

# Kimble Neighbourhood Plan HRA

Commissioned by Great and Little Kimble cum Marsh  
Parish Council

April 2019

## Quality information

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# 1. Introduction

## Background to the Project

- 1.1 AECOM was appointed on behalf of Great & Little Kimble-cum-Marsh Parish Council to assist in undertaking a Habitats Regulations Assessment (HRA) of the April 2019 Pre-submission Neighbourhood Plan for Great & Little Kimble-cum-Marsh Parish (hereafter referred to as the 'Neighbourhood Plan'). The objectives of the assessment are to:
- Identify any aspects of the Neighbourhood Plan that would cause a likely significant effect on any Natura 2000 sites, otherwise known as European Sites, which include Special Areas of Conservation (SACs), candidate SACs (cSACs), Special Protection Areas (SPAs) and potential SPAs (pSPAs) and as a matter of Government policy, Ramsar sites, both in isolation and in combination with other plans and projects;
  - Inform Wycombe District Council, as the competent planning authority, whether an appropriate assessment (AA) would be required; and
  - Undertake an analysis to inform the AA, with a view to whether any aspects of the Neighbourhood Plan would have an adverse effect on the integrity of any European sites.

## Legislation

- 1.2 The need for Habitats Regulations Assessment is set out within Article 6 of the EC Habitats Directive 1992, and interpreted into British law by the Conservation of Habitats and Species Regulations 2017 (as amended). The ultimate aim of the Directive is to “*maintain or restore, at favourable conservation status, natural habitats and species of wild fauna and flora of Community interest*” (Habitats Directive, Article 2(2)). This aim relates to habitats and species rather than the European sites themselves, although the sites have a significant role in delivering favourable conservation status.
- 1.3 The Habitats Directive applies the precautionary principle to European sites. Plans and projects can only be permitted having ascertained that there will be no adverse effect on the integrity of the site(s) in question. Plans and projects with predicted adverse effects on European sites may still be permitted if there are no alternatives to them and there are Imperative Reasons of Overriding Public Interest (IROPI) as to why they should proceed. In such cases, compensation would be necessary to ensure the overall integrity of the site network.
- 1.4 In order to ascertain whether or not site integrity will be affected, a Habitats Regulations Assessment should be undertaken of the plan or project in question:

### Box 1. The legislative basis for appropriate assessment

#### **Habitats Directive 1992**

Article 6 (3) states that:

*“Any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the site’s conservation objectives.”*

#### **Conservation of Habitats and Species Regulations 2017 (as amended)**

With specific reference to Neighbourhood Plans, Regulation 106(1) states that:

*‘A qualifying body which submits a proposal for a neighbourhood development plan must provide such information as the competent authority [the Local Planning Authority] may reasonably require for the purposes of the assessment under regulation 105 [which sets out the formal process for determination of ‘likely significant effects’ and the ‘appropriate assessment’]...’.*

- 1.5 It is therefore important to note that this report has two purposes:
- To assist the Qualifying Body (the Neighbourhood Plan Group) in preparing their plan by recommending (where necessary) any adjustments required to protect European sites, thus making it more likely their plan will be deemed compliant with the Conservation of Habitats and Species Regulations 2017 (as amended); and
  - On behalf of the Qualifying Body, to assist the Local Planning Authority to discharge their duty under Regulation 105 (in their role as ‘plan-making authority’ within the meaning of that regulation) and Regulation 106 (in their role as ‘competent authority’).
- 1.6 As ‘competent authority’, the legal responsibility for ensuring that a decision of ‘likely significant effects’ is made, for ensuring an ‘appropriate assessment’ (where required) is undertaken, and for ensuring Natural England are consulted, falls on the local planning authority and the Neighbourhood Plan examiner. However, they are entitled to request from the Qualifying Body the necessary information on which to base their judgment and that is a key purpose of this report.
- 1.7 Over the years the phrase ‘Habitats Regulations Assessment’ has come into wide currency to describe the overall process set out in the Conservation of Habitats and Species Regulations 2017 (as amended) from screening through to IROPI. This has arisen in order to distinguish the process from the individual stage described in the law as an ‘appropriate assessment’. Throughout this report we use the term Habitats Regulations Assessment for the overall process.
- 1.8 In 2018, the ‘People Over Wind’ European Court of Justice (ECJ) ruling<sup>1</sup> determined that ‘mitigation’ (i.e. measures that are specifically introduced to avoid or reduce the harmful effects of a plan or project on European sites) should not be taken into account when forming a view on likely significant effects. Mitigation should instead only be considered at the appropriate assessment stage. Appropriate assessment is not a technical term: it simply means ‘an assessment that is appropriate’ for the plan or project in question. As such, the law purposely does not prescribe what it should consist of or how it should be presented; these are decisions to be made on a case by case basis by the competent authority. An amendment was made to the Neighbourhood Planning Regulations in late 2018 which permitted Neighbourhood Plans to be made if they required appropriate assessment.
- 1.9 Also in 2018, the Holohan ECJ ruling<sup>2</sup> was handed down. This determined that an HRA must catalogue (i.e. list/identify) all the features for which a European site is designated. It also determined that a European site must be considered within the context of its functional relationships in terms of a) whether any interest features of the European site may be located outside the site boundary and could be affected by the plan or project, and b) whether habitats and species for which the European site is *not* designated are nonetheless fundamental to the ability of that site to achieve its conservation objectives and could be affected by the plan or project. This HRA report considers those issues.

## Report Structure

- 1.10 Section 2 of this report summarises the methodology for the assessment. Section 3 identifies the possible pathways by which adverse effects on European sites could arise. Section 4 discusses the results of the test of likely significant effects and Section 5 details the appropriate assessment. Background Information on the European sites discussed in this report, including a catalogue of their interest features as required by the Holohan ruling, is provided in Appendix A. Screening tables of the likely significant effects test of Neighbourhood Plan policies and housing sites are included in Appendix B. Appendix C presents a map of the European sites and housing sites discussed in this report.

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<sup>1</sup> Case C-323/17

<sup>2</sup> Case C-461/17

## 2. Methodology

### Introduction

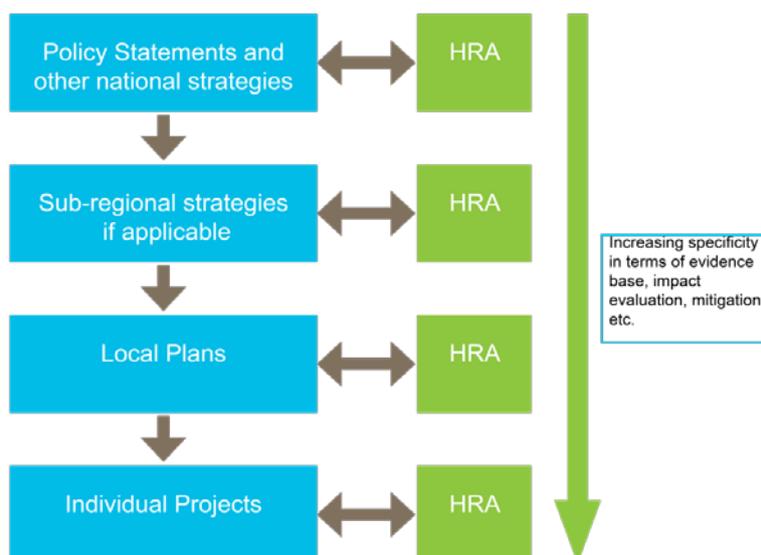
- 2.1 This section sets out our approach and methodology for undertaking the HRA. Habitats Regulations Assessment itself operates independently from the Planning Policy system, being a legal requirement of a discrete Statutory Instrument.

