

# Habitats Regulations Assessment of the D-AGT1 South Aylesbury Supplementary Planning Document

## Habitats Regulations Assessment Report

August 2022



**LEPUS** CONSULTING  
LANDSCAPE, ECOLOGY, PLANNING & URBAN SUSTAINABILITY



# Habitats Regulations Assessment of the South Aylesbury (D-AGT 1) Supplementary Planning Document

## Habitats Regulations Assessment Report

LC-746	Document Control Box
Client	Buckinghamshire Council
Report Title	Report to Inform the Habitats Regulations Assessment of the South Aylesbury (AGT1) SPD
Status	Final
Filename	LC-746_Aylesbury SPD-HRA_8_010822SC.docx
Date	August 2022
Author	SC
Reviewed	NJD
Approved	NJD

# Contents

1	Introduction .....	1
1.1	Background .....	1
1.2	Purpose of this report .....	1
2	Aylesbury South (AGT1) SPD .....	2
2.1	Background Context .....	2
2.2	Aylesbury South Masterplan .....	3
3	The HRA Process .....	6
3.1	Overview .....	6
4	Methodology .....	9
4.1	HRA guidance .....	9
4.2	HRA methodology .....	9
4.3	Stage 1: Screening for likely significant effects .....	9
4.4	What is a Likely Significant Effect? .....	9
4.5	Consideration of mitigation measures .....	11
4.6	Stage 2: Appropriate Assessment and Integrity Test .....	11
4.7	Dealing with uncertainty .....	12
4.8	The Precautionary Principle .....	12
5	Vale of Aylesbury Local Plan HRA .....	14
5.1	Introduction .....	14
5.2	Vale of Aylesbury Local Plan 2017 Submission HRA .....	14
5.3	RAF Halton HRA Update .....	14
5.4	Vale of Aylesbury Local Plan 2013 – 2033 HRA .....	14
5.5	Vale of Aylesbury Local Plan 2013-2033 Proposed Further Modifications Stage – HRA Addendum .....	15
6	HRA Stage 1: Screening .....	16
6.1	Aylesbury South SPD HRA Screening .....	16
6.2	Screening Consultation .....	16
7	HRA Stage 2: Appropriate Assessment .....	17
7.1	Introduction .....	17
7.2	Chilterns Beechwoods SAC .....	17
7.3	Ecological Condition .....	21
7.4	Public Access and Disturbance Threats .....	22
7.5	Ashridge Commons and Woods SSSI component of the SAC .....	23
7.6	Aston Rowant Woods SSSI component of the SAC .....	27
7.7	Bisham Woods SSSI component of the SAC .....	28
7.8	Bradenham Woods, Park Wood and The Coppice SSSI component of the SAC .....	29
7.9	Ellesborough and Kimble Warrens SSSI component of the SAC .....	29
7.10	Hollowhill and Pullingshill Wood SSSI component of the SAC .....	30
7.11	Naphill Common SSSI component of the SAC .....	31
7.12	Tring Woodlands SSSI component of the SAC .....	31
7.13	Windsor Hill SSSI component of the SAC .....	33
7.14	Components of the SAC sensitive to recreational impacts .....	33
7.15	South Aylesbury Site .....	34
7.16	Recreational Mitigation .....	35
7.17	Alone assessment .....	41
7.18	In-combination assessment .....	41
8	Conclusions and Next Steps .....	43
8.1	Conclusions .....	43
8.2	Next steps .....	43

Appendix A Habitats Site Conservation Objectives and Threats /Pressures

Appendix B SSSI Favourable Conservation Status

---

Appendix C Ashridge Commons and Woods suggested SANG guidelines

## List of Figures

<b>Figure 3.1: Stages in the Habitats Regulations Assessment process</b> .....	8
<b>Figure 7.1: Location of Chilterns Beechwoods SAC and constituent SSSIs</b> .....	19
<b>Figure 7.2: Ashridge Commons and Woods SSSI ZOI</b> .....	26
<b>Figure 7.3: Areas of Development and Infrastructure within AGTI (Source: South Aylesbury SPD, August 2022)</b> .....	37
<b>Figure 7.4: SPD ANGSt compliant GI Plan (Source: South Aylesbury SPD, August 2022)</b> .....	38

## List of Tables

<b>Table 7.1: SSSI components which are coincident with the Chilterns Beechwoods SAC</b> .....	18
--	----

---

# Acronyms

AA	Appropriate Assessment
AADT	Annual Average Daily Traffic
AIOSI	Adverse Impact on Site Integrity
AONB	Area of Outstanding Natural Beauty §
CJEU	Court of Justice of the European Union
DfT	Department for Transport
DMRB	Design Manual for Roads and Bridges
DTA	David Tyldesley and Associates
GI	Green Infrastructure
GIS	Geographic Information System
ha	Hectares
HRA	Habitat Regulation Assessment
HEELA	Housing and Economic Land Availability Assessment
IRZ	Impact Risk Zone
IUCN	International Union for Conservation of Nature
JNCC	Joint Nature Conservation Committee
LSE	Likely Significant Effect
NDP	Neighbourhood Development Plan
NE	Natural England
NNR	National Nature Reserve
NPPF	National Planning Policy Framework
NVC	National Vegetation Classification
NP	Neighbourhood Plan
PRoW	Public Right of Way
SAC	Special Area of Conservation
SEALR	South East Aylesbury Link Road
SIP	Site Improvement Plan
SPA	Special Protection Area
SPD	Supplementary Planning Document
SSSI	Site of Special Scientific Interest
UK	United Kingdom
VALP	Vale of Aylesbury Local Plan
ZOI	Zone of Influence

# 1 Introduction

## 1.1 Background

1.1.1 The purpose of supplementary planning documents (SPDs) is to build upon and provide more detailed advice or guidance on policies in an adopted local plan. The National Planning Policy Framework (NPPF) defines SPDs as:

1.1.2 *Documents which add further detail to the policies in the development plan. They can be used to provide further guidance for development on specific sites, or on particular issues, such as design. Supplementary planning documents are capable of being a material consideration in planning decisions but are not part of the development plan<sup>1</sup>.*

1.1.3 Buckinghamshire Council is in the process of preparing an SPD for Aylesbury South (AGT1). The purpose of this SPD is to provide guidance on the future sustainable development of the strategic site known as Aylesbury South (AGT1), specifically in relation to policy D-AGT 1 Aylesbury South of the Vale of Aylesbury Local Plan<sup>2</sup>.

1.1.4 Lepus Consulting has prepared this report to inform the Habitats Regulations Assessment (HRA) of the SPD<sup>3</sup> on behalf of the Buckinghamshire Council.

## 1.2 Purpose of this report

1.2.1 The HRA has been prepared in accordance with the Conservation of Habitats and Species Regulations 2017 (as amended)<sup>4</sup>, known as the Habitats Regulations. When preparing plans, councils are required by law to carry out an HRA. The requirement for authorities to comply with the Habitats Regulations when preparing a plan is also noted in the Government's online planning practice guidance<sup>5</sup>.

1.2.2 The purpose of this report is to inform the HRA of the SPD using best available information. Buckinghamshire Council, as the Competent Authority, will have responsibility to make the Integrity Test. This can be undertaken in light of the conclusions set out in this report, having regard to representations made by Natural England under the provisions of Regulations 63(3) and 105(2) of the Habitats Regulations.

---

<sup>1</sup> Ministry of Housing, Communities & Local Government (July 2021). National Planning Policy Framework. Para 181. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1005759/NPPF\\_July\\_2021.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf) [Date Accessed: 25/11/21]

<sup>2</sup> Buckinghamshire Council. Vale of Aylesbury Local Plan (VALP) 2013 – 2033. September 2021. Adopted Plan. <https://www.aylesburyvaledc.gov.uk/sites/default/files/VALP/AppendixA/Adopted%20Vale%20of%20Aylesbury%20Local%20Plan%201.pdf> Available at: [Date Accessed: 25/11/21]

<sup>3</sup> Vale of Aylesbury Local Plan. Aylesbury Garden Town 1. Supplementary Planning Document. Draft for Consultation. 28<sup>th</sup> July 2022.

<sup>4</sup> The Conservation of Habitats and Species Regulations 2017 SI No. 2017/1012, TSO (The Stationery Office), London. Available at: <https://www.legislation.gov.uk/uksi/2017/1012/contents> [Date Accessed: 29/01/21] as amended by The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019. Available at: <https://www.legislation.gov.uk/ukdsi/2019/9780111176573> [Date Accessed: 29/01/21]

<sup>5</sup> Ministry of Housing, Communities and Local Government (July 2019) Planning Practice Guidance Note, Appropriate Assessment, Guidance on the use of Habitats Regulations Assessment

## 2 Aylesbury South (AGT1) SPD

### 2.1 Background Context

- 2.1.1 The Vale of Aylesbury Local Plan (VALP) 2013-2033 was adopted by Buckinghamshire Council as a Development Plan Document on the 15<sup>th</sup> September 2021<sup>6</sup>.
- 2.1.2 Development to the south of Aylesbury is allocated as a strategic site for Aylesbury and contributes to the delivery of Aylesbury Garden Town<sup>7</sup>.
- 2.1.3 This allocation comprises the following Housing and Economic Land Availability Assessment (HELAA) sites as set out in the VALP:
- Land south of Stoke Mandeville Hospital (SMD004)
  - Land around Red House Farm, Lower Road (SMD005)
  - Land north of Stoke Mandeville adjacent Lower Road (SMD006)
  - Land south of Aylesbury adjacent to Wendover Road (SMD007)
  - Land between railway line and Wendover Road (SMD008)
  - Land straddling railway line north of Stoke Mandeville (SMD016)
- 2.1.4 This strategic allocation is implemented in the VALP through Policy D-AGT 1 and will make provisions for the following:
- At least 1,000 dwellings
  - One primary school
  - Multi-functional green infrastructure
  - Aylesbury South East Link Road (A413 to B4443 Lower Road)
  - Local centre
  - Cycling and walking links
- 2.1.5 Given the large number of smaller parcels that make up this allocation, an overall Aylesbury South (AGT1) Masterplan is essential to ensure a co-ordinated and comprehensive approach to development, and to guide phasing of the site. This includes a coordinated approach to vehicular access which will be provided from the B4443 Lower Road and A413 Wendover Road.
- 2.1.6 The Aylesbury South (AGT1) Masterplan will become an adopted SPD. The SPD expands upon Policy D-AGT 1 to provide a framework to help guide the preparation and assessment of future planning applications within the site. The SPD will form a material consideration which will be taken into account by the Buckinghamshire Council when determining any future planning applications for the area.

---

<sup>6</sup> Buckinghamshire Council. Vale of Aylesbury Local Plan (VALP) 2013 – 2033. September 2021. Adopted Plan.

<https://www.aylesburyvaledc.gov.uk/sites/default/files/VALP/AppendixA/Adopted%20Vale%20of%20Aylesbury%20Local%20Plan%201.pdf>

Available at: [Date Accessed: 25/11/21]

<sup>7</sup> <https://www.aylesburygardentown.co.uk/>

2.1.7 Also of relevance will be the emerging Neighbourhood Plan (NP) for the local area, Stoke Mandeville, which is currently being prepared by the Parish Council<sup>8</sup>.

## 2.2 Aylesbury South Masterplan

2.2.1 The Aylesbury South Masterplan will:

- Be a masterplan to ensure the comprehensive development of the strategic allocation D-AGT1 in VALP.
- Cover the site layout and disposition of land uses.
- Provide further guidance and information on the expected time of development delivery. The expected time of delivery in VALP as Further Modified is 39 homes delivered up to 2020, 161 homes to be delivered 2020-2025 and 800 homes to be delivered 2025-2033.
- Ensure a co-ordinated and comprehensive approach to development, and to guide phasing of the site.
- Include a coordinated approach to vehicular access which should be achieved from the B4443 Lower Road and A413 Wendover Road.
- Provide further detail on how the policy criteria in VALP Policy D-AGT1 will be met.

2.2.2 The criteria for Policy D-AGT 1 as set out in the VALP are provided in **Box 1**:

---

<sup>8</sup> Stoke Mandeville Parish Council. 2021. A Neighbourhood Plan for Stoke Mandeville. Available at: <https://www.stokemandevilleparishcouncil.org.uk/neighbourhood-plan/> [Date Accessed: 26/11/21]



**Box 1**

**D-AGT 1 Policy Criteria (extracted from VALP)**

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:

- a. Provision of land for at least 1,000 dwellings at a density that takes account of the adjacent settlement character and identity, integrates new development with the existing built area of Aylesbury and responds positively to the best characteristics of the surrounding area
- b. Provision of 5 Gypsy and Traveller pitches
- c. Safeguarding the land required for the delivery of a dual carriageway distributor road (the SEALR) between B4443 Lower Road and A413 Wendover Road to cross the railway line, with sufficient land for associated works including but not limited to earthworks, drainage and structures
- d. Provision of new access points into the development parcels from the B4443 Lower Road and A413 Wendover Road. Access from the South East Aylesbury Link Road (SEALR) will not be supported unless it can be demonstrated that this would leave parcels of land inaccessible and incapable of development.
- e. Provision for public transport into the town and to surrounding areas
- f. Existing vegetation should be retained where practicable, including existing woodlands and hedgerows. Existing public rights of way need to be retained and integrated into the development within safe and secure environments as part of a wider network of sustainable routes, to directly and appropriately link the site with surrounding communities and facilities
- g. Proposals must retain and enhance existing habitats where practicable, including the creation of linkages with surrounding wildlife assets and green corridors linking development with the wider countryside and surrounding communities.
- h. Provision and management of 50% green infrastructure to link to other new development areas and the wider countryside as part of a high quality built and semi-natural environment
- i. The development should be designed using a landscape-led approach including consideration of the long-distance views of the AONB and the field pattern and landscape features on the site
- j. Detailed modelling will be required to confirm 1 in 20, 100 and 1,000 year extents and 1 in 100 year plus climate change extents on the ordinary watercourse (see SFRA Level 2)
- k. Surface water modelling should be undertaken to define the level of surface water risk and the risk areas/flow paths. Climate change should be modelled using the +40% allowance (February 2016) for rainfall intensity. A surface water drainage strategy should ensure that the development does not increase flood risk elsewhere. Opportunity to mitigate against potential surface water flooding of Stoke Mandeville Hospital
- l. Risk of overtopping or breach of the Aylesbury Arm (Grand Union Canal) should be modelled
- m. The development should be designed using a sequential approach. Flood Zones 2 and 3, and 3a plus climate change (subject to a detailed flood risk assessment) should be preserved as green space as shown in the policies map as the area of 'not built development'. Built development should be restricted to Flood Zone 1
- n. Drainage designs should 'design for exceedance' and accommodate existing surface water flow routes, with development located outside surface water flood areas
- o. Provision of buffer between the new development and Stoke Mandeville to maintain the setting and individual identity of the settlement of Stoke Mandeville
- p. provision of land, buildings and car parking for a combined primary school, including playing field provision, and a contribution to secondary school provision
- q. Provision of land, buildings and car parking for a new local centre, including retail
- r. Provision of financial contributions towards off-site health facilities

- s. Provision of community buildings, including temporary buildings if necessary
- t. Provision of and contribution to infrastructure as appropriate.
- u. Retention of the Grade II listed Magpie Cottage within an appropriate setting

## 3 The HRA Process

### 3.1 Overview

- 3.1.1 The HRA process assesses the potential effects of a plan or project on the conservation objectives of Habitats sites designated under the Habitats<sup>9</sup> and Birds<sup>10</sup> Directives. These sites form a system of internationally important sites throughout Europe known collectively as the 'Natura 2000 Network'. In line with the Habitats Regulations, UK sites which were part of the Natura 2000 Network before leaving the EU, have become part of the National Site Network.
- 3.1.2 The Habitats Regulations<sup>11</sup> provide a definition of a European site at Regulation 8. These sites include Special Areas of Conservation (SAC), Sites of Community Importance, Special Protection Areas (SPA) and sites proposed to the European Commission in accordance with Article 4(1) of the Habitats Directive.
- 3.1.3 In addition, policy in England and Wales notes that the following sites should also be given the same level of protection as a European site<sup>12</sup>. European sites together with sites set out in national policy (listed below) are referred to in England and Wales as a Habitats site<sup>13</sup>.
- A potential SPA (pSPA);
  - A possible / proposed SAC (pSAC);
  - Listed and proposed Ramsar Sites (Wetland of International Importance); and
  - In England, sites identified or required as compensation measures for adverse effects on statutory Habitats sites, pSPA, pSAC and listed or proposed Ramsar sites.

