



# **Site D-HAL003, RAF Halton SPD, Aylesbury Vale Area**

## **Strategic Environmental Assessment and Habitats Regulations Assessment Screening**

**Final Screening Outcome**

**December 2022**

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# 1. Summary

1. The Conservation of Habitats and Species Regulations 2017 (as amended) places a requirement for competent authorities – here the Council – to ascertain whether a plan or project will have any adverse effects on the integrity of European sites.
2. To assess whether a full Appropriate Assessment is required under the Conservation of Habitats and Species regulations 2017 (as amended), the Council has undertaken a screening assessment of the D-HAL003, RAF Halton SPD – Scope.
3. To assess whether a SEA / HRA are required, the local planning authority must undertake a screening process. For SEA this must be subject to consultation with the three consultation bodies: Historic England, the Environment Agency and Natural England. Or HRA there is one consultation body, Natural England. Following consultation, the results of the screening process must be detailed in a screening statement, which is required to be made available to the public.
4. Strategic Environmental Assessment (SEA) is a way of ensuring the environmental implications of decisions are taken into account before any decisions are made. The need for environmental assessment of plans and programmes is set out in the Environmental Assessment of Plans and Programmes Regulations 2004. Under these Regulations, Supplementary Planning Documents may require SEA if they could have significant environmental effects.
5. If an SPD as envisaged is considered to have potential for significant environmental effects through the screening process, then the conclusion will be that the preparation of a SEA and/ or Appropriate Assessment is necessary.
6. Buckinghamshire Council considers that, following this Screening statement, the D-HAL003 RAF Halton SPD – Scope does have potential to introduce significant environmental effects beyond those already assessed in the VALP Sustainability Appraisal outcome and so requires an SEA to be prepared. The SPD also requires an HRA Appropriate Assessment. Furthermore, the requirement for an appropriate assessment of the SPD as identified by the Council would in any case consequently

trigger the requirement for an SEA under Regulation 5(3) of the SEA Regulations.

7. A consultation took place with the statutory bodies and their conclusions received are reflected in the final report and responses appended. The consultation took place with Natural England, The Environment Agency and Historic England for 28 days between 28 October 2022 and end of 25 November 2022.
8. The full screening statement follows.

## **2. Legislative Background and Criteria**

### **Legislative Background**

9. Strategic Environmental Assessment (SEA) is a way of ensuring the environmental implications of decisions are taken into account before any decisions are made. The need for environmental assessment of plans and programmes is set out in the Environmental Assessment of Plans and Programmes Regulations 2004. Under these Regulations, Supplementary Planning Documents may require SEA if they could have significant environmental effects.
10. The Planning Practice Guidance sets out the circumstances under which a Sustainability Appraisal (SA) and an SEA are required. It is clear from the PPG that SEAs are normally incorporated into SAs, which go beyond environmental effects to also include social and economic effects. It sets out that supplementary planning documents do not require a sustainability appraisal but may in exceptional circumstances require a strategic environmental assessment if they are likely to have significant environmental effects that have not already have been assessed during the preparation of the relevant strategic policies.
11. Regulation 5 (3) of the SEA Regulations also set out that a SEA is required if the plan is determined to require an Appropriate Assessment.  
“5(3) The description is a plan or programme which, in view of the likely effect on sites, has been determined to require an assessment pursuant to Article 6 or 7 of the Habitats Directive.”

### **Criteria for Assessing the likely Effects of The D-HAL003 RAF Halton SPD**

12. Criteria for determining the likely significance of effects referred to in Article 3(5) of Directive 2001/42/EC are set out as follows (Source: Annex II of SEA Directive 2001/42/EC):
13. The characteristics of plans and programmes, having regard to:

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

### **3. The Supplementary Planning Document – Site D-HAL003, RAF Halton**

#### **3.1. Summary**

The SPD Masterplan will cover the following:

- How a comprehensive approach to development of the site can be achieved through a masterplan and design details.
- Where the housing (at least 1,000 homes) is to be located on the site, the layout of housing blocks relative to public realm, private spaces and other land uses.
- Address how the scale and massing of buildings on the site is to be considered through a development proposal and openness of the green belt and impact on adjacent settlement character and identity
- Address the heritage assets and seek to reuse and enhance where possible.
- The mix of dwelling types and tenures to be sought
- How the principles of development for Aylesbury Garden Town (see VALP Policy D1 (a) to (i) are to be applied in proposals for developing this site. In particular, principle (h) which seeks to achieve a minimum 50% of land to be used as multi-functional accessible green infrastructure.
- How development is to be landscape-led in design and responds to the character and setting of the Chilterns AONB. The SPD in its Masterplan and guidance will need to explain how this is to be done.
- The 50% of Green Infrastructure required on the site should reflect in how it is masterplanned (type of GI, location of GI) the high level of open space already present on the site including green corridors and link with other new development areas and the wider countryside.
- Location of a local centre including community hall including its land, buildings and car parking.
- The details of junction improvements onto the B4009 Upper Icknield Way.
- The masterplan and guidance should cover the provision of public transport from the site into Wendover and to surrounding areas and show how this would be achieved in and around the site.
- Routes and safe places for cycling and walking across the site linking to and from Aylesbury Town, Wendover and to the wider area.



- Set out the location of land, buildings and car parking (to meet standards in the VALP) for a combined primary school including location and details of playing field provision.
- Where the key heritage assets are and how they will be conserved and managed along with management of their setting.
- Where the existing sports facilities are and how they will be managed as part of a long-term strategy for sport and recreation to serve new residents and the existing community.
- Details of all infrastructure and services required and their locations.

### **3.2. Relationship with the Local Plan**

The SPD is a planning document, produced at the local level to provide more detail, advice or guidance on local policies. The SPD will set out the agreed strategy for mitigating the impact of new development on the environment, by ensuring that the Masterplan is comprehensive regarding the delivery of future development and its implications within Buckinghamshire Council, arising as a consequence of the Vale of Aylesbury Local Plan 2021 (VALP).

The purpose of the SPD is to provide further guidance and information for the development of the strategic allocated site D-HAL003 which has been proposed in the adopted VALP. The strategy for mitigation includes:

- retaining and enhancing on-site green infrastructure and sport facilities,
- conserving and enhancing heritage assets,
- providing improved transport links including walking and cycle paths as well as public transport infrastructure,
- junction improvements to the B4009 Upper Icknield Way

Should the SPD in its formal draft form or final version post consultation be significantly refined in the future, a re-screening of any significant amendments should be undertaken for the purposes of the SEA screening processes.

### **3.3. The Adopted VALP – RAF Halton Policy D-HAL003**

#### **RAF Halton**

Wendover is situated on the northern edge of the Chilterns AONB and is one of the most sustainable settlements in Aylesbury Vale due to the good provision of services and facilities. RAF Halton is located in the parish of Halton, which adjoins Wendover. The Defence Infrastructure Organisation (DIO) has confirmed that RAF Halton is to close finally in 2025 and because it is in reasonable walking and cycling distance of Wendover's services and facilities, it is appropriate that it be redeveloped for housing and other associated uses. The allocation is shown on the Policies Map.

Due to RAF Halton's proximity to Aylesbury and the good linkages between the two by rail and road, the development at RAF Halton should follow the same principles as Aylesbury Garden Town. As Halton Camp is not due to close until 2025, development of this site will not commence until later in the Plan period.

Due to the size of the site, it is expected that there will be further development beyond this plan period, and this will be part of the Local Plan review. Work is underway on behalf of the DIO in order to establish the broad land uses that might come forward. This will inform the masterplan supplementary planning document (SPD) for this site.

The site allocation lies within the Metropolitan Green Belt and there are a number of listed buildings on site. It is adjacent to the Chilterns AONB. The masterplan SPD for the site will identify how these are to be addressed. Any planning applications for the development of this site will need to have regard to and be in accordance with the masterplan SPD, and the policies for the delivery of Aylesbury Garden Town.

The site outline includes a number of listed barrack blocks, and other designated and non-designated heritage assets that will need to be conserved and enhanced in any redevelopment, as well as many non-listed buildings and an existing road network. It excludes Halton House and its grounds, a number of open recreation areas, areas of woodland and the airfield and associated buildings. As set out in the NPPF (2012), limited infilling or the partial or complete redevelopment of previously developed sites, whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development is an exception to not allowing new housing development in the Green Belt. Therefore it is considered that

redevelopment and/or refurbishment of existing buildings in the first phase of development would be appropriate. This is set out in policy S4 in this plan.

