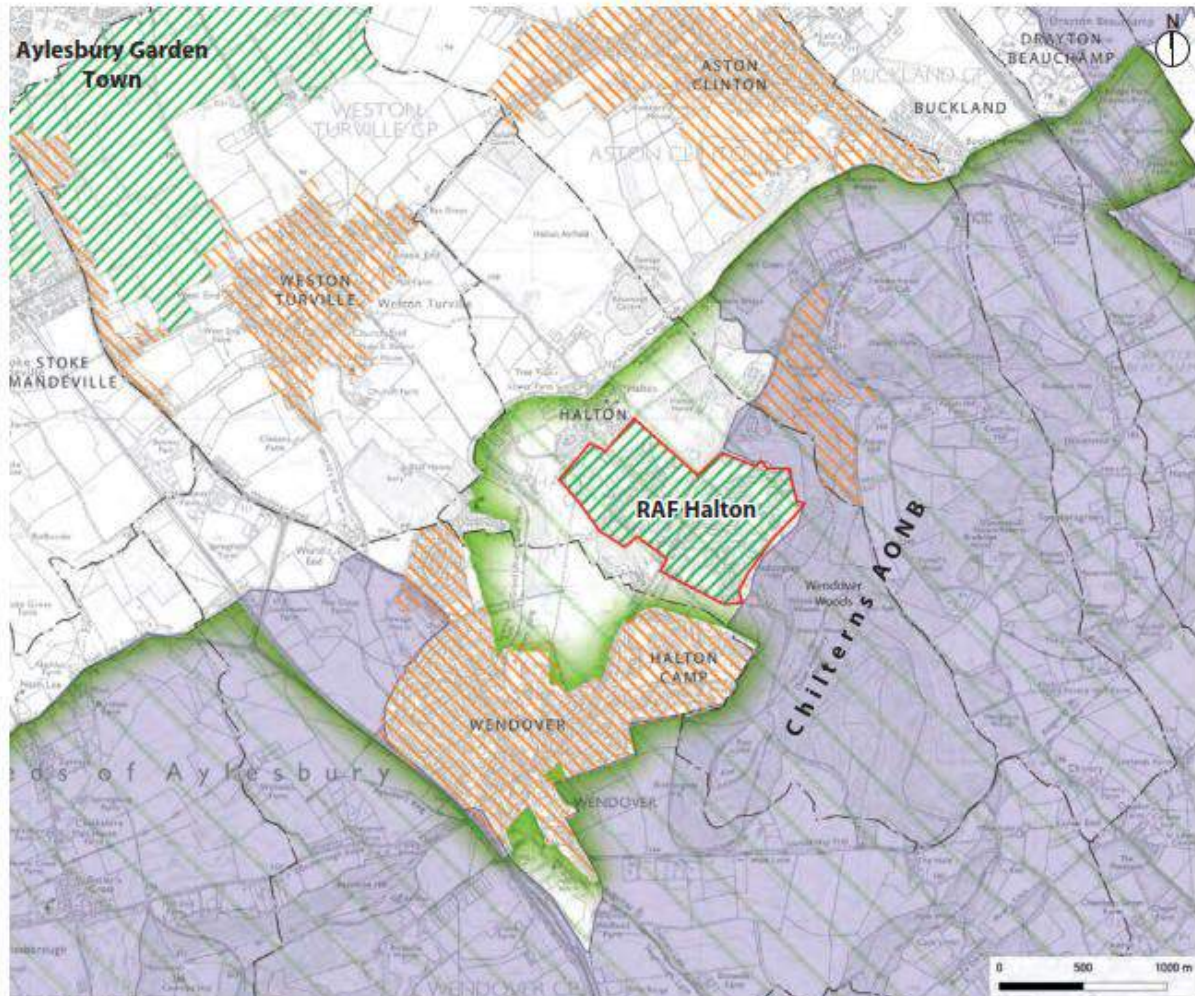
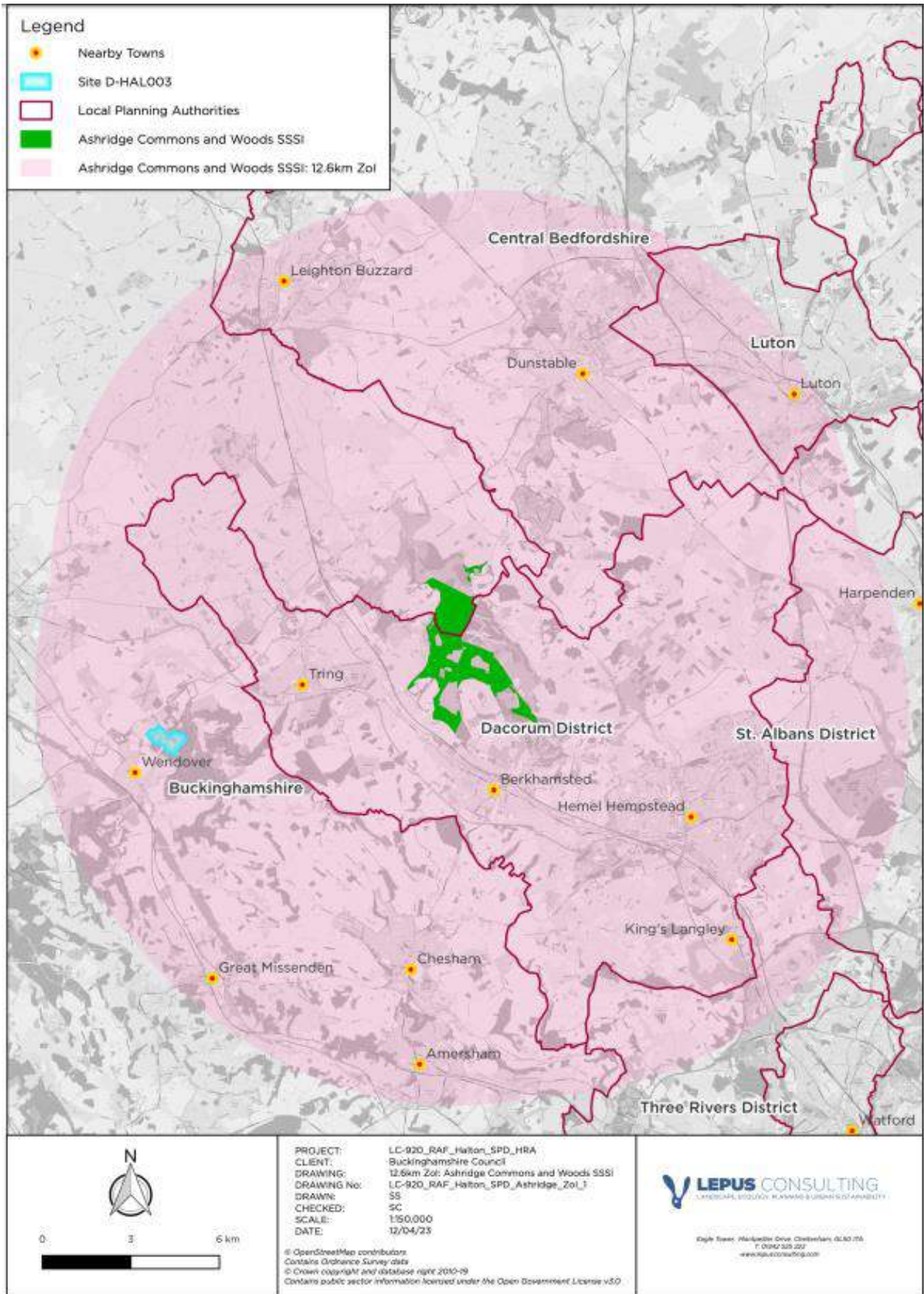


