

Strategic Environmental Assessment of the RAF Halton Supplementary Planning Document

SEA Scoping Document

May 2023



LEPUS CONSULTING
LANDSCAPE, ECOLOGY, PLANNING & URBAN SUSTAINABILITY

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SEA Scoping Document

LC-921	Document Control Box
Client	Buckinghamshire Council
Report Title	Strategic Environmental Assessment of the RAF Halton Supplementary Planning Document: SEA Scoping Document
Status	Final post-consultation
Filename	LC-921_RAF_Halton_SPD_ScopingSEA_6_211123LB.docx
Date	May 2023
Author	SS
Reviewed	LB
Approved	ND

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Acronyms & Abbreviations

AAL	Area of Attractive Landscape
AGT	Aylesbury Garden Town
ANGSt	Accessible Natural Green Space Standards
AONB	Area of Outstanding Natural Beauty
DEFRA	Department for Environment, Food and Rural Affairs
EA	Environment Agency
EU	European Union
GI	Green Infrastructure
HRA	Habitats Regulations Assessment
IRZ	Impact Risk Zone
LCA	Landscape Character Assessment
LCT	Landscape Character Type
LLA	Local Landscape Areas
LNR	Local Nature Reserve
LWS	Local Wildlife Site
MHCLG	Ministry for Housing, Communities and Local Government
NCA	National Character Area
NNR	National Nature Reserve
NPPF	National Planning Policy Framework
ODPM	Office of the Deputy Prime Minister
PPG	Planning Policy Guidance
PPP	Plan, Policy and Programme
PRoW	Public Right of Way
RAF	Royal Air Force
RPG	Registered Park and Garden
SA	Sustainability Appraisal
SAC	Special Area of Conservation
SEA	Strategic Environmental Assessment
SM	Scheduled Monument
SPA	Special Protection Area
SPD	Supplementary Planning Document
SSSI	Site of Special Scientific Interest
VALP	Vale of Aylesbury Local Plan

1 Introduction

1.1 This report

- 1.1.1 Buckinghamshire Council have commissioned Lepus Consulting to carry out a Strategic Environmental Assessment (SEA), to support the preparation of the RAF Halton Supplementary Planning Document (SPD). The purpose of this report is to identify the scope and level of detail of information that is necessary to inform the SEA.

1.2 Strategic Environmental Assessment

- 1.2.1 EU Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment (SEA Directive) is transposed into English law by the Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulations)¹. Detailed guidance of these regulations can be found in the Government publication 'A Practical Guide to the Strategic Environmental Assessment Directive' (ODPM, 2005²) and Paragraph 009 of the Planning Practice Guidance (PPG) 'Neighbourhood Planning' section³.
- 1.2.2 The RAF Halton SPD SEA and HRA Screening was undertaken by Buckinghamshire Council in December 2022⁴. The screening opinion recommended that the SPD should be screened in for full SEA. Following consultation on the report, the conclusion that SEA was required was agreed on by two of the statutory bodies: Historic England and Natural England. No comments were received from the Environment Agency.
- 1.2.3 SEA seeks to ensure that environmental considerations are part of the process of preparing certain plans and programmes. The objective of the SEA Regulations is to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development, by ensuring that, in accordance with the SEA Regulations, an environmental assessment is carried out of certain plans and programmes which are likely to have significant effects on the environment.
- 1.2.4 Regulation 12 (5) of the SEA Regulations states that: "When deciding on the scope and level of detail of the information that must be included in the report the responsible authority shall consult the consultation bodies".

¹ The Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulations). Available at: <https://www.legislation.gov.uk/uksi/2004/1633/contents/made> [Date accessed: 13/03/23]

² ODPM (2005) A Practical Guide to the Strategic Environmental Assessment Directive. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/7657/practicalguides_ea.pdf [Date accessed: 06/03/23]

³ EA/SA Guidance. Available at: <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal> [Date accessed: 06/03/23]

⁴ Buckinghamshire Council (2022) Site D-HAL003, RAF Halton SPD, Aylesbury Vale Area: Strategic Environmental Assessment and Habitats Regulations Assessment Screening. [Date accessed: 06/03/23]

- 1.2.5 This report will identify the appropriate scope for the SEA of the RAF Halton SPD. This report will then be consulted on with the three statutory bodies (Natural England, Historic England, and the Environment Agency).

1.3 RAF Halton SPD

- 1.3.1 The RAF Halton SPD will provide a framework for the development of the proposed site D-HAL003 'RAF Halton' allocated within the Vale of Aylesbury Local Plan (VALP), which was adopted in September 2021. D-HAL003 is identified as one in a suite of 'major sites' in the strategic settlements and in North East Aylesbury Vale for development, within VALP Policy D2.
- 1.3.2 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.
- 1.3.3 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).
- 1.3.4 Site D-HAL003 is proposed to include the development of:
- At least 1,000 dwellings;
 - New primary school;
 - New local centre, including a community hall;
 - Junction improvements onto B4009 (Upper Icknield Way);
 - New green infrastructure (GI); and
 - Access routes.
- 1.3.5 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.
- 1.3.6 **Table 1.1** below presents the criteria for development as proposed within the adopted VALP Policy D-HAL003 RAF Halton⁵.

⁵ Aylesbury Vale District Council (2021) Vale of Aylesbury Local Plan 2013-2033. Adopted Plan (September 2021). Available at: https://buckinghamshire.gov.uk.s3.amazonaws.com/documents/Aylesbury_local_plan_L46JWaT.pdf [Date accessed: 06/03/23]

Table 1.1: D-HAL003 RAF Halton Site Allocation criteria as presented in the VALP

Information	Site Details
Site Reference	HAL003
Site Name	RAF Halton
Size (hectares)	82 ha
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.

1.3.7 The boundary for Site D-HAL003 is shown in **Figure 1.1**. 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.

1.3.8 A scoping report is not required by law, but it is a useful way of presenting information in order to establish a proportionate and relevant SEA process that informs the plan-making process effectively in a way in which the statutory bodies and the local authority agree.

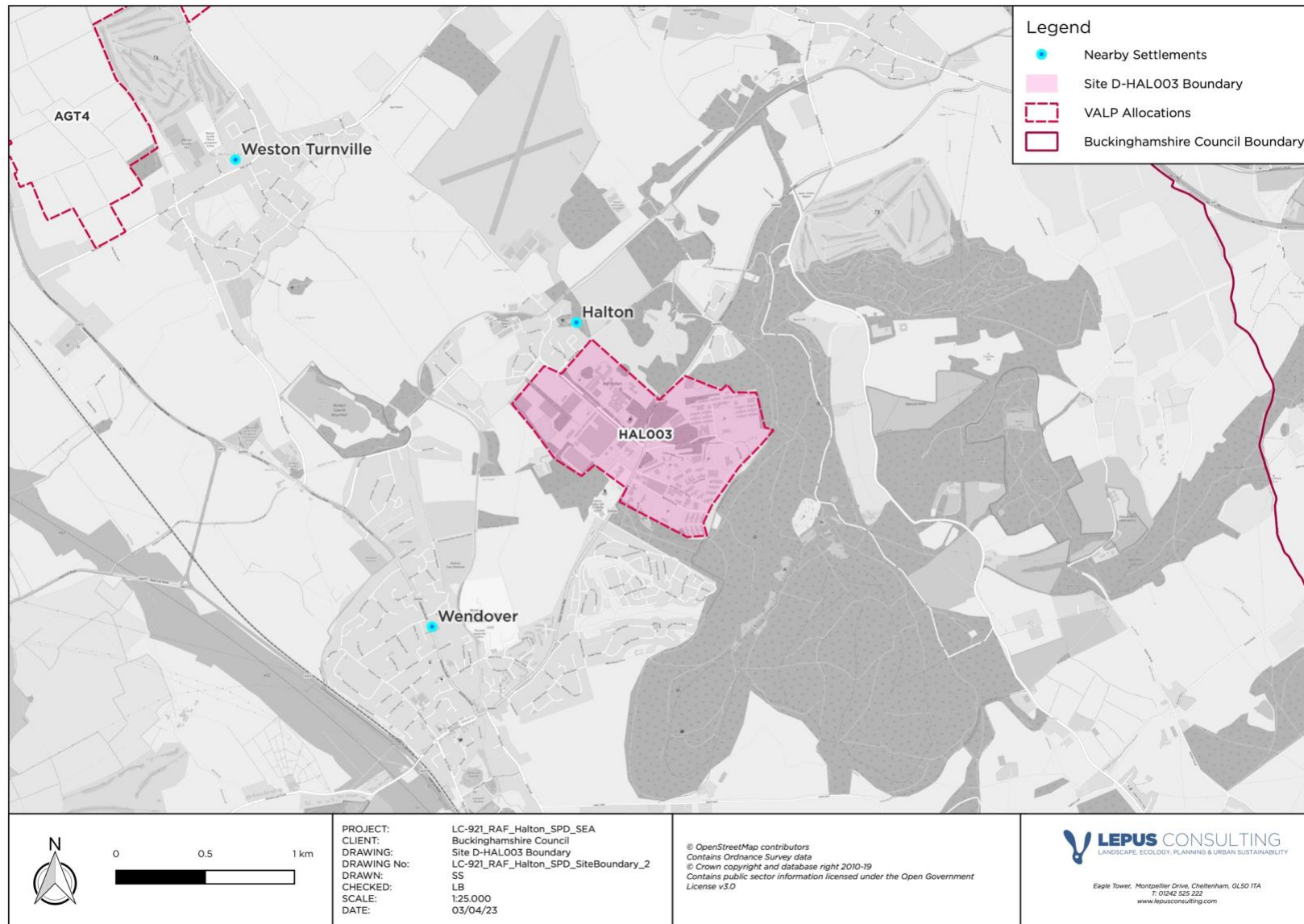


Figure 1.1: Proposed site D-HAL003 boundary area

2 Screening and scoping the plan

2.1 SEA Screening outcome

2.1.1 The SEA and HRA screening opinion prepared in December 2022 reviewed the extent to which the RAF Halton SPD could potentially result in significant effects on the environment.

2.1.2 Schedule 2 of the SEA Regulations⁶ states that the information provided in SEA should identify the likely significant effects on the environment⁷, including:

“Issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the issues”.

2.1.3 The SEA screening opinion considered the extent to which the SPD could potentially have a likely significant effect on each of the topics listed in Schedule 2 of the SEA Regulations. The screening opinion concluded that a significant effect on the environment could not be ruled out for the following topics:

- **Climate Change:** The introduction of at least 1,000 new dwellings, increase in energy consumption, and traffic owing to both construction and occupancy stages is likely to increase local air pollution, thus negatively impacting climatic factors locally.
- **Cultural Heritage:** There are a range of heritage assets within the area and in the surrounding of the proposed development site D-HAL003. The heritage constraints set out the need for a heritage-led development and thus indicate potential negative impacts on the historical setting of these assets.
- **Landscape:** The site borders the Chilterns Area of Outstanding Natural Beauty (AONB). With the onset of construction and occupation of new dwellings and infrastructure at Site D-HAL003, negative impacts on the highly distinctive and sensitive character of the AONB could occur.

2.1.4 The findings from the HRA of the VALP indicate recreational pressure from the proposed housing development on the Chilterns Beechwoods Special Area of Conservation (SAC). The HRA Screening highlighted a full HRA was required for the SPD. Therefore, SEA topic ‘Biodiversity, Flora and Fauna’ has also been screened in:

- **Biodiversity, Flora and Fauna:** Conclusions from the RAF Halton SPD Screening Report state that there is potential for significant effects on Chiltern Beechwoods SAC. The closest component of the SAC is located approximately 2.8km east from the site at Tring Woodlands. An HRA Screening exercise has been completed by Buckinghamshire Council which identified likely significant effects arising from recreational pressure associated with proposed

⁶ The Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulations). Available at: <https://www.legislation.gov.uk/uksi/2004/1633/contents/made> [Date accessed: 13/03/23]

⁷ These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects.

development Site D-HAL003. Consequently, an Appropriate Assessment of the SPD will be prepared.

- 2.1.5 It is not expected that new development outlined within the RAF Halton SPD would result in any negative impacts in relation to any of the other topics listed in Schedule 2 of the SEA Regulations.

2.2 Proportionate scope for the RAF Halton SPD

- 2.2.1 Drawing on the findings from the SEA screening stage (see paragraph 2.1.4 and 2.1.5), **Table 2.1** provides an overview of the SEA topics and their screening outcome.

Table 2.1: Content of the SEA topics screened in or out from this Scoping Report

SEA topic	To be scoped into or out of the SEA of the SPD
Biodiversity, flora and fauna	In
Population	Out
Human health	Out
Soil	Out
Water	Out
Air	Out
Climatic factors	In
Material assets	Out
Cultural heritage	In
Landscape	In

2.3 Policy, Plan and Programme Review

- 2.3.1 The plan may be influenced in various ways by other policies, plans or programmes (PPPs), or by external sustainability objectives such as those put forward in higher strategies or by legislation. The SEA process will take advantage of potential synergies between these PPPs and address any inconsistencies and constraints. A summary of the PPP review is presented in the following chapters under each sustainability theme. The PPP summaries should be read alongside the more detailed information included in **Appendix B**.

2.4 Baseline data collection

- 2.4.1 **Chapters 3 to 6** provide a review of the current baseline data for each of the 'screened in' topics listed in **Table 2.1**. The purpose of the baseline review is to help define the key sustainability issues for the plan as well as the likely evolution of each topic in the absence of the SPD. This will enable the predicted effects of the plan to be effectively appraised. The currency, resolution and presentation of data is crucial to an effective baseline. This is limited by the range of data available but seeks to focus on data at the level of the RAF Halton SPD where possible whilst being up-to-date and fit for purpose. One of the purposes of consultation on the Scoping Report is to seek views on whether the data selected is appropriate.

3 Biodiversity, Flora and Fauna

3.1 Summary of policy and plan review

- 3.1.1 The strategic emphasis of the various PPPs is to conserve biological and geological diversity (including a reversal of the current trend of biodiversity loss) and protect and monitor endangered and vulnerable species and habitats. Policies identify a hierarchy of designations which aim to protect and enhance the natural environment. The highest priority is afforded to internationally designated habitats and species (Natura 2000) which are the subject of a specific HRA regime to examine the potential impacts on site or species integrity arising from policies or programmes. Other notable designations include national sites such as Sites for Scientific Interest (SSSIs) and National Nature Reserves (NNRs), as well as Local Wildlife Sites (LWSs) being identified locally. The integration of biodiversity considerations into all environmental and socio-economic planning is strongly advocated.
- 3.1.2 The Natural Environment White Paper⁸ focuses on promoting high quality natural environments, expanding multifunctional green infrastructure (GI) networks and initiating landscape scale action to support ecological networks. The White Paper specifically seeks to: protect core areas of high nature conservation value; promote corridors and 'stepping stones' to enable species to move between key areas; and initiate Nature Improvement Areas, where ecological functions and wildlife can be restored.
- 3.1.3 The White Paper is supported by the Biodiversity 2020 strategy⁹. This seeks to halt overall biodiversity loss, support healthy, well-functioning ecosystems and establish coherent ecological networks with more and better places for nature for the benefit of wildlife and people. The Biodiversity Strategy for England also proposes introducing a new designation for Local Green Areas to enable communities to protect places that are important to them.
- 3.1.4 The NPPF includes guidance on promoting the conservation and enhancement of the natural environment. It requires the planning system to contribute to and enhance the natural and local environment by minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.