---

<sup>9</sup> Official Journal of the European Communities (1992). Council Directive 92 /43 /EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora.

<sup>10</sup> Official Journal of the European Communities (2009). Directive 2009/147/EC of the European Parliament and of the Council of 30 November 2009 on the conservation of wild birds.

<sup>11</sup> Conservation of Habitats and Species Regulations 2017 SI No. 2017/1012, TSO (The Stationery Office), London. Available at: <https://www.legislation.gov.uk/ukdsi/2017/1012/contents> [Date Accessed: 02/02/22] as amended by The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019. Available at: <https://www.legislation.gov.uk/ukdsi/2019/9780111176573> [Date Accessed: 02/02/22]

<sup>12</sup> Ministry of Housing, Communities & Local Government (2021). National Planning Policy Framework. Para 181. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/810197/NPPF\\_Feb\\_2019\\_revised.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf) [Date Accessed: 02/02/22]

<sup>13</sup> Habitats site: Any site which would be included within the definition at regulation 8 of the Conservation of Habitats and Species Regulations 2017 for the purpose of those regulations, including candidate Special Areas of Conservation, Sites of Community Importance, Special Areas of Conservation, Special Protection Areas and any relevant Marine Sites. Ministry of Housing, Communities & Local Government (2021). National Planning Policy Framework. Para 181. Available in Annex 2 (Glossary) at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/810197/NPPF\\_Feb\\_2019\\_revised.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf) [Date Accessed: 02/02/22]

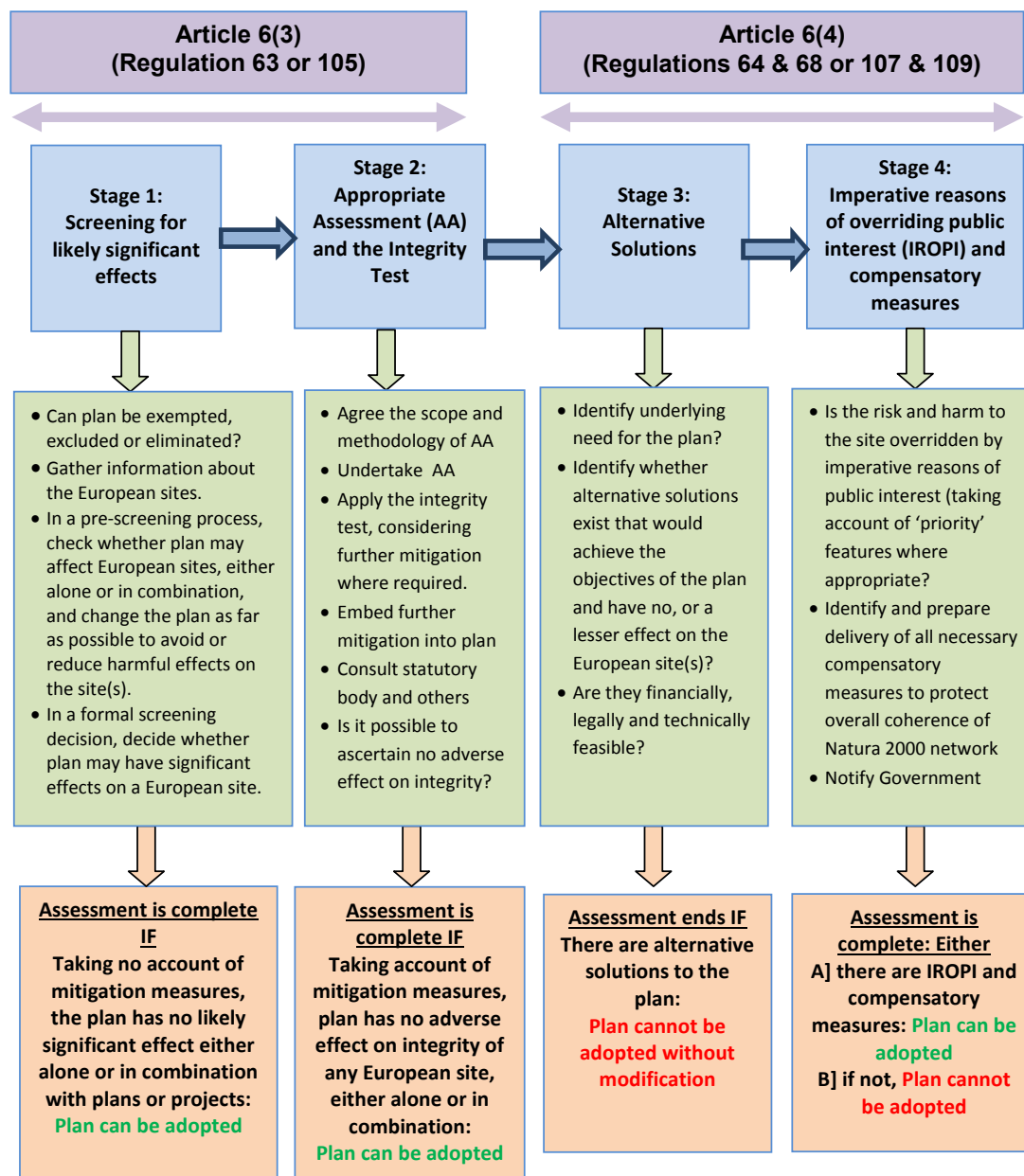
- 3.1.4 Regulation 63 of the Habitats Regulations notes a competent authority, before deciding to undertake, or give any consent, permission or other authorisation for, a plan or project, must make an appropriate assessment of the implications of the plan or project for that site in view of its site conservation objectives. These tests are referred to collectively as a Habitats Regulations Assessment (HRA).
- 3.1.5 HRA applies to plans or projects which are likely to have a significant effect on a Habitats site (either alone or in combination with other plans or projects), and / or not directly connected with or necessary to the management of that site.
- 3.1.6 There is no set methodology or specification for carrying out and recording the outcomes of the assessment process. The Habitats Regulations Assessment Handbook, produced by David Tyldesley Associates (referred to hereafter as the 'DTA Handbook'), provides an industry recognised good practice approach to HRA. The DTA Handbook, and in particular 'Practical Guidance for the Assessment of Plans under the Regulations'<sup>14</sup>, which forms part F, has therefore been used to prepare this report, alongside reference to Government Guidance on Appropriate Assessment<sup>15</sup>.
- 3.1.7 A step-by-step guide to the methodology adopted in this assessment, as outlined in the DTA Handbook, is illustrated in **Figure 3.1**. In summary, the four key stages of the HRA process are as follows:
- **Stage 1. Screening:** Screening to determine if the SPD would be likely to have a significant effect on a Habitats site. This stage comprises the identification of potential effects associated with a plan on Habitats sites and an assessment of the likely significance of these effects.
  - **Stage 2. Appropriate Assessment and the 'Integrity Test':** Assessment to ascertain whether or not the SPD would have a significant adverse effect on the integrity of any Habitats site to be made by the Competent Authority (in this instance Buckinghamshire Council). This stage comprises an impact assessment and evaluation in view of a Habitats site's conservation objectives. Where adverse impacts on site integrity are identified, consideration is given to alternative options and mitigation measures which are tested.
  - **Stage 3. Alternative solutions:** Deciding whether there are alternative solutions which would avoid or have a lesser effect on a Habitats site.
  - **Stage 4. Imperative reasons of overriding public interest and compensatory measures:** Considering imperative reasons of overriding public interest and securing compensatory measures.

---

<sup>14</sup> Tyldesley, D., and Chapman, C. (2013) The Habitats Regulations Assessment Handbook (September) (2013) edition UK: DTA Publications Limited. Available at: [www.dtapublications.co.uk](http://www.dtapublications.co.uk)

<sup>15</sup> Government Guidance on Appropriate Assessment. July 2019. Guidance on the use of Habitats Regulations Assessment. Available at: <https://www.gov.uk/guidance/appropriate-assessment>

**Outline of the four-stage approach to the assessment of plans under the Habitats Regulations**



Extract from *The Habitats Regulations Assessment Handbook*, [www.dtapublications.co.uk](http://www.dtapublications.co.uk)  
 © DTA Publications Limited (October 2018) all rights reserved  
 This work is registered with the UK Copyright Service

Figure 3.1: Stages in the Habitats Regulations Assessment process<sup>16</sup>

<sup>16</sup> Tyldesley, D., and Chapman, C. (2013) *The Habitats Regulations Assessment Handbook* (October) (2018) edition UK: DTA Publications Limited. Available at: [www.dtapublications.co.uk](http://www.dtapublications.co.uk)

## 4 Methodology

### 4.1 HRA guidance

4.1.1 HRA applies to plans and projects in England and Wales. This report has been informed by the following guidance:

- Planning Practice Guidance: Appropriate Assessment<sup>17</sup>; and
- The Habitat Regulations Assessment Handbook - David Tyldesley and Associates (referred to hereafter as the DTA Handbook), 2013 (in particular Part F: '*Practical Guidance for the Assessment of Plans under the Regulations*').

### 4.2 HRA methodology

4.2.1 HRA is a rigorous precautionary process centred around the conservation objectives of a Habitats site's qualifying interests. It is intended to ensure that designated Habitats sites are protected from impacts that could adversely affect their integrity, as required by the Birds and Habitats Directives. A step-by-step guide to this methodology is outlined in the DTA Handbook and has been reproduced in **Figure 3.1**.

### 4.3 Stage 1: Screening for likely significant effects

4.3.1 The first stage in the HRA process comprises the screening stage. The purpose of the screening process is to firstly determine whether a plan or project is either (1) exempt (because it is directly connected with or necessary to the management of a Habitats site), (2) whether it can be excluded (because it is not a project), or (3) eliminated (because there would be no conceivable effects), from the HRA process.

4.3.2 If none of these conditions apply, it is next necessary to identify whether there are any aspects of a project which may lead to Likely Significant Effects (LSEs) at a Habitats site. This informs the requirement to progress the Appropriate Assessment stage (stage 2 of the HRA process, see **Figure 3.1**).

4.3.3 Screening considers the potential 'significance' of adverse effects. Where elements of a plan will not result in an LSE on a Habitats site these are screened out and not considered in further detail in the process.

### 4.4 What is a Likely Significant Effect?

4.4.1 HRA screening provides an analysis of LSEs identified during the HRA screening process. It considers the nature, magnitude and permanence of potential effects in order to inform the plan making process.

4.4.2 The DTA Handbook guidance provides the following interpretation of LSEs:

---

<sup>17</sup> Ministry of Housing, Communities and Local Government (July 2019) Planning Practice Guidance Note, Appropriate Assessment, Guidance on the use of Habitats Regulations Assessment

- 4.4.3 *“In this context, ‘likely’ means risk or possibility of effects occurring that cannot be ruled out on the basis of objective information. ‘Significant’ effects are those that would undermine the conservation objectives for the qualifying features potentially affected, either alone or in combination with other plans or projects ... even a possibility of a significant effect occurring is sufficient to trigger an ‘appropriate assessment’<sup>18</sup>.”*
- 4.4.4 With reference to the conservation status of a given species in the Habitats or Birds Directives, the following examples would be considered to constitute a significant effect:
- Any event which contributes to the long-term decline of the population of the species on the site;
  - Any event contributing to the reduction, or to the risk of reduction, of the range of the species within the site; and
  - Any event which contributes to the reduction of the size of the habitat of the species within the site.
- 4.4.5 Rulings from the 2012 ‘Sweetman’<sup>19</sup> case provide further clarification:
- 4.4.6 *“The requirement that the 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”.*
- 4.4.7 Therefore, it is not necessary for the Council to show that a plan will result in no effects whatsoever on any Habitats site. Instead, the Council is required to show that a plan, either alone or in-combination with other plans and projects, will not result in an effect which undermines the conservation objectives of one or more qualifying features.
- 4.4.8 Determining whether an effect is significant requires careful consideration of the environmental conditions and characteristics of the Habitats site in question, as per the 2004 ‘Waddenzee’<sup>20</sup> case:
- 4.4.9 *“In assessing the potential effects of a plan or project, their significance must be established in the light, inter alia, of the characteristics and specific environmental conditions of the site concerned by that plan or project”.*

---

<sup>18</sup>Tyldesley, D. (2013) The Habitats Regulations Assessment Handbook – Chapter F. DTA Publications

<sup>19</sup> Source: EC Case C-258-11 Reference for a Preliminary Ruling, Opinion of Advocate General Sharpston ‘Sweetman’ delivered on 22nd November 2012 (para 48)

<sup>20</sup> Source: EC Case C-127/02 Reference for a Preliminary Ruling ‘Waddenzee’ 7<sup>th</sup> Sept 2004 (para 48)

## 4.5 Consideration of mitigation measures

- 4.5.1 The European Court Judgement on the interpretation of the Habitats Directive in the case of People Over Wind and Sweetman vs Coillte Teoranta (Case C-323/17<sup>21</sup>) determined that mitigation measures are only permitted to be considered as part of an appropriate assessment (**Box 2**).