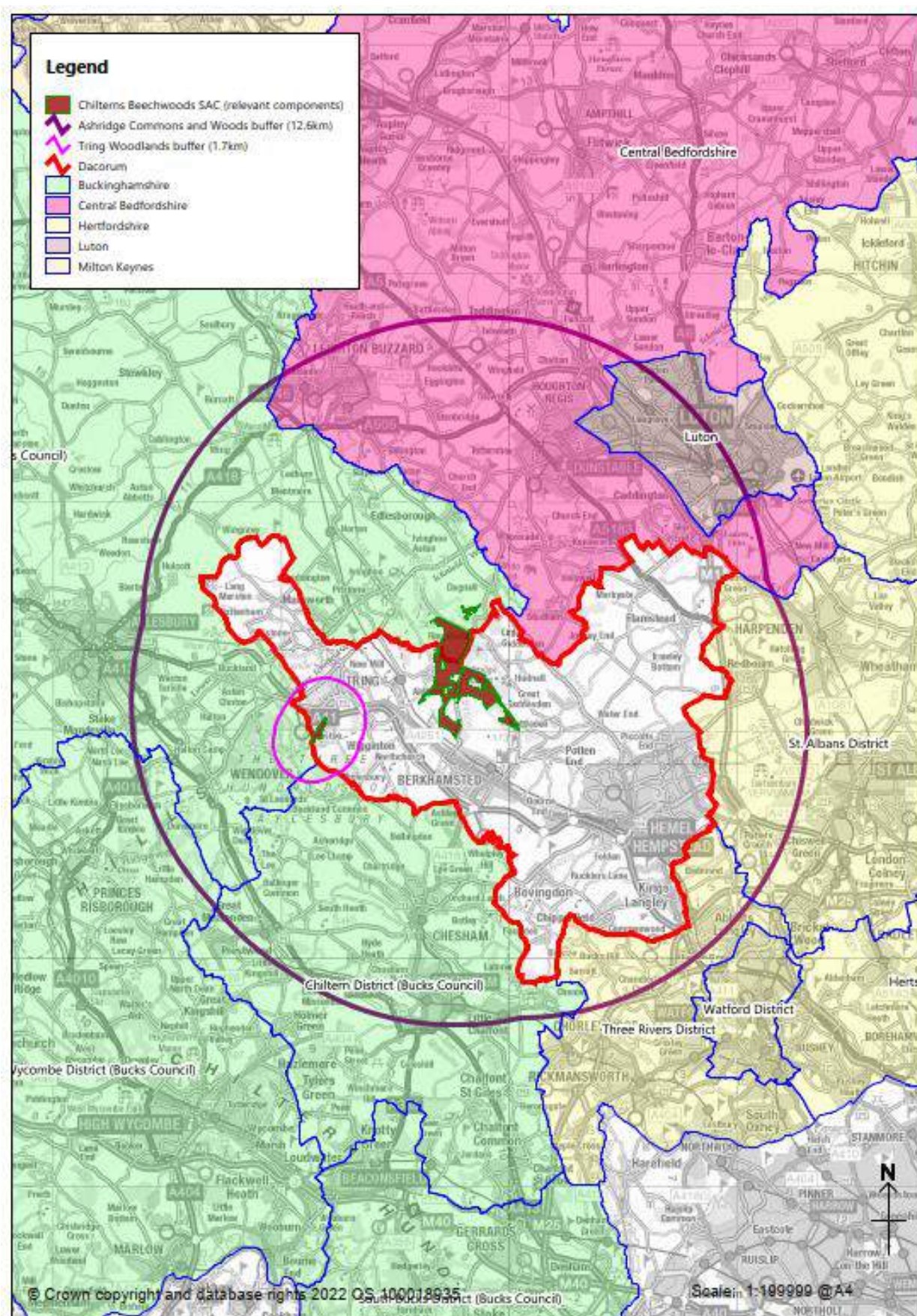
Fig. 1: Location and wider context of the RAF Halton strategic allocation