### A Proportionate Assessment

- 2.2 Project-related HRA often requires bespoke survey work and novel data generation in order to accurately determine the significance of adverse effects. In other words, to look beyond the risk of an effect to a justified prediction of the actual likely effect and to the development of avoidance or mitigation measures.
- 2.3 However, the draft Ministry of Housing Communities and Local Government guidance<sup>3</sup> makes it clear that when implementing HRA of land-use plans, the appropriate assessment should be undertaken at a level of detail that is appropriate and proportional to the level of detail provided within the plan itself:
- 2.4 *'The comprehensiveness of the [appropriate] assessment work undertaken should be proportionate to the geographical scope of the option and the nature and extent of any effects identified. An AA need not be done in any more detail, or using more resources, than is useful for its purpose. It would be inappropriate and impracticable to assess the effects [of a strategic land use plan] in the degree of detail that would normally be required for the Environmental Impact Assessment (EIA) of a project.'*
- 2.5 In other words, there is a tacit acceptance that appropriate assessment can be tiered and that all impacts are not necessarily appropriate for consideration to the same degree of detail at all tiers (Box 2).
- 2.6 For a local or neighbourhood plan, the level of detail concerning the developments that will be delivered is usually insufficient to make a highly detailed assessment of the significance of effects. For example, precise and full determination of the impacts and significant effects of a new settlement will require extensive details concerning its design, including the layout of greenspace and type of development to be delivered in particular locations, yet these data will not be finalised until subsequent stages.
- 2.7 The most robust and defensible approach to the absence of fine detail at this level is to make use of the precautionary principle. In other words, the plan is never given the benefit of the doubt; it must be assumed that a policy or measure is likely to have an impact pathway leading to an adverse effect upon a European site unless it can be clearly established otherwise.

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<sup>3</sup> MHCLG. (2006) Planning for the Protection of European Sites, Consultation Paper.

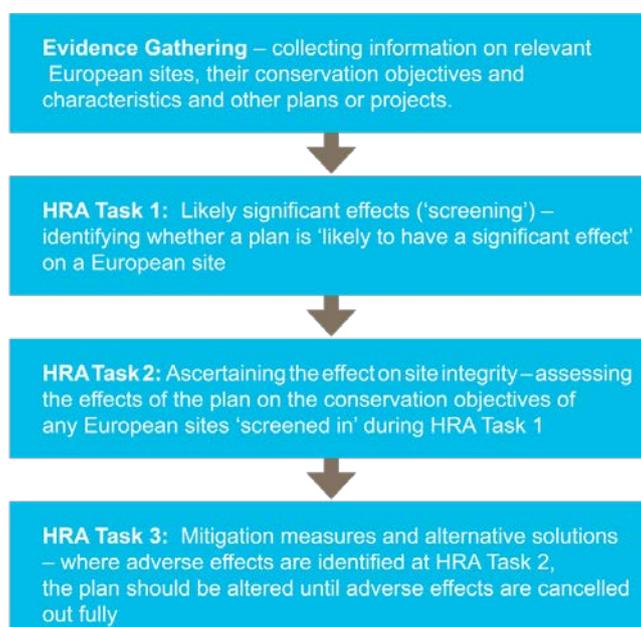


**Box 2. Tiering in HRA of land use plans**

## The Process of HRA

2.8 The HRA has been carried out in the continuing absence of formal Government guidance. MHCLG released a consultation paper on the appropriate assessment of plans in 2006<sup>4</sup>. As yet, no further formal guidance has emerged.

2.9 Box 3 below outlines the stages of HRA according to current draft MHCLG guidance. The stages are essentially iterative, being revisited as necessary in response to more detailed information, recommendation and any relevant changes to the plan until no significant adverse effects remain.



**Box 3. Four-stage approach to HRA**

2.10 In practice, this broad outline requires some amendment in order to feed into a developing land use plan such as a neighbourhood plan. The following process (Section 2.11-2.23) has been adopted for carrying out the HRA.

<sup>4</sup> Ibid.

## Physical Scope

- 2.11 The physical scope of the assessment (i.e. the range of European sites to be considered) is based on a combination of tracing impact pathways and using distances derived from various studies.
- 2.12 The European sites of relevance to this HRA are shown in Table 1. In compiling this list reference has been made to the over-arching HRA work undertaken for the Wycombe District Local Plan. Full details of reasons for designation, conservation objectives and key vulnerabilities are presented in Appendix A. The locations of these European sites in relation to Great & Little Kimble-cum-Marsh Parish (hereafter referred to as the 'Parish') are presented in Figure 1.

**Table 1. European sites of relevance to HRA of the Neighbourhood Plan**

European site	Site character	Proximity to Great & Little Kimble-cum-Marsh Parish
Aston Rowant SAC	125ha of heath, dry grassland and broadleaved deciduous woodland	Approximately 11.3km SW
Burnham Beeches SAC	384ha of broadleaved deciduous woodland with smaller areas of heath and coniferous woodland	Approximately 20.1km SE
Chilterns Beechwoods SAC	1286ha of broadleaved deciduous woodland with smaller areas of dry grassland and heath	Partially within the Parish (Ellesborough and Kimble Warrens SSSI)

## In Combination Scope

- 2.13 It is a requirement of the Conservation of Habitats and Species Regulations 2017 (as amended) that the impacts and effects of any plan being assessed are not considered in isolation but 'in combination' with other plans and projects that may also affect the European sites(s) in question.
- 2.14 In practice, in combination assessment is of greatest importance when the neighbourhood plan would otherwise be screened out because the individual contribution is inconsequential. The principal other plans and projects of relevance regarding in combination effects are:
- Wycombe District Draft Local Plan 2018 (Main Modifications 2019);
  - Chiltern and South Bucks Emerging Local Plan 2019;
  - South Oxfordshire Emerging Local Plan;
  - Royal Borough of Windsor and Maidenhead Submitted Local Plan 2013-2033 (further work is being undertaken on this Local Plan as of early 2019);
  - Vale of Aylesbury Emerging Local Plan 2013-2033;
  - Wokingham Emerging Local Plan 2022-2036; and
  - The Chilterns Area of Outstanding Natural Beauty (AONB) Management Plan 2014-2019.
- 2.15 The Wycombe District Local Plan (hereafter referred to as the 'Local Plan') details the quantum of development within the District and has already been subject to HRA. This is highly relevant because under Local Plan Policy RUR6, the Neighbourhood Plan is required to allocate land with a total capacity of 160 dwellings during the Local Plan period (subject to any reasonable allowance for windfall schemes). The HRA of the Local Plan stated that the Neighbourhood Plan *"will set where these [proposed dwellings within Great & Little Kimble-cum-Marsh Parish] should be delivered. As part of the Neighbourhood Plan preparation, likely significant effects on SAC sites will need to be considered."*
- 2.16 Therefore, the overall quantum of growth within the Neighbourhood Plan has already been subject to HRA at the Local Plan level as part of the overall quantum of housing and employment growth within Wycombe District, and in combination with other projects and plans. Therefore strategic issues unrelated to the specific location of housing within the Parish (such as roadside air quality across the District and beyond)

do not require reinvestigation for this Neighbourhood Plan HRA. The Neighbourhood Plan HRA therefore focusses on the potential for the actual site allocations to result in effects on European sites.

## Stage One: Likely Significant Effects Test (Screening)

2.17 The first stage of any HRA is a likely significant effects (LSE) test. This is essentially a high level assessment to decide whether the full subsequent stage known as appropriate assessment is required. The essential question is:

*'Is the Plan, either alone or in combination with other relevant projects and plans, likely to result in a significant effect upon European sites?'*

2.18 The objective is to 'screen out' those plans and projects (or site allocations/policies) that can, without any detailed appraisal, be said to be unlikely to result in significant adverse effects upon European sites, usually because there is no mechanism or pathway for adverse interactions with European sites. This stage is undertaken in Section 4 of this report.