### Box 2: The Sweetman Case (April 2018)

A recent decision by the Court of Justice of the European Union (CJEU) People Over Wind and Sweetman v Coillte Teoranta (C-323/17) (from here on known as the 'Sweetman Case') has important consequences for the HRA process in the UK.

In summary, the ruling reinforces the position that if an LSE is identified during the HRA screening process it is not appropriate to incorporate mitigation measures to prevent the LSE at this stage. An appropriate assessment (AA) of the potential effects and the possible avoidance or mitigation measures must be undertaken. The 're-screening the Plan after mitigation has been applied' is no longer an option which would be legally compliant:

"Article 6(3) of Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora must be interpreted as meaning that, in order to determine whether it is necessary to carry out, subsequently, an appropriate assessment of the implications, for a site concerned, of a plan or project, it is not appropriate, at the screening stage, to take account of the measures intended to avoid or reduce the harmful effects of the plan or project on that site."

- 4.5.2 In light of the above, it is necessary to further define mitigation measures. The DTA Handbook notes that there are two types of measures as follows:
- *"Measures intended to avoid or reduce harmful effects on a European site; or*
  - *Features or characteristics of a plan which are essential in defining the nature, scale, location, timing, frequency or duration of the plan's proposals, or they may be inseparable aspects of the plan, without which an assessment of the plan could not properly be made, in the screening decision, even though these features or characteristics may incidentally have the effect of avoiding or reducing some or all of the potentially adverse effects of a plan"*<sup>22</sup>.
- 4.5.3 The HRA screening process undertaken for the SPD took no account of incorporated mitigation or avoidance measures that are intended to avoid or reduce harmful effects on a Habitats site when assessing the LSE of the SPD on Habitats sites. These are measures, which if removed (i.e. should they no longer be required for the benefit of a Habitats site), would still allow the lawful and practical implementation of a plan.

## 4.6 Stage 2: Appropriate Assessment and Integrity Test

- 4.6.1 Where LSEs are identified from a plan either alone or in-combination it is necessary to move to Stage 2 of the HRA process – the Appropriate Assessment and Integrity Test.

<sup>21</sup> InfoCuria (2018) Case C-323/17. Available at: <http://curia.europa.eu/juris/document/document.jsf?docid=200970&doclang=EN> [Date Accessed: 27/01/20]

<sup>22</sup>Tyldesley, D. (2013) The Habitats Regulations Assessment Handbook – Chapter F. DTA Publications



- 4.6.2 The purpose of the Appropriate Assessment (as defined by the DTA Handbook) is to “undertake an objective, scientific assessment of the implications for the European site qualifying features potentially affected by the plan in light of their consideration objectives and other information for assessment”<sup>23</sup>.
- 4.6.3 As part of this process decision makers 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, for instance, through the adoption of mitigation measures. Mitigation measures should aim to avoid, minimise or reduce significant effects on Habitats sites. Mitigation measures may take the form of policies within a plan or mitigation proposed through other plans or regulatory mechanisms. All mitigation measures must be deliverable and able to mitigate adverse effects for which they are targeted.
- 4.6.4 The Appropriate Assessment aims to present information in respect of all aspects of a plan and ways in which it could, either alone or in-combination with other plans and projects, affect a Habitats site.
- 4.6.5 The Council (as the Competent Authority) must then ascertain, based on the findings of the Appropriate Assessment, whether the SPD will adversely affect the integrity of a Habitats site either alone or in-combination with other plans and projects. This is referred to as the Integrity Test and will draw on the conclusions of this report and take into consideration representations made by Natural England.
- 4.6.6 It is noted that failure to mitigate any identified adverse effects on the integrity of any Habitats site from the SPD, alone or in-combination, would trigger stage 3 (assessment of alternatives) and stage 4 (IROPI) of the HRA process, as set out in **Figure 3.1**.

## 4.7 Dealing with uncertainty

- 4.7.1 Uncertainty is an inherent characteristic of HRA, and decisions can be made only on currently available and relevant information. This concept is reinforced in the 7th September 2004 ‘Waddenzee’ ruling<sup>24</sup>:
- 4.7.2 *“However, the necessary certainty cannot be construed as meaning absolute certainty since that is almost impossible to attain. Instead it is clear from the second sentence of Article 6(3) of the habitats directive that the competent authorities must take a decision having assessed all the relevant information which is set out in particular in the appropriate assessment. The conclusion of this assessment is, of necessity, subjective in nature. Therefore, the competent authorities can, from their point of view, be certain that there will be no adverse effects even though, from an objective point of view, there is no absolute certainty”.*

## 4.8 The Precautionary Principle

- 4.8.1 The HRA process is characterised by the precautionary principle. This is described by the European Commission as being:

---

<sup>23</sup>Tyldesley, D. (2013) The Habitats Regulations Assessment Handbook – Chapter F. DTA Publications

<sup>24</sup>EC Case C-127/02 Reference for a Preliminary Ruling ‘Waddenzee’ 7<sup>th</sup> September 2004 Advocate General’s Opinion (para 107)

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

# 5 Vale of Aylesbury Local Plan HRA

## 5.1 Introduction

5.1.1 Development of the Vale of Aylesbury Local Plan (VALP) was supported by the Habitats Regulations Assessment (HRA) process. The outputs were presented in a number of documents which contained the Council's findings and conclusions in respect of the HRA of the VALP as a whole. These assessments included consideration of the AGT1 Aylesbury South strategic allocation. Natural England was consulted at each stage of the HRA process. The following sections provide a summary of the HRA which was undertaken at each stage of the VALP planning making process.

## 5.2 Vale of Aylesbury Local Plan 2017 Submission HRA

5.2.1 The VALP 2017 Submission HRA<sup>25</sup> summarised the outputs of a screening assessment. It focused on the Chilterns Beechwoods SAC and Aston Rowant SAC. It concluded no LSEs as a result of VALP upon any Habitats site, either alone or in combination with other plans and projects, and as such, ruled out the requirement for further assessment of the VALP under the Habitats Regulations.

## 5.3 RAF Halton HRA Update

5.3.1 The Submission HRA work was updated in 2017 to take into consideration spatial site options, including a site at RAF Halton, which were being considered by the Council<sup>26</sup>. This HRA found that the conclusions of the 2017 HRA (**Section 5.2**) remained valid.

## 5.4 Vale of Aylesbury Local Plan 2013 – 2033 HRA

5.4.1 The 2019 HRA<sup>27</sup> took into consideration emerging case law including People over Wind and Holohan (see **Box 2** and **Box 3** for more details) and included an HRA screening and Appropriate Assessment.

5.4.2 This report provided a screening assessment of LSEs at the Chilterns Beechwoods SAC and Aston Rowant SAC. The Appropriate Assessment focused on likely significant recreation and air quality impacts at the Chilterns Beechwoods SAC.

---

<sup>25</sup> Land Use Consultants. VALP Habitat Regulations Assessment (2017). Available at <https://www.aylesburyvaledc.gov.uk/habitats-regulations-assessment> [Date Accessed: 25/11/21]

<sup>26</sup> Land Use Consultants. RAF Halton Addendum (2017). Available at <https://www.aylesburyvaledc.gov.uk/habitats-regulations-assessment> [Date Accessed: 25/11/21]

<sup>27</sup> Land Use Consultants. VALP Habitat Regulations Assessment Report 2019. Available at [https://www.aylesburyvaledc.gov.uk/sites/default/files/page\\_downloads/ED209%20Vale%20of%20Aylesbury%20Local%20Plan%20-%20Final%20HRA%20Report%20June%202019.pdf](https://www.aylesburyvaledc.gov.uk/sites/default/files/page_downloads/ED209%20Vale%20of%20Aylesbury%20Local%20Plan%20-%20Final%20HRA%20Report%20June%202019.pdf) [Date Accessed: 25/11/21]

- 5.4.3 In terms of recreational pressure the Appropriate Assessment concluded that *“providing that the specific proposals for green infrastructure detailed above are re-inserted into Policy I1 in the modified plan and applied to housing allocation HALO3, and there is a commitment by AVDC to ensure that scheme design seeks to provide natural greenspace that contributes to alleviating visitor pressure on the SAC, it is certain that the VALP will not result in adverse effects on the integrity of the Chilterns Beechwoods SAC as a result of recreational pressures, either alone or in- combination with other plans and projects”*.
- 5.4.4 In relation to air quality impacts, it concluded that there would be no adverse impact on site integrity.
- 5.4.5 Natural England was consulted on the 2019 HRA report at responded as follows:
- 5.4.6 *“Natural England agree with the conclusions reached within the Appropriate Assessment in regards to recreational disturbance. We agree with section 6.13, which states that provided the green infrastructure proposals detailed in Policy I1 are applied to the RAF Halton site, and that AVDC commit to providing natural greenspace to alleviate visitor pressure on the SAC, there will be no likely significant effect (either alone or in combination) on the integrity of the SAC. We also agree with the conclusions reached in regards to air pollution.”*
- 5.4.7 In summary the HRA concluded that
- 5.4.8 *“... 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’*.

## 5.5 Vale of Aylesbury Local Plan 2013-2033 Proposed Further Modifications Stage – HRA Addendum

- 5.5.1 An HRA was undertaken in support of the VALP main modifications<sup>28</sup>. This focused on an update to the air quality assessment in light of updated traffic modelling which resulted in an exceedance of the 1,000 AADT threshold along the A41. The Air Quality Assessment concluded that the effects of the VALP, as proposed to be modified, would not be significant with regard to annual mean NOx concentrations and nutrient and acid nitrogen deposition. Natural England agreed with this conclusion.

---

<sup>28</sup> Land Use Consultants. VALP Proposed Further Modifications Stage – Habitat Regulations Assessment Addendum (2020) available at <https://aylesburyvalecd.c2.uk/docfiles/13/ED247%20Proposed%20Further%20Main%20Modifications%20Habitat%20Regulations%20Assessment.pdf> [Date Accessed: 25/11/21]

## 6 HRA Stage 1: Screening

### 6.1 Aylesbury South SPD HRA Screening

6.1.1 The Aylesbury South SPD is not directly connected with or necessary to the management of any Habitats site. Neither can it be excluded or eliminated from the HRA process. Therefore, as required under Regulation 105 of the Habitats Regulations, an assessment of LSEs of the Aylesbury South SPD upon Habitats sites has been undertaken by Buckinghamshire Council<sup>29</sup>.

6.1.2 This assessment prepared by the Council concluded that there would be the potential for LSEs associated with increased recreational pressure at the Chilterns Beechwoods SAC as a result of the SPD. It noted that the VALP HRA findings regarding the need for recreational pressure mitigation from the housing growth impacts on the Chiltern Beechwoods SAC led directly to the inclusion of policies and proposals on green infrastructure mitigation as set out in Policy I1 and D-AGT1 of VALP (see **Section 5.4**). As the SPD is expected to add further details on the type of Green Infrastructure (GI), location of GI and management of GI in terms of how the policy requirements will be met on the Aylesbury South site, it concluded that there was a need for a greater level of detail on mitigation to be evaluated in HRA terms. As these details were not available at the time of the VALP HRA, it summarised that an Appropriate Assessment should be carried out for the scope/draft SPD to evaluate if the mitigation details proposed are adequate or if there would be adverse impacts on the integrity of the Chiltern Beechwoods SAC, either alone or in combination with other plans and projects, as a result of the Aylesbury South SPD.

6.1.3 The screening assessment took no account of mitigation measures that the SPD may incorporate to mitigate adverse impacts upon Habitats sites. It concluded that the SPD would be screened into the HRA process. The next stage of the HRA process is Stage 2 - Appropriate Assessment.

### 6.2 Screening Consultation

6.2.1 Natural England was consulted on the screening decision in September 2021 and indicated their agreement with the conclusions.

---

<sup>29</sup> Buckinghamshire Council. October 2021. Aylesbury South (D-AGT 1) Masterplan Supplementary Planning Document. Habitats Regulations Assessment Screening Statement – Final Outcome

# 7 HRA Stage 2: Appropriate Assessment

## 7.1 Introduction

7.1.1 Potential LSEs associated with increased recreational pressure from the Aylesbury South SPD at the Chilterns Beechwoods SAC were screened into the HRA process for further assessment in an Appropriate Assessment. This section of the HRA report focuses specifically on recreational impacts upon this Habitats site. All other Habitats sites and potential pathways of impact have been screened out of the HRA process.

## 7.2 Chilterns Beechwoods SAC

7.2.1 The Chilterns Beechwoods SAC comprises a number of components of woodland which represent a range of semi natural woodlands dominated by beech (*Fagus sylvatica*). These sites are scattered throughout the Chilterns Area of Outstanding Natural Beauty (AONB), with the exception of Bisham Woods SSSI. Due to the different locations of each component of the SAC, the underlying geology, topology and site conditions varies at each.

7.2.2 The SAC is designated for two qualifying habitats; semi-natural dry grasslands and scrubland facies and Beech forests on neutral to rich soils, with its qualifying species being the stag beetle (*Lucanus cervus*) (**Appendix A**). All components of the SAC, with the exception of Bishams Wood and Tring Wood, lie within Buckinghamshire's administrative boundary. Bishams Wood and Tring Wood are located immediately adjacent to its boundary.

7.2.3 Sites of Special Scientific Interest (SSSIs) are protected areas in the United Kingdom designated for conservation. SSSIs are the building blocks of site-based nature conservation in the UK. A SSSI will be designated based on the characteristics of its fauna, flora, geology and/or geomorphology. Whilst typically analogous in ecological function, the reasons for its designation can be entirely different to those for which the same area is designated as a SAC, SPA or Ramsar.

7.2.4 **Table 7.1** provides a summary of the SSSI components which are coincident with the SAC and their distance from the Aylesbury South site, these are also illustrated on **Figure 7.1**.