⁸ HM Government (2014): Natural Environment White Paper. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/366526/newp-imp-update-oct-2014.pdf [Date accessed: 06/03/23]

⁹ DEFRA (2011) Biodiversity 2020: A strategy for England's wildlife and ecosystem services. Available at: <https://www.gov.uk/government/publications/biodiversity-2020-a-strategy-for-england-s-wildlife-and-ecosystem-services> [Date accessed: 06/03/23]

- 3.1.5 The Environment Act¹⁰ introduces plans, policies and targets to improve the natural environment. Focussing on biodiversity and the anticipated incorporation of the Biodiversity Metric 3.1¹¹ into law in November 2023, the Act would ensure all new development delivers at least 10% net gain in biodiversity.
- 3.1.6 The 25 Year Environment Plan¹² sets out how we must improve the environment over a generation by creating richer habitats for wildlife. The Plan also sets out how we will improve air and water quality, as well as reducing plastic within the world's oceans.

3.2 Baseline data

Natura 2000

- 3.2.1 Special Areas of Conservation (SACs) are sites of the Natura 2000 network protected under EU Council Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora¹³ (the Habitats Directive). Special Protection Areas (SPAs) are also sites of the Natura 2000 network, protected under Directive 2009/147/EC of the European Parliament and of the Council on the Conservation of Wild Birds¹⁴ (the Birds Directive). Sites classified as a SPA or designated as a SAC are protected for the habitats and species they support.
- 3.2.2 The closest Natura 2000 site to the RAF Halton Site D-HAL003 is Chilterns Beechwoods SAC. The closest component of the Chilterns Beechwoods SAC is located approximately 2.8km east from the site at Tring Woodlands (see **Figure 3.1**). An HRA process has been carried out parallel to the preparation of the VALP to inform the plan-making process to ensure that potential impacts arising from the VALP in relation to this SAC and other European sites have been suitably addressed and mitigated. However, owing to the site's location within the 12.6km Zone of Influence (ZOI) for the Ashridge Commons and Woods SSSI component of the SAC, and the emerging strategic solution to mitigate recreational effects on the SAC since the adoption of the VALP, the HRA Screening exercise for the RAF Halton SPD¹⁵ identified likely significant effects associated with D-HAL003. Consequently, an Appropriate Assessment of the SPD will be prepared.

¹⁰ Environment Act 2021. Available at: <https://www.legislation.gov.uk/ukpga/2021/30/contents/enacted> [Date accessed: 06/03/23]

¹¹ Natural England (2021) Biodiversity Metric 3.1. Available at: <http://publications.naturalengland.org.uk/publication/6049804846366720> [Date accessed: 06/03/23]

¹² HM Government (2018) A Green Future: Our 25 Year Plan to Improve the Environment. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf [Date accessed: 06/03/23]

¹³ European Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora . Available at: <http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:31992L0043&from=EN> 7 [Date accessed: 06/03/23]

¹⁴ European Directive 2009/147/EC on the conservation of wild birds . Available at: <http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32009L0147&from=EN> [Date accessed: 06/03/23]

¹⁵ Buckinghamshire Council (2022) Site D-HAL003, RAF Halton SPD, Aylesbury Vale Area- Strategic Environmental Assessment and Habitats Regulations Assessment Screening. Last updated: 05 December 2022 Version: 1.2 [Date accessed: 06.03.23]

National designations

3.2.3 Natural England designates SSSIs in England under the Wildlife and Countryside Act 1981¹⁶ (as amended). The closest SSSIs to Site D-HAL003 are Weston Turville SSSI (0.6km away), Dancersend SSSI (1km away) and Aston Clinton Ragpits SSSI (1km away) (see **Figure 3.1**). The site also falls within 12.6km ZOI of the Ashridge Commons and Woods SSSI.

3.2.4 Natural England has developed Impact Risk Zones (IRZs) for each SSSI unit in the country. IRZs are a tool for rapid initial assessment of the potential risks to SSSIs posed by development proposals¹⁷. Site D-HAL003 is located within IRZs which indicates that the proposed development (residential development with net gain in residential units) should be consulted on with Natural England, owing to potential negative effects on nearby SSSIs.

Ancient woodland

3.2.5 Ancient woodland is an area that has been wooded continuously since at least 1600AD and includes 'ancient semi-natural woodland' and 'plantations on ancient woodland sites', both of which have equal protection under the NPPF. Besides a number of stands of ancient woodland within the 1km proximity from the site, the site D-HAL003 is adjacent to 'Hale Wood' (see **Figure 3.1**).

Local designations

3.2.6 Bacombe Hill Local Nature Reserve (LNR) is located approximately 2.2km to the south-west of the site boundary (see **Figure 3.2**). The site is also adjacent to Wendover Woods LWS, which is also designated as a Local Geological Site. A section of 'RAF Halton: N & SW of Haddington Hill' LWS coincides with the north east of Site D-HAL003.

Habitats and Species

3.2.7 Priority habitats found within and around the site boundary include several stands of deciduous woodland, and a small area of traditional orchard (see **Figure 3.2**).

3.2.8 According to the screening report, 11 sightings of protected species have been recorded in the site D-HAL003 and these are protected by the Habitats Regulations, including:

- *Rana temporaria* (Common Frog)
- *Chiropter asp.* (A Bat species)
- *Nyctalus noctule* (Noctule Bat)
- *Pipistrellus pipistrellus* (Common Pipistrelle)
- *Plecotus auratus* (Brown Long-eared Bat)

¹⁶ HM Government (1981): Wildlife and Countryside Act 1981 (amended). Available at: <https://www.legislation.gov.uk/ukpga/1981/69> [Date accessed: 07/03/23]

¹⁷ Natural England (2023) Natural England's Impact Risk Zones for Sites of Special Scientific Interest, 24 January 2023. Available at: <https://data.gov.uk/dataset/5ae2af0c-1363-4d40-9d1a-e5a1381449f8/ssi-impact-risk-zones-england> [Date accessed: 07/03/23]

- 3.2.9 The proposed development at Site D-HAL003 must be in accordance with VALP policies including Policies NE1 (Biodiversity and Geodiversity) and I1 (Green Infrastructure) which seek to protect and enhance designated sites, protected habitats/species and GI, and deliver biodiversity net gain.
- 3.2.10 The site allocation as proposed within the VALP includes requirements to ensure “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” which could potentially help to provide a high quality ecological network, ensuring habitat connectivity to the wider area is retained and improved.

3.3 Key Sustainability Issues

- 3.3.1 Based on the PPP review and baseline data presented in this Chapter, key sustainability issues for the Biodiversity, Flora and Fauna theme are listed in **Box 3.1**.

Box 3.1: Key Biodiversity, Flora and Fauna Issues for the RAF Halton SPD

- The SPD should ensure that damage through recreational pressures, promoting restoration and/or enhancement of the European protected site Chilterns Beechwoods SAC is avoided, in line with the NPPF, and that the findings of the emerging HRA for the SPD are adhered to.
- There is a need to ensure that the proposed residential development for site D-HAL003 addresses any potential impact on nearby SSSIs, in consultation with Natural England.
- Potential impact of development on existing ecological networks and protected habitats/species.

3.4 Future Evolution without the Plan

- 3.4.1 Schedule 2 of the SEA Regulations¹⁸ requires information on: “the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme”.
- 3.4.2 The RAF Halton SPD is an essential component of Policy D-HAL003 within the VALP, where without the SPD in place, co-ordination of the various phases of development would be unlikely to occur in a timely and well-planned method. Therefore, without the SPD, the housing requirement would still stand and a potentially less comprehensive approach in place of the SPD could lead to possible adverse impacts on biodiversity. Based on local and national trend data, the likely evolution of the Biodiversity and Geodiversity theme in the affected area is presented in Box 3.2.

Box 3.2: Future evolution of the baseline without the RAF Halton SPD

- Sites designated for their national and international biodiversity and/or geodiversity value will continue to benefit from legislative protection.

¹⁸ SEA Regulations. Available at: <https://www.legislation.gov.uk/uksi/2004/1633/schedule/2/made?view=plain> [Date accessed: 07/03/23]

Box 3.2: Future evolution of the baseline without the RAF Halton SPD

- Without the SPD, it may be difficult to help ensure that development is not of a type, scale and location that could potentially have a major adverse impact on a biodiversity and geodiversity designation or on the functioning ecological network. It would be likely that biodiversity features would be somewhat protected by policies set out the VALP, however, it is uncertain to what extent.

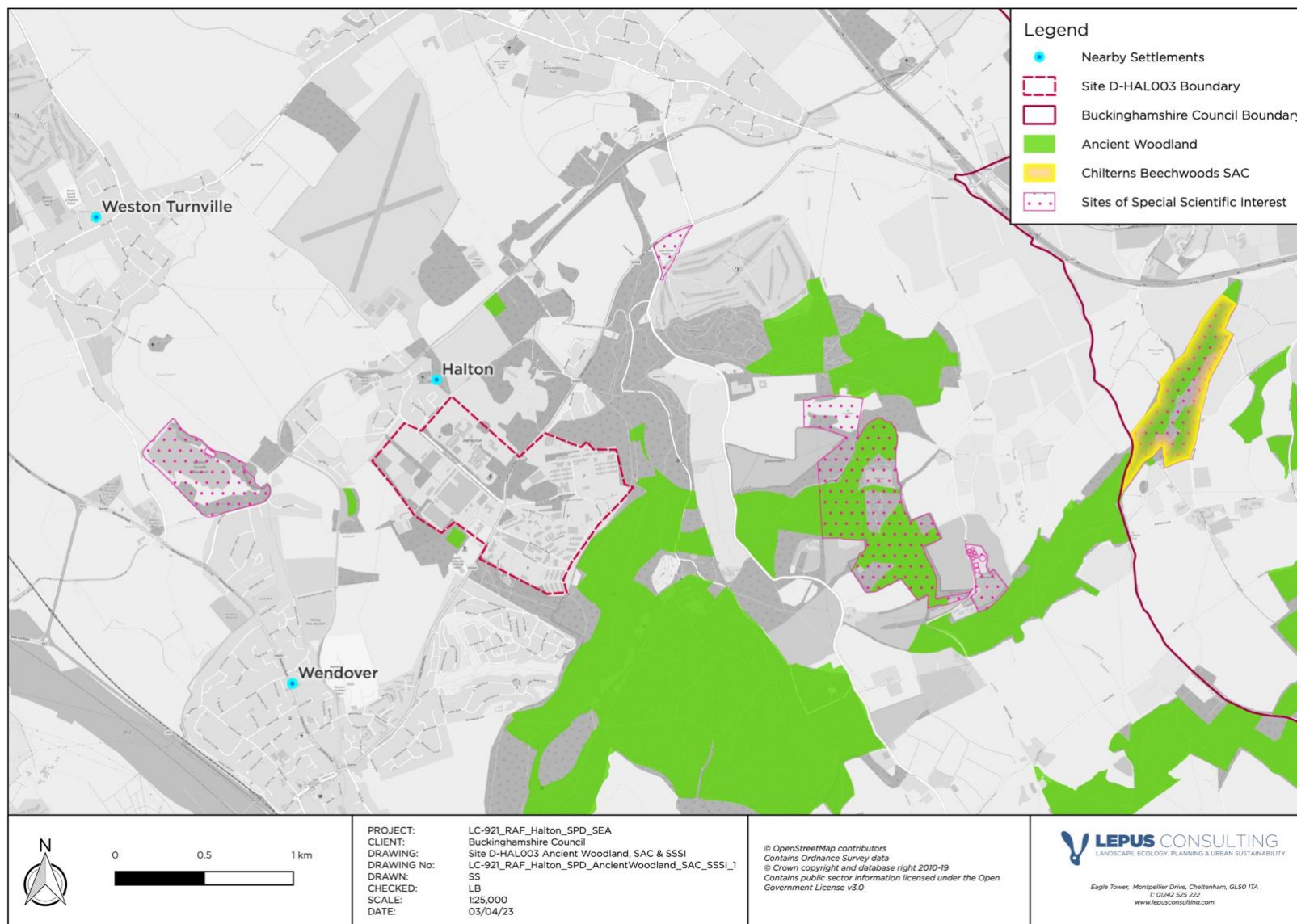


Figure 3.1: Biodiversity designations (Ancient Woodland, SAC and SSSI) within and around site D-HAL003

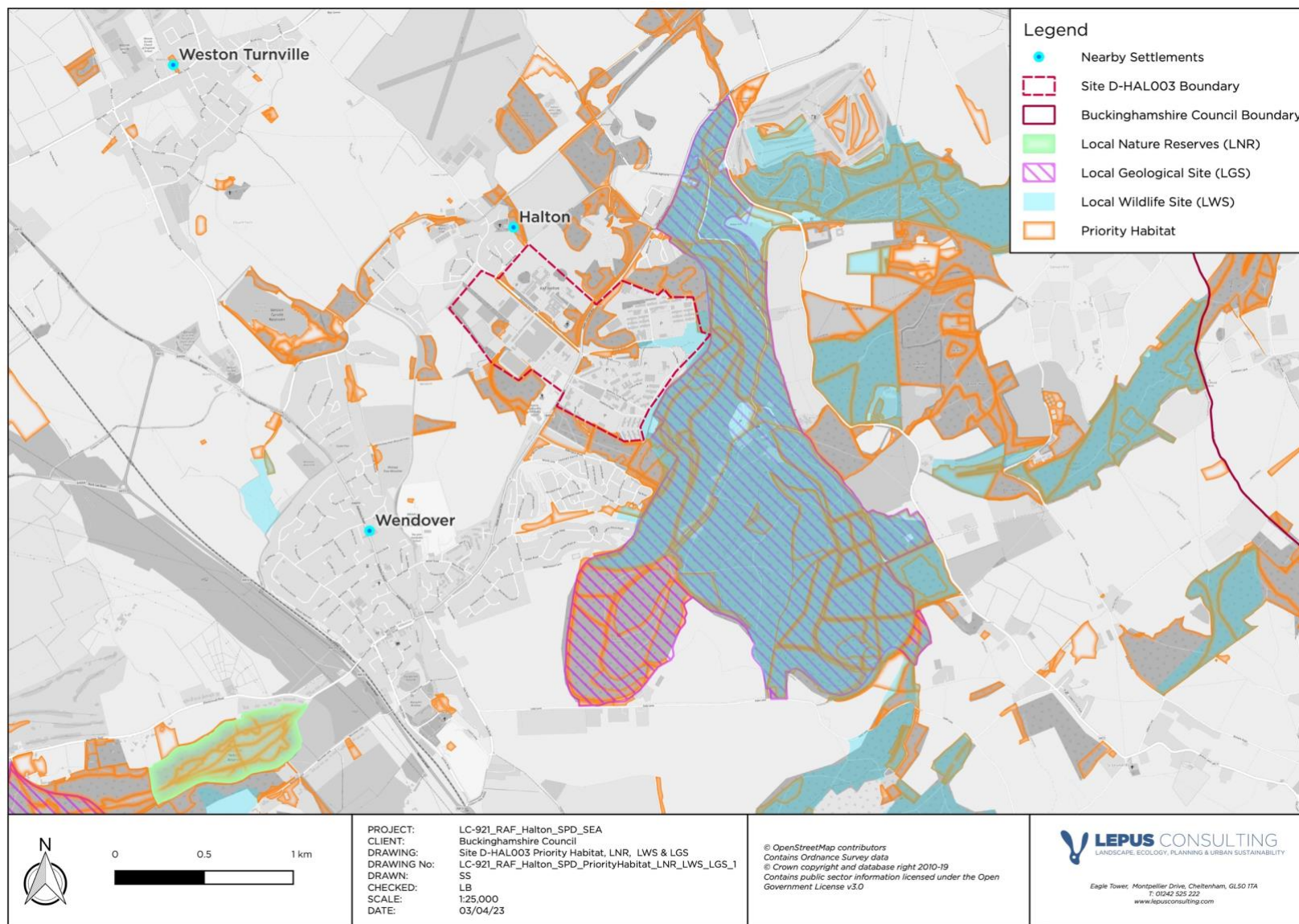


Figure 3.2: Biodiversity designations (LNR, LGS, LWS and Priority Habitat) within and around site D-HAL003

4 Climate Change

4.1 Summary of policy and plan review

- 4.1.1 Anthropogenic climate change is predominantly the result of greenhouse gas (GHG) emissions. GHGs are emitted from a wide variety of sources, including transport, construction, agriculture and waste. Typically, development leads to a net increase in GHG emissions in the local area, although efforts can be made to help limit these increases.
- 4.1.2 The Climate Change Act 2008¹⁹ is the basis for the UK's approach to tackling and responding to climate change. It requires that emissions of carbon dioxide and other GHGs are reduced and that climate change risks are prepared for. The Act also establishes the framework to deliver on these requirements.
- 4.1.3 The UK is a member of the United Nations Framework Convention on Climate Change (UNFCCC). The UNFCCC is the key forum which oversees international action to tackle climate change. The UNFCCC led the development and adoption of The Paris Agreement in 2015²⁰. A total of 160 countries have pledged to cut their emissions as part of this process. The Committee on Climate Change (CCC) report 'Net Zero – The UK's contribution to stopping global warming'²¹ recommended new emission targets: reducing GHG emissions by at least 100% of 1990 levels (net zero) by 2050.
- 4.1.4 Buckinghamshire Council have published a Climate Change and Air Quality Strategy²² which sets out a 'blueprint' on how the Council aims to tackle the issues of climate change and air quality within Buckinghamshire. Additionally, the former Aylesbury Vale District Council have outlined various programmes and initiatives to tackling climate change²³ including a Carbon Management Plan, carbon off-setting initiative and an Energy Strategy.

