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Vale of Aylesbury Local Plan - Habitats Regulations Assessment

Title Technical Note – HRA of potential changes to the VALP

Project No 6980

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LUC has been commissioned to review the findings of the Habitats Regulations Assessment (HRA) of the emerging Vale of Aylesbury Local Plan¹ in light of spatial site options being considered by the Council ahead of finalising the Vale of Aylesbury Local Plan (VALP) Proposed Submission document. The review aims to establish whether any individual spatial site option or combination of options could result in likely significant effects of the plan which might require Appropriate Assessment.

Potential spatial site options

It is understood that the potential changes under consideration relate to two main issues:

- release of the RAF Halton site at Wendover as a major potential site for strategic development; and
- a reassessment of unmet needs in neighbouring authorities (namely Wycombe, Chiltern and South Bucks) now being met through their emerging plans.

These issues amongst others have likely implications for the following aspects of the VALP:

- Policy S3 Settlement hierarchy and cohesive development
- Policy S4 Green Belt
- Policy D4 Housing development at strategic settlements (excluding Aylesbury)
- Policies map

The insertion of a new policy in relation to the allocation of 'RAF Halton' for housing is also being considered.

Methodology

Each of these individual policies has been screened / rescreened in light of the potential changes to the VALP, as set out in Appendix 1; this has followed the same methodology as the original HRA and it is assumed that all other policies would remain unchanged. As in the original HRA, this assessment has screened for likely significant effects on two Natura 2000 sites, namely Chilterns Beechwoods SAC (air quality and recreation) and Aston Rowant SAC (recreation only). New evidence has also been considered, which has included updated traffic modelling carried out by Jacobs on behalf of the Council². The overall

¹ LUC (2017) Vale of Aylesbury Local Plan 2017 Submission: Habitats Regulations Appraisal Report (April 2017)

² Jacobs (2017) Countywide Local Plan Modelling: Phase 3 Technical Note (dated 16th August 2017)
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effects of all potential changes to the VALP have also been considered in order to identify any synergistic or cumulative effects of policy changes, as discussed below.

As part of the update, the neighbouring authorities have also been reviewed for any emerging draft plan documents and associated HRAs. The results of this this review are presented in Appendix 2 and discussed below.

This technical note draws heavily on the original HRA document, which should be read alongside this update.

Effects of the plan alone

Chiltern Beechwoods SAC – air pollution

The potential changes to the VALP would effectively replace one allocation previously proposed north of Wendover for an alternative allocation at the Halton RAF base; this would increase the scale of growth by 200 dwellings. This is a relatively modest increase within the context of the total plan growth, the effects of which have previously be modelled and found to be insignificant, with considerable headroom for additional growth before the 1,000AADT screening threshold could be reached. As such the effect of the potential changes to the VALP may be dismissed as *de minimis* and the conclusion of no likely significant effects remains valid.

Chiltern Beechwoods SAC –recreational pressure

The potential changes to the VALP would increase the scale and decrease the proximity of development within the theoretical visitor catchment for the SAC (moving it approximately 1km closer), particularly with regards to the Tring Woodlands SSSI component. However, given that the Halton RAF site is surrounded by attractive and accessible woodland which extends across the landscape between this site and the SAC, it is therefore highly unlikely that new residents would walk nearly 3km to get to the SAC. Residents would also be unlikely to drive to Tring Woodlands SSSI as there are no car parks at the woods. The specific effect of increasing recreational pressure identified in the Site Improvement Plan is the removal of deadwood by local residents, which could result habitat for stag beetles, however as highlighted in the original HRA, local residents who may be likely to take dead wood from woodland sites are unlikely to travel significant distances for such an excursion. As such the effect of the potential changes to the VALP can be dismissed as *de minimis* and the conclusion of no likely significant effects remains valid.

Ashton Rowant SAC – Recreational Pressure

The potential changes to the VALP would not have any implications for the HRA with regards to this SAC as no further development is proposed within 5km of this site, and as such the conclusion of no likely significant effects remains valid.

Effects of the plan in-combination

Overall the housing target for the VALP is likely to be reduced from 33,300 to around 27,400 dwellings due to an update the objectively assessed needs for the Buckinghamshire Housing Market Area, following new household and population projections, and capacity to accommodate some of this development being identified in the neighbouring districts of Wycombe, Chiltern and South Bucks to the south of Aylesbury Vale.



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The traffic model for Buckinghamshire which covers all four districts has been updated to reflect this change in the distribution of growth, however the report focusses on increases in travel time rather than changes in flows, and in that respect it provides limited new evidence about the effects of growth on traffic flows. This new distribution of growth is likely to generate additional AADT on sensitive stretches of road (the A41 at Tring Woodland SSSI and the A4010 at Grangeland and Pulpits Wood SSSI) which link Aylesbury town with these neighbouring districts. At the current time, the neighbouring districts have not yet published their updated plans and therefore these potential effects cannot be considered or assessed in-combination with this plan. It is likely that the in-combination effects will be revisited in the HRAs of those emerging plans, when the next iterations are published this autumn; it would therefore be prudent for the Council to monitor this situation as there may be implications which emerge prior to this plan being adopted

Outside of Buckinghamshire, the HRA of the emerging South Oxfordshire Local Plan has identified the potential for likely significant effects upon the Chiltern Beechwoods SAC and is undertaking traffic modelling to inform an Appropriate Assessment. However, the component parts of the SAC which are potentially affected by that plan are Bisham Woods SSSI on the A404 and Bradenham Woods, Park Wood and The Coppice SSSI on the A4010; the two plans would therefore only have the potential to contribute towards traffic flows on different stretches of road and aerial pollution at different components of the SAC, and as such it can be assumed that in-combination effects could not occur.