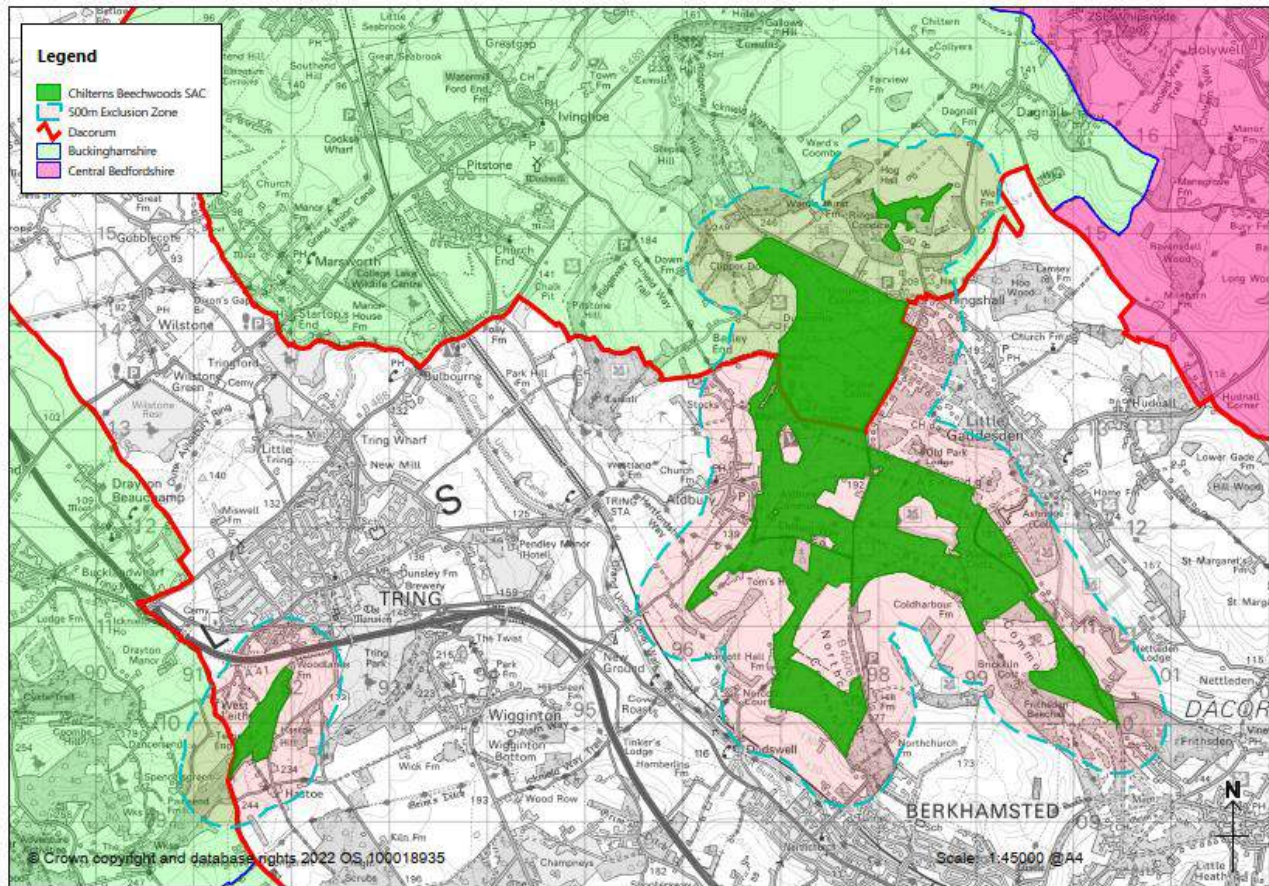
Zone of Influences (Source: HRA supporting the RAF Halton SPD)



Zone of Influences (Source: Dacorum Borough Council)



Zone of Influences (Source: Dacorum Borough Council)



Relevant Vale of Aylesbury Local Plan Policies (source: Vale of Aylesbury Local Plan (VALP) 2013 – 2033)

HAL003 is the VALP policy linked to RAF Halton. However, other VALP policies may require further consideration during planning submission and the future development of this SANG strategy. Further information on this can be found within Section 5 (Policy Context) of the RAF Halton SPD.

Information	Site details
Site Ref:	HAL003
Site Name	RAF Halton
Size (hectares)	82ha
Allocated for (key development and land use requirements)	At least 1,000 homes during the Plan period and associated infrastructure, services and facilities including a primary school, new local centre, new access routes if needed and new green infrastructure
Expected time of delivery	25 homes to be delivered 2020-2025 and 975 homes to be delivered 2025-2033
Planning History and Current Planning Status	No relevant planning history
Site-specific Requirements	<p>Development proposals must be accompanied by the information required in the council's Local Validation List and comply with all other relevant policies in the plan, including the principles of development for Aylesbury Garden Town and the Masterplan SPD to be prepared for the site. In addition, proposals should comply with the following criteria:</p> <ol style="list-style-type: none"> Provision of land for at least 1,000 dwellings during this plan period at a density that takes account of the existing curtilage, the scale and massing of the buildings on the site, and that of the adjacent settlement character and identity if appropriate, as well as retaining the openness of the green belt Be planned in a manner that responds positively to the best characteristics of the surrounding area using a landscape-led approach, taking account of the character and setting of the Chilterns AONB Provision of junction improvements onto the B4009 Upper Icknield Way Provision for public transport into Wendover and to surrounding areas Establishment of and safeguarding for a network of cycling and walking links to and from Aylesbury Town and to the wider area Provision of 50% green infrastructure, to reflect the high level of open space already present on the site including green corridors, to link to other new development areas and the wider countryside Provision of land, buildings and car parking for a combined primary school including playing field provision Provision of land, buildings and car parking for a new local centre including community hall. The conservation and enhancement of heritage assets and their settings whilst ensuring viable uses consistent with their conservation. The retention of existing sports facilities as part of a long-term strategy for sport and recreation to serve new residents and the existing community.
Phasing and Delivery Programme	Development of this site will come forward towards the latter part of the plan period as the site will not be fully released until 2025. Further detail about phasing and implementation will be set out in the masterplan SPD for the site.

Information	Site details
Implementation Approach	Development at RAF Halton will come forward towards the latter end of the Plan period, and only once a masterplan SPD for the allocation has been prepared and adopted by the council. Proposals for development within the RAF Halton Strategic Site Allocation will be expected to demonstrate how they deliver a comprehensive redevelopment of this site and positively contribute to the achievement of the SPD and the Aylesbury Garden Town principles as set out in Policy D1.