2.19 It is important to determine the various ways in which a neighbourhood plan can affect European sites by following any potential impact pathways from policies and site allocations, in some cases many kilometres distant. Briefly defined, pathways are routes by which a change in activity associated with a policy can lead to an effect upon an internationally designated site.

2.20 In evaluating significance, AECOM has relied on professional judgement as well as the results of previous stakeholder consultation regarding development impacts on the European sites considered within this assessment.

## Stage Two: Appropriate Assessment

2.21 European site(s) which have been 'screened in' during the likely significant effects test are then subject to a detailed assessment of the potential impacts of the policies or site allocations on their integrities. Avoidance and mitigation measures to prevent adverse impacts are incorporated where necessary.

2.22 As established by case law, appropriate assessment is not a technical term; it simply means whatever further assessment is necessary to confirm whether there would be adverse impacts on the integrity of any European sites that have not been dismissed at the likely significant effects stage. Since it is not a technical term it has no firmly established methodology except that it essentially involves repeating the analysis for the likely significant effects stage but to a greater level of detail on a smaller number of policies and sites, this time with a view to determining if there would be adverse impacts on site integrity.

2.23 One of the key considerations during appropriate assessment is whether mitigation could entirely address the potential effect. In practice, the appropriate assessment takes any policies or allocations that could not be dismissed during the likely significant effects test and analyses the potential for an effect in more detail, with a view to concluding whether there would be an actual adverse effect on integrity (in other words, the disruption of the coherent structure and function of the European site(s)).

# 3. Pathways of Impact

## Recreational Pressure and Urbanisation

3.1 Recreational use of a European site has the potential to:

- Prevent appropriate management or exacerbate existing management difficulties;
- Cause damage through erosion and fragmentation;
- Cause excessive richness of nutrients from dog fouling; and
- Cause disturbance to sensitive species.

3.2 Different types of European sites are subject to different types of recreational pressures and have different vulnerabilities. Studies across a range of species have shown that the effects from recreation can be complex.

3.3 It should be emphasised that recreational use is not inevitably a problem. Many European sites contain nature reserves managed for conservation and public appreciation of nature. At these sites, access is encouraged and resources are available to ensure that recreational use is managed appropriately.

3.4 Most terrestrial European sites can be affected by soil compaction, erosion and trampling resulting from use by walkers, cyclists, horse-riders and off-road vehicles. Motorcycle scrambling and off-road vehicles can be particularly significant causes of erosion and disturbance to sensitive species. Walkers with dogs contribute to pressure on sites through nutrient enrichment via dog fouling and also have potential to cause greater disturbance to fauna as dogs are less likely to keep to marked footpaths and move more erratically.

3.5 Recreational pressure is widely considered to be of concern where development is proposed within c.5-6km of inland terrestrial European sites. This is supported by a range of visitor surveys that have been undertaken on such European sites over the past 10 years, including Thames Basin Heaths SPA, Wealden Heaths Phase 2 SPA, Dorset Heathlands SPA, Burnham Beeches SAC, Folkestone to Etchinghill Escarpment SAC, Rodborough Common SAC, Ashdown Forest SAC/SPA, Epping Forest SAC and others. With one or two exceptions (notably the major regional recreational sites The New Forest and Cannock Chase) these have indicated that approximately 75% of regular visitors to inland European sites live within 5-6km of those sites and sometimes less.

3.6 Urbanisation is closely related to recreational pressure, in that both result from increased populations within close proximity to sensitive sites. In the case of urbanisation the delivery of large amounts of housing within easy walking distance (e.g. 400m, an approximate 5 minute walk) can exacerbate pressures. Urbanisation is considered separately as the detail of the impacts is distinct from the trampling, disturbance and dog fouling that specifically results from recreational activity. Urbanisation impacts can be diverse<sup>5</sup>, including:

- Increased fly-tipping: not only is rubbish-tipping unsightly, but disposal of garden waste often aids the dispersal of non-native invasive species. Such species are inherently likely to be tipped, as they are often the 'most troublesome' to landowners<sup>6</sup>. Alien species may also be introduced deliberately or dispersed by birds;
- Arson: heathlands are particularly vulnerable to arson or accidental fires. Wildfires can result in the rapid loss of large areas of important habitat, to the detriment of priority species. For example, approximately 1.6% of Shortheath Common SAC was lost to wildfires in 2010, whilst four fires logged between 2008 and 2010 covered a total area of 5.6ha on Broxhead Common; and
- Cat predation: urbanisation is likely to lead to increased cat numbers. Cats are a significant predator of native wildlife, with the nine million cats in the UK catching 92 million prey items over

<sup>5</sup> Underhill-Day, J.C. (2005) A Literature Review of Urban Effects on Lowland Heaths and their Wildlife: English Nature Research Report 623.

<sup>6</sup> Gilbert, O. & Bevan, D. (1997) The effect of urbanisation on ancient woodlands. British Wildlife 8:13-2018.

a five month period in 1997<sup>7</sup>.

- 3.7 Urbanisation can also result in the loss of supporting habitat to European sites (i.e. 'functionally-linked habitat') used by populations of species for which the European sites are designated. This must also be considered in the HRA process where relevant as emphasised by the ECJ ruling in the Holohan case. In the case of Chilterns Beechwoods SAC, habitat containing abundant dead wood near to a European site designated for a population of stag beetle *Lucanus cervus* may be used by stag beetles hailing from the European site. Whilst this land is not formally designated within the European site, development of this land or near to this land may adversely affect the European site's stag beetle population.
- 3.8 Public access has been identified as a threat to Burnham Beeches SAC and Chilterns Beechwoods SAC. At the former site, soil compaction within root zones (e.g. due to trampling and vehicle movements) affects the health of veteran trees which are vital to the structure of the habitat for which the site is designated. At Chilterns Beechwoods SAC, dead wood is removed by recreational users and in the interests of health and safety, and tidiness, reducing the suitability of habitat for invertebrate fauna which depend on dead or decaying wood (especially stag beetle, which is a qualifying feature for the designation of the site; although this is less of an issue at Ellesborough and Kimble Warrens SSSI, where the most recent condition assessment deemed there to be abundant dead wood<sup>8</sup>). The Chilterns Beechwoods stag beetle population may be vulnerable to the loss of nearby functionally linked habitat. Increased nutrient enrichment (e.g. due to dog fouling) has the potential to threaten the function of nutrient-poor habitats, such as juniper *Juniperus communis* heaths at Aston Rowant SAC.

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<sup>7</sup>Woods, M., McDonald, R.A. & Harris, S. (2003) Predation of wildlife by domestic cats *Felis catus* in Great Britain. *Mammal review*, 33(2), pp.174-188.

<sup>8</sup><https://designatedsites.naturalengland.org.uk/ReportUnitCondition.aspx?SiteCode=S1002446&ReportTitle=Windsor%20Hill%20SSSI>

# 4. Likely Significant Effects Test

## Introduction

4.1 The Neighbourhood Plan includes the following policies requiring screening to determine if there is potential for likely significant effects on European sites:

- KIM1 Settlement Boundaries;
- KIM2 Design Principles;
- KIM3 Housing Site Allocations;
- KIM4 Schools;
- KIM5 Landscape Buffer;
- KIM6 Employment;
- KIM7 Community and Leisure Uses; and
- KIM8 Protecting International Habitats.