¹⁹ Climate Change Act 2008. Available at: <http://www.legislation.gov.uk/ukpga/2008/27/contents> [Date accessed: 07/03/2023]

²⁰ United Nations Climate Change (2015) The Paris Agreement. Available at: <https://unfccc.int/process-and-meetings/the-paris-agreement/the-paris-agreement> [Date accessed: 07/03/2023]

²¹ Committee on Climate Change (2019) Net Zero – The UK's contribution to stopping global warming. Available at: <https://www.theccc.org.uk/publication/net-zero-the-uks-contribution-to-stopping-global-warming/> [Date accessed: 07/03/2023]

²² Buckinghamshire Council (2021) Climate Change and Air Quality Strategy. Available at: <https://www.buckinghamshire.gov.uk/environment/sustainability-and-climate-change/energy-and-climate-change/the-climate-change-and-air-quality-strategy/climate-change-and-air-quality-strategy/> [Date accessed: 07/03/2023]

²³ Aylesbury Vale District Council (2015) Your council tackling climate change. Available at: <https://www.aylesburyvaledc.gov.uk/your-council-tackling-climate-change> [Date accessed: 07/03/2023]

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- 4.1.5 The CCC's latest progress report²⁴ discusses the need for further measures to be implemented by the Government to ensure that the UK meets the target of net zero by 2050. The COP26 event in November 2021 has provided an opportunity for the UK Government to continue to strengthen its focus on climate change resilience and adaptation and to ensure Covid-19 recovery plans help to accelerate the UK's transition to net zero.
- 4.1.6 Commitments to reduce GHG emissions have been introduced from the international level to the sub-regional level. The PPPs address policy development across all sectors and at all levels, combining both demand management (reduced energy consumption and increased efficiency of use) and supply-side measures (low carbon options including fuel mix and renewables).
- 4.1.7 Climate change and energy efficiency PPPs to encourage sustainable development are set out by central government. The national Building Regulations, as updated March 2015²⁵, require certain levels of sustainable construction to be met and provide guidance on additional, optional regulations for water and access. The UK Government has outlined, through the Localism Act, the importance of sustainable development and its commitments to reducing carbon emissions and GHGs.
- 4.1.8 The Environment Agency (EA) provides guidance on flood risk for planners, developers and advisors in order to inform flood risk assessments and the plan-making process and stresses the importance of making allowances for climate change²⁶.
- 4.1.9 Adaptation measures proposed by the PPPs include a presumption against development in flood risk areas, appropriate design of new development, the promotion of new infrastructure such as Sustainable Drainage Systems (SuDS) and improved maintenance to help address the changes that are likely to occur as a result of climate change. Through this approach, the Government is seeking to ensure that flood risk is taken into account at all stages of the planning process to avoid inappropriate development in areas at risk of flooding, and to direct development away from areas of highest risk.

²⁴ Reducing UK emissions: 2021 Progress Report to Parliament. Available at: <https://www.theccc.org.uk/publication/2021-progress-report-to-parliament/> [Date accessed: 07/03/2023]

²⁵ The Building Regulations (Amendment) Regulations 2015. Available at: <https://www.legislation.gov.uk/uksi/2015/767/contents/made> [Date accessed: 07/03/2023]

²⁶ Environment Agency (2022) Flood risk assessments: climate change allowances. Available at: <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances> [Date accessed: 07/03/2023]

4.2 Baseline Data

Carbon emissions

- 4.2.1 The addition of new dwellings (at least 1,000) as proposed in the SPD and the resultant increase in number of vehicles could potentially lead to an increase in air pollution, energy consumption and traffic during both the construction and occupancy stages, to some extent. This could also contribute towards potential cumulative and trans-boundary effects when considered in-combination with other developments within and in the neighbouring areas.
- 4.2.2 The SPD would be expected to promote active travel through the provision of new routes and multi-functional GI. Promoting active travel, such as walking or cycling, as well as improving the provision of public transport links into RAF Halton, would help to encourage new residents to use more sustainable travel modes compared to personal vehicles, and in turn, result in an improvement to the air quality.

Renewable energy

- 4.2.3 Policy D1 of the VALP advocates Garden Town Principles and is applicable for site D-HAL003 to ensure resilience “for changing demographics, future growth and the impacts of climate change by anticipating opportunities for technological change including renewable energy measures”.
- 4.2.4 The SPD is also expected to adhere to Policy C3 of the VALP, as well as national policies, where the development is expected to “*make use of renewable energy*”. The VALP Garden Town Principles (Policy D1) also advocates renewable energy measures in anticipation of climate change impacts and future growth.

Flooding

- 4.2.5 Climate change is anticipated to increase the risk of extreme weather events. Of particular concern in the UK is the rising risk of fluvial, pluvial (surface water) and coastal flooding. In 2009 the EA estimated 2.4 million properties in England were susceptible to fluvial and/or coastal flooding, whilst 3.8 million properties in England were susceptible to pluvial flooding²⁷.
- 4.2.6 Although the site D-HAL003 is located wholly within Flood Zone 1 and therefore away from areas of fluvial flood risk, small areas of the site are susceptible to surface water flooding (1 in 30; high risk in some patches). It is likely that flood risk will become more prevalent in future years due to higher flood plain levels and climate change introducing more extreme weather events including higher volumes of rainfall.

²⁷ Environment Agency (2009) Flooding in England: National Assessment of Flood Risk. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/292928/geho0609bgds-e-e.pdf [Date accessed: 07/03/2023]

- 4.2.7 Multi-functional GI (also proposed to be within SPD) should be used within this development as a buffer for current and future flood risk. It is expected that the requirements of VALP and national policies, alongside the delivery of 50% GI on site, would help to ensure that significant adverse impacts regarding flood risk do not arise through a reduction in surface water runoff.

Green Infrastructure

- 4.2.8 GI is a network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities²⁸. GI has many benefits including human health, climate change adaptation and wildlife value²⁹. GI can play an important role in helping urban areas adapt to climate change, by filtering airborne pollutants, providing shade and local cooling and reducing surface water runoff³⁰.
- 4.2.9 The RAF Halton SPD requires development of Site D-HAL003 to implement 50% GI throughout its design, this may include parks and gardens, natural and semi-natural green spaces and green corridors and buffers. In order to meet the 50% GI requirements, the GI needs to be publicly accessible natural green space to subsequently meet the Accessible Natural Green Space Standards in Towns and Cities (ANGSt), as outlined within VALP paragraphs 3.38 and 11.1.
- 4.2.10 VALP Policy D1 states that "new garden communities should be designed to be resilient places that allow for changing demographics, future growth and the impacts of climate change by anticipating opportunities for technological change including renewable energy measures". In line with Policy C3, development would be expected to utilise sustainable design and construction measures and seek to use decentralised and renewable or low carbon sources for energy where feasible. The emerging SPD should set out guidance with regards to sustainable energy, water consumption and how the proposed development will be adaptable to climate change.

4.3 Key Sustainability Issues

- 4.3.1 Based on the PPP review and baseline data presented in this chapter, key sustainability issues for the Climate Change theme are listed in **Box 4.1**.

Box 4.1: Key Climate Change Issues for the RAF Halton SPD

- Introducing at least 1,000 new dwellings would be likely to increase energy consumption, pollution and traffic within the local area, with potential adverse effects on climatic factors.

²⁸ MHCLG (2021) National Planning Policy Framework. Available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2> [Date accessed: 07/03/2023]

²⁹ Forest Research (2010) Benefits of green infrastructure. Available at: <https://www.forestresearch.gov.uk/research/benefits-of-green-infrastructure/> [Date accessed: 07/03/2023]

³⁰ Landscape Institute (no date) Green Infrastructure (GI). Available at: <https://www.landscapeinstitute.org/policy/green-infrastructure/> [Date accessed: 07/03/2023]

4.4 Future evolution without the Plan

- 4.4.1 The RAF Halton SPD is an essential component of Strategic Policy D-HAL003 within the VALP, where without the SPD in place, co-ordination of the various parcels of development would be unlikely to occur in a timely and well-planned method. Therefore, without the SPD, the housing requirement would still stand and a potentially less-comprehensive approach in place of the SPD could lead to possible adverse impacts on climate change. Based on local and national trend data, the likely evolution of the Climate Change theme in the affected area is presented in **Box 4.2**.

Box 4.2: Future evolution of the baseline without the RAF Halton SPD

- In the absence of the SPD, future planning applications for the land which encompasses Site D-HAL003 would be required to adhere to local and national policies regarding production of GHG emissions and particulate matter.
- The extent to which pollution could result in absence of the SPD is uncertain, and would depend on any future planning applications which would be required to fulfill the housing need.

5 Historic Environment

5.1 Summary of policy and plan review

- 5.1.1 Historic environment priorities from the international to the local level seek to address a range of issues. These include protecting designated resources and their settings (such as Listed Buildings, Conservation Areas, Scheduled Monuments, and Registered Parks and Gardens); recognising the cultural aspects of landscape and establishing mechanisms for their protection against inappropriate development; recognising the potential value of unknown and undesignated resources; and conserving/enhancing sites and landscapes of archaeological and heritage interest so that they may be enjoyed by both present and future generations.
- 5.1.2 Regional guidance provides information on the way in which streets and public open spaces are managed in order to reinforce local character, creating a set of general principles for the continuing maintenance and enhancement of space. The local PPPs are in line with the regional, national and international PPPs, providing more specific guidance and information.
- 5.1.3 Relevant legislation, plans, policies and programmes include the Government's Statement on the Historic Environment for England 2010³¹, Historic England Corporate Plan 2021-22³² and Historic England Good Practice Advice in Planning Notes 1-3³³.

5.2 Baseline data

- 5.2.1 The site D-HAL003 and the surrounding area contains an array of distinctive heritage assets and historic areas recognised through designations including various Listed Buildings, SMs and a RPG.

³¹ UK Government (2010) Statement on the historic Environment for England 2010 - Parts 1,2 and 3. Available at: <https://www.gov.uk/government/publications/the-governments-statement-on-the-historic-environment-for-england> [Date accessed: 07/03/23]

³² Historic England (2021) Historic England Corporate Plan (2022-2023). Available at: <https://historicengland.org.uk/about/what-we-do/corporate-plan/> [Date accessed: 07/03/23]

³³ Historic England (2015) Good Practice Advice in Planning Notes 1-3. Available at: <https://historicengland.org.uk/images-books/publications/> [Date accessed: 08/03/23]

Listed Buildings

- 5.2.2 Listed Buildings are those that have been placed on the Statutory List of Buildings of Special Architectural or Historic Interest. Seven Grade II Listed Buildings, known as the Groves and Henderson Barracks, a group of RAF Barracks designed in 1919 are located within the site D-HAL003 (see **Figure 5.1**). The first phase of development at site D-HAL003 is proposed to be on the existing brownfield site and utilise the listed buildings/barrack blocks. In the technical note for RAF Halton (Historic Environment) prepared by WSP to support the preparation of masterplan, Historic England agrees to the conversion of the barracks for residential development³⁴:

"...These are listed grade II and so Historic England would not normally be consulted on any application for listed building consent unless substantial demolition was involved, but I think it is worth taking a holistic view of the whole site and setting out our views on the future of this area.

Residential conversion is likely to be the only practical future use for these buildings, given that they are so extensive and the form that these buildings take lends themselves to flats rather than houses....."

- 5.2.3 Halton House, a Grade II* listed building is located within Halton House Registered Park and Garden (RPG) and is 0.3 km away from the site boundary.
- 5.2.4 By applying Policy BE1 and BE2 of the VALP, the proposed development at Site D-HAL003 should ensure enhancement and conservation of heritage assets and retention of the locally distinctive character, in line with its historic significance.

Scheduled Monuments

- 5.2.5 A Scheduled Monument (SM) is a nationally important archaeological site or historic feature that is given protection under the Ancient Monuments and Archaeological Areas Act 1979.
- 5.2.6 To the east of the SPD area, the site D-HAL003 coincides with an SM called 'long barrow 200m east of parade ground' (see **Figure 5.1**). It is assumed that the development laid out in the emerging SPD will also aspire to be 'heritage-led' and take into account the setting of the SM and other heritage assets.

Registered Parks and Gardens

- 5.2.7 The Historic England's RPG of Special Historic Interest was established in 1983 to identify sites which are of particular historic significance. Although inclusion on the Register brings no additional statutory controls, Registered Parks and Gardens are a 'material consideration' in planning process³⁵.

³⁴ WSP (2022) Technical note: RAF Halton – Historic Environment

³⁵ Registered Parks & Gardens (2023). Available at: <https://historicengland.org.uk/listing/what-is-designation/registered-parks-and-gardens/> [Date accessed: 03/04/23]

5.2.8 The site intersects with Halton House RPG (see **Figure 5.1**). The RPG is also listed in Historic England's Heritage at Risk Register, which notes that "*The open parkland has been fragmented and lost to development of the camp with the historic fabric of the ornamental features of the garden in poor condition*"³⁶. The surviving woodland structures in the RPG are now managed by the Forestry Commission.

5.2.9 Given the heritage constraints in the site D-HAL003, the proposed SPD will require a holistic approach for development. It is expected that the proposed development will incorporate design principles and visual screening measures to avoid potential negative impacts on cultural heritage both within and outside the site boundary, especially Halton House RPG.

Conservation Area

5.2.10 Conservation Areas are areas of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance. Local authorities have the power to designate conservation areas in any area of 'special architectural or historic interest' whose character or appearance is worth protecting or enhancing. This is judged against local and regional criteria, rather than national importance as is the case with listing. Conservation Area designations increase the local planning authority's control over demolition of buildings and over certain alterations to residential properties that would normally be classed as 'permitted development' and not require planning permission.

5.2.11 Although the site D-HAL003 does not coincide with any designated conservation areas, Halton (0.1km), Wendover (1.2km) and Weston Turnville (1.3km) lie in proximity (see **Figure 5.1**). The proposed development in the SPD could potentially impact the setting of these conservation areas.

Non-Designated Features

5.2.12 The Archaeology Data Service shows records of physical archaeological evidence within and in the surrounding of the site boundary³⁷. This includes records of known features as well as digs and excavations, some of which resulted in archaeological finds.

5.2.13 Besides several designated features, the site also features several locally listed buildings such as railway buildings, workshops, former guard rooms, military camps and barracks etc. Although Policy BE1 within the VALP could help protect these features, it is uncertain if any adverse impacts will be completely mitigated by the policy.

5.3 Key Sustainability Issues

5.3.1 Based on the PPP review and baseline data presented in this chapter, key sustainability issues for the Cultural Heritage theme are listed in **Box 5.1**.