Housing Allocation Site Overview

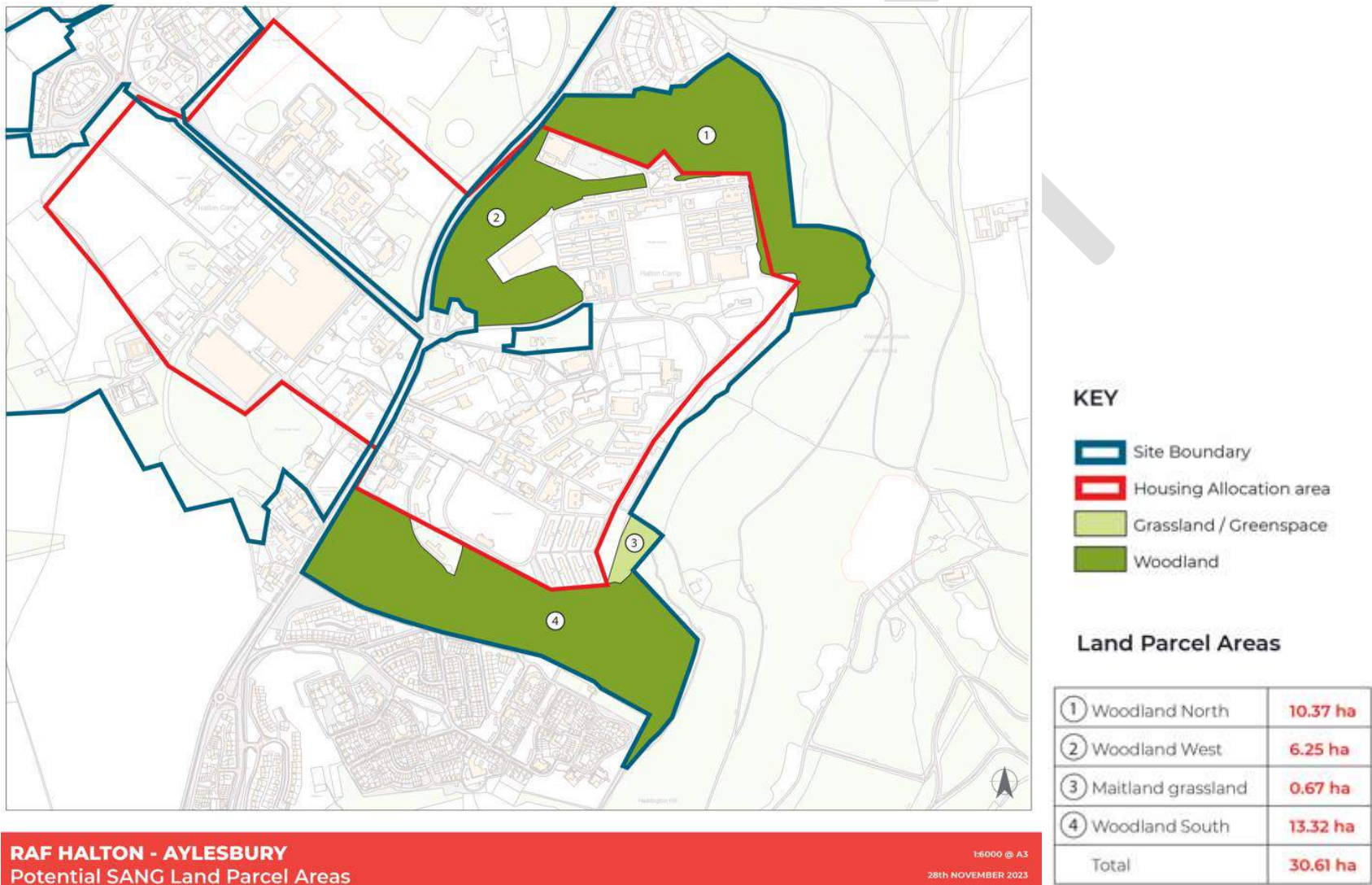
Based on a review of RAF Halton, there is approximately **30.61ha** of habitat falling either within the housing allocation, or the immediately surrounding area, to support the delivery of housing in the allocation site. This habitat has the potential to be included as sections of SANG associated with the development (see land parcel map below). This land includes areas of woodland and grassland all of which have the potential for enhancement to improve access or to improve their value for biodiversity. It should be noted that this 30.61ha provides a potential overprovision of SANG of between 7.57ha to 11.41ha.

Other key features in the area which have the potential to link with the SPD masterplan include Wendover Woods to the east and the Grand Union Canal which is to the west of the allocated site.

Green space areas within the West Camp (comprising existing sports pitches south of Halton Lane) and the land west of Halton House forming part of the SPD land have been omitted from current plans as they are identified as potential “Local Centre” or “Sports Facilities” (i.e. sports pitches) which are not compatible with the requirements for SANG, however these areas may offer potential linkages and pathways that support the SANG provision and connections to other areas (including the airfield area to the north).

Land Parcels:

The Plan below highlights areas of habitat which have been identified as having the potential to be incorporated into any eventual SANG provision to mitigate the RAF Halton SPD impact.