The proximity of the Chilterns AONB will need to be addressed in the design and layout of any development. The masterplan SPD for the site will establish the site layout and disposition of land uses. The amount and quality of existing sports provision within the allocation and elsewhere around the camp is a valuable asset which is why policy D-HAL003 requires its retention wherever possible in any proposed redevelopment.

In the first phases, development will be concentrated on those areas that are already built-up, through the redevelopment or remodelling of existing buildings.

The vision and objectives for the site are:

- To deliver a comprehensive redevelopment of this site, including provision of any new and or/improved infrastructure, services and facilities
- To successfully link this site with Halton and Wendover, whilst protecting the setting of Halton village and the Chilterns AONB and
- To link to the green infrastructure network.

## RAF Halton Policy D-HAL003

D-HAL003 RAF Halton	
<b>Site Ref:</b>	<b>HAL003</b>
<b>Site Name</b>	RAF Halton
<b>Size (hectares)</b>	82ha
<b>Allocated for(key development and land use requirements)</b>	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
<b>Expected time of delivery</b>	25 homes to be delivered 2020-2025 and 975 homes to be delivered 2025-2033
<b>Planning History and Current Planning Status</b>	No relevant planning history

<b>Site-specific Requirements</b>	<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"> <li>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</li> <li>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</li> <li>Provision of junction improvements onto the B4009 Upper Icknield Way</li> <li>Provision for public transport into Wendover and to surrounding areas</li> <li>Establishment of and safeguarding for a network of cycling and walking links to and from Aylesbury Town and to the wider area</li> <li>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</li> <li>Provision of land, buildings and car parking for a combined primary school including playing field provision</li> <li>Provision of land, buildings and car parking for a new local centre including community hall.</li> <li>The conservation and enhancement of heritage assets and their settings whilst ensuring viable uses consistent with their conservation.</li> <li>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.</li> </ol>
<b>Phasing and Delivery Programme</b>	<p>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.</p> <p>Further detail about phasing and implementation will be set out in the masterplan SPD for the site.</p>
<b>Implementation Approach</b>	<p>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.</p>

## **Policy D1 – Principles of design and delivery of development within Aylesbury Garden Town**

- a. To create distinctive, inclusive sustainable, high quality, successful new communities which support and enhance existing communities within the town and neighbouring villages with the highest quality, planning, design and management of the built and public realm. This will ensure that new garden communities and development within the Garden Town is distinctive, creates a local identity, enhances local assets and establishes environments that promote health, happiness and well-being. The Aylesbury Garden Town design principles and detailed design guidance will be set out within the overarching Aylesbury Vale Design SPD
- b. Ensuring the right infrastructure is provided at the right time, ahead of or in tandem with the development that it supports, to address the impacts of new garden communities and to meet the needs of residents and the town's changing demographics (in accordance with Policy S5 and the Infrastructure Delivery Plan). The AGT Framework and Infrastructure SPD will set out in detail when infrastructure is required and how it will be delivered and funded
- c. Community and stakeholder engagement is embedded within the design and delivery of the Garden Town from the outset. The stakeholder and engagement strategy for the Garden Town will need to be taken into account and long-term community engagement planned for
- d. Development will be delivered to provide a truly balanced inclusive and accessible community that meet the needs of local people, including the mix of dwellings sizes, tenures and types including provision for custom and self build and for an ageing population (in line with policies H5 and H6a, b and c); the Garden Town will also deliver housing for those most in need through delivery of a minimum of 25% affordable housing (in line with policy H1)
- e. Providing and promoting opportunities for local employment for new and existing residents, both within and alongside new garden communities, to support and enhance the overall economic viability of Aylesbury Garden Town (in line with policies E1, E2, E3, E4 and E5)
- f. Promote and encourage sustainable travel choices through integrated, forward looking and accessible transport options which support economic prosperity and wellbeing for residents. Travel plans will be required to increase walking, cycling and the promotion of public transport routes connecting new garden communities to the town and beyond. New development should be planned around a user hierarchy that places pedestrians and cyclists at the top. Consideration should also be given to delivering electric vehicle infrastructure in new development and disability discrimination requirements. Policies T1, T2, T3, T4, T6, T7 and T8 should be taken into account
- g. New garden communities should be designed to be easily accessible and maximise opportunities to integrate with existing communities to create healthy sociable, vibrant and walkable neighbourhoods with equality of access for all to a range of community service and facilities including health/wellbeing, education, retail, culture, community meeting spaces, multifunctional open space, sports and leisure facilities and well connected to public transport. Policies I2 and I3 should be taken into account. A site-specific supplementary planning document (SPD) will be developed as required to set out clear and detailed advice for place-making
- h. Creation of distinctive environments which seek to achieve a minimum of 50% land within the proposed garden communities as local and strategic multifunctional green infrastructure which should be designed as multifunctional, accessible, and maximise benefits for wildlife, recreation and water

management. This will include land required to mitigate the ecological and flood risk impacts of development. As part of the masterplan for allocated sites, areas of Best and Most Versatile Agricultural Land will be preferred to be used for green infrastructure. Management regimes should be developed in tandem with the detailed development of GI for each of the garden communities. Policies I1, I2, I3, I4, I5, I6, NE1, NE2, NE3 and NE4 should be taken into account. A site-specific Masterplan SPD will be developed for AGT1 Aylesbury South in order to set out clear and detailed advice for place-making

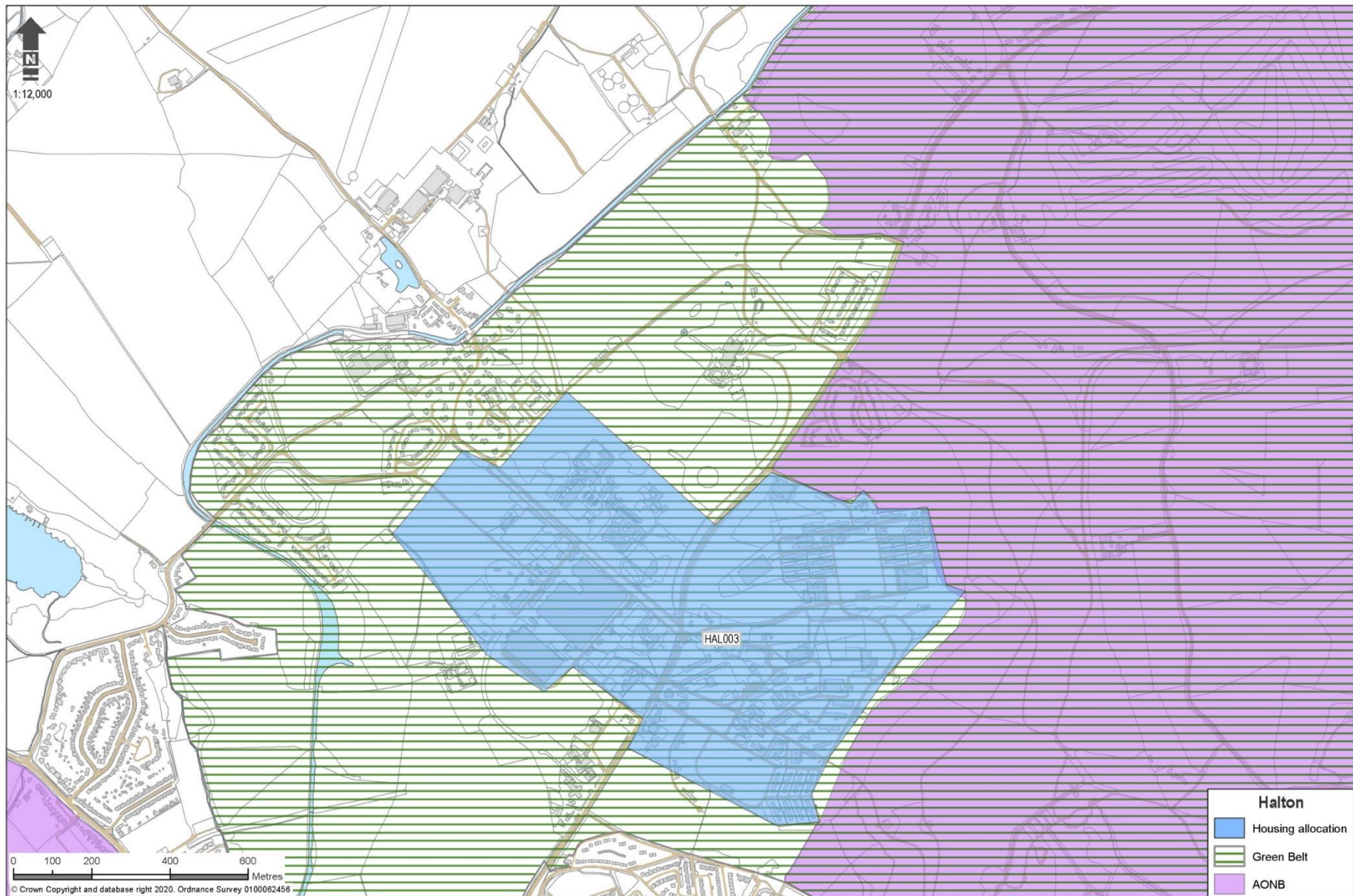
- i. Establishing opportunities for appropriate and sustainable governance and stewardship arrangement for community assets including green space, public realm, community and other relevant facilities. Such arrangements should be funded by developments and include community representation
- j. New garden 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 and 5G.