The conclusions of the screening assessment of the Vale of Aylesbury Draft Local Plan therefore remain valid in light of the potential changes to the VALP. It may still be concluded that the Local Plan (including the potential changes) would not have any likely significant effects upon the Natura 2000 network and as such no Appropriate Assessment of the plan is necessary.



Appendix 1 – Implications for HRA Screening Assessment for effects of the plan alone

Table 1 summarises the potential changes to the VALP currently being considered by the Council based on recent correspondence from the Council³, and considers any implications of those individual changes for the conclusions of the screening assessment.

| Policy | Summary of potential changes to the VALP | Implications for HRA screening |
|--------|---|---|
| S3 | Update to Table 3 to adjust the 'Amount of housing development' from 834 to 1,128 dwellings to reflect the replacement of the allocation for 800 homes with an allocation for 1,000 homes at RAF Halton and some new commitments. | <p>Chiltern Beechwoods SAC – air pollution The change would result in a net increase in the number of dwellings at Wendover, however this is very small (+200) in the context of total growth proposed in the plan (now 24,700). The vast majority of traffic flows on the strategic road network generated by development at Wendover are likely to result from daily trips along the A413 and A41 to and from Aylesbury (as a sub-regional centre for employment and retail). A very small proportion of Annual Average Daily Trips (AADT) are likely to be generated on sensitive stretches of road, specifically the A41 at Tring and the A4010 at Great Kimble. Given that modelling has shown that the effects of the plan as a whole will only generate a relatively small AADT on these sensitive stretches of road (<100 AADT), well below the 1,000 threshold, the effect of this net increase at Wendover is considered to be <i>de minimis</i>.</p> <p><u>No likely significant effects</u></p> <p>Chiltern Beechwoods SAC – recreational pressure The change would result in an increase the number of new dwellings (+200) at Wendover and would bring development approximately 1km closer (within 3km) to the Tring Woodlands SSSI component of the SAC. Development at this location would be within the theoretical recreational visitor catchment of the woods, however RAF Halton is surrounded by a very large, attractive and accessible woodland (Wendover Woodland). It is therefore highly unlikely that a significant number of new residents would walk through this woodland to get to the</p> |

³ Emails from David Broadley and Greg Macrdechian dated 23/08/17
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| Policy | Summary of potential changes to the VALP | Implications for HRA screening |
|---------------|---|---|
| | | SAC, or that they would get in their car and drive, when the majority of new residents will live within less than a 10 minute walk of a woodland. As such, any increases in recreational visits to the SAC as a result of the allocation at RAF Halton are considered to be <i>de minimis</i> . <u>No likely significant effects</u> |
| S4 | Remove reference to removal of Green Belt land at Wendover for 800 homes (change to the supporting text at Para.3.36). | This change to the plan would reduce the level of growth in the plan, and therefore would have <u>no likely significant effects</u> . |
| D4 | Remove reference to a potential site for 800 homes being found under Policy S3 (delete text from the Table on p74) | This change to the plan would reduce the level of growth in the plan, and therefore would have <u>no likely significant effects</u> . |
| Proposals map | Remove site 'RSA2 – North of Wendover' | This change to the plan would reduce the level of growth in the plan, and therefore would have <u>no likely significant effects</u> . |
| New Policy | <u>RAF Halton</u> 'Up to 1,000 homes during the plan period and associated infrastructure, services and facilities including a primary school, new local centre, new access routes if needed and new green infrastructure' | Chiltern Beechwoods SAC – air pollution As explained under Policy S2, an additional 1,000 dwellings at RAF Halton are unlikely to generate a significant increase in traffic flows on sensitive stretches of road, particularly the A41 at Tring and the A4010 at Great Kimble. <u>No likely significant effects</u> Chiltern Beechwoods SAC – recreational pressure As explained under Policy S2, an additional 1,000 dwellings at RAF Halton are unlikely to generate a significant increase in recreational pressure at the SAC due to the wooded context of the site. <u>No likely significant effects</u> |



Appendix 2 – Changes to in-combination effects

The following neighbouring authorities were identified as relevant for identifying potential in-combination effects as part of the original HRA of the Draft Local Plan⁴. That work has now been reviewed in order to identify any relevant local plan documents or HRA work which has been published since the previous Appropriate Assessment was carried out (April 2017), which might have identified further in-combination effects.

Chiltern and South Bucks

- No updates to the emerging Local Plan since April 2017. A resubmission consultation is expected to commence in October / November 2017.
- A HRA screening was carried out in January 2017⁵, the results of which were not available in April 2017. This screens out likely significant effects upon Chiltern Beechwoods SAC with regards to air pollution and recreational pressure. Effects of recreational pressure upon the Ashton Rowant SAC were scoped out of the assessment.

Wycombe District

- No updates to the emerging Local Plan since April 2017. A pre-submission consultation is due to commence in October 2017.
- No HRA of the emerging plan has been carried out yet.

South Oxfordshire District

- No updates to the emerging Local Plan since April 2017. A pre-submission consultation is due to commence in October 2017.
- A HRA was published carried out in March 2017⁶, the results of which were not available in April 2017. Likely significant effects of air pollution on Chiltern Beechwoods were could not be ruled on the basis of the available evidence and further traffic modelling is currently underway; these effects will be subject to an Appropriate Assessment of the plan in light of the up to date traffic modelling.

Dacorum Borough

- No updates to the emerging Local Plan since April 2017. An issues and options consultation is due to commence in August 2017.
- No HRA work for the emerging Local Plan has been published yet.

⁴ As set out in Appendix 4 to the HRA

⁵ Lepus Consulting (2017) *Habitats Regulations Assessment of the Chiltern and South Bucks Local Plan: HRA Screening Document*

⁶ LUC (2017) South Oxfordshire Local Plan: Habitats Regulations Assessment Report
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