RAF HALTON - AYLESBURY
Potential SANG Land Parcel Areas

1:6000 @ A3
28th NOVEMBER 2023

Land Parcel 01 – Woodland North 10.37ha

Land Parcel 02 – Woodland West 6.25ha

Land Parcel 03 – Maitland Grassland 0.67ha

Land Parcel 04 – Woodland South 13.32ha

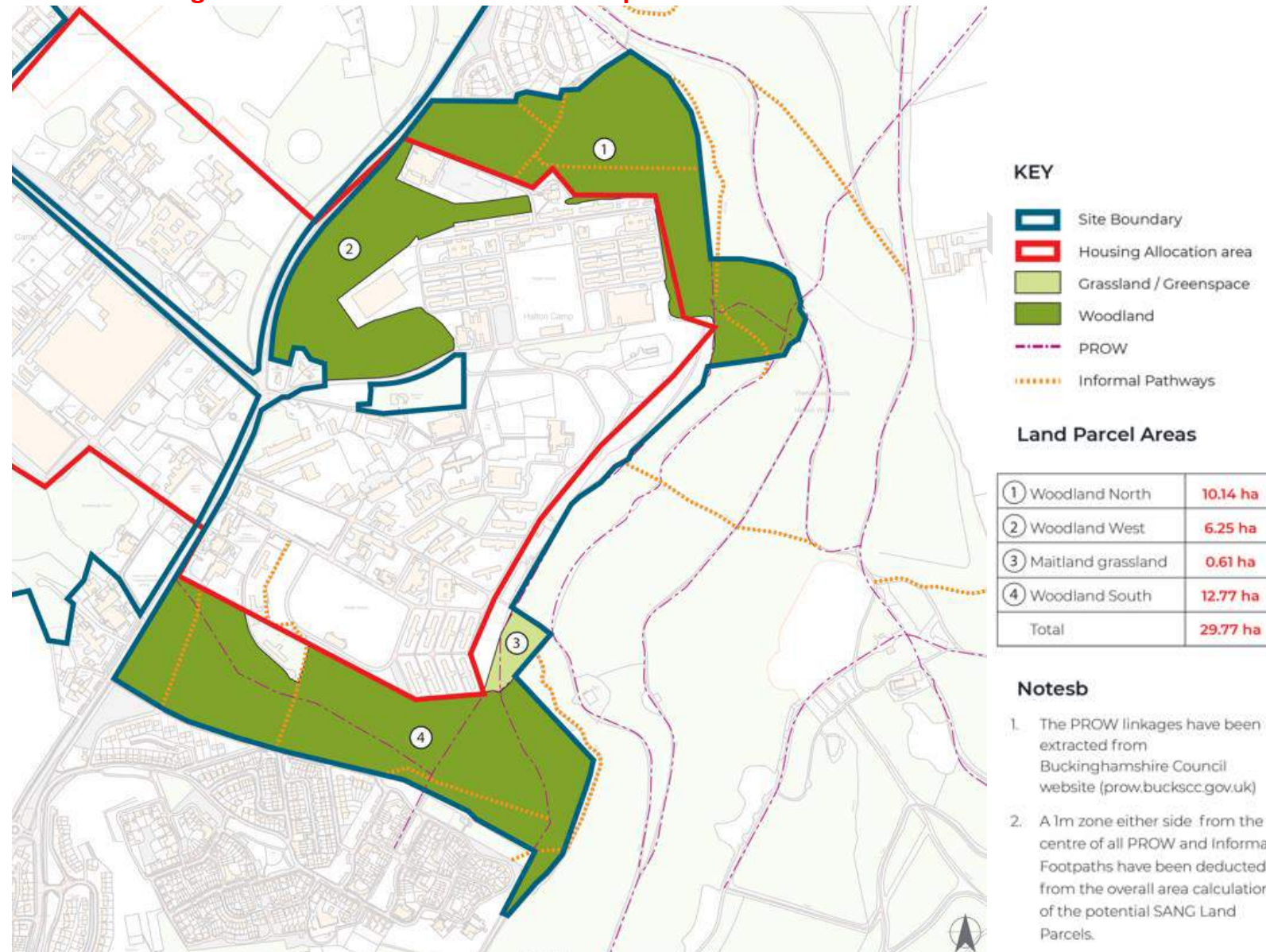
It should be noted that this 30.61ha represents a potential overprovision of SANG of between 7.57ha to 11.41ha based on the number of units being delivered via the RAF Halton SPD (between 1,000 and 1,200 units).

Movement Network:

The site is surrounded by a number of registered Public Rights of Way (PROW) and a number of informal footpaths. These paths currently provide good connectivity to RAF Halton and the wider recreational areas and would provide good connectivity for the re-developed site.

These PROW and informal paths are highlighted on the plan below.

Plan illustrating location of PRow + Informal Footpaths



Proposed Routes within SANG areas

As confirmed above, the proposed land available for SANG forms part of the wider RAF Halton site set for closure in 2027 and the wider RAF Halton disposal programme. It therefore presents an opportunity to review the location of and improve existing paths, and the creation of new routes to enhance connectivity based on the developing RAF Halton SPD masterplan. The SANG areas proposed allow for the provision of a circular route in line with Buckinghamshire Council and Natural England's guidance.

The exact routes will be determined through future planning application(s) for the RAF Halton SPD land and will also include footpath surveys, as required by Natural England, to ensure the existing public usage and access is captured and factored into the design.

Future residents would have two route options within the potential SANG parcels, details of which would be refined at the planning application(s) stage:

Option 01 – Land Parcels 01 + 02

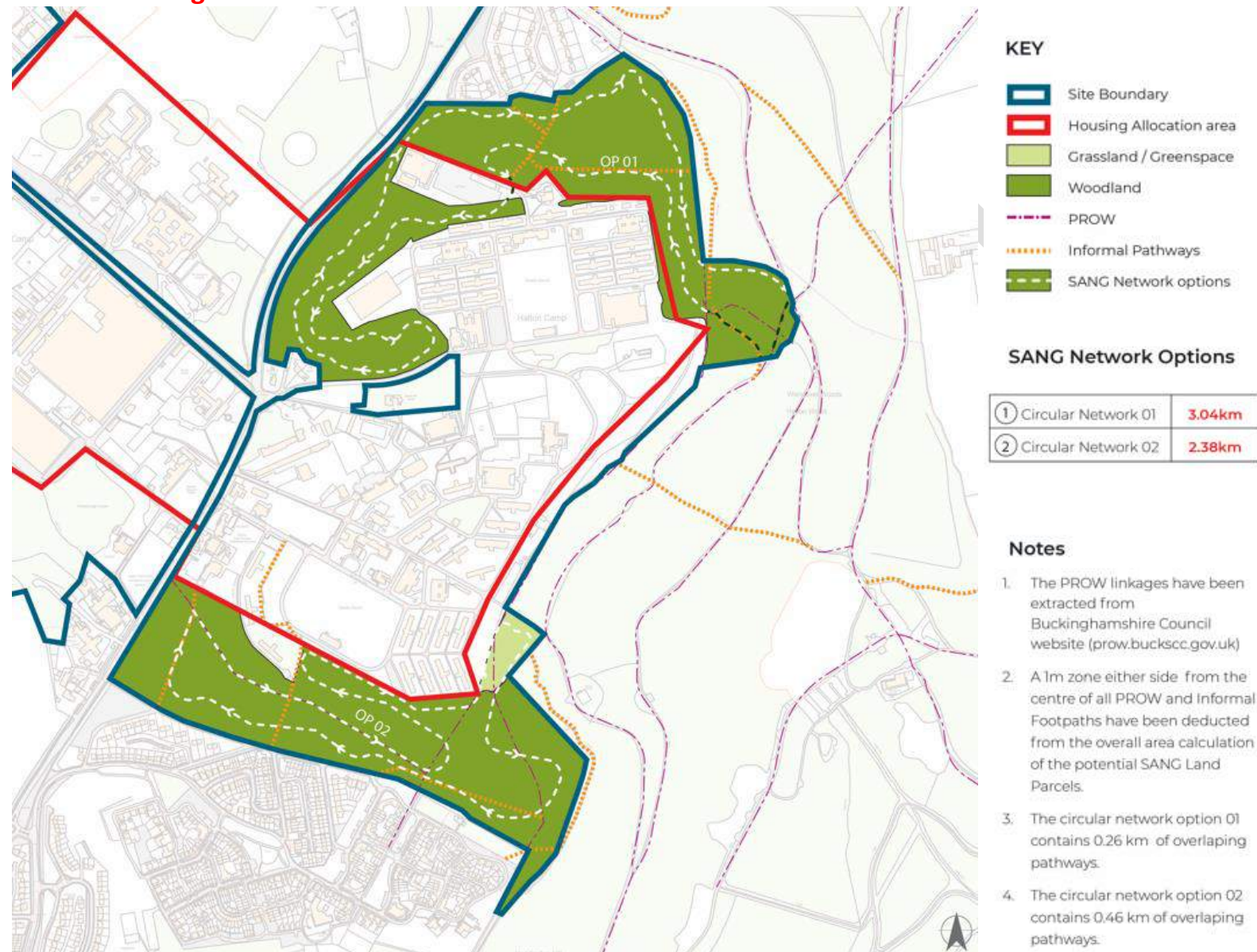
This provides a **3.04km** route that utilises and overlaps 0.26km of existing footpaths. Where the proposed route crosses a potential future access road / passes near new residential development proposed within the RAF Halton SPD masterplan, adequate strategic planting will be required to provide separation from the built form. Natural England have advised this route would not meet Buckinghamshire Council's or Natural England's circular route guidelines for SANG in its current form, or as guidelines stand, but would provide additional routes within the SANG.

Option 02 – Land Parcels 03 + 04

This provides a **2.38km** circular route that utilises and overlaps 0.46km of existing footpaths away from new and existing residential development and without the need to cross any roads. This route has the potential to deliver a 2.3km circular route in compliance with Buckinghamshire Council's and Natural England's criteria.

These are highlighted on the plan below for information.

Plan illustrating Potential Routes



As part of the design criteria, reflecting on Natural England's guidance, and observing Dacorum Borough Council's Mitigation Strategy to support their HRA in regard to Chiltern Beechwood SAC, adequate separation between footpaths will be required. Where a route may cross through the built form, adequate strategic planting will be designed in to provide separation between the two.

The proposed routes are planned to be informal and link with the existing network. Where paths become close in proximity, through the future planning application(s) careful tree and understorey planting design can be utilised to ensure that they do not overlook each other, therefore providing physical and visual separation as required.

For clarity, the southern route would provide a 2.3km circular route in compliance with Buckinghamshire Council and Natural England's circular route criteria. The northern route, in its current form, would provide additional routes within the SANG but would not be compliant in accordance with current guidelines and therefore with circular route criteria.

As detailed below, it should be noted that the need for parking provision is not applicable because all residential development parcels fall within 400m of the SANG.

Buckinghamshire Council - Quality Criteria for SANG

The table below presents the SANG criteria as set out by the guidelines. It is required to provide both the current provision of each of the criteria alongside what the RAF Halton site could design and provide in the future.

The Criteria are divided into three categories: 'Essential', 'Should have', and 'Desirable'.

SUITABLE ALTERNATIVE NATURAL GREENSPACE			
	Criteria	Current	Future
ESSENTIAL			
1	Parking on all sites larger than 4ha (unless the site is intended for use within 400m only).	There is no public parking at present.	The proposed SANG is to serve the needs of new residents located within 400m of the central neighbourhood areas for all RAF Halton SPD development parcels. Therefore, parking would not be required.
2	Circular walk of 2.3-2.5km.	Currently there are some formal Public Rights of Way (PRoW) and informal walking routes throughout the site.	As demonstrated in the plan above, a circular route of appropriate distance in the south SANG parcel can be provided. In addition, a route can be provided in the northern SANG parcel and the proposed SANG land can be linked via existing PRoW and other networks for wider public benefit beyond the SANG requirement. For example, via the proposed RAF Halton SPD heritage trail and planned green infrastructure links across the allocated site.
3	Car parks easily and safely accessible by car and clearly sign posted.	There is no public parking at present.	The proposed SANG is to serve the needs of new residents located within 400m of the central neighbourhood areas for all RAF Halton SPD development parcels. Therefore, parking would not be required.
4	Access points suitably located for the intended visitors to the Suitable Alternative Natural Greenspace.	Current access points include informal and formal routes between the RAF base and surrounding housing, and the PRoW network linking the SANG area to adjacent woodland outside of the promoter's ownership.	As shown, the potential SANG locations would have suitable and easily accessible access points leading to short/medium/long distance circular walks and all areas within the allocation site.