### **3.4. Plan of the Site**

Plan of the RAF Halton (D-HAL003) site from the Adopted Vale of Aylesbury Local Plan (2021) Policies Maps.

[https://www.buckinghamshire.gov.uk/documents/9742/Aylesbury\\_local\\_plan\\_L46JWaT.pdf](https://www.buckinghamshire.gov.uk/documents/9742/Aylesbury_local_plan_L46JWaT.pdf)

# D-HAL003 RAF Halton SPD – SEA HRA Screening



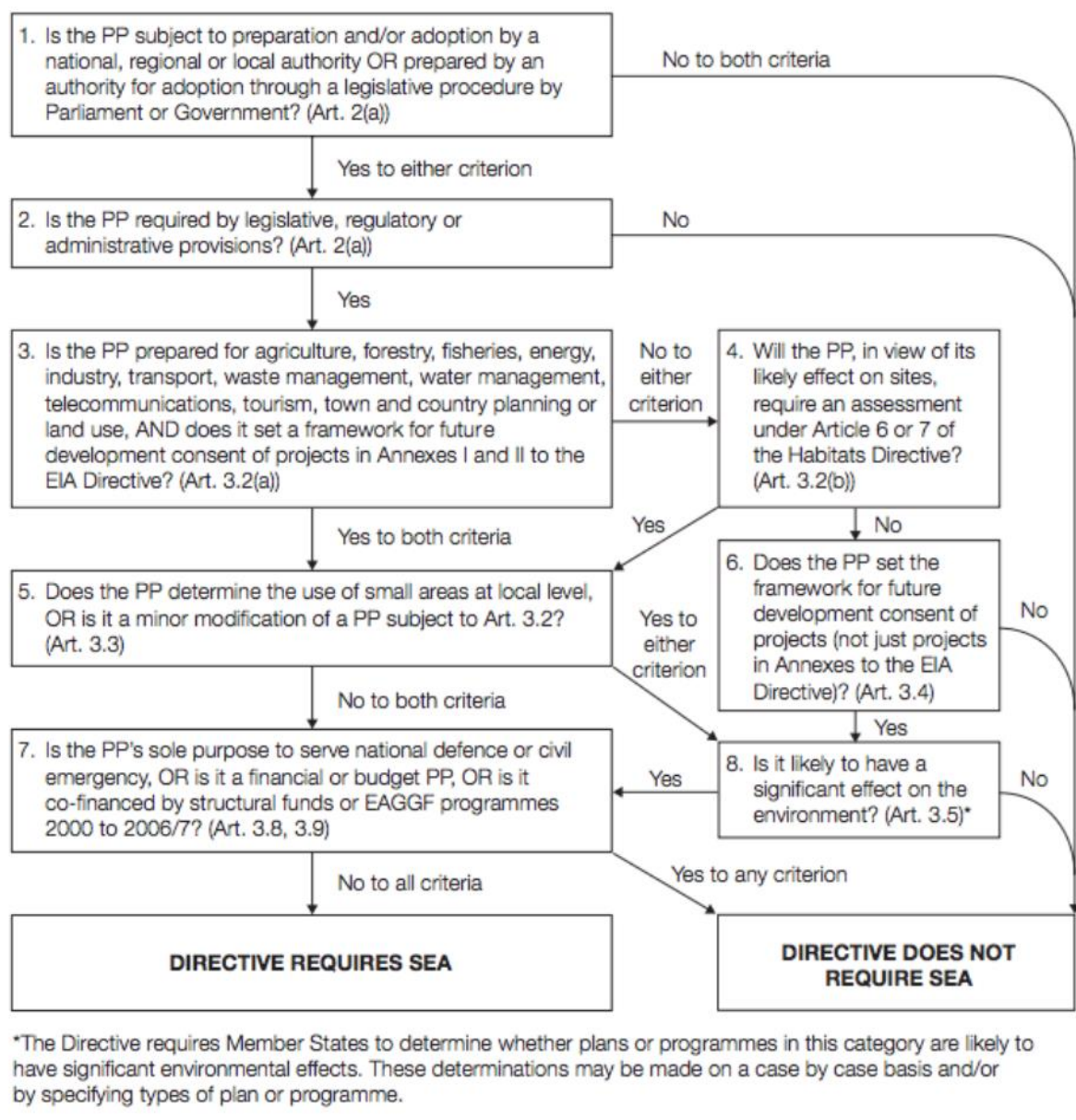


## 4. The SEA Screening Process

15. The requirement for a Strategic Environment Assessment (SEA) is set out in the “Environmental Assessment of Plans and Programmes Regulations 2004”. There is also practical guidance on applying European Directive 2001/42/EC produced by the former Government department for planning, the ODPM (now DLUHC). These documents have been used as the basis for this screening report.
16. Paragraph 008 of the DLUHC ‘Strategic environmental assessment and sustainability appraisal guidance’ states that “Supplementary planning documents do not require a sustainability appraisal but may in exceptional circumstances require a strategic environmental assessment if they are likely to have significant environmental effects that have not already have been assessed during the preparation of the relevant strategic policies.”
17. The former ODPM practical guidance provides a checklist approach based on the SEA regulations to help determine whether SEA is required. This guide has been used as the basis on which to assess the need for SEA as set out below. Figure 2 sets out a flow diagram showing the process for assessing plans and programmes.

**Figure 2 – Application of the SEA Directive to plans and programmes**

This diagram is intended as a guide to the criteria for application of the Directive to plans and programmes (PPs). It has no legal status.



18. The next section assesses the Scope for a Site D-HAL003 RAF Halton SPD against the questions set out in Figure 1 above to establish whether the SPD is likely to require an SEA.

## Stage 1

19. Is the SPD subject to preparation and/or adoption by a national, regional or local authority OR prepared by an authority for adoption through a legislative procedure by Parliament of Government? (Article 2(a))

Response – Yes

Reason - The SPD will be adopted by a Local Planning Authority, Buckinghamshire Council after public consultation on a formal draft.

## Stage 2

20. Is the SPD required by legislative, regulatory, or administrative provisions? (Article 2(a))

Response – Yes

Reason - The SPD is prepared under the Town and Country Planning Regulations 2012. The SPD is a requirement of the VALP Planning Policy 'D-HAL003 RAF Halton'. In collaboration with the Vale of Aylesbury Local Plan, it provides a detailed guide for development of the D-HAL003 site.

## Stage 3

21. Is the plan prepared for agriculture, forestry, fisheries, energy, industry, transport, waste management, water management, telecommunications, tourism, town and country planning or land use, and does it set a framework for future development consent of projects in Annexes I and II to the EIA Directive? (Art. 3.2(a))

Response – No

Reason - The SPD is being prepared to inform the comprehensive planning, vision, design, delivery, phasing and required infrastructure of the D-HAL003 allocation and wider VALP policies. The VALP establishes the development framework and sets the requirement and high-level specification for the SPD. The SPD will form a material consideration which will be considered by the Local Planning Authority when determining any future planning applications for the area

## Stage 4

22. Will the SPD scope in view of its likely effect on sites, require an assessment under Article 6 or 7 of the Habitats Directive?