**Table 7.1:** SSSI components which are coincident with the Chilterns Beechwoods SAC

SSSI sites which are coincident with and together constitute the Chilterns Beechwoods SAC	Distance from Aylesbury South Site
Ashridge Commons and Woods SSSI	11.9km to the east
Aston Rowant Woods SSSI	13.9km to south west
Bisham Woods SSSI	25.2km to the south
Bradenham Woods, Park Wood & The Coppice SSSI	11.5km to south
Ellesborough and Kimble Warrens SSSI	4.1km to the south
Hollowhill and Pullingshill Wood SSSI	24.1km to the south
Naphill Common SSSI	12.9km to south
Tring Woodlands SSSI	7.3km to the south east
Windsor Hill SSSI	7.3km to the south

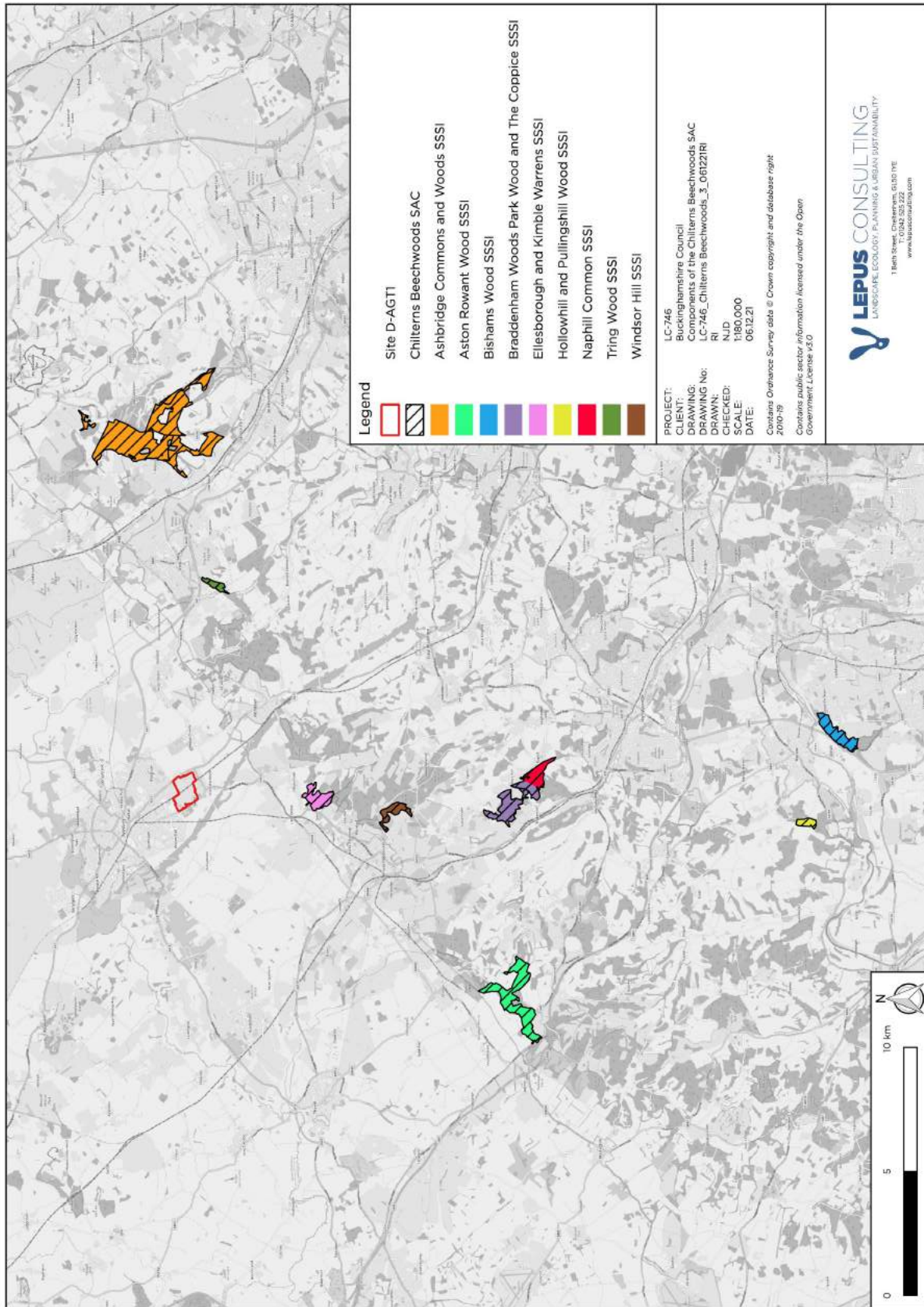


Figure 7.1: Location of Chilterns Beechwoods SAC and constituent SSSIs



- 7.2.5 Due to the varying locations of each component of the SAC the underlying soils also vary. As a result, each of the National Vegetation Classification (NVC) woodland classification types<sup>30</sup> in which beech is a major component feature across the components of the SAC. These include:
- W12 *Fagus sylvatica* – *Mercurialis perennis* woodland;
  - W14 *Fagus sylvatica* – *Rubus fruticosus* woodland; and
  - W15 *Fagus sylvatica* – *Deschampsia flexuosa* woodland.
- 7.2.6 The SAC also supports a number of rare plants with restricted distribution including coralroot bittercress (*Cardamine bulbifera*), southern woodrush (*Luzula forsterii*), red helleborine (*Cephalanthera rubra*) and lesser hairy-brome (*Bromus benekenii*). The Chilterns Beechwoods represent a stronghold for one of the UK's rarest plants, ghost orchid (*Epipogium aphyllum*). Another notable feature is the prominence of box (*Buxus sempervirens*) at Ellesborough and Kimble Warrens SSSI<sup>31</sup>.
- 7.2.7 Dry grasslands and scrublands on chalk or limestone form a qualifying habitat of the SAC. This is associated with thin, well-drained, lime-rich soils associated with chalk and limestone. Within the SAC these are restricted and found at the Windsor Hill SSSI and Ellesborough and Kimble Warrens SSSI components of the SAC. These support a diversity of grasses and scarce invertebrates<sup>32</sup>.
- 7.2.8 The qualifying species of the SAC is the stag beetle (*Lucanus cervus*). This species is saproxylic and therefore reliant on dead and decaying wood for the larval stages of its lifecycle. Deadwood habitat is found within the SAC in the form of fallen branches and tree stumps. Records indicate the beetle has been recorded at the Bisham Woods SSSI and Hollowhill and Pullingshill Woods SSSI components of the SAC<sup>33</sup>. This represents the northern range of the beetle.
- 7.2.9 Natural England's Site Improvement Plan (SIP)<sup>34</sup> notes that the SAC is vulnerable to a number of threats and pressures (see **Appendix A**) including public access and disturbance (the stag beetle).

---

<sup>30</sup> Rodwell, J.S. (ed.) 1991. British Plant Communities. Volume 1. Woodlands and scrub. Cambridge University Press.

<sup>31</sup> Natural England (2019) Chiltern Beechwoods SAC Conservation Objectives Supplementary Advice. <http://publications.naturalengland.org.uk/file/5422856020426752> [Date Accessed: 26/11/21].

<sup>32</sup> Natural England (2019) Chiltern Beechwoods SAC Conservation Objectives Supplementary Advice. <http://publications.naturalengland.org.uk/file/5422856020426752> [Date Accessed: 26/11/21].

<sup>33</sup> Natural England (2019) Chiltern Beechwoods SAC Conservation Objectives Supplementary Advice. <http://publications.naturalengland.org.uk/file/5422856020426752> [Date Accessed: 26/11/21].

<sup>34</sup> Natural England (2015) Chiltern Beechwoods SAC Site Improvement Plan. <http://publications.naturalengland.org.uk/file/5908864568393728> [Date Accessed: 26/11/21].

## 7.3 Ecological Condition

- 7.3.1 The CJEU ruling in the Holohan case (C-461/17<sup>35</sup>) confirmed that Appropriate Assessment should: (i) catalogue (i.e. list) all habitats and species for which the site is protected and (ii) include in its assessment other (i.e. non-protected) habitat types or species which are on the site and habitats and species located outside of the site if they are necessary to the conservation of the habitat types and species listed for the protected area (**Box 3**).

### Box 3: Holohan v An Bord Pleanala (November 2018)

*“Article 6(3) of Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora must be interpreted as meaning that an ‘appropriate assessment’ must, on the one hand, catalogue the entirety of habitat types and species for which a site is protected, and, on the other, identify and examine both the implications of the proposed project for the species present on that site, and for which that site has not been listed, and the implications for habitat types and species to be found outside the boundaries of that site, provided that those implications are liable to affect the conservation objectives of the site.*

*Article 6(3) of Directive 92/43 must be interpreted as meaning that the competent authority is permitted to grant to a plan or project consent which leaves the developer free to determine subsequently certain parameters relating to the construction phase, such as the location of the construction compound and haul routes, only if that authority is certain that the development consent granted establishes conditions that are strict enough to guarantee that those parameters will not adversely affect the integrity of the site.*

*Article 6(3) of Directive 92/43 must be interpreted as meaning that, where the competent authority rejects the findings in a scientific expert opinion recommending that additional information be obtained, the ‘appropriate assessment’ must include an explicit and detailed statement of reasons capable of dispelling all reasonable scientific doubt concerning the effects of the work envisaged on the site concerned”.*

- 7.3.2 This report fully considers the potential for effects on species and habitats. This includes those not listed as a qualifying feature for the Habitats site, but which may be important to achieving its conservation objectives. This includes consideration of functionally linked habitat. This ensures that the functional relationships underlying Habitats sites and the achievement of their conservation objectives are adequately understood.
- 7.3.3 Natural England periodically assesses the conservation conditions of each SSSI unit, assigning it a status. SSSIs which are coincident with the Chilterns Beechwoods SAC are listed in **Appendix B** along with their current conservation status. The conservation status of each SSSI highlights any component of the SAC that is currently particularly vulnerable to threats/pressures. Conservation status is defined as follows:
- Favourable;
  - Unfavourable – recovering;
  - Unfavourable – no change; or
  - Unfavourable – declining.

<sup>35</sup> EUR-Lex (2018) Case C-461/17. Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:62017CJ0461&from=EN> [Date Accessed: 05/11/19]

- 7.3.4 SSSI units in either an 'Unfavourable – no change' or 'Unfavourable – declining' condition indicate that the Habitats site may be particularly vulnerable to certain threats or pressures. It is important to remember that the SSSI may be in an unfavourable state due to the condition of features unrelated to its Habitats designation. However, it is considered that the conservation status of SSSI units that overlap with Habitats designated sites offer a useful indicator of habitat health at that location.
- 7.3.5 There are two SSSI unit within the SAC designation which are in an unfavourable – recovering – condition, one at Tring Woodlands SSSI and the other at Ashridge Commons and Woods SSSI.
- 7.3.6 Natural England defines zones around each SSSI which may be at risk from specific types of development, these are known as Impact Risk Zones (IRZ). These IRZs are *“a GIS tool developed by Natural England to make a rapid initial assessment of the potential risks to SSSIs posed by development proposals. They define zones around each SSSI which reflect the particular sensitivities of the features for which it is notified and indicate the types of development proposal which could potentially have adverse impacts. The IRZs also cover the interest features and sensitivities of European sites, which are underpinned by the SSSI designation and “Compensation Sites”, which have been secured as compensation for impacts on Natura 2000/Ramsar sites”*<sup>36</sup>.
- 7.3.7 A review of Natural England's current SSSI IRZ data (updated 25<sup>th</sup> April 2022) indicates that none of the SAC components have an IRZ which covers Aylesbury South in relation to residential development.

## 7.4 Public Access and Disturbance Threats

- 7.4.1 Public access and disturbance threats at the SAC are noted in Natural England's SIP to be related to increased visitor pressures and disturbance on the stag beetle. Natural England's Supplementary Advice notes that, given its location within the Chilterns AONB, the Chilterns Beechwoods SAC has become a popular recreational destination for walking and cycling. Surveys undertaken by the Chilterns AONB indicated that in 2007 just over 55 million leisure visits were made to and within the Chilterns AONB<sup>37</sup>, this figure is likely to have risen since these surveys were undertaken.

---

<sup>36</sup> Natural England (2019) Natural England's Impact Risk Zones for Sites of Special Scientific Interest User Guidance. Available at: [https://magic.defra.gov.uk/Metadata\\_for\\_magic/SSSI%20IRZ%20User%20Guidance%20MAGIC.pdf](https://magic.defra.gov.uk/Metadata_for_magic/SSSI%20IRZ%20User%20Guidance%20MAGIC.pdf) [Date Accessed: 05/11/19]

<sup>37</sup> The Chilterns AONB. 2007. Chilterns AONB Visitor Survey. Available at: [https://www.chilternsaonb.org/uploads/files/ConservationBoard/Chilterns\\_AONB\\_Visitor\\_Survey\\_2007.pdf](https://www.chilternsaonb.org/uploads/files/ConservationBoard/Chilterns_AONB_Visitor_Survey_2007.pdf) [Date Accessed: 25/01/21]

- 7.4.2 Elsewhere in the UK, public access and disturbance threats have been considered in terms of buffer distances and zones. Urbanisation impacts are often experienced when development is located in close proximity of a designation boundary. For recreational impacts, buffers are defined by recreational survey data and are often dependent on a number of factors including the recreational draw of a site, accessibility and the availability of other recreational resource in an area. With the exception of the Ashridge Common and Woods SSSI and Tring Woodlands SSSI, a bespoke recreational zone of influence is not currently available for the other components of the Chilterns Beechwoods SAC (as outlined in **Section 7.5**).
- 7.4.3 With the exception of the Bisham Woods SSSI, all components of the Chilterns Beechwoods SAC lie within the AONB. The Chilterns AONB Management Plan notes that 80,000 people live within the AONB and a further 1.6 million within 8km<sup>38</sup>. The Management Plan aims to attract visitors within 8km of the AONB. The Management Plan notes that this is the area over which visitors are predominantly drawn to the AONB as a whole.
- 7.4.4 The characteristics and recreational draw of each of component of the SAC varies depending on its location and accessibility. **Sections 7.5** to **Section 7.13** provide an overview of the characteristics of each component, its ecological condition, location in relation to the Aylesbury South strategic site and levels of accessibility.

## 7.5 Ashridge Commons and Woods SSSI component of the SAC

- 7.5.1 Ashridge Commons and Woods SSSI is located 11.9km to the east of the strategic site, predominately within the administrative boundary of Dacorum Borough Council (70% of the designated area) with the remainder located in Buckinghamshire Council's administrative area.
- 7.5.2 The area of the Chilterns Beechwoods SAC, which is coincident with Ashridge Commons and Woods SSSI, broadly corresponds with areas of the Ashridge Estate, for which the National Trust is the main landowner.
- 7.5.3 A number of areas of woodland within the SSSI comprise ancient woodland. The SSSI citation for Ashridge Commons and Woods indicates that the site comprises a mixture of ancient semi-natural and secondary woodland, plantation, scrub, a more open component dominated by bracken, and grassland<sup>39</sup>. The woodland ground flora is noted to be associated with the underlying soils, with sparse flora in areas on the acidic plateau soils and more diverse communities on the more base rich soils. It also notes the diverse range of woodland bird species that are supported on site by the varied woodland stand types, areas of scrub (dominated by bracken and scattered trees) and small areas of unimproved calcareous and acidic grassland.