5	Safe access route on foot from nearest car park and/or footpath.	There is no public parking at present but there is the use of formal and informal paths.	Safe access routes can be provided for new residents using residential streets and new green infrastructure routes within the allocation land to the SANG.
6	Circular walk which starts and finishes at the car park.	There is no public parking at present.	The proposed SANG is to serve the needs of new residents located within 400m of the central neighbourhood areas for all RAF Halton SPD development parcels. Therefore, parking would not be required.
7	Perceived as safe – no tree and scrub cover along part of walking routes.	The characteristic of the existing natural greenspace is predominantly woodland; however, it is a mature woodland with very little understorey, which permits a feeling of safety.	To mitigate the impact from new built form proposed in the RAF Halton SPD masterplan and discussed in Route Option 1 above, some strategic planting may be necessary to meet other SANG criteria, as noted above, however this can be achieved in such a way that does not compromise the current natural surveillance and safe perception.
8	Paths easily used and well maintained but mostly unsurfaced.	Existing paths are mostly unsurfaced and informal in nature.	Paths can be made stable and maintained as needed by SANG requirements.
9	Perceived as semi-natural with little intrusion of artificial structures.	The area is generally perceived as semi-natural with no artificial structure intrusions. There are however clear views of the RAF base from parts of the SANG area due to limited perimeter screening. The western edge of the proposed SANG abuts Upper Icknield Way (public highway) which introduces traffic noise into a small part of the woodland.	To strengthen the perception of semi-natural experience and to screen any perception of visual intrusion from new housing where the circular route is at its closest to new housing additional native planting could be provided within the design as part of the future planning application(s)
10	If larger than 12 ha then a range of habitats should be present.	Site is not currently used for SANG.	<p>The RAF Halton SPD masterplan demonstrates a range of housing of between 1,000 and 1,200 units can be achieved within the allocated land. Based on Buckinghamshire Council and Natural England guidance this represents a SANG requirement of 19.2ha to 23.04ha.</p> <p>Through a detailed and considered landscape and biodiversity plan that will be provided through the future planning application(s) the SANG land would be able to provide a range of habitats that could co-exist with the circular walking routes.</p>

11	Access unrestricted – plenty of space for dogs to exercise freely and safely off the lead.	The land parcels are currently used by dog walkers on an informal basis with minimal known safety concerns from the neighbouring residential developments or the B4009 public highway.	The proposed SANG areas offer a number of interesting and varied dog walking routes where dogs can be exercised safely off the lead. Where walking routes are proposed near to the B4009 mitigation measures to address any safety concerns would need to be designed in and demonstrated through future planning application(s).
12	No unpleasant intrusions (e.g. sewage treatment smells etc).	No existing issues.	Should any unpleasant intrusions be identified at the time of the future planning application(s) new paths can be designed to avoid these as far as practicably possible.
SHOULD HAVE			
13	Clearly sign posted or advertised in some way.	There is currently very little existing signage at present.	Interpretation boards identifying SANG routes and links to further walks could be located at key entrance points within both SANG parcels. In addition, waymarkers can be positioned at regular intervals to assist with route navigation. These details would be considered as part of any future planning application(s).
14	Leaflets or website advertising their location to potential users.	There is currently very little existing advertising to potential users at present apart for formal PRoW.	In addition to any interpretation boards and waymarkers the SANG routes could be advertised through the use of leaflets, website, a social media page, details of which would be considered through future planning application(s).
DESIREABLE			
15	Can dog owners take dogs from the car park to the SANG safely off the lead.	There is currently no public car park provision as noted above, but there are routes allowing dog owners to safely walk across the land via the PRoW.	The proposed SANG is located within 400m of the central areas for all RAF Halton SPD development parcels. Therefore, delivering easy access to all residential dwellings without the need for separate car park provision. Safe access will be provided for new residents with dogs into the SANG land using residential streets and new green infrastructure routes within the allocation.

16	Gently undulating topography.	<p>The land does undulate throughout the site offering a mixture of flat, gentle and steep terrain.</p> <p>Areas around the Henderson and Maitland part of the site (in the east) are quite steep in places when connecting into the woodland.</p>	<p>There is a potential for the routes to traverse around and avoid the steepest terrain and offer gently sloping areas, through the majority of the woodland.</p> <p>Full design details will be considered as part of all future planning application(s) relating to the RAF Halton SPD site.</p>
17	Access points with signage outlining the layout of the SANGS and routes available to visitors.	<p>Not available yet as this is a new proposal.</p>	<p>These could be developed and made available.</p>
18	<p>Naturalistic space with areas of open countryside and areas of dense and scattered trees and shrubs.</p> <p>Provision of open water is desirable</p>	<p>The proposed SANG includes current areas of mature broadleaf, conifer, and mixed woodland, as well as small glades.</p> <p>It is considered that this provides a similar semi-natural experience as the Chiltern Beechwoods SAC.</p> <p>The proposed SANG land does not provide access to existing open water. However, routes taken north of the B4009 can link towards PRow adjacent to the Grand Union Canal.</p>	<p>The proposed SANG provides opportunities to improve these areas for public enjoyment through woodland management and landscape planting.</p> <p>Retaining the natural feel of the site through retention and enhancement of existing habitats is the preferred option and allows for incorporation of areas of woodland and grassland.</p> <p>SuDS features could be located adjoining the circular walk.</p> <p>These features could be managed and enhanced to provide a recreation destination and improved habitat mosaic as part of the SANG proposals.</p>
19	Focal point such as a viewpoint or monument within the SANG	<p>There is a Scheduled Monument within the proposed SANG area. In addition, there are a number of large, attractive trees that form focal points to routes within the SANG area. In addition, RAF Halton consists of numerous heritage assets.</p>	<p>There is the opportunity to improve key vistas and view points across the proposed SANG area with information boards provided to highlight key features like the Scheduled Monument.</p> <p>In addition, and subject to the ability to retain the required semi-natural feel of the SANG, visual links to the wider RAF Halton site could be considered.</p>

Requirements of a Full Management Plan

This document sets out high level principles, with reference to Natural England's guidance, proportionate to this stage of the plan making process around SANG implementation and management. It has also been based on the requirements of the HRA produced to support the RAF Halton SPD. The HRA is an iterative process, and it is acknowledged that a detailed Management Plan will be required to inform the HRA at the detailed planning application(s) stage.