Response – Yes

Reason – The SPD does not allocate any type of development or quantum of development not already set out in allocated site policy D-HAL003 in the Vale of Aylesbury Local Plan, adopted 2021. The SPD will provide further guidance and information to the development described in VALP Policy D-HAL003 including a masterplan design principles and details of infrastructure required to meet requirements in D-HAL003 and the wider VALP policies.

However, the requirement for Appropriate Assessment of land at the SPD location is identified in the HRA Screening in this report. The site is in the Zone of Influence for the Ashridge Commons and Woods SSSI, part of the Chiltern Beechwoods SAC as is a short distance to the SSI itself (see below). At the time of drafting this Screening Assessment, there is no agreed strategic solution to the evidenced recreational pressures at Ashridge and so the SPD masterplan in its required provision of 50% on site accessible natural green space can constitute mitigation as a Suitable Alternative Natural Greenspace (SANG) to that at the Ashridge SSSI. There may also be in the future an agreed levy required for the Strategic Access Management and Monitoring (SAMM) at Ashridge SSSI. However that would need to be agreed by Natural England and Councils it was not part of the context of the VALP as Adopted in 2021.

There are no areas of Natura 2000 sites (Special Areas of Conservation or Special Protection Areas) in the SPD area. The nearest such site is the Chiltern Beechwoods Special Area of Conservation 3.7km to the east at Tring Woodlands.

The SPD area is in the 12.6km Zone of Influence of the Ashridge Commons and Woods SSSI but not the 1.7km ZOI to the Tring Woodlands SSSI (see the recreational pressures issue affecting these SSSIs confirmed in March 2022 [Chilterns Beechwoods Special Area of Conservation \(dacorum.gov.uk\)](https://dacorum.gov.uk) . The nearest part of these SSSIs within the SAC (Tring Woodlands) is 3.7km away to the east.

There have been 11 recorded sightings of protected species in the SPD area. These are listed below. These are all species protected under Schedule II, IV or V of the EU Habitats Directive 1992, transposed into UK law.

These are all mammals and protected under the Habitats Directive at EPS-Habitats Regulations-Schedule 2 & HabDir-A2,HabDir-A4:

<b>No. Species</b>	<b>Vernacular</b>
1 Rana temporaria	Common Frog
3 Chiroptera sp.	A Bat species
1 Nyctalus noctule	Noctule Bat
5 Pipistrellus pipistrellus	Common Pipistrelle
1 Plecotus auratus	Brown Long-eared Bat

## Stage 5

23. Does the plan determine the use of small areas at local level, or is it a minor modification of a plan subject to Art. 3.2? (Art. 3.3)

Response – No

Reason – The VALP is the plan that determines the use of the D-HAL003 RAF Halton Site. The SPD is only be guidance to the VALP and there is no development the subject of the SPD that's hasn't already been assessed in the Sustainability Appraisal process done for VALP. The SPD will provide further guidance and information to the development described in VALP Policy D-HAL003 including a masterplan design principles and details of infrastructure required to meet requirements in D-HAL003 and the wider VALP policies.

## Stage 6

24. Does the plan set the framework for future development consent of projects (not just projects in Annexes to the EIA Directive)?

Response – No

Reason - The SPD is being prepared to inform the detailed planning of the D-HAL-003 allocation. The VALP establishes the development framework and sets the requirement and high-level specification for the SPD. The SPD will form a material consideration which will be considered by the Local

Planning Authority when determining any future planning applications for the area.

## **Stage 7**

25. Is the plan's sole purpose to serve the national defence or civil emergency, OR is it a financial or budget PP, OR is it co-financed by structural funds or EAGGF programmes 2000 to 2006/7? (Art 3.8, 3.9)

Response – No

Reason - The purpose of what will be an SPD is not for any of the projects listed in Art 3.8, 3.9.

## **5. SEA Criteria for determining likely significance of effects**

### **Evaluation of the Scope for the D-HAL003 RAF Halton SPD**

26. Question 8 within the former ODPM guidance flowchart (see Figure 2 p.16 of this screening) refers to whether the SPD would have a significant effect on the environment referred to in Article 3(5). The criteria from Annex II of the SEA Directive and Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 2004 can be used to consider the relevance of the Plan to the SEA Directive. Paragraph 35-45 consider the likely environmental effects of the plan.

### **The characteristics of plans and programmes, having regard, in particular, to:**

27. a) the degree to which the plan or programme sets a framework for projects and other activities, either regarding the location, nature, size and operating conditions or by allocating resources

Response- The RAF Halton SPD will set a framework by providing detail regarding the site allocation D-HAL003 RAF Halton as set out in the adopted VALP. The SPD will form a material consideration for the nature and operating conditions of the development.

28. b) the degree to which the plan or programme influences other plans and programmes, including those in a hierarchy

Response - The SPD provides additional guidance and details regarding site D-HAL003 as set out in the VALP. It does not create new policies.

29. c) The relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development

Response– There are opportunities to integrate environmental considerations within the RAF Halton Masterplan. The SPD aims to conserve important aspects of the built and natural environment. The SPD will include measures to improve local facilities, cycling, walking and public transport and allow for sustainable growth, as well as responding positively to the setting of the Chilterns AONB whilst protecting open space, sport facilities and the natural environment.

30. d) Environmental problems relevant to the plan or programme.

Response – The potential characteristics and effects of the SPD, which include consideration of existing environmental problems, are screened in sections 5 and 6 of this screening report. In summary, **the SPD has scope for significant effects on climate change, cultural heritage and landscape issues.**

31. e) The relevance of the plan or programme for the implementation of Community legislation on the environment (for example, plans and programmes linked to waste management or water protection)

Response - The SPD will provide guidance to carry out a land use plan (the VALP) and so help set the framework for future development consents. The VALP site allocation criteria on foul drainage strategy, sewerage capacity, surface water drainage strategy, climate change modelling of the ordinary watercourse on the site and an air quality and noise assessment can all link to environmental protection by the council and other stakeholders concerned with water resources flood management and pollution control.

## **Characteristics of the effects and of the area likely to be affected, having regard to:**

32. a) the probability, duration, frequency and reversibility of the effects

Response - The SPD does not propose development or infrastructure and mitigation that is not already identified or required through the VALP policies. The VALP is a balanced strategy to allow for sustainable growth and contains mitigation measures and infrastructure improvements. However, the site has a number of significant constraints on and around the site and so 3 impacts are screened in for an SEA to be carried out: the effects on (1) cultural heritage, (2) landscape and (3) climate change



## **Cultural Heritage**

The VALP paragraph 4.127 describes the heritage constraints on the site and policy D-HAL003 criterion (i) sets out that proposals for the site will be required to conserve and enhance the heritage assets and their settings whilst ensuring viable uses consistent with their conservation.

RAF Halton is of significant heritage value, but it seems likely that a sympathetic, 'heritage-led' redevelopment can be implemented. The proposed Masterplan SPD should help to ensure that this is the case.

The allocation at least 1,000 home mixed use redevelopment of RAF Halton, has a number of important heritage considerations - with several large listed buildings (including the Grade II\* Halton House) and the site adjacent to (potentially intersecting) Halton House Registered Park and Garden, and a scheduled monument ("long barrow 200 m east of parade ground") at the edge of the site - however, as the site is currently developed the assumption is that 'heritage led' redevelopment could be undertaken thereby avoiding negative impacts and potentially supporting heritage objectives.

## **Landscape**

The proximity of the Chilterns AONB a nationally designated landscape immediately adjacent the site will need to be addressed in the design and layout of any development. The SPD will be able to provide detailed guidance on how the presence of the Chilterns AONB is to be addressed, particularly in design, layout and character.

The site will be developed in line with Aylesbury Garden Town Principles. The SPD will set out measures or how green infrastructure on the site (minimum 50% of the site area) can be multifunctional, and accessible helping to create healthy sociable vibrant and walkable neighbourhoods. The green infrastructure should also be designed to maximise benefits for wildlife, recreation and water management and so can include space needed to mitigate any ecological impacts or any form of flood risk.