4.2 Under Local Plan Policy RUR6, the Neighbourhood Plan is required to allocate land with a total capacity of 160 dwellings during the Local Plan period. Of the 29 housing sites that were originally appraised by the Project Steering Group, ten were approved for further consideration, one of which has since been granted planning permission. The remaining nine sites under consideration by the Plan have the potential capacity for 217 dwellings (exceeding the permitted total under Local Plan Policy RUR6). These housing sites are as follows:

- 1 Grove Lane (west) – 11 dwellings;
- 4 Grove Barn – 23 dwellings;
- 7 Birdbrook, Marsh Rd – 15 dwellings;
- 10 The Laurels, Marsh Rd – 14 dwellings;
- 14 Kimblewick Rd, Grove Lane – 45 dwellings;
- 15 Village Foundations, Grove Lane – 20 dwellings;
- 17A Doe Hill Farm (lower) – 40 dwellings;
- 17B Doe Hill Farm (upper) – 35 dwellings; and
- 20 Rear of Chequers/Hawthorn, Bridge St – up to 15 dwellings.

4.3 Other factors, including but not limited to an assessment in the form of a Sustainability Appraisal, determined that housing sites 1, 10, 14, 15 and 17A should be selected, although it is understood that a formal decision regarding the selection of housing site allocations is yet to be made.

4.4 Any remaining dwellings within the 160 dwelling capacity for the Parish will be delivered as windfall schemes at Marsh and/or Kimblewick during the Neighbourhood Plan period. As this was considered during HRA of the Local Plan, strategic issues (such as air quality) do not need reinvestigating.

## Recreational Pressure and Urbanisation

4.5 The following policy could not be screened out in the test of likely significant effects (Table 2, Appendix B) because it will govern the distribution of new housing within the Parish:

- KIM3 Housing Site Allocations (details of which are provided in Section 4.7 below).

4.6 The following proposed housing sites are located within 5km of European sites, and therefore could not be screened out during the test of likely significant effects (Table 3, Appendix B)

- 1 Grove Lane (west) – 11 dwellings (approximately 0.7km NW of Chilterns Beechwoods SAC: Ellesborough and Kimble Warrens SSSI and approximately 3.3km N of Chilterns Beechwoods SAC: Windsor Hill SSSI);
  - 4 Grove Barn – 23 dwellings (approximately 0.8km NW of Chilterns Beechwoods SAC: Ellesborough and Kimble Warrens SSSI and approximately 3.3km N of Chilterns Beechwoods SAC: Windsor Hill SSSI);
  - 7 Birdbrook, Marsh Rd – 15 dwellings (approximately 1.0km NW of Chilterns Beechwoods SAC: Ellesborough and Kimble Warrens SSSI and approximately 3.9km N of Chilterns Beechwoods SAC: Windsor Hill SSSI);
  - 10 The Laurels, Marsh Rd – 14 dwellings (approximately 0.8km NW of Chilterns Beechwoods SAC: Ellesborough and Kimble Warrens SSSI and approximately 3.6km N of Chilterns Beechwoods SAC: Windsor Hill SSSI);
  - 14 Kimblewick Rd, Grove Lane – 45 dwellings (approximately 0.8km NW of Chilterns Beechwoods SAC: Ellesborough and Kimble Warrens SSSI and approximately 3.1km N of Chilterns Beechwoods SAC: Windsor Hill SSSI);
  - 15 Village Foundations, Grove Lane – 20 dwellings (approximately 0.6km NW of Chilterns Beechwoods SAC: Ellesborough and Kimble Warrens SSSI and approximately 3.3km N of Chilterns Beechwoods SAC: Windsor Hill SSSI);
  - 17A Doe Hill Farm (lower) – 40 dwellings (approximately 0.9km NW of Chilterns Beechwoods SAC: Ellesborough and Kimble Warrens SSSI and approximately 3.7km N of Chilterns Beechwoods SAC: Windsor Hill SSSI);
  - 17B Doe Hill Farm (upper) – 35 dwellings (approximately 0.9km NW of Chilterns Beechwoods SAC: Ellesborough and Kimble Warrens SSSI and approximately 3.9km N of Chilterns Beechwoods SAC: Windsor Hill SSSI); and
  - 20 Rear of Chequers/Hawthorn, Bridge St – up to 15 dwellings (approximately 0.6km NW of Chilterns Beechwoods SAC: Ellesborough and Kimble Warrens SSSI and approximately 2.9km N of Chilterns Beechwoods SAC: Windsor Hill SSSI).
- 4.7 These policies and housing sites have the potential to result in likely significant effects on two SSSIs within Chilterns Beechwoods SAC (Ellesborough and Kimble Warrens SSSI and Windsor Hill SSSI) through increased recreational pressure. It is therefore necessary to undertake an appropriate assessment of these policies and housing sites (Section 5).
- 4.8 Aston Rowant SAC and Burnham Beeches SAC are more than 10km from any of the proposed housing sites and Marsh and Kimblewick (the proposed locations of windfall housing). Considering this lack of proximity, and the limited potential for likely significant effects due to the relatively small scale of development proposed in the Neighbourhood Plan, there are deemed to be no impact pathways through which Neighbourhood Plan policies and housing sites could result in likely significant effects on these European sites through increased recreational pressure.
- 4.9 The Neighbourhood Plan does not propose development within 400m of any European sites. From review of aerial photography, land proposed for Neighbourhood Plan housing sites does not appear to be suitable for stag beetle (such animals are most likely to be found in large rural/suburban gardens that contain lots of trees and dead wood). Therefore impacts on functionally linked habitat for Chilterns Beechwoods SAC that is likely to be used by the SAC stag beetle population can be screened out at this stage.
- 4.10 Overall, likely significant effects on European sites due to urbanisation can be screened out at this stage. No appropriate assessment of such effects is required. The appropriate assessment therefore focuses on the possible impacts of recreational pressure on Chiltern Beechwoods SAC.

# 5. Appropriate Assessment

## Recreational Pressure (Alone)

- 5.1 The HRA screening in Section 4 identified a potential impact pathway linking development proposed in the Neighbourhood Plan to Chilterns Beechwoods SAC: Ellesborough and Kimble Warrens SSSI and Chilterns Beechwoods: Windsor Hill SSSI. The nine housing sites proposed in the Neighbourhood Plan range from approximately 0.6km to 1.0km from Ellesborough and Kimble Warrens SSSI, and approximately 2.9km to 3.9km from Windsor Hill SSSI.
- 5.2 Housing development detailed in the Neighbourhood Plan accounts for 160 new dwellings. Any increase in recreational use of Chilterns Beechwoods SAC is therefore likely to be minor, particularly in the case of Windsor Hill SSSI as it is over 2.5km from the nearest housing site. Potential for adverse effects on site integrity is therefore limited. There are many existing areas within the Chilterns AONB that may be used by the public, potentially reducing recreational pressure on Chilterns Beechwoods SAC.
- 5.3 Considering the sizes and locations of the housing sites detailed in the Neighbourhood Plan, it is deemed that these will not have adverse effects on Chilterns Beechwoods SAC through increased recreational pressure.
- 5.4 This is in accordance with Policy KIM8 Protecting International Habitats, which states that:
  - *“Development proposals will only be supported if it can be demonstrated that they will not have an adverse effect on the integrity of the Chiltern Beechwoods Special Area of Conservation or other European sites.”*