To get to this stage, there has been a number of meetings and conversations with the LPA and Natural England and the detailed requirements of a Management Plan have been clearly understood and will be implemented through the planning process. It is acknowledged that, due to members of the public already using some of the identified SANG land, detailed visitor surveys will be required to capture this usage. It is expected this survey will form part of future planning application(s).

Full details of the SANG, its implementation, funding, maintenance and monitoring will be provided through the development of detailed plans and a full Management Plan that will form part of future planning application submissions. These will include details of all acceptable materials for surfaces and furniture such as benches, lighting and bins, as well as details of maintenance regimes, timings, frequencies and costings.

The council have kindly provided examples of an acceptable Management Plan. It is our intention that a similar structure and contents will be developed.

At least a proportion of SANG will be open and accessible prior to the occupation of the first dwelling on the site in accordance with the relevant planning permission with monitoring and maintenance most likely to be achieved through a management company funded by resident contributions. A mechanism would be put in place through any future planning permission to ensure the SANG is monitored, maintained and retained for an in-perpetuity period of at least 80 years.

The intended format of the report could include:

- **Section 01 – Introduction**

This section will look to introduce the project and the purpose of the document.

- **Section 02 – Site + Wider Context**

This section will identify and explain site details and its surrounding content. It will look to explain:

- Location
- Access
- Topography
- Drainage + Flooding
- Landscape + Views
- Wildlife + Biodiversity
- Archaeology + Heritage

- Recreational Uses
- Legal + Planning Framework – Designations, Ownership + Governance
- Evaluation

- **Section 03 - Proposals for SAC Mitigation and or SANG Required Elements**

This section will aim to explain:

- Enhancement objectives + proposals.
- Potential for strategic delivery officer if required.
- Re-Surfacing of any footpaths or replacements or construction of new ones.
- Enhancement or construction of any required cycleways.
- Provision of any required furniture such as benches, bins, tables dog bins, cycle stands, wayfinding and signage.
- Provision of any required hard features such as gates, walls, fencing or retaining features.
- Provision of any lighting features.
- Provision of any new planting including management regimes
- Provision of any ecological features including SuDs features.
- Provision of any intended maintenance regimes and issues.

- **Section 04 – Costs + Funding**

This section will address any anticipated in-perpetuity costs for delivering all proposed measures.

- **Section 05 – Monitoring**

This section will provide details on monitoring and maintenance. This will most likely be achieved through a management company funded by resident contributions for an in-perpetuity period of at least 80 years.

- **Section 06 – Conclusions**

This section will conclude and summarise all findings.

- **Appendices – All relevant Plans and Guidance Notes**

This section will include all relevant developed plans and guidance notes.

Habitats Regulations Assessments

Sustainability Appraisals

Strategic Environmental Assessments

Landscape Character Assessments

Landscape and Visual Impact Assessments

Green Belt Reviews

Expert Witness

Ecological Impact Assessments

Habitat and Ecology Surveys



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Montpellier Drive

Cheltenham

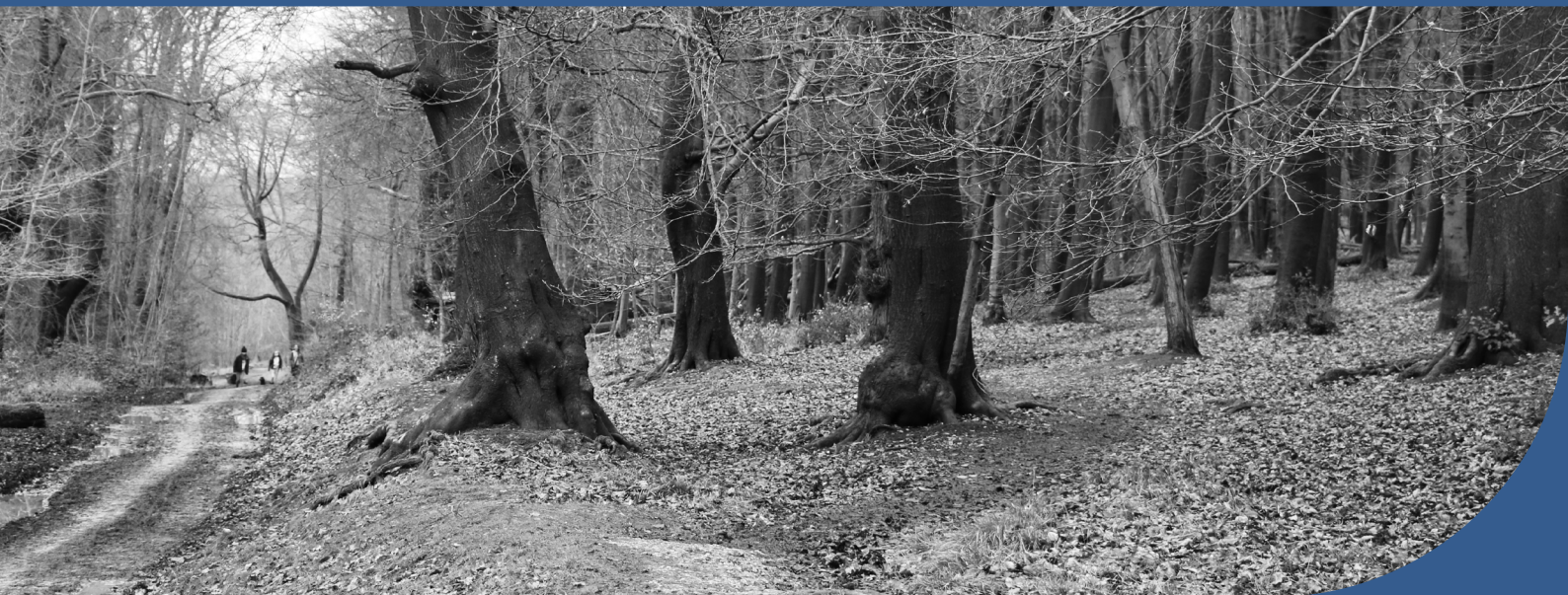
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