The existing site includes a number of open recreation areas and areas of woodland. There is a major opportunity to link the site better into Wendover and Halton, other new development areas and the wider countryside with green infrastructure networks. The site is in the Zone of Influence for recreational pressure impacts on Ashridge Commons and Woods and the

nearby Tring Woodlands SSSI. So the green infrastructure and outdoor recreation opportunities should consider what can be done to maximise recreational opportunities locally and relieve the pressure of users having to travel to what the Ashridge and Tring Woodland sites offer.

### **Climate change**

RAF Halton is a redevelopment opportunity of existing buildings and open spaces. So it offers opportunities for climate change benefits compared to a greenfield site. The addition of at least 1000 dwellings and the cars used by residents and their visitors (despite B4009 proposed junction improvements) could potentially cause some negative impacts in terms of climatic factors, such as an increase in local air pollution.

The SPD would be expected to facilitate active travel through the provision of new routes and multi-functional GI. It will also help in promoting active travel, such as walking or cycling. The SPD will also facilitate improved provision of public transport links into Wendover and surrounding areas. This could help new residents to use more sustainable travel modes compared to personal vehicles, and in turn, result in an improvement to the air quality.

The introduction of 1,000 new dwellings will inevitably cause an increase in energy consumption, pollution and traffic during both the construction and occupancy stages, to some extent.

The VALP Garden Town Principles (within Policy D1) to be followed through the SPD 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 VALP 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 SPD would benefit from inclusion of more specific guidance with regards to sustainable energy, water consumption and how the proposed development will be adaptable to climate change.

33. b) The cumulative nature of the effects

Response - It is highly unlikely there will be any negative cumulative effects of the policies. Any impact will be tackled in masterplanning including vision,

objectives and detailed design mitigated by measures. There are also specific measures set out in the D-HAL003 VALP Policy criteria (for example impact on the AONB, green belt, heritage, landscape and transport) or otherwise required in the adopted VALP policies. Cumulative effects have already been screened for the 2017 VALP Sustainability Appraisal report (all the growth committed and proposed in VALP plus neighbouring council plans) which is still considered up to date. There are no neighbourhood plan proposing significant development that could affect possible cumulative effects.

34. 2c) The trans-boundary nature of the effects

Response – Any impacts for example on the neighbouring Council area of Dacorum or neighbouring parishes including Wendover has already been assessed in the 2017 VALP Sustainability Appraisal report which is still considered up to date. Masterplanning, mitigation and infrastructure enhancement measures set out in the D-HAL003 VALP Policy criteria or otherwise required in the adopted VALP policies are to be covered in more detail in the SPD. For example, junction improvements on the B4009, heritage asset conservation, consideration of the impact on the green belt and AONB, enhancement of green infrastructure links, recreational and sports opportunities will limit the transboundary nature of any effects.

35. 2d) The risks to human health or the environment (e.g., due to accidents)

Response - No risks have been identified.

36. 2e) The magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected)

Likely to have significant environmental effects? – No

Reason - The SPD area covers an area of 82 ha. Any impacts for example on the neighbouring Council area of Dacorum or neighbouring parishes including Wendover has already been assessed in the 2017 VALP Sustainability Appraisal report which is still considered up to date. Masterplanning, mitigation and infrastructure enhancement measures set out in the D-HAL003 VALP Policy criteria or otherwise required in the adopted VALP policies are to be covered in more detail in the SPD. . For example, junction improvements on the B4009, heritage asset conservation, consideration of the impact on the green belt and AONB, enhancement of green infrastructure links, recreational

and sports opportunities. The SPD will only provide guidance on the delivery of these requirements including where best they are located within the site.

37. 2f) The value and vulnerability of the area likely to be affected due to:

- I. special natural characteristics or cultural heritage,
- II. exceeded environmental quality standards or limit values
- III. intensive land-use

Response –

### **Natural Characteristics**

See para 32 above for impact assessment on the natural environment including landscape.

### **Cultural Heritage**

See para 32 above for impact assessment

### **Environmental Quality Standards**

A development proposal that comes forward will have to provide the following to meet VALP Environmental Policies which will affect Environmental Quality Standards:

- A strategy for foul drainage (Policy I5)
- Up to date assessment of sewerage treatment capacity (Policy I5)
- A SuDs drainage strategy (VALP Policy I4)
- Feasibility assessment for district heating and cooling (Policy C3)
- Transport statement of assessment (Policy T5)
- Air quality and noise assessments (Policy NE5)
- Heritage assessments (Policy BE1)
- Ecological management plan (Policy NE1)
- Landscape and visual impact assessment (Policy NE3)

The SPD will be able to advise further on how these strategies and assessments required should affect the masterplan and development delivery guidance in the SPD

38. 2g) The effects on areas or landscapes which have a recognised national, community or international protection status

Response – The proximity of the Chilterns AONB a nationally designated landscape immediately adjacent the site will need to be addressed in the design and layout of any development (to be landscape-led). Halton House is a Registered Park and Garden. The existing open areas of the site will remain and the SPD will set out how the existing buildings can be redeveloped and refurbished. The SPD will be able to provide detailed guidance on how the presence of the Chilterns AONB is to be addressed, particularly in design, layout and character.

## 6. VALP Sustainability Appraisal, 2017

(See full SA attached to this SEA/HRA Screening and sent to 3 national consultees with the draft Screening, 21/10/22). In particular on pages 50-52 of the 2017 SA Technical Annexe:

[https://www.aylesburyvaledc.gov.uk/sites/default/files/page\\_downloads/VALP%20SA%20Report%20-%20Tech%20Annex%20170915.pdf](https://www.aylesburyvaledc.gov.uk/sites/default/files/page_downloads/VALP%20SA%20Report%20-%20Tech%20Annex%20170915.pdf)

39. **Biodiversity** is a key constraint at Halton Camp (Option 3), given the adjacent Wendover Woods LWS, which also stretches into part of the site. Also, on the far side of Wendover Woods is Dancers End SSSI, at c.1.2km distant.
40. There would be good potential to design-in **Sustainable Drainage Systems** (SuDS) such that rates of surface water run-off on-site are better than, or at least not any worse than, current rates. Also, it is noted that Halton Camp is a previously developed site, hence redevelopment will not necessarily lead to an increase in hard-standing; however, at the current time it is appropriate to 'flag' the risk associated with development at either site, i.e. flag Option 1 as preferable.
41. However, in practice there may be limited opportunity. Recent major (and indeed larger in scale) planning permissions granted in the District have not tended to include requirements in relation to **low carbon infrastructure**, reflecting viability considerations, i.e. the need to divert funds to other infrastructure, high quality design and affordable housing. At Halton Camp, it is also fair to assume that heritage, design etc. will be funding priorities; and at both sites it is anticipated that a funding priority would be delivery of a new primary school.
42. Halton Camp represents something of an 'opportunity', in **communities** terms, as there is an expectation that the site would deliver a new primary school and a local centre. There are also existing sports facilities etc which have the potential to be retained. Also, there is potential to deliver a **heritage-led scheme**, with a high quality urban realm and also excellent access to Wendover Woods and the wider Chilterns.
43. There is little reason to suggest that Halton Camp is suited to delivering employment land, recognising that the site is not well related to the strategic road network.