## Recreational Pressure (In Combination with Other Plans and Projects)

- 5.5 It is important to consider potential adverse effects on European sites from Neighbourhood Plan policies and housing sites in combination with development occurring in the wider area. The HRA of the Local Plan, which took into account the quantum of development within the Parish, identified potential for adverse effects on the integrity of Chilterns Beechwoods SAC (specifically on Windsor Hill SSSI) from increased recreational pressure, due primarily to the major proposed growth at Princes Risborough (approximately 1.5km from the SAC boundary).
- 5.6 The Local Plan HRA stated that *‘Chapter 6 identified that two areas of growth could lead to likely significant effects in relation to recreational pressure. These were: Princes Risborough major expansion and developments near Bourne End / Wooburn’* (paragraphs 7.20 and 7.21). However, both sites were to be subject to mitigation including the delivery of a new country park. As such a conclusion of no adverse effect on integrity could ultimately be made.
- 5.7 While the authors of the Local Plan HRA did not know which sites were to be allocated in Great and Little Kimble, they did know how much housing was going to be delivered there and concluded that, provided the major sites (Princes Risborough and Bourne End/Wooburn) were addressed, there would be no adverse effect alone or in combination with other plans and projects.
- 5.8 In addition paragraph 3.47 of the Local Plan HRA states that *‘Ellesborough and Kimble Warrens in the north of the District consist of 4 units of which only 1 is in favourable condition (7.95 hectares). The other 62.31 hectares of grassland were found to be in a generally good condition but in need of more intensive grazing and scrub control. The site condition summary as of 16 November 2016 finds the site to be 10.75% in favourable condition and 89.25% unfavourable recovering Condition’*. This is relevant because it suggests that the issue with the closest part of the European site to the proposed housing sites is a *lack* of vegetation and scrub control rather than excessive trampling. This therefore supports a conclusion that it is not under particular threat.

- 5.9 Given this, it is considered that there would be no adverse effect on the integrity of the Chilterns Beechwoods SAC as a result of the Neighbourhood Plan either alone or in combination with other projects and plans.
- 5.10 Policy KIM8 Protecting International Habitats states that:
- *“Development proposals will only be supported if it can be demonstrated that they will not have an adverse effect on the integrity of the Chiltern Beechwoods Special Area of Conservation or other European sites.”*
- 5.11 Measures in the Local Plan regarding provision of new greenspace would reinforce the conclusion of no adverse effect on the integrity of Chilterns Beechwoods SAC as a result of the Neighbourhood Plan either alone or in combination with other projects and plans:
- DM11 Green Networks and Infrastructure;
  - DM12 Green Spaces;
  - DM13 Conservation and Enhancement of Sites, Habitats and Species of Biodiversity and Geodiversity Importance;
  - DM14 Biodiversity in Development;
  - DM16 Open Space in New Development; and
  - DM34 Delivering Green Infrastructure in Development.
- 5.12 Specifically, under Policy DM16, developments of fewer than 40 dwellings would be required to provide off-site strategic and local open space (to be funded through the Community Infrastructure Levy (CIL). Developments of 40 dwellings or more would need to provide off-site strategic open space (to be funded through the CIL) and local open space on-site (1.15 hectares of local open space per 1,000 population).
- 5.13 According to Local Plan policy the housing sites would need to provide alternative greenspace as follows:
- 1 Grove Lane (west) – 11 dwellings: off-site strategic and local open space through CIL contributions;
  - 4 Grove Barn – 23 dwellings: off-site strategic and local open space through CIL contributions;
  - 7 Birdbrook, Marsh Rd – 15 dwellings: off-site strategic and local open space through CIL contributions;
  - 10 The Laurels, Marsh Rd – 14 dwellings: off-site strategic and local open space through CIL contributions;
  - 14 Kimblewick Rd, Grove Lane – 45 dwellings: off-site strategic open space and on-site local open space;
  - 15 Village Foundations, Grove Lane – 20 dwellings: off-site strategic and local open space through CIL contributions;
  - 17A Doe Hill Farm (lower) – 40 dwellings: off-site strategic open space and on-site local open space;
  - 17B Doe Hill Farm (upper) – 35 dwellings: off-site strategic and local open space through CIL contributions; and
  - 20 Rear of Chequers/Hawthorn, Bridge St – up to 15 dwellings: off-site strategic and local open space through CIL contributions.
- 5.14 To reinforce the conclusion of no adverse effect on integrity, it is recommended that the policy requirement of Local Plan policy DM16 is reflected in the Neighbourhood Plan policy.

## 6. Conclusions

- 6.1 This HRA undertook screening and appropriate assessment of policies and housing sites detailed in the pre-submission Neighbourhood Plan.
- 6.2 The overall quantum of growth within the Neighbourhood Plan, as part of the overall quantum of housing and employment growth within Wycombe District, and in combination with other projects and plans, has already been subject to detailed HRA at the Local Plan level. Therefore strategic issues unrelated to the specific location of housing within the Parish (such as roadside air quality across the District and beyond) did not require reinvestigation for the Neighbourhood Plan HRA.
- 6.3 Of the three European sites considered within the scope of this report, Aston Rowant SAC and Burnham SAC were deemed to have no linking impact pathways to Neighbourhood Plan policies and development, and were therefore screened out at the likely significant effects stage. Loss of functionally linked land for the stag beetle population of the Chiltern Beechwoods SAC was also considered unlikely to occur. The analysis therefore focussed on recreational pressure.
- 6.4 Housing development proposed in the Neighbourhood Plan (accounting for 160 new dwellings) is located as little as approximately 0.6km from Chilterns Beechwoods SAC: Ellesborough and Kimble Warrens SSSI, and as little as approximately 2.9km from Chilterns Beechwoods SAC: Windsor Hill SSSI. These components of this European site are potentially vulnerable to impacts from increased recreational use (e.g. trampling, nutrient enrichment from dog fouling, removal of dead wood).
- 6.5 Appropriate assessment of Neighbourhood Plan policies and housing sites identified limited scope for in isolation (i.e. due to Neighbourhood Plan policies and development alone) impacts from increased recreational use, due to the small scale of development proposed (160 dwellings). HRA of the Local Plan identified potential for adverse effects on the integrity of Windsor Hill due to major development at Princes Risborough (which could also receive recreational users as a result of Neighbourhood Plan housing allocations, potentially resulting in 'in combination' effects). HRA of the Local Plan (which considered the quantum of development proposed in the Parish) determined that sufficient alternative greenspace can be delivered such that adverse effects on the integrity of Chilterns Beechwoods SAC can be avoided. The Local Plan includes provision for alternative greenspace, which will need to be delivered according to the strategy specified in Policy DM16. This policy will also be applied regarding development proposed in the Neighbourhood Plan, increasing the availability of greenspace within the District.
- 6.6 Considering this, the fact that recreational pressure does not appear to be a concern at the relevant parts of the SAC (indicated by a plentiful supply of dead wood and a condition assessment that indicates inadequate vegetation control is more of a current risk to the site than recreational pressure), the small amount of new housing to be delivered in the Parish and the existing availability of recreational opportunities (e.g. in the Chilterns AONB), no adverse effects on the integrity of Chilterns Beechwoods SAC, either in isolation or in combination with other plans, are expected.
- 6.7 This HRA acknowledges the introduction of Neighbourhood Plan policy KIM8 Protecting International Habitats, which requires the development proposals will not have an adverse effect on the integrity of any European sites.
- 6.8 **To reinforce the conclusion of no adverse effect on integrity due to in combination effects from increased recreational pressure, it is recommended that the policy requirement of Local Plan policy DM16 is reflected in the Neighbourhood Plan policy.**

# Appendix A European Sites Background

## Aston Rowant SAC

### Introduction

Aston Rowant SAC covers 124.89ha comprising dry grassland (62%), heath and scrub (14%) and broadleaved deciduous woodland (23%). This includes one of the largest remaining juniper populations in lowland Britain, which is present as part of a mixed scrub community and as isolated bushes in chalk grassland.

### Conservation Objectives<sup>9</sup>

With regard to the SAC and the habitats for which the site has been classified (the 'Qualifying Features' listed below), and subject to natural change:

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;
- The structure and function (including typical species) of qualifying natural habitats; and
- The supporting processes on which qualifying natural habitats rely.