³⁶ Historic England (no date) Halton House, Halton / Aston Clinton - Buckinghamshire (UA) (2023). Available at: <https://historicengland.org.uk/advice/heritage-at-risk/search-register/list-entry/26108> [Date accessed: 16/03/23]

³⁷ Archaeology Data Service (2018) ARCHSEARCH. Available at: <http://archaeologydataservice.ac.uk/> [Date accessed: 16/03/23]

Box 5.1: Key Historic Environment Issues for the RAF Halton SPD

- Development within Site D-HAL003 could potentially alter the setting of historic assets, both designated and non-designated.
- In particular, potential effects on Halton House RPG (and opportunities to promote its conservation and enhancement) need to be taken into consideration in light of its status on the Heritage at Risk Register.
- Archaeological remains, including that which has not yet been discovered, are present in the area and could potentially be affected by development proposals of the RAF Halton SPD.

5.4 Future evolution without the Plan

- 5.4.1 The RAF Halton SPD is an essential component of Policy D-HAL003 within the VALP, where without the SPD in place, co-ordination of the various parcels of development would be unlikely to occur in a timely and well-planned method. Therefore, without the SPD, the housing requirement would still stand and a potentially less-comprehensive approach in place of the SPD could lead to possible adverse impacts on the historic environment. However, based on local and national trend data, the likely evolution of the Cultural Heritage theme in the affected area is presented in Box 5.2.

Box 5.2: Future evolution of the baseline without the RAF Halton SPD

- In the absence of the SPD, the character and setting of designated and non-designated heritage assets is unlikely to change significantly, primarily due to policies set out in the VALP.
- The extent to which the accessibility, local awareness or setting of heritage assets may be enhanced over time without the SPD is uncertain.
- In the absence of the SPD, it is unlikely that archaeological assets (both discovered and undiscovered) will be harmed or threatened.

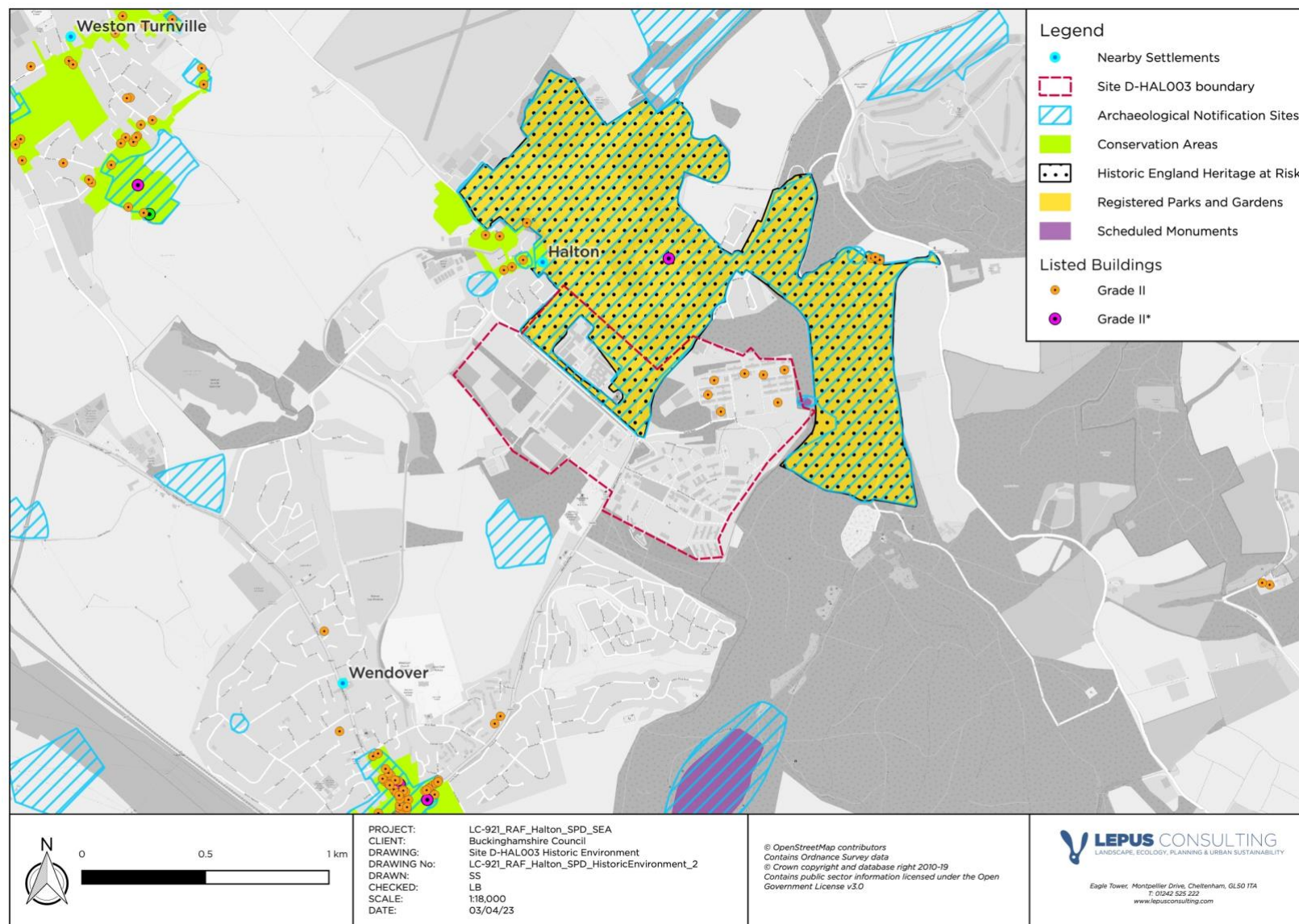


Figure 5.1: Cultural heritage features within and around site D-HAL003

6 Landscape

6.1 Summary of policy and plan review

- 6.1.1 At European, national, regional and local levels, emphasis is placed on the protection of landscape as an essential component of people's surroundings and sense of place. The 2006 European Landscape Convention³⁸ acknowledges the quality and diversity of European landscapes, that they constitute a common resource and that it is important to co-operate towards its protection, management and planning. Paragraph 8 of the NPPF³⁹ states:
- 6.1.2 "Achieving sustainable development means ... to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy".
- 6.1.3 The relevant plans, policies and programmes seek to increase recognition of the linkages and interplay between the different aspects and roles of landscape, including: local distinctiveness; the historic environment; natural resources; farming, forestry and food; educational, leisure and recreation opportunities; transport and infrastructure; settlements and nature conservation.
- 6.1.4 These nationally set policies generally advocate the provision of open space, green networks and woodland as opportunities for sport and recreation, creating healthier communities, supporting and enhancing biodiversity, reducing temperatures in built up areas in summer, reducing the impact of noise and air pollution, and limiting the risk of flooding.
- 6.1.5 The site borders Chilterns Area of Outstanding Natural Beauty (AONB), a nationally designated landscape on the east of the site.
- 6.1.6 VALP Policy NE4, landscape character and locally important landscape, aims to ensure that the local landscape is maintained. Any development must recognise the individual character and distinctiveness of particular landscape character areas set out in the Landscape Character Assessment and must follow the relevant policies set out in the VALP.

³⁸ Council of Europe (2000) European Landscape Convention. Available at: <https://rm.coe.int/1680080621> [Date accessed: 07/03/23]

³⁹ MHCLG (2021) NPPF. Available at: <https://www.gov.uk/government/publications/national-planning-policy-framework-2> [Date accessed: 07/03/23]

6.2 Baseline data

National Character Areas

6.2.1 Based on a combination of landscape, biodiversity, geodiversity and economic activity, England has been sub-divided into 159 National Character Areas (NCAs) that follow natural boundaries⁴⁰.

6.2.2 Site D-HAL003 lies within the NCA 'Chilterns'. Key characteristics of this NCA include:

- chalk plateau incised by parallel branching valleys;
- several chalk streams;
- low-lying vales;
- branching valleys, sunken routeways and extensive woodland and hedgerow-enclosed fields;
- mixture of arable, grassland and woodland and the numerous commons reflects the dominance of Grade 3 agricultural land; and
- native beechwoods, rare box woods, 'hanging' woods and rare yew woods.

Landscape Character Assessment

6.2.3 Landscape character is defined as the distinct, recognisable and consistent pattern of elements in the landscape. It is these patterns that give each locality its 'sense of place', making one landscape different from another, rather than better or worse. In defining the combinations of components which make each landscape unique, landscape character is a way of thinking about landscape more holistically and objectively, rather than focusing on scenic beauty and subjective responses. Landscapes have evolved over time as a result of both natural and cultural processes.

6.2.4 According to Landscape Character Assessment for LCA Vale⁴¹, site D-HAL003 is located within Landscape Character Area 'Wendover Foothills (East)' which has key characteristics of:

- Gently sloping landform rising steeply to the south
- Transition from open arable fields in the north to more wooded landscape in the south
- Loss of field pattern and structure in the south
- Extensive areas of development adjacent to Halton within woodland setting
- Settlement of Wendover lies within a gap in the Chilterns and interrupts continuity of the area
- Village of Drayton Beauchamp

6.2.5 On the east, the site coincides with 'Chiltern Scarp (Wendover East)' which has key characteristics of:

- Steeply sloping chalk scarp (downland)
- Boddington and Ivinghoe Beacon hillforts

⁴⁰ Natural England (2014) National Character Areas. Available at: <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making> [Date accessed: 08/03/23]

⁴¹ Aylesbury Vale District Council (2008) Landscape Character Assessment. Available at: <https://www.buckinghamshire.gov.uk/planning-and-building-control/planning-policy/landscape-character-assessments/> [Date accessed: 09/03/23]

- Extensive woodland cover
- Species rich chalk grassland
- Long distance views over the Aylesbury Vale landscape
- Occasional smaller parcels of grazing land within woodland setting

Local Landscape Character

- 6.2.6 The site coincides with other designated landscapes such as Local Landscape Areas (LLA) and Area of Attractive Landscape (AAL), which may be sensitive to development (see **Figure 6.1**). The VALP states that “*neither of these designations are seeking to resist development in principle, unless regard has not been given to distinctive features and key characteristics of the AALs and LLAs*”⁴².
- 6.2.7 The site, which lies in the Halton LLA, serves as a setting for the Chilterns AONB and is situated on the lower slopes of the Chilterns escarpment. The distinct landscape is wide and undulating, with parts of chalk geology, and it has characteristics which are unique to the Chilterns landscape. The western boundary includes significant woodland areas.
- 6.2.8 Built development predominates in some locations and the natural landscape has been disrupted by recontouring. Despite the development, the site has retained its natural landscape character; resembling the Chilterns landscape⁴³. The proposed development for the site (D-HAL003) has the potential to adversely impact areas that have remained open and undeveloped.

The Chilterns AONB

- 6.2.9 The Chilterns Area of Outstanding Natural Beauty (AONB) is located adjacent to the site, to the east (see **Figure 6.1**). The Chilterns AONB Management Plan 2019-2024⁴⁴, prepared by the Chilterns Conservation Board, aims to conserve and enhance the AONB through four general policies:
- Explore the case for and against the Chilterns having enhanced status or being designated a National Park;
 - Review the boundary of the protected area to cover the wider area of the Chilterns landscape that merits it;
 - Establish a strong partnership to deliver the Chilterns AONB Management Plan working together in the best interests of the area, its environment, communities, economy and visitors; and
 - Support projects and proposals that have a positive impact on the ability of the Chilterns to contribute sustainable Ecosystem Services through various approaches, including ‘sustainably managing land and water environments’.

⁴² Aylesbury Vale District Council (2021) Vale of Aylesbury Local Plan 2013-2033. Adopted Plan (September 2021). Available at: https://buckinghamshire-gov-uk.s3.amazonaws.com/documents/Aylesbury_local_plan_L46JWaT.pdf [Date accessed: 06/03/23]

⁴³ LUC (2016) Defining the special qualities of local landscape designations in Aylesbury Vale District. Available at: https://www.aylesburyvaledc.gov.uk/sites/default/files/page_downloads/Aylesbury%20ValV%20Local%20Landscape%20Designations_Final%20Draft%20%20Report.pdf [Date accessed: 09/03/23]

⁴⁴ Chilterns AONB (2019) Chilterns Area of Outstanding Natural Beauty Management Plan 2019-2024. Available at: https://www.chilternsaonb.org/uploads/files/ConservationBoard/ManagementPlan/Chilterns_Management_Plan_2019-2024_Full.pdf [Date accessed: 08/03/23]

- 6.2.10 The proposed development in the SPD for Site D-HAL003 could have adverse impact on the setting of the AONB owing to its proximity. It is essential that the development adheres to policies set out in the VALP, such as VALP Policy NE3 which specifically regards the conservation and enhancement of the Chilterns AONB and its setting. Additionally, VALP Policy NE4, landscape character and locally important landscape, aims to ensure that the local landscape is maintained. Any development must recognise the individual character and distinctiveness of particular landscape character areas set out in the Landscape Character Assessment and must follow the relevant policies set out in the VALP.

Visual impacts

- 6.2.11 As stated in the Sustainability Appraisal (SA) of the VALP⁴⁵, completed in 2018, the main concern regarding landscape was the potential effects that the expansion of Aylesbury to the south and southeast may cause for the Chilterns AONB. The SA examined the 'cumulative effects' of growth around Aylesbury and paragraph 10.9.2 (page 95) of the SA report concludes:
- 6.2.12 "There would be direct visual effects on the AONB as a result of the cumulative development sites. The visual extent of the cumulative development sites, combined with the existing development at Aylesbury and nearby settlements, would be readily apparent. However, development across the sites will be predominantly low-rise and incorporate substantial mitigation planting, reducing the impact on views across the low-lying vale landscape from the elevated viewpoints within the AONB. The key characteristics of views across the wider landscape would be fundamentally unchanged, in that they would remain expansive across the settled vale landscape. It is considered unlikely that there would be significant cumulative residual landscape and visual effects on the AONB".
- 6.2.13 Whilst maintaining the character of the area, the long-distance views across the site to the Chilterns AONB should be maintained as much as practicable by building low lying dwellings. Green corridors, cycle and footpaths should be used to reduce traffic flow, noise, sound and air pollution that may affect the surrounding landscape quality and character. A carefully planned and well-managed GI network, as advocated by the VALP, would be expected to minimise intrusion on the nationally important landscape of the Chilterns AONB.

Green Belt

- 6.2.14 Whilst Green Belt itself is not necessarily of high landscape value, it often serves to protect the character and setting of historic towns and support landscape-scale biodiversity networks. New development could potentially increase noise and light pollution and reduce the perception of tranquillity in some areas.
- 6.2.15 Whilst the Green Belt is not a statutory landscape designation, it is a significant element of landscape protection in the area. The Green Belt is intended to:
- check the unrestricted sprawl of larger built-up areas;
 - prevent neighbouring towns from merging into one another;

⁴⁵ AECOM (2018) Sustainability Appraisal (SA) of the Vale of Aylesbury Local Plan. Available at: https://www.aylesburyvaldc.gov.uk/sites/default/files/page_downloads/VALP%20-%20SA%20Report%20170918.pdf
[Date Accessed 08/03/23]

- assist in safeguarding the countryside from encroachment;
- preserve the setting and special character of historic towns; and
- assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

6.2.16 The site D-HAL003 sits within London Metropolitan Green Belt (see **Figure 6.1**). Policy S4 of the VALP is set out against inappropriate development within the Green Belt in accordance with national policy.

6.2.17 Site D-HAL003 is largely previously developed, but contains some undeveloped / open areas particularly to the west and northeast. Although the SPD aims to address the scale and massing of buildings on the site through the development proposal, there is potential for the openness of the Green Belt to be impacted. It is expected that the SPD will advocate refurbishment/ redevelopment of existing buildings and incorporate designs that would seek to retain the openness of the site where possible.