44. There are a number of important **heritage constraints** at Halton Camp, including: several large listed buildings; the adjacent Halton House Registered Park and Garden; and a scheduled monument ('long barrow 200 m east of parade ground') at the edge of the site. However, as the site is currently developed, the assumption is that 'heritage led' redevelopment could be undertaken (particularly by finding new uses for redundant, but listed, buildings e.g. barrack blocks) thereby avoiding negative impacts and potentially supporting heritage objectives.
45. **Landscape.** Halton Camp is inherently sensitive on the basis that it is adjacent to the AONB, and specifically adjacent to a steep wooded slope leading directly to the summit of Coombe Hill / Wendover Woods (the highest point in the Chilterns). However, the scarp slope is heavily wooded in this area, and so views into the site are minimised. The site is also currently 'washed over' by the Metropolitan Green Belt; however, the Buckinghamshire Green Belt assessment (2016) concluded that the extent of built development means that its contribution to Green Belt purposes is limited.
46. Halton Camp currently comprises built development, which of course means that it performs well in terms of '**Natural resources**'.
47. Focusing on **traffic congestion**, there are understood to be some existing issues in Wendover, focused on the B4009 and its junctions with the A413. This being the case, it could be suggested that Halton Camp is the preferable site, as a higher proportion of trips might be northwards, towards the A41 / away from Wendover. Also, it is important to bear in mind that there are existing car movements from Halton Camp.
48. However, the conclusion that Halton Camp is preferable is not clear cut. There is a need to consider the possibility that walking/cycling into Wendover may be less attractive from Halton Camp than from alternative sites. Another possible concern, relating to the Halton Camp site, is the attractiveness of 'rat running' through Halton (a small village), in order to reach Aylesbury.

## 7. SEA Screening Opinion

49. This SEA screening report has evaluated the likelihood of any significant effects arising against the criteria set out in the SEA Regulations. It can be concluded that the D-HAL003 RAF Halton SPD is likely to have a significant environmental impact on the surrounding area and will therefore require an SEA in relation to:

- Cultural Heritage
- Landscape and
- Climate Change

50. Furthermore, the requirement for an appropriate assessment of the SPD as identified by the Council consequently triggers the requirement for an SEA under Regulation 5(3) of the SEA Regulations.

51. Therefore, a Strategic Environmental Assessment (SEA) is needed. The SEA will need to involve the Council's conservation team and archaeological advisers as recommended by Historic England in their consultation response to this screening. Also taking a holistic approach to the site's (re)development. As a result, it will be important for the SEA to consider effects on cultural heritage not only linked with heritage assets within the site boundary, but also on the edge of or just outside the allocated site's boundary, including:

- a) Assessing effects on the Scheduled Monument (SM) and its setting
- b) Assessing effects on the Registered Park & Garden (RPG)
- c) Assessing effects on the setting of Halton House



## **8. Habitat Regulations Assessment Screening**

### **Introduction**

52. The screening statement will consider whether the scope for an SPD for Site D-HAL003 RAF Halton requires a Habitats Regulations Assessment. This is a requirement of Regulation 106 of the Conservation of Habitats and Species Regulations 2017.

### **The Habitats Regulations Assessment (HRA) process**

53. The requirements for undertaking an appropriate assessment under the Habitats Regulations are set out within the Conservation of Habitats and Species Regulations 2017 (as amended).
54. The Regulations (63.(1)) provide that “ A competent authority, before deciding to undertake, or give any consent, permission or other authorisation for, a plan or project which — (a) is likely to have a significant effect on a European site or a European offshore marine site (either alone or in combination with other plans or projects), and (b) is not directly connected with or necessary to the management of that site, must make an appropriate assessment of the implications of the plan or project for that site in view of that site’s conservation objectives.”
55. The National Planning Practice Guidance in relation to “Appropriate Assessment” clarifies the circumstances in which a non-strategic plan, which this SPD is, can rely on an appropriate assessment undertaken for a local plan (see Paragraph 008 Reference ID: 65-008-20190722)
56. The HRA process assesses the potential effects of a land-use plan against the conservation objectives of any European sites designated for their importance to nature conservation. These sites form a system of internationally important sites throughout Europe and are known collectively as the ‘Natura 2000 network’.

57. European sites provide valuable ecological infrastructure for the protection of rare, endangered or vulnerable natural habitats and species of exceptional importance within the EU. These sites consist of Special Areas of Conservation (SAC), designated under the Habitats Directive and Special Protection Areas (SPA), designated under European Directive 2009/147/EC on the conservation of wild birds (the Birds Directive). Additionally, Government policy requires that sites designated under the Ramsar Convention (The Convention on Wetlands of International Importance, especially as Waterfowl Habitat) are treated as if they are fully designated European sites for the purpose of considering development proposals that may affect them.
58. Decision-makers then must determine what action/s to take. They should take account of the potential consequences of no action, the uncertainties inherent in scientific evaluation, and should consult interested parties on the possible ways of managing the risk. Measures should be proportionate to the level of risk, and to the desired level of protection. They should be provisional in nature pending the availability of more reliable scientific data.
59. Action is then undertaken to obtain further information, enabling a more objective assessment of the risk. The measures taken to manage the risk should be maintained so long as scientific information remains inconclusive and the risk is unacceptable.
60. The hierarchy of intervention is important: where significant effects are likely or uncertain, plan makers must firstly seek to avoid the effect through for example, a change of policy. If this is not possible, mitigation measures should be explored to remove or reduce the significant effect. If neither avoidance, nor subsequently, mitigation is possible, alternatives to the plan should be considered. Such alternatives should explore ways of achieving the plan's objectives that do not adversely affect European sites.
61. If no suitable alternatives exist, plan-makers must demonstrate under the conditions of Regulation 107 of the Habitats Regulations, that there are Imperative Reasons of Overriding Public Interest (IROPI) to continue with the proposal.
62. There are no areas of Natura 2000 sites (Special Areas of Conservation or Special Protection Areas) in the parish. The nearest such site is the Chiltern

Beechwoods Special Area of Conservation 3.7km to the east at Tring Woodlands.

63. The SPD area is in the 12.6km Zone of Influence of the Ashridge Commons and Woods SSSI but not the 1.7km ZOI to the Tring Woodlands SSSI (see the recreational pressures issue affecting these SSSIs confirmed in March 2022 [Chilterns Beechwoods Special Area of Conservation \(dacorum.gov.uk\)](https://dacorum.gov.uk) . The nearest part of these SSSIs within the SAC (Tring Woodlands) is 3.7km away to the east.
64. The Council must under Regulation 105 provide such information as the appropriate authority (Natural England) may reasonably require for the purposes of the discharge by the appropriate authority of its obligations. That information is this screening recommendation and the 2017 HRA of the Vale of Aylesbury Local Plan - Addendum - RAF Halton [https://www.aylesburyvaledc.gov.uk/sites/default/files/page\\_downloads/HRA%20Addendum%20final%20to%20publishing%2007%2009%2017%20%281%29.pdf](https://www.aylesburyvaledc.gov.uk/sites/default/files/page_downloads/HRA%20Addendum%20final%20to%20publishing%2007%2009%2017%20%281%29.pdf), 2019 (updated HRA accounting for “People Over Wind” judgement), 2020 (Main Modifications to VALP) and 2021 (Further Main Modifications to VALP) HRA Reports.

## People over Wind

65. The HRA Screening in light of the 2017 ‘People over Wind’ Court of Justice of the European Union (CJEU) case which ruled that where there would be likely significant effects at the HRA Stage 1 Screening stage, mitigation measures (specifically measures which avoid or reduce adverse effects) should be assessed as part of an Appropriate Assessment and should not be taken into account at the screening stage.
66. The Council considers that in re-applying the criteria in section 8 of this HRA Screening on the likely the screening outcome and considering the ‘People over Wind’ CJEU case, there are not likely to be likely significant effects. The SPD alone will not propose any additional development, infrastructure requirements or mitigation not already required to meet the Adopted VALP Policies or specifically identified in Policy D-HAL003 site allocation policy criteria.

## 9. Stages of HRA

### **Stage 1: Screening (the ‘Significance Test’) that is this current stage**

- 67. Task - Description of the plan. Identification of potential effects on European Sites. Assessing the effects on European Sites.
- 68. Outcome - Where effects are unlikely, prepare a ‘finding of no significant effect report’. Where effects judged likely, or lack of information to prove otherwise, proceed to Stage 2.

### **Stage 2: Appropriate Assessment (the ‘Integrity Test’) – If Screening Outcome says needed**

- 69. Task - Gather information (plan and European Sites). Impact prediction. Evaluation of impacts in view of conservation objectives. Where impacts considered to affect qualifying features, identify alternative options. Assess alternative options. If no alternatives exist, define and evaluate mitigation measures where necessary.
- 70. Outcome - Appropriate assessment report describing the plan, European site baseline conditions, the adverse effects of the plan on the European site, how these effects will be avoided through, firstly, avoidance, and secondly, mitigation including the mechanisms and timescale for these mitigation measures. If effects remain after all alternatives and mitigation measures have been considered proceed to Stage 3.