---

<sup>38</sup> Lepus Consulting. March 2021. Dacorum Local Plan. HRA Desk Study and Site Walkover Survey. Chilterns Beechwoods SAC: Ashridge Commons and Woods SSSI and Tring Woodlands SSSI.

<sup>39</sup> Natural England. Ashridge Commons and Woods SSSI Citation. Available at: <https://designatedsites.naturalengland.org.uk/PDFsForWeb/Citation/1000452.pdf> [Date Accessed: 02/12/21]

- 7.5.4 Ashridge is open to the public with a number of routes for walking, cycling, horse-riding and running promoted by the National Trust across the site. There is a visitor centre, toilets, a shop and a café on site located at the end of Monument Drive, and mobility vehicles are available for advance booking. Dogs are permitted on site on the lead. Free parking is provided along Monument Drive. The site can also be accessed from another 23 car parks which offer free parking in the local area, by foot, bike or horse from neighbouring residential areas and via the rights of way network which links to the site. There are three major trails that cross the site, the Chiltern Way, the Hertfordshire Way and the Icknield Way. In addition, the estate is freely accessible to the public with a substantial portion being designated as 'registered common land' or 'other access land' under the Countryside and Rights of Way Act 2000.
- 7.5.5 Monument Drive is registered as a byway open to all traffic (BOAT) which is a highway over which the public have a right of way for vehicular and all other kinds of traffic but which is used by the public mainly for the purposes for which footpaths and bridleways are used (i.e. walking, cycling or horse riding)<sup>40</sup>. Dacorum Borough Council placed a Traffic Regulation Order 1991 on the road which restricts access past 10pm and before 7am (except for access).
- 7.5.6 Organised events at Ashridge over the past few years (before the national pandemic) included guided nature and education walks, workshops, children focused sessions, camping, organised horse rides and seasonal events, such as the annual Easter egg trail. The National Trust hold a license for a significant number of permitted events such as running events of various lengths, orienteering clubs, health walks, long distance walks, horse riding clubs, geocaching events, canicross, scout groups, birthday parties and group outings.
- 7.5.7 Dacorum Borough Council is currently preparing and updating the evidence base to support its Emerging Local Plan, which includes an HRA. As part of the HRA, research has been carried out to look at the impacts of recreational pressure on Chilterns Beechwoods SAC and in particular recreational impacts upon the Ashridge Commons and Woods SSSI and Tring Woodlands SSSI components. This research included visitor surveys, ecological surveys and parking transect surveys.
- 7.5.8 The output of these surveys identified current recreational impacts on the qualifying features of the Ashridge Commons and Woods SSSI component of the SAC, including evidence of severe damage occurring over many areas. These impacts included trampling and vegetation wear, soil compaction and erosion, nutrient enrichment (e.g. dog fouling), litter, invasive species, risk of fire (e.g. from BBQs), harvesting and impacts associated with the management of the site more generally.

---

<sup>40</sup> Land Registry Title Deeds. Available at: <https://www.landregistry-titledeeds.co.uk/frequently-asked-questions/information/public-rights-of-way.asp#:~:text=A%20Byway%20Open%20to%20All,%2C%20cycling%20or%20horse%20riding> [Date Accessed: 02/12/21]

7.5.9 The visitor surveys highlighted that the Ashridge Estate is an attractive 'honey-pot site' and draws visitors from a particularly wide area, primarily by car. Using postcode data, a recreational Zone of Influence (ZOI)<sup>41</sup> was established which extends for a distance of 12.6km from the Ashridge Estate. The Aylesbury South Site (D-AGT 1) is located approximately 11.9km from this component of the SAC. Approximately half (45.16ha) of the Aylesbury South site is located within the 12.6km ZOI (see **Figure 7.2**).

---

<sup>41</sup> The recreational ZOI is the area across which 75% of people will travel to use a site for recreational purposes.

---

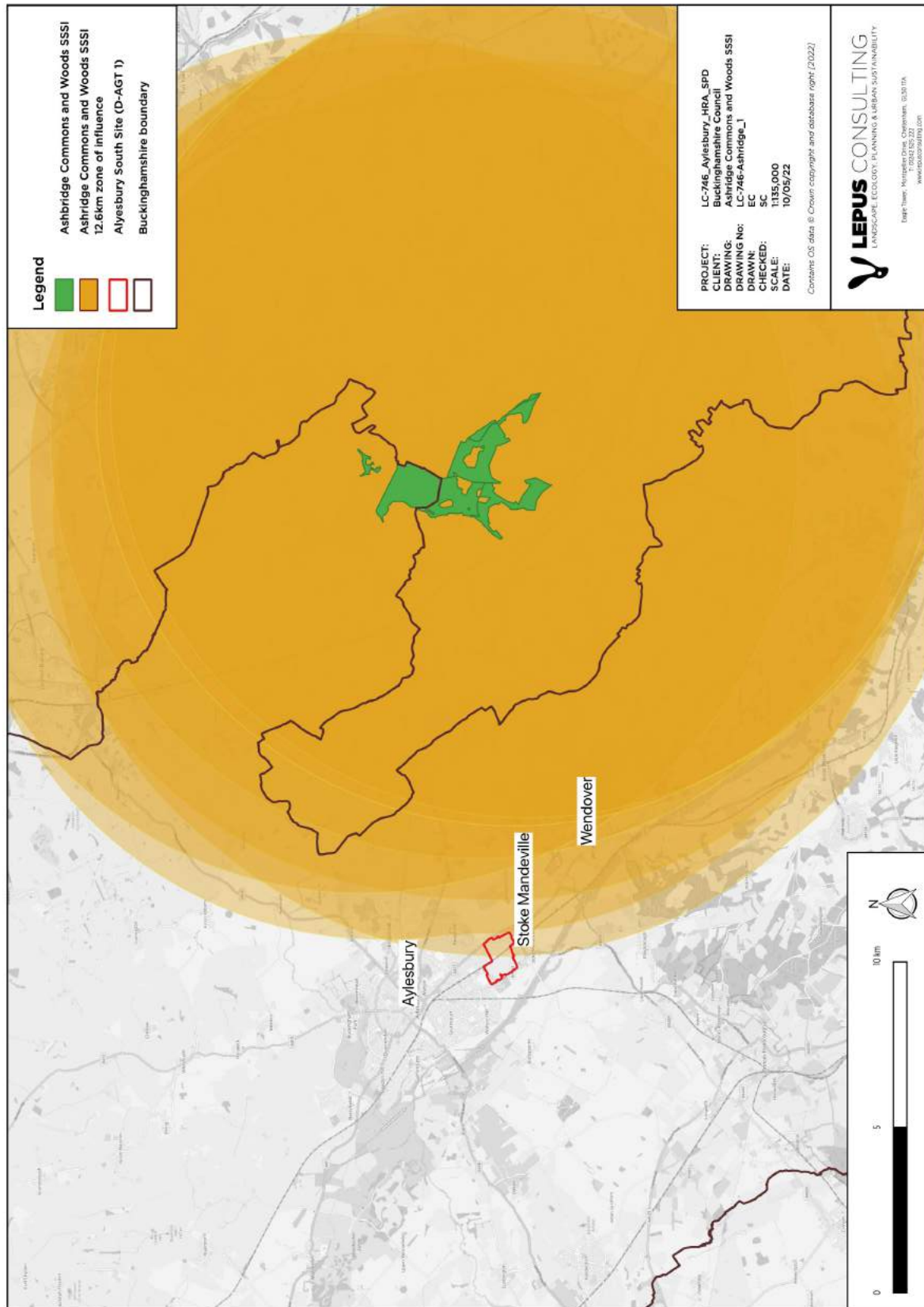


Figure 7.2: Ashridge Commons and Woods SSSI ZOI

- 7.5.10 Taking into consideration the precautionary principle (see **Section 4.8**), future housing growth within this ZOI has the potential to result in increased recreational pressure on this component of the SAC and its qualifying features, both on its own and when considered in-combination with other development.
- 7.5.11 Natural England provided advice to Buckinghamshire Council, and other LPAs affected by the emerging evidence base on 14<sup>th</sup> March 2022. This advice identified the need for mitigation to deal with recreational impacts from new growth. This advice indicates that Natural England will require adequate mitigation measures to be established for any net increased in development within the 12.6km ZOI to avoid additional recreational impacts. Natural England specially recommend that a permanent strategic solution is developed for the Ashridge Estate by all affected LPAs. Such mitigation is required to satisfy the Habitats Regulations such that an Appropriate Assessment would be able to conclude there would be no adverse impacts on the integrity of the SAC.
- 7.5.12 Natural England's advice, whilst not setting out what the strategic mitigation solution should look like, does outline a common approach to mitigation which has been successfully applied at other Habitats sites across the UK. This includes a combination of Strategic Access Management and Monitoring measures (SAMM) for the SAC itself, alongside provision of Suitable Alternative Natural Greenspace (SANG)<sup>42</sup>. The package of SAMM would manage on-site impacts at the SAC, whilst SANG would work to re-direct visitors to alternative sites, relieving recreational pressure. These two measures would dovetail together to offer a strategic package of mitigation. The Natural England advice also points to creation of a new visitor gateway at the Ashridge Estate as a possible component of a mitigation strategy.
- 7.5.13 Whilst a strategic mitigation approach is established, Natural England notes the following:
- 7.5.14 *"Natural England understand that Strategic Solutions can be a time consuming process, and will lead to a period of time where strategic-level mitigation hasn't yet been identified. During this period we advise that HRAs will be needed, detailing how each individual site is going to avoid adverse impacts on the integrity of the Chilterns Beechwoods SAC. **This is for all planning applications that result in a net increase in dwellings, within the entire 500m – 12.6km ZOI.** We are happy to work with the Local Planning Authorities and developers proactively to seek to find solutions during this temporary period. The interim position is likely to apply until such time that a formal strategic solution is found. We will be looking for all applications to incorporate mitigation measures that will avoid additional recreational impacts".*

## 7.6 Aston Rowant Woods SSSI component of the SAC

- 7.6.1 Aston Rowant Woods SSSI is located approximately 13.9km to the south west of the strategic site, partly within the administrative boundary of Buckinghamshire Council but predominantly within South Oxfordshire.

---

<sup>42</sup> Where SANG is proposed, this should be delivered at a minimum standard of 8 ha / 1000 population. It should also be secured in perpetuity and agreed with the respective Local Planning Authority and Natural England. It should also meet bespoke SANG guidelines.



- 7.6.2 It comprises a large area of ancient beech woodland located on the escarpment of the Chilterns. The SSSI citation notes that the site '*consists of a series of contiguous areas of woodland on the chalk escarpment, plateau and dip slope of the Chilterns. Much of this site is ancient woodland and although parts have been modified by the planting of introduced trees and by sycamore invasion, a unusually wide range of semi-natural woodland stand types occur, dominated by oak and beech. The rich flora includes no fewer than 52 species indicative of old woods. Over a hundred species of fungi are recorded. Paths, rides and glades are numerous, and the presence of boggy hollows and standing and fallen dead timber provide diverse niches for invertebrates*'<sup>43</sup>.
- 7.6.3 The Ridgeway long distance path passes to the north of the site and the Bledlow Circular Ride runs through the eastern section of the site. Sections of the SSSI to the south west and north east of the site are open access, with a number of linear footpaths running through the site along with some forestry tracks around Kington Wood. Aston Rowant National Nature (NNR) Reserve lies to the immediate west of the SSSI. There is car parking to the south of the SSSI at Beacon Hill, signposted from the A40 near Stokenchurch. The A40 runs through the western section of the SSSI.

## 7.7 Bisham Woods SSSI component of the SAC

- 7.7.1 Bishams Woods SSSI is located approximately 25.2km to the south of the strategic site, partly within the administrative boundary of the Royal Borough of Windsor and Maidenhead.
- 7.7.2 Bisham Woods SSSI comprises an extensive area of predominantly broad-leaved woodland situated on a steep north-west facing slope overlooking the River Thames at Marlow<sup>44</sup>.

---

<sup>43</sup> Natural England. Aston Rowant Woods SSSI Citation. Available at:  
<https://designatedsites.naturalengland.org.uk/PDFsForWeb/Citation/1000426.pdf> [Date Accessed: 01/12/21]

<sup>44</sup> Natural England. SSSI Citation. <https://designatedsites.naturalengland.org.uk/PDFsForWeb/Citation/1002835.pdf> [Date Accessed: 01/12/21].

7.7.3 Bisham Woods SSSI is managed by the Woodland Trust. The woods are open access and contain a number of PRoW, including restricted byways, bridleways and footpaths serving pedestrians, horse riders and cyclists. There is limited parking in the form of pull-ins along Quarry Wood Road, Grubswood Lane and Marlow Road which limits access to this site<sup>45</sup>. The Woodland Trust have prepared a Management Plan for the woodland covering the period from 2018 to 2023<sup>46</sup> and actively manage this habitat. This Management Plan recognises the potential threats associated with increased public access pressure at the woodland and, as such, maintains a well-managed network of paths and signage. It states that “*deadwood will be allowed to accumulate wherever possible, with all windblown trees and the majority of trees felled for safety reasons left to decompose naturally. In this way the deadwood habitat will continue to support a viable population of stag beetles, as well as many other invertebrates and fungi*”.

## 7.8 Bradenham Woods, Park Wood and The Coppice SSSI component of the SAC

7.8.1 Bradenham Woods, Park Wood and The Coppice SSSI is located approximately 11.5km to the south of the strategic site, within the administrative boundary of Buckinghamshire Council.

7.8.2 The citation for the SSSI notes that the SSSI is ‘*primarily a woodland site, with extensive beechwoods of types characteristic of both the acid clay-with-flints of the Chiltern plateau, and the chalk and various deposits of the valley slopes*’<sup>47</sup>.

7.8.3 The Bradenham Estate is managed by the National Trust and includes Bradenham Woods and The Coppice, an extensive area of ancient beech wood. It is open access land with a network of footpaths and permitted bridleways promoted by the National Trust across the site. Free parking is available in Bradenham village opposite cricket pavilion and a small National Trust car park is located on Smalldean Lane approximately 1.5 miles northwest of Bradenham village.

## 7.9 Ellesborough and Kimble Warrens SSSI component of the SAC

7.9.1 Ellesborough and Kimble Warrens SSSI is located approximately 4.1km to the south of the strategic site, within the administrative boundary of Buckinghamshire Council.

---

<sup>45</sup> The Woodland Trust. Bradenham Woods, Park Wood and The Coppice SSSI. Available at: <https://designatedsites.naturalengland.org.uk/PDFsForWeb/Citation/1000478.pdf> [Date Accessed: 01/12/21].