6.3 Key Sustainability Issues

6.3.1 Based on the PPP review and baseline data presented in this Chapter, key sustainability issues for the Landscape theme are listed in **Box 6.1**.

Box 6.1: Key Landscape Issues for the RAF Halton SPD

- The SPD seeks to develop Site D-HAL003 which is located adjacent to the Chilterns AONB. Development outside the AONB should seek to conserve and enhance its setting, in line with the objectives of the AONB Management Plan and national legislation.
- The impact of development on the purposes of the Green Belt should be considered.
- The findings of Aylesbury's Landscape Character Assessment should be considered.

6.4 Future Evolution without the Plan

6.4.1 The RAF Halton SPD is an essential component of Policy D-HAL003 within the VALP, where without the SPD in place, co-ordination of the various parcels of development would be unlikely to occur in a timely and well-planned method. Therefore, without the SPD, the housing requirement would still stand and a potentially less comprehensive approach in place of the SPD could lead to possible adverse impacts on the landscape. However, based on local and national trend data, the likely evolution of the Landscape theme in the Neighbourhood Plan area is presented in **Box 6.2**.

Box 6.2: Future evolution of the baseline without the RAF Halton SPD

- The Chilterns AONB will continue to be proactively and effectively managed by the Chilterns Conservation Board and, in the absence of the SPD, would be likely to be conserved and enhanced through the Chilterns AONB Management Plan 2019 - 2024. However, there may be less opportunity to provide a coordinated and landscape-led approach to the development, without the SPD.
- In the absence of the SPD, important local landscape features would be likely to be preserved in line with policies set out in the VALP.

Box 6.2: Future evolution of the baseline without the RAF Halton SPD

- In the absence of the SPD, housing needs would likely be met through planning applications and it is uncertain whether distinctive and long-distance countryside views within and of the site, and of any alternative site, would be altered. Policies set out in the VALP would be likely to protect some views, however without proactive management to conserve landscape features and open space advocated through the SPD, the quality of these views could potentially deteriorate over time.

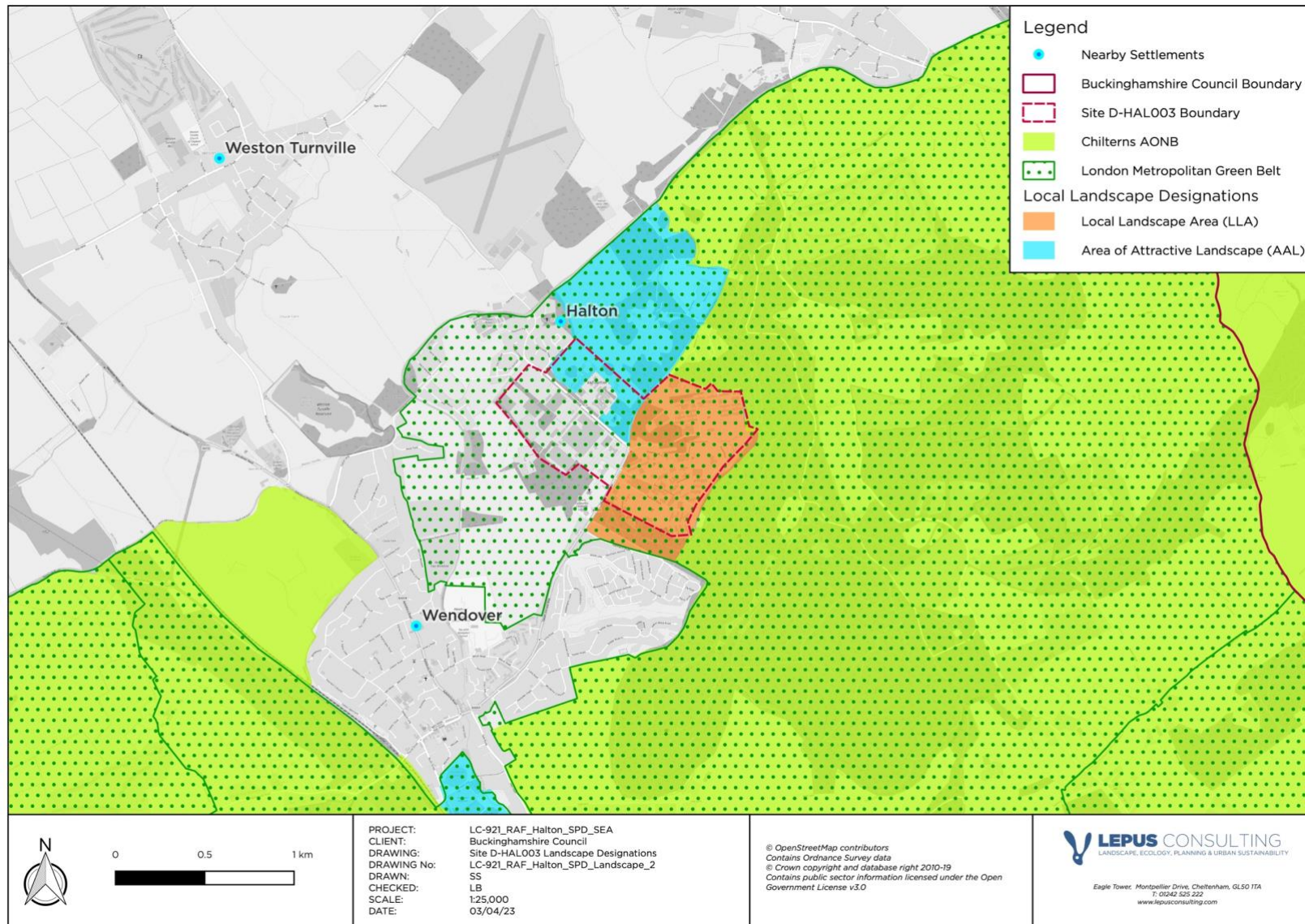


Figure 6.1: Landscape designations within and around site D-HAL003

7 SEA Framework

7.1 Purpose of the SEA Framework

- 7.1.1 The RAF Halton SPD will be assessed through an SEA Framework of objectives, decision making criteria, indicators and targets. The full SEA Framework for the SPD is presented in **Appendix A**.
- 7.1.2 SEA Objectives are typically of a high level but at a detail appropriate to the plan being assessed. The extent to which proposals in the RAF Halton SPD will help to achieve each SEA Objective (or have a 'positive impact' on each SEA Objective) will be determined by using decision making criteria and a set of indicators. The decision-making criteria and indicators can be revised and updated over time should the baseline data or the key sustainability issues in the affected area change. The set of indicators in the SEA Framework can also be used to monitor the success and sustainability performance of the RAF Halton SPD should it be adopted.

7.2 SEA Objectives

- 7.2.1 The purpose of the SEA objectives is to provide a way of ensuring the proposed SPD policies consider the needs of the wider community in terms of their environmental and socio-economic effects. The SEA topics identified in Annex 1(f) of the SEA Directive (Schedule 2 of the SEA Regulations) are one of the key determinants when considering which objectives should be used for the environmental criteria. Consequently, the SEA Objectives seek to reflect all subject areas to ensure the assessment process is transparent, robust and thorough.
- 7.2.2 The SEA/SA Framework used by the local planning authority, which in this case is Buckinghamshire Council, generally acts as a starting point for identifying suitable Objectives. However, the Objectives should be narrowed down to issues pertinent to the local area.
- 7.2.3 The SEA Objectives have drawn on the baseline information, the key issues and other plans and programmes of particular interest discussed earlier in this Scoping Report (see **Chapters 3 - 6**). It should be noted that the ordering of the SA objectives does not infer any prioritisation.
- 7.2.4 A summary of the proposed SEA Objectives for the RAF Halton SPD is presented in **Table 7.1**, with the full SEA Framework set out in **Appendix A**.

Table 7.1: *Proposed SEA Objectives*

No.	SEA Objective
1	Biodiversity, Flora and Fauna: Protect, enhance and manage the flora, fauna, biodiversity and geodiversity assets of the areas affected by the development of Site D-HAL003.
2	Climate Change: Mitigate and reduce the development of Site D-HAL003's contribution towards climate change.
3	Cultural Heritage: Conserve, enhance and manage sites, features and areas of historic and cultural importance, including their setting.
4	Landscape: Conserve, enhance and manage the character and appearance of the landscape and townscape, maintaining and strengthening its distinctiveness.

8 Subsequent stages to be carried out

8.1 Refining options and assessing likely effects

- 8.1.1 The assessment of options (or alternatives) is an important requirement of the SEA Regulations, which requires that the Environmental Report includes the following information about reasonable alternatives:
- 8.1.2 "An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information".
- 8.1.3 Each proposal of the SPD, and their reasonable alternatives, will be assessed for their likely impacts against the SEA Framework. These impacts will be considered in light of the likely evolution of the baseline in the absence of the SPD (i.e. a do-nothing scenario). The assessments of reasonable alternatives will help the SPD group to identify and refine options so that they are more economically, environmentally and socially sustainable. Specifically, the SEA of the RAF Halton SPD will help to ensure that significant effects on the local landscape, the local biodiversity, geodiversity and heritage assets, as well as climate change are identified and mitigated.
- 8.1.4 Reasonable alternatives will be assessed through the SEA process and the assessment of alternatives will take place following consultation on the Scoping Report. This will enable options for the SPD to be explored. Whilst this report would not be a requisite of the SEA Directive, a report of this nature can help demonstrate iteration between the plan making process and the SEA and provide a coherent story of the SPD's evolution and choice of options.
- 8.1.5 The assessments of alternatives will include information in relation to:
- A description of the predicted effect;
 - The duration of the effect: whether the effect is long, medium or short term;
 - The frequency of the effect: will it be ongoing?
 - Whether the effect is temporary or permanent;
 - The geographic (international, national, regional, local) significance;
 - The magnitude of effect;
 - The severity of significance; and
 - Whether mitigation is required/possible to reduce the effect.
- 8.1.6 Schedule 2 of the SEA Regulations⁴⁶ states:
- 8.1.7 "These effects should include secondary, cumulative, synergistic, short, medium and long-term, permanent and temporary, positive and negative effects".

⁴⁶ The Environmental Assessment of Plans and Programmes Regulations 2004. Available at: <http://www.legislation.gov.uk/ukxi/2004d/1633/contents/made> [Date accessed: 13/03/23]

8.1.8 The terms 'synergistic', 'secondary' and 'cumulative' are not considered to be mutually exclusive and in this report the term 'cumulative effects' is taken to include secondary and synergistic effects. Each is defined as follows:

- Secondary effects are effects that are not a direct result of the Plan, but occur away from the original effect or as a result of a complex pathway;
- Cumulative effects arise, for instance, where several developments each have insignificant effects, but in-combination have a significant effect, or where several individual effects of the Plan have a combined effect; and
- Synergistic effects interact to produce a total effect greater than the sum of the individual effects, so that the nature of the final impact is different to the nature of the individual impacts.

8.1.9 Wherever possible, throughout the appraisal process, GIS will be used as an analytical tool to examine the spatial distribution of identified effects.

8.2 Environmental Report

8.2.1 The environmental report is a core output of the Strategic Environmental Assessment process. An environmental report for the purpose of the SEA Directive must identify, describe and evaluate the likely significant effects on the environment of implementing the SPD⁴⁷. The Environmental Report will accompany the Consultation version of the SPD and will be consulted on with at least the statutory bodies; Natural England, the Environment Agency and Historic England.

⁴⁷ MHCLG (2021) Plan-making. Available at: <https://www.gov.uk/guidance/plan-making> [Date accessed: 09/03/23]

9 Consultation on the Scoping report

9.1 Purpose of Consultation

- 9.1.1 The SEA Regulations state that the scoping stage should be the subject of consultation with statutory bodies for a minimum period of five weeks.
- 9.1.2 Public involvement through consultation is a key element of the SEA process. The SEA Regulations require consultation with statutory consultation bodies but not full consultation with the public at the scoping stage. Regulation 12 (5) of the Environmental Assessment of Plans and Programmes Regulations 2004 (SI 1633) states that:
- 9.1.3 “When deciding on the scope and level of detail of the information that must be included in the report the responsible authority shall consult the consultation bodies”.
- 9.1.4 This report has been subject to consultation with the statutory bodies Historic England, the Environment Agency and Natural England between 4th April and 9th May 2023. Their responses are presented within **Appendix C**. The comments and recommendations made by the consultees will be taken into consideration in the subsequent SEA stages.

Appendix A – Full SEA Framework

No.	SEA Objective	Decision making criteria	Suggested indicators (not exhaustive)
1	Biodiversity, Flora and Fauna: Protect, enhance and manage the flora, fauna, biodiversity and geodiversity assets of the areas affected by the development of Site D-HAL003.	<ul style="list-style-type: none"> Will it result in a net loss or a net gain for biodiversity? Will it protect or enhance wildlife sites or biodiversity? Will it protect sites and habitats designated for nature conservation including protected species? Will it protect and enhance the water environment? 	<ul style="list-style-type: none"> Number of new residents which generate adverse impacts on sites of biodiversity importance, such as the Chiltern Beechwoods SAC. Area and condition of sites designated for biodiversity interest. Provision and connectivity of multi-functional green infrastructure. Quality and extent of priority habitats (habitats of principal importance). Amount of biodiversity net gain provided in new developments measured using the DEFRA biodiversity metric.
2	Climate Change: Mitigate and reduce Site D-HAL003's contribution towards climate change.	<ul style="list-style-type: none"> Will it reduce emissions from transport and the built environment? Will it help to reduce reliance on private car use? Will it encourage renewable energy generation or use of energy from renewable or low-carbon sources? Will it reduce flood risk? Will it conserve water resources? 	<ul style="list-style-type: none"> Provision and connectivity of green infrastructure. Proximity to, and frequency of, public transport links and cycling and walking provision for new development. Implementation of adaptive techniques, such as passive heating/cooling, SuDS and drainage designed for 'exceedence' events. Carbon emissions from domestic and transport sources.
3	Cultural heritage: Protect, enhance and manage heritage assets, including designated and non-designated, as well as features and areas of and heritage importance.	<ul style="list-style-type: none"> Will it preserve buildings of historic interest and, where necessary, encourage their conservation? Will it improve the energy efficiency of historic buildings? Will it preserve or enhance archaeological sites and features? Will it preserve or enhance the setting or character of cultural heritage assets or areas? 	<ul style="list-style-type: none"> Protection of local heritage features including Listed Buildings, such as various Grade II Listed Buildings associated with the 'Groves and Henderson Barracks'. Number and condition of historic assets on the Heritage at Risk register (including Halton House). Statutory and non-statutory sites in the Historic Environment Record (HER) including potential for below ground remains.