### **Stage 3: Assessment where no alternatives exist and adverse impacts remain taking into account mitigation**

- 71. Task - Identify ‘imperative reasons of overriding public interest’ (IROPI). Identify potential compensatory measures.
- 72. Outcome - This stage should be avoided if at all possible. The test of IROPI and the requirements for compensation are extremely onerous.

## Potential impacts and activities adversely affecting European sites

### Broad categories and examples of potential impacts on European sites

- 73. **Physical loss.** Removal (including offsite effects, e.g., foraging habitat), Smothering, Habitat degradation
- 74. **Physical Damage.** Sedimentation / silting, Prevention of natural processes, Habitat degradation, Erosion, Trampling, Fragmentation, Severance / barrier effect, Edge effects, Fire
- 75. **Non-physical (and indirect) disturbance.** Noise, Vibration, Visual presence, Human presence, Light pollution
- 76. **Water table/availability.** Drying, Flooding / storm water, Water level and stability, Water flow (e.g., reduction in velocity of surface water, Barrier effect (on migratory species)
- 77. **Toxic contamination.** Water pollution, Soil contamination, Air pollution
- 78. **Non-toxic contamination.** Nutrient enrichment (e.g., of soils and water), Algal blooms, Changes in salinity, Changes in thermal regime, Changes in turbidity, Air pollution (dust)
- 79. **Biological disturbance,** Direct mortality, Out-competition by non-native species, Selective extraction of species, Introduction of disease, Rapid population fluctuations, Natural succession

### Examples of activities responsible for impacts

(Paragraphs correspond to categories above in bold)

- 80. Development (e.g., housing, employment, infrastructure, tourism), Infilling (e.g., of mines, water bodies), Alterations or works to disused quarries, Structural alterations to buildings (bat roosts), Afforestation, Tipping, Cessation of or inappropriate management for nature conservation, Mine collapse
- 81. Flood defences, Dredging, Mineral extraction, Recreation (e.g., motor cycling, cycling, walking, horse riding, water sports, caving), Development (e.g., infrastructure, tourism, adjacent housing etc.), Vandalism, Arson, Cessation of or inappropriate management for nature conservation

82. Development (e.g., housing, industrial), Recreation (e.g., dog walking, water sports), Industrial activity, Mineral extraction, Navigation, Vehicular traffic, Artificial lighting (e.g., street lighting)
83. Water abstraction, Drainage interception (e.g., reservoir, dam, infrastructure and other development), Increased discharge (e.g., drainage, runoff)
84. Agrochemical application and runoff, Navigation, Oil / chemical spills, Tipping, Landfill, Vehicular traffic, Industrial waste / emissions
85. Agricultural runoff, Sewage discharge, Water abstraction, Industrial activity, Flood defences, Navigation, Construction
86. Development (e.g., housing areas with domestic and public gardens), Predation by domestic pets, Introduction of non-native species (e.g., from gardens), Fishing, Hunting, Agriculture, Changes in management practices (e.g., grazing regimes, access controls, cutting/clearing)

## 10. HRA Screening of the D-HAL003 Site RAF Halton SPD Scope

### Background

87. The first stage in carrying out an Appropriate Assessment for the Habitats Directive is screening, by determining whether the plan is likely to have any significant effect on a European site, either alone or in combination with other plans and projects.
88. The Vale of Aylesbury Local Plan HRA report 2019 (revised HRA Screening following 'People Over Wind' and Appropriate Assessment) can be found at [https://www.aylesburyvaledc.gov.uk/sites/default/files/page\\_downloads/ED187%20Vale%20of%20Aylesbury%20Local%20Plan%20-%20Final%20HRA%20Report.pdf](https://www.aylesburyvaledc.gov.uk/sites/default/files/page_downloads/ED187%20Vale%20of%20Aylesbury%20Local%20Plan%20-%20Final%20HRA%20Report.pdf) The report concluded that there was uncertainty in the likely significant effects of the plan (including Modifications) on the Chiltern Beechwoods SAC on the issues of recreational pressures and air pollution. This Assessment concludes that the Vale of Aylesbury Local Plan will not adversely affect, either alone or in combination with other plans or projects, the integrity of the Chilterns Beechwoods SAC or any other protected site. At paragraph 6.27 the 2019 VALP HRA states in conclusion:
- “In light of the above, providing that the adopted VALP includes the previously omitted open space standards specified in Policy I1 and there is a commitment by AVDC to ensure that the SPD Masterplan provides natural greenspace that contributes to alleviating visitor pressure on the SAC, the VALP will not result in adverse effects on European Sites, either alone or in combination with other plans and projects”.
89. A further 2020 HRA Report covering the VALP Modifications of 2019 and in 2020 and HRA of the VALP Further Modifications did not change this conclusion. They did not have any specific coverage of the D-HAL003 RAF Halton site and no likely significant effects were identified for D-HAL003 on the basis that the local plan required modifications were taken into account.

## Interpretation of ‘likely significant effect’

90. Relevant case law helps to interpret when effects should be considered as being likely to result in a significant effect, when carrying out a HRA of a plan. In the Waddenzee case, the European Court of Justice ruled on the interpretation of Article 6(3) of the Habitats Directive (translated into Reg. 102 in the Habitats Regulations), including that:

- An effect should be considered ‘likely’, “if it cannot be excluded, on the basis of objective information, that it will have a significant effect on the site” (para 44).
- An effect should be considered ‘significant’, “if it undermines the conservation objectives” (para 48).
- Where a plan or project has an effect on a site “but is not likely to undermine its conservation objectives, it cannot be considered likely to have a significant effect on the site concerned” (para 47).

91. An opinion delivered to the Court of Justice of the European Union commented that:

“The requirement that an effect in question be ‘significant’ exists in order to lay down a de minimis threshold. Plans or projects that have no appreciable effect on the site are thereby excluded. If all plans or projects capable of having any effect whatsoever on the site were to be caught by Article 6(3), activities on or near the site would risk being impossible by reason of legislative overkill.”

92. This opinion (the ‘Sweetman’ case) therefore allows for the authorisation of plans and projects whose possible effects, alone or in combination, can be considered ‘trivial’ or de minimis; referring to such cases as those “which have no appreciable effect on the site”. In practice such effects could be screened out as having no likely significant effect; they would be ‘insignificant’.

## Assessment of the SPD Scope

### SPD - What It Will Contain



The SPD Masterplan will cover the following:

- How a comprehensive approach to development of the site can be achieved through a masterplan and design details.
- Where the housing (at least 1,000 homes) is to be located on the site, the layout of housing blocks relative to public realm, private spaces and other land uses.
- Address how the scale and massing of buildings on the site is to be considered through a development proposal and openness of the green belt and impact on adjacent settlement character and identity
- Address the heritage assets and seek to reuse and enhance where possible.
- The mix of dwelling types and tenures to be sought
- How the principles of development for Aylesbury Garden Town (see VALP Policy D1 (a) to (i) are to be applied in proposals for developing this site. In particular, principle (h) which seeks to achieve a minimum 50% of land to be used as multi-functional accessible green infrastructure.
- How development is to be landscape-led in design and responds to the character and setting of the Chilterns AONB. The SPD in its Masterplan and guidance will need to explain how this is to be done.
- The 50% of Green Infrastructure required on the site should reflect in how it is masterplanned (type of GI, location of GI) the high level of open space already present on the site including green corridors and link with other new development areas and the wider countryside.
- Location of a local centre including community hall including its land, buildings and car parking.
- The details of junction improvements onto the B4009 Upper Icknield Way.
- The masterplan and guidance should cover the provision of public transport from the site into Wendover and to surrounding areas and show how this would be achieved in and around the site.
- Routes and safe places for cycling and walking across the site linking to and from Aylesbury Town, Wendover and to the wider area.
- Set out the location of land, buildings and car parking (to meet standards in the VALP) for a combined primary school including location and details of playing field provision.
- Where the key heritage assets are and how they will be conserved and managed along with management of their setting.

- Where the existing sports facilities are and how they will be managed as part of a long term strategy for sport and recreation to serve new residents and the existing community.
- Details of all infrastructure and services required and their locations.