### Qualifying Features<sup>10</sup>

The following features are reasons for designation as an SAC:

Annex I habitats that are a primary reason for selection of this site:

- *Juniperus communis* formations of heaths or calcareous grasslands: Aston Rowant lies towards the northern edge of this habitat's range on Southern England's chalk, where it is rare and declining. It is one of the best remaining examples of lowland juniper scrub on chalk in the UK, with approximately 1,000-2,000 individual junipers of various ages.

Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site:

- Asperulo-Fagetum beech forests.

### Environmental Vulnerabilities Relevant to the Plan<sup>11</sup>

The threats and pressures likely to affect the SAC are listed below:

- Unsustainable on-site populations and changes in species distributions: successful reproduction and survival of new generations of juniper is extremely rare, requiring significant management, without which the distribution of juniper within the site will recede.
- Deer: deer threaten the function of beech forests within the site.
- Conflicting conservation objectives: hinder the implementation of favourable management practices for juniper.
- Disease: junipers within the site are threatened by the introduction of *Phytophthora austrocedrae*; a fungus-like pathogen causing juniper dieback, which is considered to be a serious threat to juniper in the UK.
- Air pollution: whilst the site is considered to be in a favourable condition, nitrogen deposition in excess of habitat-specific critical loads risks detrimental effects on the functioning of habitats for which the

<sup>9</sup> <http://publications.naturalengland.org.uk/publication/5596085330378752> [Accessed 17/01/2019]

<sup>10</sup> <http://jncc.defra.gov.uk/protectedsites/sacselection/sac.asp?EUCode=UK0030082> [Accessed 17/01/2019]

<sup>11</sup> <http://publications.naturalengland.org.uk/publication/4960794580090880> [Accessed 17/01/2019]

SAC is designated. According to Air Pollution Information System (APIS) data from 2013-2015<sup>12</sup>, levels of nitrogen deposition exceed the habitat-specific critical loads for the following habitats:

- Asperulo-Fagetum beech forests: average nitrogen deposition = 30.5kg N/ha/yr (critical load = 10-20kg N/ha/yr);
- *Juniperus communis* formations on heaths or calcareous grasslands (sub-Atlantic semi-dry calcareous grassland): average nitrogen deposition = 30.5kg N/ha/yr (critical load = 15-25kg N/ha/yr); and
- *Juniperus communis* formations on heaths or calcareous grasslands (dry heaths): average nitrogen deposition = 30.5kg N/ha/yr (critical load = 10-20kg N/ha/yr).

## Burnham Beeches SAC

### Introduction

Burnham Beeches SAC covers 383.71ha comprising broadleaved woodland (90%) and heath and scrub (5%). This includes an extensive area of Atlantic acidophilous beech forest consisting of former beech wood-pasture with old pollards and associated beech *Fagus sylvatica* and oak *Quercus* spp. high forest. An exceptionally rich saproxylic invertebrate assemblage includes 14 Red Data Book species, and nationally important epiphytic communities include the moss *Zygodon forsteri*.

### Conservation Objectives<sup>13</sup>

With regard to the SAC and the natural habitats and/or species for which the site has been designated (the 'Qualifying Features' listed below), and subject to natural change:

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;
- The structure and function (including typical species) of qualifying natural habitats; and
- The supporting processes on which qualifying natural habitats rely.

### Qualifying Features<sup>14</sup>

Annex I habitats that are a primary reason for selection of this site:

- Atlantic acidophilous beech forest with *Ilex* and sometimes also *Taxus* in the shrublayer (Quercion robori-petraeae or Ilici-Fagenion).

### Environmental Vulnerabilities Relevant to the Plan<sup>15</sup>

The threats and pressures likely to affect the SAC are listed below:

- Air pollution: nitrogen deposition in excess of habitat-specific critical loads risks detrimental effects on the functioning of habitats for which the SAC is designated. Epiphytic lichen communities are particularly sensitive. According to APIS data from 2013-2015<sup>16</sup>, levels of nitrogen deposition exceed the habitat-specific critical loads for the following habitats:
  - Atlantic acidophilous beech forest with *Ilex* and sometimes also *Taxus* in the shrublayer (Quercion robori-petraeae or Ilici-Fagenion): average nitrogen deposition = 25.7kg N/ha/yr (critical load = 10-20kg N/ha/yr).
- Public access/disturbance: soil compaction within root zones (e.g. due to trampling and vehicle movements) negatively affects veteran trees.
- Habitat fragmentation: high pressure for new housing development in the vicinity of the SAC risks isolating the site.

<sup>12</sup> <http://www.apis.ac.uk/src/select-a-feature?site=UK0030082&SiteType=SAC&submit=Next> [accessed 17/01/19]

<sup>13</sup> <http://publications.naturalengland.org.uk/publication/6014456282742784> [Accessed 17/01/2019]

<sup>14</sup> <http://jncc.defra.gov.uk/protectedsites/sacselection/sac.asp?EUCode=UK0030034> [Accessed 17/01/2019]

<sup>15</sup> <http://publications.naturalengland.org.uk/publication/5689860228644864> [Accessed 17/01/2019]

<sup>16</sup> <http://www.apis.ac.uk/src/select-a-feature?site=UK0030034&SiteType=SAC&submit=Next> [accessed 17/01/19]

- Deer: deer are most numerous in the north of the site, where they adversely affect tree regeneration and ground flora composition.
- Species decline: the number of veteran trees within the site is in decline, with a significant age gap between these and the next generation. This could have significant future impacts on this designated habitat and on saproxylic invertebrates, for which the site is nationally important.
- Invasive species: oak processionary moth *Thaumetopoea processionea* is well-established near to the SAC, and could threaten notable native invertebrates if it establishes within the SAC. Rhododendron *Rhododendron ponticum* (which acts as a host for a seriously deleterious oak and beech pathogen) is abundant in land adjacent to the site. Efforts to reduce its prevalence within the site have been undertaken.

## Chilterns Beechwoods SAC

### Introduction

Chilterns Beechwoods SAC covers 1285.86ha comprising broadleaved woodland (88%), dry grassland (8%) and heath and scrub (4%). This includes an extensive area of Asperulo-Fagetum beech forest, containing rare and notable species such as coralroot *Cardamine bulbifera* and stag beetle.

The site comprises several geographically separate SSSIs, which include:

- Ellesborough and Kimble Warrens: 68.9ha containing deciduous woodland (mostly over-mature) and dense scrub including abundant box *Buxus sempervirens* (thought to be native at this site). According to the most recent condition assessment the site is predominantly in an unfavourable-recovering condition; and
- Windsor Hill: 61.8ha containing fine examples of beech woodland, scrub and chalk grassland. Woodland contains a legally protected orchid species, whilst scrub contains an important juniper colony. According to the most recent condition assessment the site is largely in an unfavourable-recovering condition.

### Conservation Objectives<sup>17</sup>

With regard to the SAC and the natural habitats and/or species for which the site has been designated (the 'Qualifying Features' listed below), and subject to natural change:

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<sup>18</sup>

Annex I habitats that are a primary reason for selection of this site:

- Asperulo-Fagetum beech forests.

Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site:

<sup>17</sup> <http://jncc.defra.gov.uk/protectedsites/sacselection/sac.asp?EUCode=UK0012724> [Accessed 17/01/2019]

<sup>18</sup> <http://jncc.defra.gov.uk/default.aspx?page=2037> [Accessed 17/01/2019]

- Semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco-Brometalia) (important orchid sites).

Annex II species present as a qualifying feature, but not a primary reason for selection of this site:

- Stag beetle.