No.	SEA Objective	Decision making criteria	Suggested indicators (not exhaustive)
4	Landscape: Conserve, enhance and manage the character and appearance of the landscape, and maintaining and strengthening their distinctiveness.	<ul style="list-style-type: none"> Will it protect and enhance the character of the landscape and local distinctiveness? Will it re-use previously developed land or existing buildings? Will it protect and enhance visual amenity, including light and noise pollution? Will it incorporate landscape-led development with consideration of long-distance views of the Chilterns AONB? 	<ul style="list-style-type: none"> Use of locally sourced materials. Re-use of brownfield land and/or derelict buildings. Is development in-keeping with surroundings (e.g. character of Wendover)? Protection of local PProWs. Area of new greenspace created per capita

Appendix B – Plans, policies and programmes review

Plan, policy and/or programme (PPP)	Main objectives and requirements of PPP in relation to biodiversity, flora and fauna
A Green Future: Our 25 Year Plan to Improve the Environment (2018)	<p>The document sets out government action to help achieve natural world regain and retain good health. The main goals of the Plan are to achieve:</p> <ul style="list-style-type: none"> • Clean air; • Clean and plentiful water; • Thriving plants and wildlife; • A reduced risk of harm from environmental hazards such as flooding and drought; • Using resources from nature more sustainably and efficiently; and • Enhanced beauty, heritage and engagement with the natural environment.
EC Seventh Environmental Action Programme 2013-2020 (2013)	<p>The main concern of the EEB was the need to describe in an un-ambivalent manner the environmental challenges the EU is faced with, including accelerating climate change, deterioration of our eco-systems and increasing overuse of natural resources.</p>
Our life insurance, our natural capital: an EU biodiversity strategy to 2020 (2011)	<p>The EU biodiversity strategy follows on from the EU Biodiversity Action Plan (2006). It aims to halt the loss of biodiversity and ecosystem services across the EU by 2020. The strategy contains six targets and 20 actions. The six targets cover:</p> <ul style="list-style-type: none"> • Full implementation of EU nature legislation to protect biodiversity; • Better protection for ecosystems, and more use of green infrastructure; • More sustainable agriculture and forestry; • Better management of fish stocks; • Tighter controls on invasive alien species; and • A bigger EU contribution to averting global biodiversity loss.
The Pan-European Biological and Landscape Diversity Strategy (1995)	<p>The strategy aims to stop and reverse the degradation of biological and landscape diversity values in Europe.</p>
UN Convention on Biological Diversity (1992)	<p>The aims of the Convention include the conservation of biological diversity (including a commitment to significantly reduce the current rate of biodiversity loss), the sustainable use of its components and the fair and equitable sharing of the benefits arising out of the utilization of genetic resources.</p>
Bern Convention on the Conservation of European Wildlife and Natural Habitats (1979)	<p>The Convention seeks to conserve wild flora and fauna and their natural habitats, and to monitor and control endangered and vulnerable species.</p>
Directive on the Conservation of Natural Habitats and of Wild Fauna and Flora 1992 (the Habitats Directive)	<p>The main aim of the Habitats Directive is to promote the maintenance of biodiversity by requiring Member States to take measures to maintain or restore natural habitats and wild species listed on the Annexes to the Directive at a favourable conservation status, introducing robust protection for those habitats and species of European importance. In applying these measures Member States are required to take account of economic, social and cultural requirements, as well as regional and local characteristics.</p> <p>The provisions of the Directive require Member States to introduce a range of measures, including:</p> <ul style="list-style-type: none"> • Maintain or restore European protected habitats and species listed in the Annexes at a favourable conservation status as defined in Articles 1 and 2;

Plan, policy and/or programme (PPP)	Main objectives and requirements of PPP in relation to biodiversity, flora and fauna
	<ul style="list-style-type: none"> Contribute to a coherent European ecological network of protected sites by designating Special Areas of Conservation (SACs) for habitats listed on Annex I and for species listed on Annex II. These measures are also to be applied to Special Protection Areas (SPAs) classified under Article 4 of the Birds Directive. Together SACs and SPAs make up the Natura 2000 network (Article 3); Ensure conservation measures are in place to appropriately manage SACs and ensure appropriate assessment of plans and projects likely to have a significant effect on the integrity of an SAC. Projects may still be permitted if there are no alternatives, and there are imperative reasons of overriding public interest. In such cases compensatory measures are necessary to ensure the overall coherence of the Natura 2000 network (Article 6); Member States shall also endeavour to encourage the management of features of the landscape that support the Natura 2000 network (Articles 3 and 10); Undertake surveillance of habitats and species (Article 11); Ensure strict protection of species listed on Annex IV (Article 12 for animals and Article 13 for plants). <p>Report on the implementation of the Directive every six years (Article 17), including assessment of the conservation status of species and habitats listed on the Annexes to the Directive.</p>
The Conservation of Habitats and Species Regulations 2017 (Habitats regulations)	This transposes into national law the Habitats Directive and also consolidates all amendments that have been made to the previous 1994 Regulations. This means that competent authorities have a general duty in the exercise of any of their functions to have regard to the Directive.
DEFRA. Biodiversity 2020: A strategy for England's wildlife and ecosystem services (2011)	<p>The England biodiversity strategy 2020 ties in with the EU biodiversity strategy in addition to drawing links to the concept of ecosystem services. The strategy's vision for England is:</p> <p><i>"By 2050 our land and seas will be rich in wildlife, our biodiversity will be valued, conserved, restored, managed sustainably and be more resilient and able to adapt to change, providing essential services and delivering benefits for everyone".</i></p> <p>The Strategy's overall mission is <i>"to halt overall biodiversity loss, support healthy well-functioning ecosystems and establish coherent ecological networks, with more and better places for nature for the benefit of wildlife and people".</i></p>
DoE Biodiversity: The UK Action Plan (1994)	Government's strategy for protection and enhancement of biodiversity, from 1992 convention on Biodiversity commitments. Advises on opportunities and threats for biodiversity.
TCPA: Biodiversity by Design: A Guide for Sustainable Communities (2004)	The development process should consider ecological potential of all areas including both greenfield and brownfield sites. Local authorities and developers have a responsibility to mitigate impacts of development on designated sites and priority habitats and species and avoid damage to ecosystems.
National Planning Policy Framework (MHCLG 2021)	<p>The NPPF includes guidance on promoting the conservation and enhancement of the natural environment. It requires the planning system to contribute to and enhance the natural and local environment by:</p> <ul style="list-style-type: none"> protecting and enhancing valued landscapes, geological conservation interests and soils; recognising the wider benefits of ecosystem services; minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures; preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability; and remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.

Plan, policy and/or programme (PPP)	Main objectives and requirements of PPP in relation to biodiversity, flora and fauna
<p>Making Space for Nature: a review of England's wildlife sites and ecological network (2010)</p>	<p>The Making Space for Nature report, which investigated the resilience of England's ecological network to multiple pressures, concluded that England's wildlife sites do not comprise a coherent and resilient ecological network. The report advocates the need for a step change in conservation of England's wildlife sites to ensure they are able to adapt and become part of a strong and resilient network. The report summarises what needs to be done to improve England's wildlife sites to enhance the resilience and coherence of England's ecological network in four words; more, bigger, better, and joined. There are five key approaches which encompass these, which also take into account of the land around the ecological network:</p> <ul style="list-style-type: none"> • Improve the quality of current sites by better habitat management. • Increase the size of current wildlife sites. • Enhance connections between, or join up, sites, either through physical corridors, or through 'stepping stones'. • Create new sites. • Reduce the pressures on wildlife by improving the wider environment, including through buffering wildlife sites. <p>It will not be possible to achieve a step-change in nature conservation in England without society accepting it to be necessary, desirable, and achievable. This will require strong leadership from government and significant improvements in collaboration between local authorities, local communities, statutory agencies, the voluntary and private sectors, farmers, landowners and other land-managers and individual citizens.</p>
<p>DEFRA England's Trees, Woods and Forests Strategy (2007)</p>	<p>The England's Trees, Woods, and Forest Strategy (2007) aims to:</p> <ul style="list-style-type: none"> • provide, in England, a resource of trees, woods and forests in places where they can contribute most in terms of environmental, economic and social benefits now and for future generations • ensure that existing and newly planted trees, woods and forests are resilient to the impacts of climate change and also contribute to the way in which biodiversity and natural resources adjust to a changing climate • protect and enhance the environmental resources of water, soil, air, biodiversity and landscapes (both woodland and non-woodland), and the cultural and amenity values of trees and woodland • increase the contribution that trees, woods and forests make to the quality of life for those living in, working in or visiting England; and • improve the competitiveness of woodland businesses and promote the development of new or improved markets for sustainable woodland products and ecosystem services where this will deliver identify able public benefits, nationally or locally, including the reduction of carbon emissions.
<p>The Natural Choice: Securing the Value of Nature. The Natural Environment White Paper. (HM Government 2011)</p>	<p>Published in June 2011, the Natural Environment White paper sets out the Government's plans to ensure the natural environment is protected and fully integrated into society and economic growth. The White Paper sets out four key aims:</p> <p>(i) <u>Protecting and improving our natural environment</u></p> <p>There is a need to improve the quality of our natural environment across England, moving to a net gain in the value of nature. It aims to arrest the decline in habitats and species and the degradation of landscapes. It will protect priority habitats and safeguard vulnerable non-renewable resources for future generations. It will support natural systems to function more effectively in town, in the country and at sea. It will achieve this through joined-up action at local and national levels to create an ecological network which is resilient to changing pressures.</p> <p>(ii) <u>Growing a green economy</u></p> <p>The ambition is for a green and growing economy which not only uses natural capital in a responsible and fair way but also contributes to improving it. It will properly value the stocks and flows of natural capital. Growth will be green because it is intrinsically linked to the health of the country's natural resources. The economy will capture the value of nature. It will encourage businesses to use natural capital sustainably, protecting and improving it through their day-to-day operations and the management of their supply chains.</p> <p>(iii) <u>Reconnecting people and nature</u></p>

Plan, policy and/or programme (PPP)	Main objectives and requirements of PPP in relation to biodiversity, flora and fauna
	<p>The ambition is to strengthen the connections between people and nature. It wants more people to enjoy the benefits of nature by giving them freedom to connect with it. Everyone should have fair access to a good-quality natural environment. It wants to see every child in England given the opportunity to experience and learn about the natural environment. It wants to help people take more responsibility for their environment, putting local communities in control and making it easier for people to take positive action.</p> <p>(iv) <u>International and EU leadership</u></p> <p>The global ambitions are:</p> <ul style="list-style-type: none"> internationally, to achieve environmentally and socially sustainable economic growth, together with food, water, climate and energy security; and to put the EU on a path towards environmentally sustainable, low-carbon and resource-efficient growth, which is resilient to climate change, provides jobs and supports the wellbeing of citizens.
CABE Making Contracts Work for Wildlife: How to Encourage Biodiversity in Urban Parks (2006)	Advises on how to make the most of the potential for biodiversity in urban parks and it shows how the commitment of individuals and employers can make the difference between failure and inspiring success.
Vale of Aylesbury Local Plan 2013 - 2033	The adopted Local Plan, which allocates Site D-HAL003, seeks to ensure that development adheres to relevant policies within the Plan which will protect and enhance the local environment, including those focused on biodiversity.
Emerging Buckinghamshire and Milton Keynes Biodiversity Action Plan 2030	This plan aims to build upon the previous Biodiversity Action Plan, the timeline of which completed in 2020, produced by the partnership of the Buckinghamshire and Milton Keynes councils. The plan will aim to ensure that the unique local environment and biodiversity is promoted and protected, where local residents can connect to nature and promote health benefits upto the year 2030.
Vision and Principles for Improvement of Green Infrastructure in Buckinghamshire and Milton Keynes (2018)	The NEP, in conjunction with its experts and Partners across the sectors, has approved a new Vision and Principles for Green Infrastructure in Buckinghamshire & Milton Keynes, along with a set of 9 Principles which should be followed to achieve the Vision by 2030. The new Vision and Principles responds to expected unprecedented levels of housing growth and emphasises the need for well-designed and planned, connected green infrastructure managed into the long term, to contribute to the delivery of objectives and targets for Buckinghamshire's environment, health and economy, including in responding to consultations on Local Plans.
Technical Note: RAF Halton- Ecology (2022)	Prepared by WSP, the technical note summarises the ecological technical evidence gathered to date by the Defence Infrastructure Organisation (DIO) appointed Strategic Environmental Technical Advisers (SETA) to support masterplan development for at least 1,000 units on the allocated Barracks Site at RAF Halton and the promotion of the Airfield Site for an additional 1,000 dwellings.

Plan, policy and/or programme (PPP)	Main objectives and requirements of PPP for climate change
UN Framework Convention on Climate Change (1992)	Sets an overall framework for intergovernmental efforts to tackle the challenge posed by climate change.
UN Paris Climate Change Agreement (2015)	The Paris Agreement builds upon the UN Framework Convention on Climate Change. The Paris Agreement's central aim is to strengthen the global response to the threat of climate change by keeping a global temperature rise this century well below 2°C above pre-industrial levels and to pursue efforts to limit the temperature increase even further to 1.5°C.
IPCC Kyoto Protocol to the United Nations Framework Convention on Climate Change (1997)	Commits member nations to reduce their emissions of carbon dioxide and other greenhouse gases or engage in emissions trading if they maintain or increase emissions of these gases.
European Sustainable Development Strategy (2006)	This Strategy identifies key priorities for an enlarged Europe. This includes health, social inclusion and fighting global poverty. It aims to achieve better policy integration in addressing these challenges, and to ensure that Europe looks beyond its boundaries in making informed decisions about sustainability. The Sustainable Development Strategy was reviewed in 2009 and "underlined that in recent years the EU has mainstreamed sustainable development into a broad range of its policies. In particular, the EU has taken the lead in the fight against climate change and the promotion of a low-carbon economy. At the same time, unsustainable trends persist in many areas and the efforts need to be intensified". Sustainable development is a key focus of the EU and the strategy continues to be monitored and reviewed.
European Floods Directive (2007)	Requires Local Authorities to feed into the Preliminary Flood Risk Assessment, as well as the Local Flood Risk Strategy (already completed) and ensure that objectives within Local Plans compliment the objectives of the Directive.
UK Renewable Energy Strategy (2009)	The UK has committed to sourcing 15% of its energy from renewable sources by 2020 – an increase in the share of renewables from about 2.25% in 2008. The Renewable Energy Strategy sets out how the Government will achieve this target through utilising a variety of mechanisms to encourage Renewable Energy provision in the UK. This includes streamlining the planning system, increasing investment in technologies as well as improving funding for advice and awareness raising.
UK Renewable Energy Roadmap Update (2013)	This is the second Update to the 2011 Renewable Energy Roadmap. It sets out the progress that has been made and the changes that have occurred in the sector over the past year. It also describes the continuing high ambitions and actions along with the challenges going forward.
The UK Low Carbon Transition Plan (2009)	<p>The UK Low Carbon Transition Plan sets out how the UK will meet the Climate Change Act's legally binding target of a 34% cut in emissions on 1990 levels by 2020. It also seeks to deliver emissions cuts of 18% on 2008 levels. The main aims of the Transition Plan include the following:</p> <ul style="list-style-type: none"> • Producing 30% of energy from renewables by 2020; • Improving the energy efficiency of existing housing; • Increasing the number of people in 'green jobs'; and • Supporting the use and development of clean technologies.
National Planning Policy Framework (MHCLG, 2021)	The NPPF includes guidance on climate change, flooding, and coastal change. Plans should take account of climate change over the longer term, including factors such as flood risk, coastal change, water supply and changes to biodiversity and landscape. New development should be planned to avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through the planning of green infrastructure. To increase the use and supply of renewable and low carbon energy and heat, plans should:

Plan, policy and/or programme (PPP)	Main objectives and requirements of PPP for climate change
	<ul style="list-style-type: none"> • provide a positive strategy for energy from these sources, that maximises the potential for suitable development, while ensuring that adverse impacts are addressed satisfactorily (including cumulative landscape and visual impacts); • consider identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure their development; and • identify opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems and for co- locating potential heat customers and suppliers. • Local Plans should apply a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property and manage any residual risk, taking account of the impacts of climate change, by: • applying the sequential test and then, if necessary, applying the exception test; • safeguarding land from development that is required for current and future flood management; • using opportunities offered by new development to reduce the causes and impacts of flooding; and • where climate change is expected to increase flood risk so that some existing development may not be sustainable in the long-term, seeking opportunities to facilitate the relocation of development, including housing, to more sustainable locations.
Department for Transport: An Evidence Base Review of Public Attitudes to Climate Change and Transport Behaviour (2006)	This is a summary report of the findings of an evidence base review investigating the research base on public attitudes towards climate change and transport behaviour.
Carbon Trust: The Climate Change Challenge: Scientific Evidence and Implications (2005)	This report summarises the nature of the climate change issue. It explains the fundamental science and the accumulating evidence that climate change is real and needs to be addressed. It also explains the future potential impacts, including the outstanding uncertainties.
Energy Saving Trust: Renewable Energy Sources for Homes in Urban Environments (2005)	This document provides information about the integration of renewable energy sources into new and existing dwellings in urban environments. It covers the basic principles, benefits, limitations, costs and suitability of various technologies.
HM Government: The Road to Zero (2018)	This report outlines how the Government will support the transition to zero-emission road transport. This includes measures to reduce emissions from vehicles including specific targets for Heavy Goods Vehicles (HGVs), promoting low- and zero- emission cars and developing high quality electric vehicle infrastructure networks.
Environment Agency, Adapting to Climate Change: A Checklist for Development (2005)	The document contains a checklist and guidance for new developments to adapt to climate change. The main actions are summarised in a checklist.
Environment Agency: Building a Better Environment: A Guide for Developers (2013)	Guidance on addressing key environmental issues through the development process (focusing mainly on the issues dealt with by the Environment Agency), including managing flood risk, surface water management, use of water resources and preventing pollution.