## Assessment

93. The SPD does not introduce any new development not already in the Adopted Vale of Aylesbury Local Plan Adopted in September 2021. [https://www.buckinghamshire.gov.uk/documents/9742/Aylesbury\\_local\\_plan\\_L46JWaT.pdf](https://www.buckinghamshire.gov.uk/documents/9742/Aylesbury_local_plan_L46JWaT.pdf) . The SPD is a delivery document to set out guidance on where and how the site allocation criteria should be met, other VALP policies, a masterplan and details of infrastructure delivery. So there will be no additional impact in HRA terms to what has already been assessed in HRA reports for the VALP (2017 Addendum on RAF Halton, 2019 HRA).
94. The 2019 VALP HRA Report (June 2019) para 5.28 set out “The only housing allocation within 7km of the Chilterns Beechwood SAC is HAL003 (RAF Halton). This site is located 2.9km to the west of Tring Woodlands SSSI, and 5.3km to the northeast of Ellesborough and Kimble Warren SSSI, both component sites of the SAC. Notably, the local plan specifies at Policy ‘D-HAL003 RAF Halton’ that the development of the site will include “provision of 50% green infrastructure, to reflect the high level of open space already present on the site including green corridors linking development with the surrounding countryside”, and the “Provision of links to and from Aylesbury Town and to the wider area including for walking and cycling”. These measures would be expected to provide a sufficient level of certainty that recreational demands associated with the provision of 1000 dwellings at the site will be directed to local high quality options, thereby alleviating potential recreational pressures on the Chiltern Beechwoods SAC.” It was clear in that assessment that the VALP allocation at site D-HAL003 would not result in adverse effects on the integrity of the Chiltern Beechwoods SAC.
95. In terms of air pollution, Page 2 of the 2017 HRA addendum on RAF Halton set out: “This is a relatively modest increase within the context of the total plan growth, the effects of which have previously be modelled and found to be insignificant, with considerable headroom for additional growth

before the 1,000AADT screening threshold could be reached. As such the effect of the potential changes to the VALP may be dismissed as de minimis and the conclusion of no likely significant effects remains valid.”

96. There are no areas of Natura 2000 sites (Special Areas of Conservation or Special Protection Areas) in the SPD area. The nearest such site is the Chiltern Beechwoods Special Area of Conservation 3.7km to the east at Tring Woodlands.
97. The SPD area is in the 12.6km Zone of Influence of the Ashridge Commons and Woods SSSI but not the 1.7km ZOI to the Tring Woodlands SSSI (see the recreational pressures issue affecting these SSSIs confirmed in March 2022 Chilterns Beechwoods Special Area of Conservation (<https://www.dacorum.gov.uk/home/news/2022/03/14/new-strategy-to-protect-ashridge-estate-and-tring-woodlands>) ). The nearest part of these SSSIs within the SAC (Tring Woodlands) is 3.7km away to the east.
98. In terms of ‘in combination effects’ it is not considered there would be any in-combination effects of the SPD when added to the requirements of site allocation policy D-HAL003 in the Vale of Aylesbury Local Plan. Please see 2017 HRA Addendum on RAF Halton pages 2-3 for how in-combination have been assessed and then the 2019 HRA report and 2020 HRA (Main Modifications to VALP) and 2021 (further Main Modifications to VALP). This plan has had its own HRA legal requirements met (by the local plan Inspector’s Report, August 2021) and the VALP, following an Appropriate Assessment incorporated specific mitigation measures in its policies and allocated sites for affecting the Chiltern Beechwoods SAC. There are not considered to be any in-combination effects from local plans or other plans and projects in other Council areas.

## 11. HRA screening outcome

99. The Vale of Aylesbury Local Plan HRA findings regarding the need for recreational pressure mitigation from the housing growth impacts on the Chiltern Beechwoods SAC have led directly to the inclusion of policies and proposals on green infrastructure mitigation as set out in Policy I1 and D-AGT1 of VALP. As the SPD is expected to add further details on the type of GI, location of GI and management of GI in how the policy requirements will be met on the RAF Halton site there is clearly a need for this further level of detail on mitigation to be evaluated in HRA terms. Therefore, as these details were not available to the VALP Appropriate Assessment, an Appropriate Assessment should be carried out for the scope/draft SPD to evaluate if the mitigation details proposed are adequate or if there would be adverse effects on the Chiltern Beechwoods SAC either alone or in combination with other plans and projects.
100. Buckinghamshire Council concludes following the HRA screening of this SPD Scope is that the SPD requires an Appropriate Assessment, to assess the effects of all of the proposals and measures contained within the SPD scope that relate to the development of the RAF Halton Masterplan site including the proposed recreational pressure mitigation of effects on Chiltern Beechwoods SAC.
101. The HRA work for the SPD will involve the production of the following:
  - An Appropriate Assessment Report to accompany the draft Supplementary Planning Document (SPD) in consultation with Natural England.
102. This conclusion reflects the consultation with Natural England and the final outcome will takes account of their response.

## 12. Conclusions

103. Based on the above assessment, the screening outcome is that the Scope for a Site D-HAL003 RAF Halton SPD requires both a Strategic Environmental Assessment (SEA) and a under the Habitats Regulations, a Stage 2 of HRA- an Appropriate Assessment.

## 13. Consultation Responses

### Historic England

**Response received 16.11.2022**

FAO: David Broadley

Principal Planning Officer

Buckinghamshire Council

[david.broadley@buckinghamshire.gov.uk](mailto:david.broadley@buckinghamshire.gov.uk)

by email only

**Our ref: PL00791597**

15 November 2022

Dear David

**Site D-HAL003, RAF Halton SPD: Strategic Environmental Assessment (SEA)**

#### **Screening Opinion**

Thank you for consulting Historic England about the above Screening Opinion. On the basis that the proposed SPD is a plan which is both required by legislative, regulatory or administrative provisions and, in terms of our area of interest, seems likely to result in significant effects upon the historic environment, Historic England considers that a Strategic Environmental Assessment is required for this document.

#### **Taking a holistic approach**

We recommend taking a holistic approach to the site's (re)development. As a result, it will be important for the SEA to consider effects on cultural heritage not only linked with heritage assets within the site boundary, but also on the edge of or just outside the allocated site's boundary, including:

- a) Assessing effects on the Scheduled Monument (SM) and its setting
- b) Assessing effects on the Registered Park & Garden (RPG)

c) Assessing effects on the setting of Halton House

The wording on page 25 of the draft screening assessment mentions the SM and the RPG, as does paragraph 44, but neither explicitly mentions Halton House (GII\*), the setting of which undoubtedly will be impacted by the SPD proposals. Furthermore, when mentioning effects on areas or landscapes, paragraph 38 mentions the Chilterns AONB, but it does not mention the RPG. Similarly, paragraph 45 on landscape does not mention the RPG. This omission should be rectified. (As a minor aside, we note reference to ‘para 39 above’ twice on page 28. This reference is not correct. Should this be to para 32?)

**Involvement of the local historic environment services**

Historic England is aware that the Council’s conservation team and archaeological advisers are already involved in discussions relating to the preparation of this SPD, and strongly advises these colleagues are closely involved throughout the preparation of the SEA of this SPD. 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.

**Final comments**

Historic England has produced guidance for all involved in undertaking SEA exercises which gives advice on issues relating to the historic environment. This can be found here [Sustainability Appraisal and Strategic Environmental Assessment | Historic England](#) .

This opinion is based on the information provided by you in the document dated 28 October 2022 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 plan 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

Guy Robinson

Historic Environment Planning Adviser

Development Advice – London and the South East Region



## Natural England

**Response received 02.12.2022**

**Planning consultation:** Site D-HAL003 RAF Halton SPD – SEA and HRA Screening

**Our ref:** 411053

Thank you for your consultation on the above dated 28<sup>th</sup> October 2022 which was received by Natural England on the same day.

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.

Based on the plan submitted, Natural England agree with the assessment that the Supplementary Planning Document **does** require an SEA and HRA.

Should the proposal change, please consult us again.

If you have any queries relating to this advice, please contact me on the details below.

Yours sincerely,

Ellen

**Ellen Satchwell**

Sustainable Development Lead Adviser

Thames Solent Team | Natural England

## **Environment Agency**

No comments received