### Environmental Vulnerabilities Relevant to the Plan<sup>19</sup>

- Forestry and woodland management: historic woodland management has created a relatively uniform age structure in some areas, with restricted regeneration. Future impacts on woodland regeneration and species composition are likely due to climate change.
- Deer: browsing by deer hinders or prevents natural regeneration of trees and ground flora in certain areas of the site.
- Changes in species distributions: data regarding stag beetle populations within the site are deficient and recording schemes are not currently fit-for-purpose, hindering management efforts.
- Invasive species: tree regeneration may be reduced by bark-stripping by grey squirrel *Sciurus carolinensis* and edible dormouse *Glis glis*.
- Disease: rare box-dominated woodland at Ellesborough and Kimble Warrens SSSI is threatened by box blight.
- Public access/disturbance: dead wood is removed by public and in the interests of health and safety and tidiness at certain sites within the SAC, potentially affecting saproxylic invertebrate fauna (although condition assessment of Ellesborough and Kimble Warrens SSSI in 2010 identified abundant dead wood).
- Air pollution: impacts on the site associated with nitrogen deposition are unclear, although some areas are recorded as unfavourable (recovering). Nitrogen deposition in excess of habitat-specific critical loads risks detrimental effects on the functioning of habitats for which the SAC is designated. According to APIS data from 2013-2015<sup>20</sup>, levels of nitrogen deposition exceed or are at the habitat-specific critical loads for the following habitats:
  - Asperulo-Fagetum beech forests (*Fagus* woodland): average nitrogen deposition = 30.1kg N/ha/yr (critical load = 10-20kg N/ha/yr);
  - Broadleaved deciduous woodland (containing stag beetle): average nitrogen deposition = 30.1kg N/ha/yr (critical load = 10-20kg N/ha/yr); and
  - Semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco-Brometalia) (important orchid sites) (sub-Atlantic semi-dry calcareous grassland): average nitrogen deposition = 17.8kg N/ha/yr (critical load = 15-25kg N/ha/yr).

<sup>19</sup> <http://publications.naturalengland.org.uk/publication/6228755680854016> [Accessed 17/01/2019]

<sup>20</sup> <http://www.apis.ac.uk/src/select-a-feature?site=UK0012724&SiteType=SAC&submit=Next> [accessed 17/01/19]

# Appendix B Screening of Policies and Housing Sites

Appendix B details the results of likely significant effects testing of policies (Table 2) and housing sites (Table 3) in the Neighbourhood Plan. Policies and housing sites in yellow have potential for likely significant effects on one or more European sites, and are therefore subject to appropriate assessment (Section 5). Policies and housing sites in green do not have potential for likely significant effects on any European sites, and are therefore screened out at this stage.

**Table 2. Screening table of policies in the Neighbourhood Plan**

Policy	Description	Likely Significant Effects
KIM1 Settlement Boundaries	<p><i>The Neighbourhood Plan defines Settlement Boundaries at Great Kimble (including that part known as Smokey Row) and Little Kimble, as shown on the Policies Map.</i></p> <p><i>In addition to the land allocated for development in the Neighbourhood Plan, proposals for small scale, infill development within a settlement boundary will be supported, provided the proposal accords with the design and development policies of the local development plan and the policies of the Neighbourhood Plan.</i></p> <p><i>Proposals for development outside a Settlement Boundary will only be supported if the proposal is appropriate to a countryside location and consistent with local development plan policies.</i></p>	<p><b>No HRA implications</b></p> <p>This policy is an overall spatial management policy which directs the appropriate areas of the Parish, and does not detail quantum of development.</p>
KIM2 Design Principles	<p><i>Development proposals should have regard to Chilterns Conservation Board Design Guidelines and the Wycombe Residential Design Guidance as appropriate.</i></p> <p><i>Proposals should also have regard to the following specific design principles which reflect the character of the Parish:</i></p> <ul style="list-style-type: none"> <li><i>Any new development will only utilise the existing access points to roadways, using on-site service roads where required, and no new access points to public highways are envisaged to maintain the character, integrating with the existing vegetation</i></li> <li><i>Proposals will retain the existing roadside and boundary hedges where present and will incorporate a high quality landscaping scheme to enhance the rural appearance of greenfield sites to maintain the existing character of the Parish</i></li> <li><i>Where appropriate, proposals will incorporate landscaping buffers, designed to avoid overlooking between houses and will normally be expected to maintain views to the open countryside</i></li> <li><i>Where a window in a habitable room faces a blank wall, the height of which exceeds the top of that window, there should be a distance measuring a minimum of 15 metres between them</i></li> <li><i>Where public open space is provided by new residential development, it should provide both amenity and maintain the open nature of the settlements and will be subject to restrictions to maintain the land for the benefit of the Parish (and its successors) in perpetuity</i></li> <li><i>Setbacks from the highway will normally be similar but certainly not closer to the road than nearby properties</i></li> <li><i>Ridge heights and roof designs are expected to be similar to adjoining properties to maintain and enhance the vernacular of the area</i></li> <li><i>Where practical, proposals should make a positive contribution by improving the provision of walking, cycling and horse access in the Parish, preferably on site or in the immediate vicinity</i></li> <li><i>Because the provision of public transport is more limited than urban environments and most occupants will</i></li> </ul>	<p><b>No HRA implications</b></p> <p>This is a positive policy with regards to biodiversity, encouraging the creation of green corridors, improvement of wildlife habitats and incorporation of tree planting.</p>

Policy	Description	Likely Significant Effects
	<p><i>be car owners new dwellings should have a minimum of two car parking spaces per one bedroom unit, with an additional space for each bedroom thereafter, with these car spaces provided on driveways adjoining the property rather than separate car park areas, except for terraced or flat/maisonette developments and to be of a permeable surface finish to mitigate run off of surface water. Garages will be included as a car parking space</i></p> <ul style="list-style-type: none"> <li>• <i>adequate access should be provided to each property to allow secure cycle parking</i></li> <li>• <i>each new dwelling should have a designated purpose designed and enclosed/screened bin storage area capable of taking three conventional wheelie bins plus recycling boxes adjoining the property</i></li> <li>• <i>new buildings should be designed to enhance the surroundings and utilize high quality materials in keeping with, responding to and integrating well with the surrounding buildings</i></li> <li>• <i>All new houses should benefit from private garden space</i></li> <li>• <i>All new houses should have the provision to charge electric cars.</i></li> <li>• <i>All developments should be ‘tenure blind’, whereby the quality of external materials and design does not differentiate between private ownership and other forms of tenure, to maintain the quality of the built environment.</i></li> </ul>	
<p>KIM3 Housing Site Allocations</p>	<p><i>The Neighbourhood Plan allocates sites for housing development at Great Kimble and Little Kimble, as shown on the Policies Map.</i></p> <p><i>Proposals will be supported at each site, provided they accord with the following site-specific requirements and with other relevant policies in the development plan. Specifically, each scheme must deliver affordable housing of the required number, type and form and must make an appropriate financial contribution towards a package of footpath and highway improvements to be agreed with the Highway Authority.</i></p> <p><i>Land at Grove Lane (West) (Ref: No.1)</i></p> <ul style="list-style-type: none"> <li>• <i>The scheme the Parish Council have allocated is contained within a developable area of 0.4 Ha and the proposal is to deliver 11 homes as per the drawings attached.</i></li> <li>• <i>The building types, layout and landscape scheme allow for glimpse views through the site from Grove Lane to the countryside beyond</i></li> <li>• <i>The layout and landscape scheme deliver a defensible northern-west boundary to the site to prevent any future encroachment of development into the countryside</i></li> <li>• <i>The scheme is accessed from a single point onto Grove Lane that accords with the proposed realignment of Grove Lane</i></li> <li>• <i>The proposal sets out the means by which the scheme will deliver a small A1 shop unit and necessary car parking spaces/delivery arrangements and the arrangements through which the unit will be transferred to an appropriate operator with a reasonable financial contribution to its set up and operating costs, with the requirement that such means and arrangements form part of the planning permission and S106 agreement and they are implemented prior to the occupation of any dwellings. If a shop has been delivered elsewhere in the parish and not needed on this site then an appropriate comparable financial contribution to fund improvements in the parish will be sought as part of a S106 agreement.</i></li> </ul> <p><i>This site fronting on to Grove Lane (Ref: Site 1) lies outside the setting of the AONB and is conveniently</i></p>	<p><b>HRA implications</b></p> <p>This policy provides for 160 new dwellings across at least five housing sites, raising potential for likely significant effects on European sites. Appropriate assessment of this policy is detailed in Section 5. For specific screening of housing sites see Table 3, Appendix B.</p>

located for walking trips to the school, public transport services and the Swan P.H. These requirements seek to ensure that the potential for adverse landscape effects are successfully mitigated. As the landowner has committed to providing a small shop unit (defined as less than 250 sq. m. gross floor space) as part of the scheme, the requirements set out how this will be delivered.