<sup>46</sup> Woodland Trust. 2018. Bisham Woods Woodland Management Plan. Available at: <https://www.woodlandtrust.org.uk/media/46991/4424-bisham-woods.pdf> [Date Accessed: 01/12/21].

<sup>47</sup> Natural England. Aston Rowant Woods SSSI Citation. Available at: <https://designatedsites.naturalengland.org.uk/PDFsForWeb/Citation/1000426.pdf> [Date Accessed: 01/12/21]

7.9.2 The SSSI citation notes the site *'forms part of the Chiltern escarpment here deeply incised by three valleys: Ellesborough, Great and Little Kimble 'Warrens'. The vegetation comprises deciduous woodland, of which some is developing, but most is overmature; dense scrub, including abundant box Buxus sempervirens, here thought to be native; and both grazed and ungrazed chalk grasslands, of which some are species-rich and contain both local and national rarities. Mixed scrub is invading some of these grasslands. One of the valleys harbours an unusual sedge-fen community. The site contains one of the richest assemblages of calcicolous bryophytes in the Chilterns, and is notable for its range of invertebrates as well as its overwintering and breeding bird populations'*<sup>48</sup>.

7.9.3 Small parts of the site are open access and there are a number of PRowS which run around the south and western sections of the SSSI. There is no parking on site but parking is available to the south of the adjoining Pulpit Wood. As with the majority of the Chilterns Beechwoods SAC components the site is steep in areas.

## 7.10 Hollowhill and Pullingshill Wood SSSI component of the SAC

7.10.1 Hollowhill and Pullingshill Wood SSSI is located approximately 24.1km to the south of the strategic site, within the administrative boundary of Buckinghamshire Council. Hollowhill Wood is owned by Buckinghamshire Council and managed by BBOWT; Pullingshill Wood is owned and managed by the Woodland Trust.

7.10.2 The SSSI citation indicates that there are contrasts between the acid gravelly soils of the plateau and both shallow and deeper chalky soils of the slopes are reflected in the presence of different types of beechwood. The ground flora includes some uncommon species, of which one is a national rarity<sup>49</sup>.

7.10.3 Hollowhill Wood is open access with the Chilterns long distance way running along Pullingshill Wood's northern boundary. A variety of other permissive paths run through both woods, allowing for circular walks. BBOWT's website indicates that there is parking at the reserve entrance to Hollowhill Wood but no other facilities other than information boards in both woods.

---

<sup>48</sup> Natural England. Ellesborough and Kimble Warrens. SSSI Citation.  
<https://designatedsites.naturalengland.org.uk/PDFsForWeb/Citation/1000639.pdf> [Date Accessed: 01/12/21].

<sup>49</sup> Natural England. Condition of SSSI Unit for Bisham Woods SSSI.  
<https://designatedsites.naturalengland.org.uk/ReportUnitCondition.aspx?SiteCode=S1002835&ReportTitle=Bisham%20Woods%20SSSI> [Date Accessed: 01/12/21].

7.10.4 The Woodland Trust's Management Plan for Pullingshill Wood notes that parking is available at several lay-bys alongside the minor road that runs north to south through the site. Access into the wood is possible from the minor roads around the perimeter of the wood, as well as from four entry points off public footpaths. There are several permissive paths and no paths have been surfaced. The central and eastern portions of the wood are reasonably level and open whilst the western edge drops away down a steep slope into a dry valley. The Woodland Trust assesses the site as being a moderately used site (defined by the Woodland Trust as 5±15 people using one entrance per day). They note that it is popular with local residents from Marlow (1 mile away) and is accessible from other areas of woodland, in particular the larger area of Marlow Common to the north<sup>50</sup>.

## 7.11 Naphill Common SSSI component of the SAC

7.11.1 Naphill Common SSSI is located approximately 12.9km to the south of the strategic site, within the administrative boundary of Buckinghamshire Council. It is located to the immediate south of Bradenham Woods, Park Wood & The Coppice SSSI. It is a registered common with commoners' rights of estovers, grazing and firebote.

7.11.2 The SSSI citation notes that *'the structure and composition of the woodland are believed to be more natural in character than any other Chiltern woodland. Unlike most Chiltern woods, the number of tree and shrub species is large. There is a scattering of old pollards, a mixed canopy and an extensive and varied understorey. There are patches of acid heathlands in the more open areas of the common and diversity is further increased by wet rides and ponds'*<sup>51</sup>.

7.11.3 In 2014 the Friends of Naphill Common prepared a management Plan for the site<sup>52</sup>. This noted that although the common never feels busy it well used by local people and those walking in the wider area. Naphill is part of a series of sites which are connected via open access land and linear PRoWs.

## 7.12 Tring Woodlands SSSI component of the SAC

7.12.1 Tring Woodlands SSSI is located approximately 7.3km to the south east of the strategic site, within the administrative boundary of Dacorum Borough Council. The part of the Chilterns Beechwoods SAC component, which coincides with Tring Woodlands SSSI, is owned by Hertfordshire County Council and leased to Dacorum Borough Council who manage the site.

---

<sup>50</sup> Woodland Trust. 2015. Woodland Management Plan 2015 – 2020. Available at: <https://www.woodlandtrust.org.uk/media/47022/4461-pullingshill-wood-and-marlow-common.pdf> [Date Accessed: 02/12/21]

<sup>51</sup> Natural England. Naphill Commons. SSSI Citation. <https://designatedsites.naturalengland.org.uk/PDFsForWeb/Citation/1002879.pdf> [Date Accessed: 01/12/21].

<sup>52</sup> Friends of Naphill Common. Management Plan for Naphill Common. Available at: [http://www.naphillcommon.org.uk/Documents/Management\\_Plan\\_2014%20v%202.pdf](http://www.naphillcommon.org.uk/Documents/Management_Plan_2014%20v%202.pdf) [Date Accessed: 01/12/21]

- 7.12.2 The market town of Tring is located to the north of this component of the SAC, approximately 300m beyond the A41. The woodland is located on an escarpment to the south of the town and is linked to Tring via Hastoe Hill road and a PRoW off the A41 underbridge.
- 7.12.3 The SSSI citation for Tring Woodlands indicates that the site comprises ancient semi-natural beech woodland<sup>53</sup>. It notes that areas of standard ash *Fraxinus excelsior* and pedunculate oak (*Quercus robur*) are associated with the beech woodland. With Holly (*Ilex aquifolium*) and yew (*Taxus baccata*) in its sparse shrub layer on upper slopes, with more variety including dogwood (*Cornus sanguinea*), field maple (*Acer campestre*), wayfaring tree (*Viburnum lantana*) and coppiced hazel (*Corylus avellana*) on the lower slopes. It also notes the presence of a small area of mixed larch plantation (*Larix decidua*) and a woodland bird community.
- 7.12.4 The site comprises broadleaved woodland with areas of neutral grassland in the surrounding area. The SSSI unit data indicates the ground flora is representative of NVC W12, with NVC W14 community species also recorded on site<sup>54</sup>.
- 7.12.5 The SAC part of the woodlands near Tring can be accessed along public footpaths, bridleways, byways open to all traffic and a restrict byway. The woodland comprises Stubbing's Wood and Groves Wood. There is no open access across the woodland. With the exception of the byway which runs in a north / south direction between West Leith Farm and Hastoe in a sunken lane, the footpaths which cross the site are not well made. The topography of the site is undulating in nature. There are no facilities provided at the site or formal car parks serving the site. There is limited and infrequent informal road verge parking: under the A41 road bridge and to the south of the site off Gadmore Lane.
- 7.12.6 As part of Dacorum Borough Council's Emerging Local Plan evidence base to support the HRA, visitor surveys were also undertaken at the Tring Woodlands SSSI component of the SAC. A review of postcode data indicated that Tring Woodlands SSSI experiences somewhat fewer visitors and has a more local draw. Its ZOI is much smaller with a radius of 1.7km. Aylesbury South (D-AGT 1) is located approximately 7.3km from Tring Woodlands and therefore outside the ZOI where recreational impacts from new housing development are considered likely.
- 7.12.7 Natural England's advice provided to Buckinghamshire Council on 14<sup>th</sup> March 2022 noted the following in respect of Tring Woodlands:
- 7.12.8 *"As it stands we will not be requiring any specific work as part of this Strategic Solution. We are looking into this site further with our Natural England SSSI colleagues and reserve the right to reconsider our position. We accept that large housing developments within 1.7km of the site, may need to provide bespoke mitigation, outside the scope of the Strategic Solution".*

---

<sup>53</sup> Natural England. Tring Woodlands SSSI Citation. Available at:  
<https://designatedsites.naturalengland.org.uk/PDFsForWeb/Citation/1000452.pdf>

<sup>54</sup> Joint Nature Conservation Committee (JNCC) provide information on the National Classification System which is available at:  
<https://jncc.gov.uk/our-work/nvc/>

## 7.13 Windsor Hill SSSI component of the SAC

- 7.13.1 Windsor Hill SSSI is located approximately 7.3km to the south of the strategic site, within the administrative boundary of Buckinghamshire Council.
- 7.13.2 The SSSI citation for Windsor Hill SSSI notes that the site forms an '*extensive tract of the Chiltern escarpment above Princes Risborough containing fine examples of beechwoods, scrub and chalk grassland. The woodlands harbour a legally protected orchid species. The scrub includes an important colony of juniper and an ancient hedge. The grasslands contain a wide range of chalk plants and invertebrates, several of county importance*'<sup>55</sup>. Part of the SSSI is a BBOWT reserve and is well managed.
- 7.13.3 A review of OS mapping data indicates that there is no parking or facilities on site. There are a number of linear PRow which cross the site in a north to south and east to west direction. As with other components of the SAC the site is steep in parts which make access challenging.

## 7.14 Components of the SAC sensitive to recreational impacts

- 7.14.1 As outlined in **Sections 7.5** to **Section 7.13**, each component of the SAC varies in character with some being more accessible than others. With the exception of areas of the SAC which lie within the National Trust's Ashridge and Bradenham Estates, components of the SAC are not promoted widely as key recreational destinations. With the exception of the Ashridge Estate, access is limited and the sites which form the SAC are therefore likely to draw a more local patronage of visitors.
- 7.14.2 The VALP HRA drew on established recreational zones of influence when assessing recreational impacts, and in particular the Thames Basin Heaths Special Protection Area (SPA) Delivery Framework<sup>56</sup>. This framework was used as it provided useful context in assessing whether proposed housing locations in the VALP would have the potential to result in LSEs as a result of recreation. For the purposes of the VALP screening assessment, only those allocation sites within 7km of any Chilterns Beechwoods SAC were assessed. This was considered highly precautionary because the ground nesting birds for which the Thames Basin Heaths SPA is designated are far more sensitive to recreational disturbance than the woodland, grassland and stag beetle for which the at the qualifying interests for the Chilterns Beechwoods SAC is designated. The only component of the SAC within 7km of AGT1 is Ellesborough and Kimble Warrens SSSI (4.1km), however parking is limited and given the steep nature of the site, patronage is likely to be local in nature.
- 7.14.3 Tring Woodlands SSSI and Windsor Hill SSSI both sit slightly further than 7km from the strategic site at 7.3km. Given the local recreational draw of these sites, which has been confirmed through Dacorum Borough Council's HRA evidence base at Tring Woodlands SSSI (establishing a ZOI Of 1.7km – see **Section 7.12**), and lack of parking and facilities, it is unlikely that development at the strategic site would increase recreational pressure on these components of the SAC.

---

<sup>55</sup> Natural England. Windsor Hill SSSI Citation. Available at: <https://designatedsites.naturalengland.org.uk/PDFsForWeb/Citation/1002446.pdf> [Date Accessed: 02/12/21]

<sup>56</sup> Thames Basin Heaths Joint Strategic Partnership Board (2009). Thames Basin Heaths SPA Delivery Framework. <https://www.bracknell-forest.gov.uk/sites/default/files/documents/thames-basin-heaths-spa-delivery-framework.pdf>. [Date Accessed: 02/12/21].

- 7.14.4 Dacorum Borough Council's Emerging Local Plan evidence base has established a ZOI for Ashridge Commons and Woods SSSI of 12.6km (see **Section 7.5**). AGT1 sits partly within this ZOI and therefore recreational impacts from a net increase in housing development are likely.
- 7.14.5 All other components of the SAC are not considered further due to both their distance from the strategic site, current levels of accessibility and the nature and topography of sites.

## 7.15 South Aylesbury Site

- 7.15.1 South Aylesbury is a strategic allocated site for Aylesbury, which together with other allocations and commitments contribute to the delivery of the housing requirement identified within the adopted VALP (Policy D-AGT 1), together with associated infrastructure and facilities.
- 7.15.2 Located within Stoke Mandeville Civil Parish the site is situated within Buckinghamshire Council's administrative area.
- 7.15.3 South Aylesbury is a 95-hectare sustainable extension to Aylesbury being developed on land between the town, to the north, and the village of Stoke Mandeville, to the south. The strategic site will integrate with the existing built-up area of Aylesbury whilst maintaining the setting and individual identity of Stoke Mandeville. Wendover Road (A413) forms the boundary to the east, with Lower Road (B443) to the west of the site. The London Marylebone to Aylesbury Vale Parkway railway line runs north to south through the centre of the site.
- 7.15.4 Aylesbury is a primary settlement within Buckinghamshire, identified within the VALP as a Strategic Settlement for growth. The strategy contained within the VALP utilises the settlement hierarchy to locate development in the most sustainable locations. Aylesbury Garden Town (comprising Aylesbury town and adjacent parts of surrounding parishes) will grow by 16,207 new dwellings. Taking into account commitments and completions, 3,282 homes are allocated at Aylesbury, with the majority being located within six sites, including South Aylesbury.
- 7.15.5 The VALP identifies the AGT1 site for the development with the key development and land use requirements being the delivery of at least 1,000 dwellings; a primary school; the South East Aylesbury Link Road (the "SEALR") and supporting infrastructure including multi-functional GI; a local centre and cycling and walking links.
- 7.15.6 The AGT1 site consists of several parcels of land which are in different ownerships and / or control by developers / promoters. The parcels are merged to enable a comprehensive, cohesive, and co-ordinated approach to the development of the site as a whole.

## 7.16 Recreational Mitigation

- 7.16.1 Potential adverse recreational impacts upon the Ashridge Commons and Woods SSSI component of the SAC from the Aylesbury South site cannot be ruled out of the HRA process and must therefore be considered further in the Appropriate Assessment. It is therefore necessary to consider application of mitigation measures which may avoid, cancel or reduce effects upon this component of the Chilterns Beechwoods SAC. Mitigation must be effective, timely, reliable and guaranteed to be delivered in perpetuity.
- 7.16.2 As outlined in **Section 5.4**, the HRA for the VALP noted that in order to conclude no adverse impacts on site integrity specific proposals for Green Infrastructure (GI) must be re-inserted into Policy I1 (Green Infrastructure) in order to alleviate visitor pressures on the Chilterns Beechwoods SAC. Policy I1 of the VALP was therefore updated and includes a number of key components which are of relevance to this assessment of impacts which takes into consideration mitigation (see **Box 4**).