Plan, policy and/or programme (PPP)	Main objectives and requirements of PPP for climate change
DECC Energy White Paper: Meeting the Energy Challenge (2007)	<p>Sets out Government's long-term energy policy, including requirements for cleaner, smarter energy; improved energy efficiency; reduced carbon emissions; and reliable, competitive and affordable supplies. The White Paper sets out the UK's international and domestic energy strategy, in the shape of four policy goals:</p> <ul style="list-style-type: none"> • aiming to cut CO₂ emissions by some 60% by about 2050, with real progress by 2020; • maintaining the reliability of energy supplies; • promoting competitive markets in the UK and beyond; and • ensuring every home is heated adequately and affordably.
Department of Energy and Climate Change: Microgeneration Strategy (2011)	<p>The strategy aims to improve the effectiveness of the Microgeneration Certification Scheme (MCS), enable policy makers and industry to understand the consumer protection structure and suitably sign post schemes in policy and create regulatory environment and assessment framework that enables accurate representation of contribution of microgeneration technologies to low carbon homes and buildings.</p>
Vale of Aylesbury Local Plan 2013 - 2033	<p>The adopted Local Plan, which allocates Site D-HAL003, seeks to ensure that development adheres to relevant policies within the Plan which will protect and enhance the local environment, including those which seek to reduce contributions towards the causes of climate change.</p>
Buckinghamshire County Council: Climate Change and Air Quality Strategy (2021)	<p>The strategy seeks to reduce emissions, improve air quality and adapt to climate change and sets out the following targets to achieve aims through various objectives including:</p> <ul style="list-style-type: none"> • Achieve net zero carbon emissions across council operations no later than 2050 and possibly before this, potentially by 2030, subject to resources. • Support communities to achieve net zero carbon emissions <p>The strategy guides activity for nearly 30 years, and sets out actions required to meet the targets outlined within the document.</p>
Aylesbury Transport Strategy (2017)	<p>The strategy is intended to address current issues on the transport network and accommodate future planned growth. Additionally, it allows for the single coordinated approach to planning improvements and contains objectives aimed at improving transport connectivity within Aylesbury town, air quality and pollution and accessibility to other urban centres and new growth areas outside Aylesbury town, such as the site of the RAF Halton SPD.</p>
Buckinghamshire County Council: Local Flood Risk Management Strategy (2015)	<p>The strategy seeks to explain the current understanding of flood risk across the county and ensure that development does not increase flood risk, for example through encouraging the use of sustainable drainage techniques and working with natural processes.</p>
Aylesbury Vale District Council Level 1 Strategic Flood Risk Assessment (May 2017)	<p>This Strategic Flood Risk Assessment (SFRA) 2017 document replaces the Level 1 SFRA originally published by Aylesbury Vale District Council (AVDC) in August 2012. It considers all Specified Sites identified for potential allocation within the new Local Plan for the district known as the Vale of Aylesbury Local Plan (VALP). The document will be used to inform decisions on the location of future development and the preparation of sustainable policies for the long-term management of flood risk.</p>

Plan, policy and/or programme (PPP)	Main objectives and requirements of PPP for cultural heritage
Council of Europe: Convention on the Protection of the Architectural Heritage of Europe (1985)	Aims for signatories to protect their architectural heritage by means of identifying monuments, buildings and sites to be protected; preventing the disfigurement, dilapidation or demolition of protected properties; providing financial support by the public authorities for maintaining and restoring the architectural heritage on its territory; and supporting scientific research for identifying and analysing the harmful effects of pollution and for defining ways and means to reduce or eradicate these effects.
Council of Europe: The Convention on the Protection of Archaeological Heritage (Revised) (Valetta Convention) (1992)	The convention defines archaeological heritage and identifies measures for its protection. Aims include integrated conservation of the archaeological heritage and financing of archaeological research and conservation.
National Planning Policy Framework (MHCLG, 2021)	<p>The NPPF and related guidance given within the PPG includes direction on conserving and enhancing the historic environment. It seeks to ensure local authorities plan recognise heritage assets as an irreplaceable resource and conserve them in a manner that reflects their significance. Local planning authorities should take into account:</p> <ul style="list-style-type: none"> • the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; • the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring; • the desirability of new development making a positive contribution to local character and distinctiveness; and • opportunities to draw on the contribution made by the historic environment to the character of a place.
Heritage 2020: strategic priorities for England's historic environment 2015-2020	<p>Over the next five years the commitment to the Heritage 2020 framework will achieve a step change in the understanding, valuing, caring and enjoyment of the historic environment of England. The vision concentrates on five strategic areas:</p> <ul style="list-style-type: none"> • Discovery, identification & understanding • Constructive conservation and sustainable management • Public engagement • Capacity building • Helping things to happen.
Historic England: Historic Environment Good Practice Advice in Planning Note 1, 2 and 3 (2015)	These three notes provide information on good practice to assist local authorities, planning and other consultants, owners, applicants and other interested parties in implementing historic environment policy in the National Planning Policy Framework (NPPF) and the related guidance given in the PPG.
Vale of Aylesbury Local Plan 2013 - 2033	The adopted Local Plan, which allocates Site D-HAL003, seeks to ensure that development adheres to relevant policies within the Plan which will protect and enhance the local environment, including the historic environment and cultural heritage features.
Technical note: RAF Halton – Historic Environment (2022)	Prepared by WSP, the technical note summarises the historic environment technical evidence gathered to date by the Defence Infrastructure Organisation (DIO) appointed Strategic Environmental Technical Advisers (SETA) to support masterplan development for at least 1,000 units on the allocated Barracks Site at RAF Halton and the promotion of the Airfield Site for an additional 1,000 dwellings.

Plan, policy and/or programme (PPP)	Main objectives and requirements of PPP for landscape
Council of Europe: European Landscape Convention (2006)	Aims to promote the protection, management and planning (including active design and creation of Europe's landscapes, both rural and urban, and to foster European co-operation on landscape issues.
National Planning Policy Framework (MHCLG, 2021)	The NPPF and related guidance given within the PPG states that development could seek to promote or reinforce local distinctiveness; both aesthetic considerations and connections between people and places should be considered. The NPPF also promotes the protection and enhancements of valued landscapes, giving greatest weight to National Parks and Areas of Outstanding Natural Beauty.
English Heritage and CABE: Guidance on Tall Buildings (2007)	Provides advice and guidance on good practice in relation to tall buildings in the planning process and to highlight other related issues, which need to be considered, i.e. where tall buildings would and would not be appropriate.
Vale of Aylesbury Local Plan 2013 - 2033	The adopted Local Plan, which allocates Site D-HAL003, seeks to ensure that development adheres to relevant policies within the Plan which will protect and enhance the local environment. The RAF Halton SPD is proposed to be prepared in accordance with the Aylesbury Garden Town principles, which focuses on delivering high quality development which is distinctive and responds to local characteristics.
Chilterns AONB Management Plan 2019 - 2024	<p>This management plan of the Chilterns AONB sets out a series of policies and actions that, through effective long-term planning and decision making, aim to:</p> <ul style="list-style-type: none"> • Conserve and enhance the natural beauty of the Chilterns • Enhance public understanding and enjoyment of the special quality of the AONB <p>The management plans notes the special qualities of the AONB to be protected, including panoramic views which can be harmed by development, and has produced Position Statements on Development Affecting the Setting of the Chilterns AONB and their cumulative impacts, to help protect the long-term interests of the landscape.</p>
Buckinghamshire County Council: Aylesbury Landscape Character Assessment (2008)	Explains the modern concepts of landscape and landscape character. Summarises the 13 landscape character types.
Defining the special qualities of local landscape designations in Aylesbury Vale District (2016)	<p>Commissioned by Aylesbury Vale District Council (AVDC), LUC has prepared the report to provide evidence on the special qualities and values of locally designated landscapes within the district - the Areas of Attractive Landscape (AAL) and Local Landscape Areas (LLAs), to enhance the Council's landscape evidence base and to inform the Local Plan. Information on the local landscape designations may therefore be useful for a number of purposes:</p> <ul style="list-style-type: none"> • To provide a baseline against which to assess the impact of a proposed development on the landscape by comparing the characteristics of the proposal against the area's special qualities; • to inform sensitive siting and design of new development both in development control and for prospective developers; • to communicate the distinctive characteristics of Aylesbury Vale as part of baseline data for future landscape studies; • to inform policies for the future development and management of Aylesbury Vale.
Strategic Landscape and Visual Capacity Study (2017)	Instructed by AVDC, Bradley Murphy Design Ltd. (BMD) have undertaken a strategic appraisal of the capacity in landscape and visual terms, for approximately 100 sites throughout the borough, to identify their suitability for allocation for residential or economic development, or a mix of both.

Appendix C: Responses from the statutory consultees



Historic England

FAO: [REDACTED]
Senior Environmental Consultant
Lepus Consulting Ltd.

Our ref: PL00791597

[REDACTED]
by email only

05 May 2023

Dear [REDACTED]

Strategic Environmental Assessment (SEA) of the RAF Halton Supplementary Planning Document (SPD): Scoping document

Thank you for consulting Historic England about the above Scoping Report.

In terms of the historic environment, overall, we believe that the Report provides the basis for developing an appropriate framework to assess the significant effects which the SPD might have on the historic environment. However, there are a few aspects where we consider that some amendments are necessary. We provide headline comments below and more detailed comments in the attached appendix.

Baseline

We note paragraph 5.2.2 states that Historic England agrees to the conversion of the Barracks to residential development. Please note this is not unqualified support i.e. it needs to be done sensitively, responding to the significance of the buildings and site.

Also, while the full SEA Framework on page 37 refers to the Historic Environment Record (HER) in the context of monitoring indicators, the baseline should refer to the HER, as well as relevant archaeological notification areas and non-designated heritage assets (NDHAs). Considering each of these in turn:

- As stated in our Advice Note on [planning and archaeology](#), HERs provide detailed information about the known historic environment of a given area and form an essential part of the planning system. The HER needs to be referenced as an important source of information in this scoping exercise.
- Figure 5.1 maps archaeological notification sites, but to ensure they are not over-looked, it would be preferable to refer to them explicitly in the baseline too.
- We're aware that significant work has been done recently to review and, where appropriate, revise the list of NDHAs on site. On completion of the Council's review of NDHAs at RAF Halton, relevant details should be incorporated into the baseline and SEA process.



Historic England, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA
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Please note that Historic England operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available.



Reviewing relevant plans, policies and programmes (PPPs)

While we can understand an intention not to cite all relevant legislation, plans, policies and programmes in the main text and broadly support Appendix B's content on cultural heritage, some refinements are needed, especially if key legislation and relevant PPPs are cited in the main text in addition to those in the Appendix.

Focusing on the main text, the Government's Heritage Statement 2010 is referenced in paragraph 5.1.3 but has since superseded by a new statement in 2017 (with an update published in 2018) which arguably is by now somewhat dated. Also, Historic England's most recent Corporate Plan is dated 2022-23 (rather than 2021-22). Given paragraph 5.1.3 refers to legislation, arguably it should also refer to the Planning (Listed Buildings & Conservation Areas) Act 1990 and the Ancient Monuments & Archaeological Areas Act 1979 (which we realise is mentioned in paragraph 5.25).

In Appendix B, we recommend adding the RPG's Conservation Management Plan and the [Conservation Area Appraisal for Halton](#) to the relevant PPPs.

SEA Framework

We broadly support the SEA Framework detailed in Appendix A, with the following notes and caveats on heritage:

- The wording for the objective associated with cultural heritage in Table 7.1 is not the same as the wording in Appendix A, as shown in the comparison below:

Table 7.1	Appendix A
Conserve, enhance and manage sites, features and areas of historic and cultural importance, including their setting.	Protect, enhance and manage heritage assets, including designated and non-designated, as well as features and areas of and heritage importance.

To reconcile these differences, we suggest combining the two e.g.

"Conserve, enhance and manage sites, features and areas of historic and cultural importance, including their setting. This includes both designated and non-designated heritage assets."

- We suggest revised wording of the decision-making criteria as detailed below, adding detail that we hope would support effective assessment:

"Will it ~~conserve~~^{preserve} buildings of special architectural or historic interest, ~~and, where necessary, encourage their conservation~~ lead to the repair and adaptive re-use of those assets and encourage high quality design?"

Will it improve the energy efficiency of historic buildings, without unacceptably harming their significance?

Will it ~~conserve~~^{preserve} or enhance archaeological sites and features, and their settings?

Will it ~~conserve~~^{preserve} or enhance the setting or character of cultural heritage assets or areas and provide for increased access to and enjoyment of the historic environment?"

- We advise simplifying and broadening the first indicator to connect with designated heritage assets e.g. to include not only the Listed Buildings but also the Scheduled Monument and RPG. Also, we advise adding an indicator assessing impacts on NDHAs, and referring to heritage assets (rather than historic assets) in what is currently the second indicator. Finally, we query whether the indicator linked with the HER will help to assess the impact of development proposals. Potential textual changes to consider:

~~*“Impact on the heritage significance of designated heritage assets-Protection of local heritage features including Listed Buildings, such as various Grade II Listed Buildings associated with the ‘Groves and Henderson Barracks’.*~~

Impact on the heritage significance of non-designated heritage assets

Number and condition of heritagehistoric assets on the Heritage at Risk register (including Halton House).

~~*Statutory and non-statutory sites in the Historic Environment Record (HER) including potential for below ground remains.”*~~

- While our focus is primarily on the cultural heritage content of this Report, heritage is a thread that connects with other topics too. Regarding the section on landscape, we recommend further consideration be given to the importance of and approach to all sensitive views, not only those that relate to the AONB. We propose revising the relevant decision-making criteria as follows:

“Will it incorporate landscape-led development with consideration of long-distance views of the Chilterns AONB and the protection or enhancement of other sensitive views?”

Historic England strongly advises that the Council’s conservation team and its archaeological advisors are closely involved throughout the preparation of this SEA. They are best placed to advise on: local historic environment issues and priorities, including access to data held in the HER; how the policy or proposal can be tailored to minimise potential adverse impacts on the historic environment; the nature and design of any required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of heritage assets. We have produced guidance for all involved in undertaking SEA/SA exercises which gives advice on issues relating to the historic environment. This can be found [here](#).

This opinion is based on the information provided by you in the document dated April 2023 and, for the avoidance of doubt, does not affect our obligation to advise you on, and potentially object to any specific development proposal which may subsequently arise from this or later versions of the SPD which is the subject to consultation, and which may, despite the SEA, have adverse effects on the environment.

If you have any queries about any of the matters raised above or would like to discuss anything further, please do not hesitate to contact me.