### Box 4: VALP: Policy I1 Green infrastructure<sup>57</sup>

Green Infrastructure should provide a range of functions and provide multiple benefits for wildlife, improving quality of life and water quality and flood risk, health and wellbeing, recreation, access to nature and adaptation to climate change. The council will support proposals for green infrastructure where there is no significant adverse impact on:

- a. Wider green infrastructure networks including public rights of way and green infrastructure opportunity zones identified by the Buckinghamshire and Milton Keynes Natural Environment Partnership
- b. Potential to contribute to biodiversity net gains
- c. Management of flood risk and provision of sustainable drainage systems
- d. Provision of a range of types of green infrastructure
- e. Provision of sports, recreation facilities or public realm improvements
- f. Potential for local food cultivation by communities
- g. Achieving a satisfactory landscaping scheme including the transition between the development and adjacent open land

New housing developments of more than 10 units or which have a combined gross floorspace of more than 1,000 square metres (gross internal area) will be required to meet the ANGSt (accessible natural green space standards) in Appendix C to meet the additional demand arising from new residential development. Amenity green space will need to be provided on site. Sports and recreation facilities can be provided as required (Policy I2) on the same site where these are compatible with publicly accessible green infrastructure.

The Accessibility Standards in Appendix C will need to be met by providing accessible natural green space on or off site for developments of more than 10 homes and which have maximum combined gross floorspace of more than 1,000 square metres (gross internal area) unless it has been demonstrated in an assessment for a planning application that accessible natural green space provision has already been met, when including the increased population of the new development and any other committed development.

Conditions will be imposed on permissions or planning obligations sought in order to secure green infrastructure reasonably related to the scale and kind of housing proposed. The benefits to be obtained or provided by the council by virtue of the obligation will be directly relevant to the development permitted and the needs of its occupiers and fairly and reasonably related to its scale and kind.

<sup>57</sup> [https://buckinghamshire-gov-uk.s3.amazonaws.com/documents/Aylesbury\\_local\\_plan\\_L46JWaT.pdf](https://buckinghamshire-gov-uk.s3.amazonaws.com/documents/Aylesbury_local_plan_L46JWaT.pdf)



To count towards any ANGSt quantitative/accessibility requirement, such green space must meet the definitions of 'accessible' and 'natural' in paragraph 11.8

The council will only accept the loss of ANGSt including the incorporation of such areas into private garden land if:

- h. The ANGSt has been subject to an assessment which shows it to be surplus to requirements
- i. The land does not fulfil a useful purpose in terms of its appearance, landscaping, recreational use or wildlife value
- j. The land does not host an element of semi-natural habitat or any other feature of value to wildlife to a greater extent than would be the case if it were planted as a garden
- k. The loss of publicly accessible green infrastructure would not set a precedent for other similar proposals which could cumulatively have an adverse effect on the locality or the environment
- l. The continued maintenance of the land for publicly accessible green infrastructure would be impractical or unduly onerous
- m. Publicly accessible green infrastructure lost will need to be replaced by equivalent or better following an assessment justifying this need based on applying the standards in Appendix C.

Formal outdoor sports areas, play areas, and allotments all serve a specific purpose and may be located within or outside ANGSt. Either way such facilities should be located on land that is additional to the ANGSt provided by a developer and be complimentary to it.

Green infrastructure being provided must have a long-term management and maintenance strategy to be agreed by the council with assets managed for at least 30 years after completion and during this time secure a mechanism to manage sites into perpetuity. The management and maintenance strategy shall set out details of the owner, the responsible body and how the strategy can be implemented by contractors.

- 7.16.3 The design principles for Aylesbury Garden Town (which includes AGT1) include a requirement to achieve a minimum of 50% land within the proposed garden communities as local and strategic multi-functional GI. Policy D1 of the VALP – Delivering Aylesbury Garden Town – requires a site-specific Masterplan SPD to be developed for AGT1 Aylesbury South in order to set out clear and detailed advice for place-making. This was reflected in the VALP policy for Aylesbury South itself (D-AGT 1) which also requires the Masterplan SPD to include 50% provision of GI among other factors.
- 7.16.4 Policy PSGI 1 of the Draft Stoke Mandeville Neighbourhood Plan (NP)<sup>58</sup> also sets out the requirement for new developments over 10 units to meet the Garden Town principles by providing at least 50% GI in the proposal.
- 7.16.5 In order to satisfy requirements set out in Policy I1 (Green Infrastructure) (**Box 4**), Policy D-AGT 1 and Policy D1 (Delivering Aylesbury Garden Town) of the VALP and those set out in the draft Stoke Mandeville NP, the South Aylesbury site will be required to provide and manage 50% GI to link new development areas to the wider countryside as part of a high quality built and semi-natural environment. All GI must meet the ANGSt criteria which are set out in Appendix C of the VALP and have a long-term management and maintenance strategy associated with it.

<sup>58</sup> Stoke Mandeville Parish Council. A neighbourhood Plan for Stoke Mandeville. 2021 – 2033. Available at: <https://www.stokemandevilleparishcouncil.org.uk/neighbourhood-plan/> [Date Accessed 12/05/22].

7.16.6 The SPD therefore sets out a commitment that AGT1 will provide 50% GI by area to meet this requirement (see Section 3.2.1 of the SPD). Within each application parcel, GI will link the new development areas to the wider area. Existing vegetation and habitats will be retained where practicable with urban greening and green / blue infrastructure incorporated, providing a network of open spaces for informal use together with more formal sports provision.

7.16.7 Based on the average household size of 2.5 people (VALP Paragraph 1.51) the South Aylesbury development will generate a population of at least 2,500 people (based on 1,000 dwellings). The development will, in line with Appendix C of the VALP, aim to provide a minimum of 5 hectares of accessible natural green space (2 hectares per 1,000 population); 3.5 hectares of incidental open space (1.4 hectares per 1,000 population), and 3 hectares of major open space (1.2 hectares per 1,000 population), with 2 adult size grass pitches (0.73 adult size grass pitch equivalent per 1,000 population) (see Section 4.5.3 of the SPD). Overall, as set out in **Figure 7.3**, a total of 45.23ha of ANGSt compliant GI will be provided across AGT1 which represents 18.092ha/1000 population.

AGT1 Gross Area (minus railway corridor)	90.45Ha
GI Requirement	45.23Ha
South-East Aylesbury Link Road (road)	3.51Ha
2FE Primary School (with drop off area)	1.9Ha
Gypsy & Traveller Pitches	0.34Ha
Community Facility (may include residential)	0.1Ha
Net Development Area for Residential Use	39.72Ha

Areas of Development and Infrastructure within AGT1

**Figure 7.3:** Areas of Development and Infrastructure within AGT1 (Source: South Aylesbury SPD, August 2022)

7.16.8 An overarching Green and Blue Infrastructure Plan has been developed for AGT1 (see **Figure 7.4**), which will form the basis for designs in each area. This includes the following areas of GI:

- Strategic Buffer;
- Round Aylesbury Walk;
- South-East Aylesbury Link Road Corridor;
- Railway Corridor;
- Central Open Space;
- Minor Connections; and
- School Playing Fields.



Figure 7.4: SPD ANGSt compliant GI Plan (Source: South Aylesbury SPD, August 2022)

7.16.9

The overall aim of the Aylesbury Garden Town GI is to connect the surrounding countryside to the Chilterns and surrounding rural areas. A number of GI Strategies cover Aylesbury Vale at varying hierarchal levels and include:

- Vision and Principles for the Improvement of Green Infrastructure in Buckinghamshire & Milton Keynes<sup>59</sup>;
- Buckinghamshire Green Infrastructure Delivery Plan (2013)<sup>60</sup>;

<sup>59</sup> <https://bucksmknep.co.uk/projects/vision-and-principles-for-the-improvement-of-green-infrastructure/>

<sup>60</sup> [http://www.southbucks.gov.uk/media/5014/Buckinghamshire-Green-Infrastructure-Delivery-Plan-Buckinghamshire-and-Milton-Keynes-Natural-Environment-Partnership-August-2013-/pdf/5326-Bucks-GI-Delivery-Plan-FINAL-ISSUE\\_2013\\_08\\_07\\_low\\_res.pdf](http://www.southbucks.gov.uk/media/5014/Buckinghamshire-Green-Infrastructure-Delivery-Plan-Buckinghamshire-and-Milton-Keynes-Natural-Environment-Partnership-August-2013-/pdf/5326-Bucks-GI-Delivery-Plan-FINAL-ISSUE_2013_08_07_low_res.pdf)

- Aylesbury Vale Green Infrastructure Strategy (2014)<sup>61</sup>; and
- Aylesbury Garden Town Masterplan<sup>62</sup>.

- 7.16.10 The Aylesbury Garden Town GI forms part of the county GI provision and includes a number of countryside access gateways, notably Quarrendon Leas and, at greater distance, the Waddesdon Estate (National Trust), Tring Reservoirs Complex/College Lake and Wendover Woods. This wider, county level, GI provision provides an existing range of green spaces in the locality of AGT1 with which the development will be connected.
- 7.16.11 In their advice to Buckinghamshire Council on 14<sup>th</sup> March, Natural England acknowledged that a strategic mitigation solution is yet to be developed for the Ashridge Commons and Woods SSSI component of the SAC. The proposed components of this strategic solution are set out in **Section 7.5**. Whilst work is ongoing on a long-term strategic solution, Natural England has noted that HRAs will be required to detail how each individual development within the Ashridge Commons and Woods SSSI ZOI will avoid additional adverse recreational impacts on the integrity of the Chilterns Beechwoods SAC. Natural England note that they are happy to work with affected LPAs and developers to find solutions during this temporary period, but that all applications should look to incorporate mitigation measures that will avoid additional recreational impacts.
- 7.16.12 The work undertaken on behalf of Dacorum Borough Council<sup>63</sup> notes that provision of SANG (alongside SAMM – see **Section 7.5**) is an important strand of a long-term mitigation package as it will aim to absorb additional recreational pressure associated with new development away from the SAC. It notes that such green spaces may be provided through a number of mechanisms such as enhanced or new GI, or for instance combining it with active travel routes (such as a cycle way). The aim of this new green space must however be to increase recreational capacity away from the Chilterns Beechwoods SAC and be in place prior to development coming forward in order for it to be effective. Management arrangements must also be in place in perpetuity for it to continue to deliver benefits over the lifetime of development. Provision of bespoke on-site greenspace is a common approach taken to delivering this type of recreational mitigation across the United Kingdom.

---

<sup>61</sup> <https://www.aylesburyvaledc.gov.uk/green-infrastructure-strategy>

<sup>62</sup> <https://www.aylesburygardentown.co.uk/the-masterplan-and-projects/>

<sup>63</sup> Panter, C., Liley, D., Saunders, P., % Caals, Z. (2022). Visitor survey recreational impact assessment and mitigation requirements for the Chilterns Beechwoods SAC and the Dacorum Local Plan Report by Footprint Ecology for Dacorum Borough Council.

- 7.16.13 An important consideration when providing this type of on-site recreational mitigation is the quality of green space provided. The work undertaken on behalf of Dacorum Borough Council for the Ashridge Estate includes suggested guidelines on what green space may look like. **Appendix C** provides a summary of these guidelines. In their correspondence to Buckinghamshire Council Natural England makes reference to their SANG guidelines for the Thames Basin Heaths Special Protection Area (SPA)<sup>64</sup>. This provides detailed guidance and checklists for SANG covering small scale sites, linear SANG and networks of greenspace.
- 7.16.14 Section 5 (Delivering the Place) of the SPD acknowledges that additional dwellings will be provided within 12.6km of Ashridge Commons and Woods SSSI component of the SAC. As such it notes that mitigation will therefore be required to address recreational impacts. As shown in **Box 5**, the SPD commits to a twin mitigation package to address these impacts comprising a mixture of SANG and SAMM.
- 7.16.15 Whilst bespoke SANG guidelines are yet to be developed for this component of the SAC, **Appendix C** provides an outline of provisional SANG criteria. This includes a minimum SANG standard of 8ha/1000 population; a principle supported by Natural England in a letter dated 14<sup>th</sup> March. As illustrated in **Figures 7.3** and **7.4**, the SPD will deliver approximately 45.23ha of ANGSt compliant GI. It is noted that approximately half (45.16ha) of AGT1 is located within the Ashridge Commons and Woods SSSI 12.6km ZOI. However, taking the site as a whole, a total of some 18ha of ANGSt compliant GI will be provided per 1000 population which is in excess of the suggested minimum SANG standard of 8ha/1000 population. The SPD makes a commitment that SANG provided at AGT-1 will be agreed with Natural England and managed in perpetuity (**Box 5**).
- 7.16.16 The SPD also commits to a financial contribution from each net new home within the Zone of Influence towards a SAMM (as detailed at **Section 7.5**). The details of this will be set out in a separate SPD.

**Box 5: Chilterns Beechwoods SAC text extracted from the SPD**

**Chiltern Beechwoods Special Area of Conservation**

D-AGT1 will create at least 1,000 new homes. An increase in the number of homes is expected to lead to an increase in the population residing within the 12.6 kilometre Chilterns Beechwoods Special Area of Conservation Zone of Influence.

To mitigate the potential recreational disturbance from this population to the Chilterns Beechwoods Special Area of Conservation a twin mitigation package is required.

It is anticipated that this will take the form of:

1. A financial contribution from each net new home within the Zone of Influence towards a Strategic Access Management and Monitoring Strategy. This strategy will be set out in a Supplementary Planning Document.
2. The delivery of 50% green infrastructure to Accessible Natural Green Space Standard within the allocation. The green infrastructure being provided must have a long-term management and maintenance strategy and be agreed by the council. A mechanism must be secured to manage the green

<sup>64</sup> Natural England. Guidelines for Creation of Suitable Alternative Natural Greenspace (SANG) - August 2021. Available at: [https://www.hart.gov.uk/sites/default/files/4\\_The\\_Council/Policies\\_and\\_published\\_documents/Planning\\_policy/Guidelines%20for%20Creation%20of%20Suitable%20Alternative%20Natural%20Greenspace%20%28SANG%29%20-%20August%202021.pdf](https://www.hart.gov.uk/sites/default/files/4_The_Council/Policies_and_published_documents/Planning_policy/Guidelines%20for%20Creation%20of%20Suitable%20Alternative%20Natural%20Greenspace%20%28SANG%29%20-%20August%202021.pdf) [Date Accessed: 12/05/22]

infrastructure in perpetuity. The management and maintenance strategy shall set out details of the owner, the responsible body and how the strategy can be implemented by contractors.