Yours sincerely

[Redacted signature]

Historic Environment Planning Adviser

Development Advice – London and the South East Region

[Redacted contact information]



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APPENDIX: MORE DETAILED COMMENTS

Page	Section	Comment
6	2.1.3	Reference is made to the negative impacts on the setting of heritage assets. Also, we recommend considering the potential for <u>positive</u> impacts on setting arising from related development, especially to enhance the setting of Halton House and the Registered Park & Garden, and the Scheduled Monument.
20	5.1.1	Reference is made to 'archaeological and heritage interest'; however, the NPPF defines heritage significance in terms of archaeological, architectural, artistic and historic interests. To align more precisely with the language of the NPPF, we suggest replacing 'archaeological and heritage interest' either with 'heritage significance' or 'archaeological and historic interests'.
20	5.1.2	It would be helpful to include a reference or footnote to the regional guidance being specified.
21	5.2.2	We wonder if it would be helpful to add reference to the NHLE, potentially including a weblink , and clarify the language around the number of entries on the NHLE to avoid any confusion about the actual number of buildings e.g. "Listed Buildings are those that have been placed on the Statutory List of Buildings of Special Architectural or Historic Interest <u>within the National Heritage List for England (NHLE)</u> . There are s Seven Listed Building entries on the NHLE within site D-HAL003. Designed in 1919, they are listed Grade II and collectively Listed Buildings , known as the Groves and Henderson Barracks, a group of RAF Barracks designed in 1919 are located within the site D-HAL003 (see Figure 5.1). "
21	5.2.3	For completeness we suggest adding 'Grade II' when referring to the RPG i.e. "Halton House, a Grade II* listed building is located within Halton House Registered Park and Garden (RPG) (<u>Grade II</u>) and is 0.3 km away from the site boundary."
21	5.2.4	A technicality, we recommend referring to heritage significance rather than historic significance
21	5.2.6	This is slightly unusual phrasing when referring to the approach to the SM. Acknowledging paragraph 2.1.3 has already established a heritage-led approach, it would be simpler to state here that: " <u>Noting plans for a heritage-led approach (see paragraph 2.1.3 above), there is an opportunity for the design of new development to enhance the setting of the SM, which is currently comprised by the existing development. It is assumed that the development laid out in the emerging SPD will also aspire to be 'heritage led' and take into account the setting of the SM and other heritage assets.</u> "
21	5.2.7	Reference should be made to the Register, rather than simply the RPGs e.g. "The <u>Register of Historic England's</u> RPGs of Special Historic Interest was established by Historic England (at the time, known as English Heritage) in 1983 to identify sites which are of particular historic significance. Although inclusion on the Register brings no additional statutory controls, Registered Parks and Gardens are a 'material consideration' in planning process".
21 / 22	RPG	We recommend reference also be made to the Conservation Management Plan for the RPG e.g. "A Conservation Management Plan has been written to guide future proposals."

22	Non-designated features and 5.2.12	To align more precisely with the NPPF, we suggest amending “Non-designated features” to “Non-designated heritage assets” Also, as outlined in our cover letter, the crucial reference for NDHAs is the local Historic Environment Record (HER), which needs to be mentioned in this section
23	Box 5.1	We suggest changes to the text in Box 5.1, in particular to reflect the direct impacts that development will have on heritage assets within the site. <ul style="list-style-type: none"> • <u>Development within Site D-HAL003 will have direct physical impacts on heritage assets; care is needed to ensure that the design is informed by the assets’ significance, does not cause unacceptable harm, and supports future use</u> • Development within Site D-HAL003 could potentially alter the setting of <u>heritage</u> historic assets, both designated and non-designated. • In particular, potential effects on Halton House RPG (and opportunities to promote its conservation and enhancement) need to be taken into consideration in light of its status on the Heritage at Risk Register. • <u>There is an opportunity to enhance the setting of the Scheduled Monument on the site’s boundary. Other a</u>Archaeological remains, including that which has not yet been discovered, are present in the area and could potentially be affected by development proposals of the RAF Halton SPD.
23	Box 5.2	We are not sure that we agree with the statement that in the absence of the SPD, the character and setting of designated and non-designated heritage assets is unlikely to change significantly. The policies in the VALP do not detail the heritage significance of assets on site, nor guide the design of the new development in any detail. As a result, we believe that without the SPD: <ul style="list-style-type: none"> • there is increased risk of development coming forward that harms the heritage significance of assets on site; and • opportunities could be lost to enhance the condition and appreciation of the local historic environment

Date: 26 April 2023
Our ref: 428311
Your ref: RAF Halton SD SEA Scope



Buckinghamshire Council

BY EMAIL ONLY

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Crewe
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T 0300 060 3900

Dear Sir/Madam,

RAF Halton Supplementary Planning Document (SPD): SEA Scoping Consultation.

Thank you for your consultation on the above dated 04 April 2023.

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

Chilterns Beechwoods Special Area of Conservation (SAC):

Natural England note that consideration of Chilterns Beechwoods SAC has been included in the scoping report, and would advise that due to the position of the site a Habitats Regulations Assessment (HRA) is likely to be required alongside an SEA.

Chilterns AONB Boundary Review:

The plan area is within a proposed area of search which Natural England is considering as a possible boundary variation to the Chilterns Area of Outstanding Natural Beauty (AONB). Although the assessment process does not confer any additional planning protection, paragraph 174 of the National Planning Policy Framework (NPPF) states that planning policies and decisions should protect and enhance valued landscapes and recognise the intrinsic character and beauty of the countryside. Natural England advises that this area should be considered as a valued landscape with appropriate Local Plan policies to protect and enhance its intrinsic character and natural beauty. Furthermore, Paragraph 176 of the NPPF states that development in the settings of AONBs should be sensitively located and designed to avoid or minimise impacts on the designated areas.

An extension to an existing AONB is formally designated once a variation Order, made by Natural England, is confirmed by the Defra Secretary of State. Following the issue of the designation Order by Natural England but prior to confirmation by the Secretary of State, any area that is subject to a variation Order would carry great weight in plan-making and as a material consideration in planning decisions.

For more information about the boundary review process, please read these [Frequently Asked Questions](#).

Ancient woodland, ancient and veteran trees:

You should consider any impacts on ancient woodland and ancient and veteran trees in line with paragraph 180 of the NPPF. Natural England maintains the Ancient Woodland [Inventory](#) which can help identify ancient woodland. Natural England and the Forestry Commission have produced [standing advice](#) for planning authorities in relation to ancient woodland and ancient and veteran trees. It should be taken into account by planning authorities when determining relevant planning applications. Natural England will only provide bespoke advice on ancient woodland, ancient and veteran trees where they form part of a Site of Special Scientific Interest (SSSI) or in exceptional circumstances.

Further general advice on the consideration of protected species and other natural environment issues is provided at Annex A.

For any further consultations on your plan, please contact: consultations@naturalengland.org.uk.

Yours faithfully,


Sustainable Development Lead Adviser
Thames Solent Area Team
Natural England

Annex A- Additional Advice:

Natural England offers the following additional advice:

Landscape

Paragraph 174 of the [National Planning Policy Framework](#) (NPPF) highlights the need to protect and enhance valued landscapes through the planning system. This application may present opportunities to protect and enhance locally valued landscapes, including any local landscape designations. You may want to consider whether any local landscape features or characteristics (such as ponds, woodland, or dry-stone walls) could be incorporated into the development to respond to and enhance local landscape character and distinctiveness, in line with any local landscape character assessments. Where the impacts of development are likely to be significant, a Landscape & Visual Impact Assessment should be provided with the proposal to inform decision making. We refer you to the [Landscape Institute](#) Guidelines for Landscape and Visual Impact Assessment for further guidance.

Best and most versatile agricultural land and soils

Local planning authorities are responsible for ensuring that they have sufficient detailed agricultural land classification (ALC) information to apply NPPF policies (Paragraphs 174 and 175). This is the case regardless of whether the proposed development is sufficiently large to consult Natural England. Further information is contained in [GOV.UK guidance](#). Agricultural Land Classification information is available on the [Magic](#) website on the [Data.Gov.uk](#) website. If you consider the proposal has significant implications for further loss of 'best and most versatile' agricultural land, we would be pleased to discuss the matter further.

Guidance on soil protection is available in the Defra [Construction Code of Practice for the Sustainable Use of Soils on Construction Sites](#), and we recommend its use in the design and construction of development, including any planning conditions. For mineral working and landfilling separate guidance on soil protection for site restoration and aftercare is available on [Gov.uk](#) website. Detailed guidance on soil handling for mineral sites is contained in the Institute of Quarrying [Good Practice Guide for Handling Soils in Mineral Workings](#).

Should the development proceed, we advise that the developer uses an appropriately experienced soil specialist to advise on, and supervise soil handling, including identifying when soils are dry enough to be handled and how to make the best use of soils on site.

Protected Species

Natural England has produced [standing advice](#)¹ to help planning authorities understand the impact of particular developments on protected species. We advise you to refer to this advice. Natural England will only provide bespoke advice on protected species where they form part of a Site of Special Scientific Interest or in exceptional circumstances.

Local sites and priority habitats and species

You should consider the impacts of the proposed development on any local wildlife or geodiversity sites, in line with paragraphs 175 and 179 of the NPPF and any relevant development plan policy. There may also be opportunities to enhance local sites and improve their connectivity. Natural England does not hold locally specific information on local sites and recommends further information is obtained from appropriate bodies such as the local records centre, wildlife trust, geoconservation groups or recording societies.

Priority habitats and Species are of particular importance for nature conservation and are included in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest, on the Magic website or as Local Wildlife Sites. List of priority habitats and species can be found on [Gov.uk](#). Natural England does not routinely hold species data, such data should be collected when impacts on priority habitats or species are considered likely. Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land, further information including links to the open mosaic habitats inventory can be found [here](#).

¹ <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>

Ancient woodland, ancient and veteran trees

You should consider any impacts on ancient woodland and ancient and veteran trees in line with paragraph 180 of the NPPF. Natural England maintains the Ancient Woodland [Inventory](#) which can help identify ancient woodland. Natural England and the Forestry Commission have produced [standing advice](#) for planning authorities in relation to ancient woodland and ancient and veteran trees. It should be taken into account by planning authorities when determining relevant planning applications. Natural England will only provide bespoke advice on ancient woodland, ancient and veteran trees where they form part of a Site of Special Scientific Interest or in exceptional circumstances.

Environmental gains

Development should provide net gains for biodiversity in line with the NPPF paragraphs 174(d), 179 and 180. Development also provides opportunities to secure wider environmental gains, as outlined in the NPPF (paragraphs 8, 73, 104, 120, 174, 175 and 180). We advise you to follow the mitigation hierarchy as set out in paragraph 180 of the NPPF and firstly consider what existing environmental features on and around the site can be retained or enhanced or what new features could be incorporated into the development proposal. Where onsite measures are not possible, you should consider off site measures. Opportunities for enhancement might include:

- Restoring a neglected hedgerow.
- Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Designing lighting to encourage wildlife.
- Adding a green roof to new buildings.

Natural England's [Biodiversity Metric 4.0](#) may be used to calculate biodiversity losses and gains for terrestrial and intertidal habitats and can be used to inform any development project. For small development sites the [Small Sites Metric](#) may be used. This is a simplified version of [Biodiversity Metric 4.0](#) and is designed for use where certain criteria are met.

Natural England's [Environmental Benefits from Nature tool](#) may be used to identify opportunities to enhance wider benefits from nature and to avoid and minimise any negative impacts. It is designed to work alongside [Biodiversity Metric 4.0](#) and is available as a beta test version.

Green Infrastructure

Natural England's [Green Infrastructure Framework](#) provides evidence-based advice and tools on how to design, deliver and manage green infrastructure (GI). GI should create and maintain green liveable places that enable people to experience and connect with nature, and that offer everyone, wherever they live, access to good quality parks, greenspaces, recreational, walking and cycling routes that are inclusive, safe, welcoming, well-managed and accessible for all. GI provision should enhance ecological networks, support ecosystems services and connect as a living network at local, regional and national scales.

Development should be designed to meet the [15 Green Infrastructure Principles](#). The Green Infrastructure Standards can be used to inform the quality, quantity and type of green infrastructure to be provided. Major development should have a GI plan including a long-term delivery and management plan. Relevant aspects of local authority green infrastructure strategies should be delivered where appropriate.

GI mapping resources are available [here](#) and [here](#). These can be used to help assess deficiencies in greenspace provision and identify priority locations for new GI provision.

Access and Recreation

Natural England encourages any proposal to incorporate measures to help improve people's access to the natural environment. Measures such as reinstating existing footpaths together with the creation of new footpaths and bridleways should be considered. Links to urban fringe areas should also be explored to strengthen access networks, reduce fragmentation, and promote wider green infrastructure.

Rights of Way, Access land, Coastal access and National Trails

Paragraphs 100 and 174 of the NPPF highlight the importance of public rights of way and access. Development should consider potential impacts on access land, common land, rights of way and coastal access routes in the vicinity of the development. Consideration should also be given to the potential impacts on any nearby National Trails. The National Trails website www.nationaltrail.co.uk provides information including contact details for the National Trail Officer. Appropriate mitigation measures should be incorporated for any adverse impacts.

Biodiversity duty

Your authority has a [duty](#) to have regard to conserving biodiversity as part of your decision making. Conserving biodiversity can also include restoration or enhancement to a population or habitat. Further information is available [here](#).

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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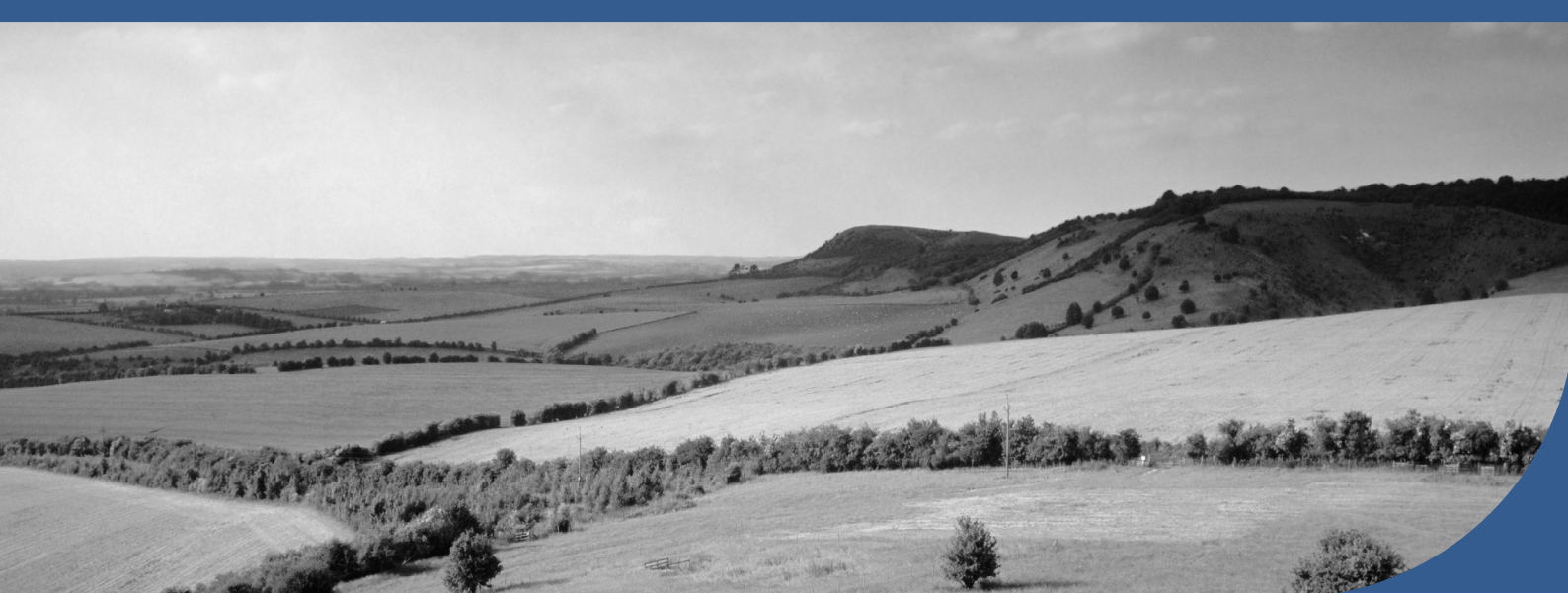
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