The delivery and the in-perpetuity maintenance of the 50% green infrastructure to Accessible Natural Green Space Standard is capable of satisfying the requirements for Suitable Accessible Natural Green Space; and should be agreed with Natural England. The aim of this green space is to provide a good quality and accessible recreational space capable of reducing the need for the new population to visit the Chilterns Beechwoods Special Area of Conservation. Perpetuity in this context is taken as at least 80 years.

Both of these mitigation measures will be considered as part of the determination of planning applications submitted to the council for this allocation affecting the Zone of Influence.

## 7.17 Alone assessment

7.17.1 The assessment of recreational impacts from AGT1 alone at the Chilterns Beechwoods SAC (Ashridge Commons and Woods SSSI) has taken into consideration the following factors:

- On-site GI provision to meet VALP and draft NP policy requirements which includes 50% ANGSt compliant GI and a commitment to develop a long-term management and maintenance strategy for all GI (**Paragraph 7.16.15**);
- Availability of existing recreational resource within the local and wider area and proposed connecting links from AGT1 to these areas (**Paragraph 7.16.9** to **Paragraph 7.16.10**); and
- The commitment of the SPD to meet SANG guidelines and SAMP contributions in line with the emerging strategic package of long-term mitigation for the Ashridge Commons and Woods SSSI component (**Box 5**).

7.17.2 Taking these factors into consideration it is considered that development at AGT1 will have no adverse impact upon the site integrity of the Chilterns Beechwoods SAC.

## 7.18 In-combination assessment

7.18.1 An Appropriate Assessment must consider information in respect of all aspects of the SPD and ways in which it could, either alone or in-combination with other plans and projects, affect a Habitats site. This is considered through the HRA process in an in-combination assessment.

7.18.2 Whilst the strategic site at Aylesbury South, following mitigation (see **Section 7.17**), will not have an alone impact on any Habitats site, there is the potential for residual recreational impacts which may contribute to in-combination impacts at components of the Chilterns Beechwoods SAC.

7.18.3 Plans and projects which are considered to be of most relevance to the in-combination assessment of the SPD include those that have similar impact pathways. These include those plans and projects which have the potential to increase residential development in the HRA study area which may increase recreational pressure upon the Chilterns Beechwoods SAC.

- 7.18.4 Of relevance to this in-combination assessment are other residential allocations made in the VALP, the emerging NP for Stoke Mandeville and local planning authority growth in neighbouring authorities which are also located within the Ashridge Commons and Woods SSSI ZOI.
- 7.18.5 As set out in **Section 5**, the VALP HRA process included consideration of the AGT1 Aylesbury South strategic allocation. Taking into consideration mitigation, the VALP HRA concluded no adverse effect on site integrity from the plan alone or in-combination on the Chilterns Beechwoods SAC.
- 7.18.6 The strategic site is located with the Stoke Mandeville NP area. At Section 14 version of the NP was published for consultation in August 2021<sup>65</sup>. The NP has been produced in line with the VALP but provides local policies to protect existing green space, amenities, historic buildings and important views and provide for new green space and public amenities in the form of a new Parish Centre, a nature reserve and parkland. It allocates land for business use within the Southern Boundary and provides a parish wide masterplan. The NP includes AGT1 and provides a masterplan for this site with which development must comply. It also provides local level detail as to how GI should be delivered at the Aylesbury South site (see PSGI policies).
- 7.18.7 The NP has been screened in for an HRA. The NP sets out local criteria to conserve GI and strengthen the VALP policies in relation to the protection of green space. It also includes provision for a new nature reserve and parkland. As such, it will have a positive impact on recreational pressure at the Chilterns Beechwoods SAC in combination with the SPD.
- 7.18.8 As noted in **Section 7.5**, a 12.6km ZOI, within which in-combination recreational impacts may occur, has been established for Ashridge Commons and Woods SSSI as part of Dacorum Borough Council's Emerging Local Plan evidence base. LPAs which sit within this ZOI include Dacorum Borough Council, Buckinghamshire Council, St Albans City and District Council and Central Bedfordshire lie. Drawing on this evidence base, all affected LPAs have made a commitment to prepare a long-term strategic solution to mitigate recreational impacts from new development. As illustrated in **Box 5**, the SPD makes a commitment to this future mitigation package (including the SAMM contributions). This solution will address the impacts of new development both alone and in-combination with neighbouring LPA growth and as such ensure no adverse in-combination impacts upon the SAC.

---

<sup>65</sup> <https://www.stokemandevilleparishcouncil.org.uk/neighbourhood-plan/>

## 8 Conclusions and Next Steps

### 8.1 Conclusions

8.1.1 Buckinghamshire Council is in the process of preparing an SPD for Aylesbury South (AGT1). The purpose of this SPD is to provide guidance on the future sustainable development of this strategic site. AGT1 is implemented in the VALP through Policy D-AGT 1 and will make provisions for the following:

- At least 1,000 dwellings
- One primary school
- Multi-functional green infrastructure
- Aylesbury South East Link Road (A413 to B4443 Lower Road)
- Local centre
- Cycling and walking links

8.1.2 HRA aims to ensure that designated Habitats sites are protected from impacts that could adversely affect their integrity. An HRA has therefore been prepared in accordance with the Conservation of Habitats and Species Regulations 2017 (as amended). This report provides the output of this assessment.

8.1.3 Taking no account of mitigation measures, the HRA screening assessment undertaken by Buckinghamshire Council concluded that there would be potential for LSEs associated with increased recreational pressure at the Chilterns Beechwoods SAC as a result of development set out in the SPD. As such the SPD was screened into the HRA process for further assessment through an Appropriate Assessment.

8.1.4 The Appropriate Assessment focused on recreational impacts upon the Chilterns Beechwoods SAC and identified potential adverse impacts upon the Ashridge Commons and Woodland SSSI component specifically. This assessment took into consideration a number of mitigation measures as set out below:

- On-site GI provision to meet VALP and draft NP policy requirements which includes 50% ANGSt compliant GI and a commitment to develop a long-term management and maintenance strategy for all GI;
- Availability of existing recreational resource within the local and wider area and proposed connecting links from AGT1 to these areas; and
- The commitment of the SPD to meet emerging SANG guidelines and SMM contributions in line with the emerging strategic package of long-term mitigation for the Ashridge Commons and Woods SSSI component.

8.1.5 Taking these factors into consideration, the Appropriate Assessment concluded no adverse impacts from the SPD, either alone or in-combination, on the site integrity of the Chilterns Beechwoods SAC.

### 8.2 Next steps

8.2.1 The purpose of this report is to inform the HRA of the SPD using best available information.



- 8.2.2 Buckinghamshire Council, as the Competent Authority, has responsibility to make the Integrity Test, which can be undertaken in light of the conclusions set out in this report.
- 8.2.3 This report will be submitted to Natural England, the statutory nature conservation body, for formal consultation. The Council must 'have regard' to their representations under the provisions of Regulations 63(3) and 105(2) prior to making a final decision as to whether they will 'adopt' the conclusions set out within this report as their own.

# Appendix A: Chilterns Beechwoods SAC Conservation Objectives

## Chiltern Beechwoods SAC<sup>1</sup>

### Conservation objectives:

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

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

Qualifying Features:

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

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

S1083. Lucanus cervus; Stag beetle

### Threats and Pressures which could be affected by the SPD<sup>2,3</sup>:

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

<sup>1</sup> Natural England (2018) Chiltern Beechwoods SAC Conservation Objectives. Available at: <http://publications.naturalengland.org.uk/file/4961243408629760> [Date Accessed: 26/11/21]

<sup>2</sup> Natural England (2015) Chiltern Beechwoods SAC Site Improvement Plan. <http://publications.naturalengland.org.uk/file/5908864568393728> [Date Accessed: 26/11/21].

<sup>3</sup> Natural England (2019) Chiltern Beechwoods SAC Conservation Objectives Supplementary Advice. [file:///Users/samanthacheater/Downloads/UK0012724\\_ChilternsBeechwoodsSAC\\_COSA\\_%20Formal%20Published\\_30%20Nov%202018%20\(1\).pdf](file:///Users/samanthacheater/Downloads/UK0012724_ChilternsBeechwoodsSAC_COSA_%20Formal%20Published_30%20Nov%202018%20(1).pdf) [Date Accessed: 26/11/21].

## Appendix B: Site of Special Scientific Interest Condition Data

European Site	SSSI Name	No. of SSSI Units	Conservation Status of SSSI Units <sup>1</sup>	Reason for unfavourable status where applicable.
Chilterns Beechwoods SAC	Ashridge Commons and Woods SSSI	7	6 Favourable	n/a
			1 Unfavourable - recovering	The Hangings. Little management and signs of deer browsing.
	Tring Woodlands SSSI	1	1 Unfavourable - recovering	Below FC targets for temporary open space, regeneration targets and canopy composition.
	Thorpe Park No.1 Gravel Pit SSSI	1	1 Favourable	n/a
	Wraysbury and Hythe End Gravel Pits SSSI	6	6 Favourable	n/a
	Wraysbury No.1 Gravel Pit SSSI	1	1 Favourable	n/a
	Wraysbury reservoir SSSI	1	1 Favourable	n/a

<sup>1</sup> Natural England. IRX <https://designatedsites.naturalengland.org.uk/>. Site condition data is provided for the SSSIs which legally underpin the European designation [Date Accessed: 20/01/21].

# **Appendix C – Chilterns Beechwoods SAC – Ashridge Commons and Woods SSSI – Suggested SANG Guidelines**

Suggested SANG Guidelines replicated from Appendix 13 of Panter, C., Liley, D., Saunders, P., & Caals, Z. (2022). Visitor survey recreational impact assessment and mitigation requirements for the Chilterns Beechwoods SAC and the Dacorum Local Plan Report by Footprint Ecology for Dacorum Borough Council.

- SANG should be provided at a rate of 8ha per 1000 new residents; this per ha standard is equivalent to 0.0192ha per dwelling (assuming an occupancy rate of 2.4 people per dwelling).
- Sites with sports grounds, playing fields or children's play areas are unlikely to meet the criteria for SANG or if such features are present they should not be counted towards the per ha standard.
- Where sites have existing visitor use, this existing use will need to be taken into account when applying the per ha standard. This will require visitor survey data to be available. Sites are likely to have additional capacity where average visitor use is less than 1 person per ha per hour<sup>66</sup>. Where existing sites are already well used, there will be a need to demonstrate that the measures will be effective, and this may require some delivery upfront.
- The focus for the SANGs should be large sites of at least 40ha (which will accommodate suitably long routes<sup>67</sup>), however smaller sites (15ha and above) may work, depending on the location and quality.
- SANGs should provide parking that is free or significantly cheaper than parking at the European sites. A guide to parking provision should be in the region of 1.5 spaces per ha of SANG<sup>68</sup>.
- They should be quiet countryside locations, away from traffic noise (i.e. the motorway), industrial sites etc. They should have a sense of space, and be a viable alternative to the Chilterns Beechwoods.
- They should contain a variety of habitats and be scenic, ideally with views.
- They should provide attractive, informal areas for dog walking: a range of walk lengths on relatively dry terrain, including some of at least 2.5km where dogs can be safely off the lead during the whole walk.
- They should provide routes that attract walkers, potentially including families. Walks are likely to need to be circuits with some interest (such as viewpoints, heritage features etc.).
- The site(s) should provide access all year round, without areas becoming waterlogged or inaccessible due to wet or muddy terrain.
- They should provide routes that work for cycling, potentially accommodating family cycling groups and mountain bikes as a low-key destination.

---

<sup>66</sup> This provides a guide or approximate benchmark, typically busier than the relevant European sites but less than an urban park (see Liley et al., 2015). Sites will need to be considered on a case-case basis.

<sup>67</sup> A square with sides of 625m would be just under 40ha and provide for a linear route (around the perimeter) of 2.5km.

<sup>68</sup> This figure will depend on how close the SANG is to housing and the proportion of visitors that might arrive on foot or by bicycle. A busy SANG site might be expected to have up to 1 person visiting per ha per hour. Given that visitor numbers will not be constant every hour (i.e. there will be peak times of visiting) and easy parking is likely to be an important draw (meaning a need to ensure confidence to park), we suggest 1.5 spaces per ha.

- 
- Access points to the SANG(s) should be primarily within a 5km radius or 10 minute drive and easily accessible by road from the development. Some direct foot access and good access routes for cyclists would be ideal. Direct access on foot would mean some SANG provision within around 500m radius of proposed housing locations.
  - SANGs should be recognisable as a 'destination' such that sporadic visitors are drawn from a wide area and such that the site also attracts more regular (at least weekly) visitors. As such they will need to be positively promoted and welcoming.
  - On-site infrastructure should be relatively low key, and could include the following as appropriate:
    - Small scale visitor centre/shelter(not necessarily staffed)
    - Interpretation (providing information about the area)  
Wayfinding infrastructure to direct people around the site
    - Some surfaced paths/boardwalks
    - Wildlife viewing facilities (such as screens)
    - Range of paths (some waymarked) that provide a range different routes and circuits, potentially including some longer routes for cycling (perhaps family groups and relatively low-key mountain bike circuits) but not such that other access (e.g. appeal to dog walkers) is compromised
    - Access to water for dogs to drink, bathe and splash in
    - Benches/informal seating  
Viewpoints
  - SANGs will need to be promoted through a range of different ways, including signage, so that they are easy to find and local residents (both new and existing) are well aware of the site.
  - SANGs will need to provide access in perpetuity, and therefore require some legal mechanism to ensure this.
  - Sites with significant nature conservation interest (SSSI) or particularly vulnerable species present are unlikely to be suitable as SANG.

Ecological Services

Green Infrastructure

Landscape and Visual Impact Assessment

Landscape Character Assessment

Habitats Regulations Assessment

Strategic Environmental Assessment

Sustainability Appraisal



**LEPUS** CONSULTING  
LANDSCAPE, ECOLOGY, PLANNING & URBAN SUSTAINABILITY

© Lepus Consulting Ltd

Eagle Tower Cheltenham GL50 1TA

T: 01242 525222

E: [enquiries@lepusconsulting.com](mailto:enquiries@lepusconsulting.com)

W: [www.lepusconsulting.com](http://www.lepusconsulting.com)

CHELTENHAM



Lepus Consulting  
Eagle Tower  
Cheltenham  
Gloucestershire GL50 1TA

t: 01242 525222  
w: [www.lepusconsulting.com](http://www.lepusconsulting.com)  
e: [enquires@lepusconsulting.com](mailto:enquires@lepusconsulting.com)