*Land at The Laurels, Marsh Road (Ref: No.10)*

- *The scheme the Parish Council have allocated is contained within a developable area of 0.6 Ha and the proposal is to deliver 14 homes as per the drawings attached.*
- *The building types, layout and landscape scheme allow for glimpse views through the site from Marsh Road to the countryside beyond*
- *The layout and landscape scheme deliver a defensible western boundary to the site to prevent any future encroachment of development into the countryside*
- *The layout ensures that buildings are set back from and front on to Marsh Road and are of a form and scale that reflect the rural village character of the local area*
- *The scheme is accessed from a single point onto Marsh Road that accords with the proposed realignment of Grove Lane*
- *The scheme provides a new footpath along its frontage with Marsh Road*
- *The detailed scheme will need to demonstrate mitigation of surface water run off and address foul water drainage issues in the area.*

This site fronting on to Marsh Road (Ref: Site 10) lies outside the setting of the AONB and is conveniently located for walking trips to the school, public transport services and the Swan P.H. These requirements seek to ensure that the potential for adverse landscape effects are successfully mitigated. They also recognise that it is especially important that the scheme presents a positive and respectful frontage to Marsh Road to maintain its rural character.

*Land off Kimblewick Road (Ref: No.14)*

- *The scheme the Parish Council have allocated is contained within a developable area of 1.7Ha and the proposal is to deliver 45 homes as per the drawings attached.*
- *The building types, layout and landscape scheme are designed to minimise the prominence of the scheme in the wider landscape when viewed from within the AONB.*
- *The scheme lays out a public open space on the non-developable part of the site with open links through the development parcels to enable access to the space from existing properties on Kimblewick Road and to connect with the adjoining Aylesbury Ring public right of way*
- *The layout ensures that buildings front on to Kimblewick Road and Grove Road and on to the public open space and green links, and are of a form and scale that reflect the rural village character of the local area*
- *The layout and landscape scheme deliver a defensible northern boundary to the site to prevent any future encroachment of development into the countryside*
- *The scheme is accessed from Kimblewick Road using the existing field access points only*

- *The public open space includes a new multi-use games area (level grassed area of circa 0.5 acres min) with a utilities service point to support events on the space*

This site fronting on to Kimblewick Road (Ref: Site 14) lies outside the setting of the AONB but is visible within the open landscape from within it. It is conveniently located for walking trips to the school, public transport services and the Swan P.H. and will form an extension to Great Kimble along the road opposite the existing buildings. These requirements seek to ensure that the potential for adverse landscape effects is successfully mitigated. As the landowner has indicated an intention to provide a large public open space as part of the planning proposal. The requirements set out how this should be delivered.

*Land South of Grove Lane (Ref: No.15)*

- *The scheme the Parish Council have allocated is contained within a developable area of 0.7 Ha and the proposal is to deliver 20 homes as per the drawings attached.*
- *The building types, layout and landscape scheme relate well to the adjoining Redding Court development in terms of scale and proximity*
- *The layout and landscape scheme deliver a defensible southern boundary to the site to prevent any future encroachment of development into the countryside*
- *The layout safeguards land that may be required for the widening of the operational railway land and the proposals have regard to the potential additional noise pollution from the railway and the realigned Grove Lane*
- *The layout safeguards land that will be required for the realignment of Grove Lane*
- *The scheme is accessed only from Redding Court provided this will not hinder delivery of the Grove Lane realignment.*

This site fronting on to Grove Lane (Ref: Site 15) lies outside the setting of the AONB and is conveniently located for walking trips to the school, public transport services and the Swan P.H. These requirements seek to ensure that the potential for adverse landscape effects or amenity effects on the adjoining Redding Court are successfully mitigated. They also ensure that the scheme does not compromise the proposals to upgrade and realign Grove Lane and the possible widening of the railway line corridor.

*Land at Doe Hill Farm (Lower) (Ref: No.17A)*

- *The scheme the Parish Council have allocated is contained within a developable area of 1.6 Ha outside the identified Flood Zone and the proposal is to deliver 40 homes as per the drawings attached.*
- *The building types, layout and landscape scheme allow for glimpse views through the site from Aylesbury Road to the countryside beyond*
- *The layout and landscape scheme deliver a defensible northern boundary to the site to prevent any future encroachment of development into the countryside*
- *The scheme layout retains the existing mature trees and hedgerow along the front of the site and minimises*

Policy	Description	Likely Significant Effects
	<p><i>the loss to create the road access</i></p> <ul style="list-style-type: none"> <li><i>The building types, layout and landscape scheme relate well to the adjoining properties on Aylesbury Road in terms of scale and proximity</i></li> <li><i>The proposals demonstrate that the scheme can successfully avoid or mitigate any adverse flooding or biodiversity effects on both these site and adjoining land</i></li> <li><i>The scheme is accessed from a single point onto Aylesbury Road</i></li> <li><i>The proposal sets out the means by which the scheme will deliver a small A1 shop unit and necessary car parking spaces/delivery arrangements and the arrangements through which the unit will be transferred to an appropriate operator with a reasonable financial contribution to its set up and operating costs, with the requirement that such means and arrangements form part of the planning permission and S106 agreement and they are implemented prior to the occupation of any dwellings. The public open space includes a level grassed area for the enjoyment of residents. If a shop has been delivered elsewhere in the parish and not needed on this site then an appropriate comparable financial contribution to fund improvements in the parish will be sought as part of a S106 agreement.</i></li> </ul> <p>This site fronting on to Aylesbury Road (Ref: Site 17A) lies within the setting of the AONB and is conveniently located for walking trips to the school and public transport services. These requirements seek to ensure that the potential for adverse landscape, flooding and biodiversity effects on adjoining land are successfully mitigated. As the landowner has committed to providing a small shop unit (defined as less than 250 sq. m. gross floor space) as part of the scheme, the requirements set out how this will be delivered.</p> <p><i>For the purposes of phasing the delivery of housing over the full plan period, no more than a total of approx. 50 dwellings will be granted consent from one or more site allocation schemes in each of the periods 2019/20 – 2022/23; 2023/24 – 2027/28; and 2028/29 – 2032/33. Priority will be given to considering proposals from those sites that will deliver a necessary community benefit.</i></p>	
KIM4 Schools	<i>Proposals which encourage and support innovative improvements to schools in the Parish will be encouraged, provided they accord with national and development plan policies.</i>	<p><b>No HRA implications</b></p> <p>This policy relates to improvements to schools. It requires that national and development plan policies are adhered to. There are no HRA implications associated with this policy.</p>
KIM5 Landscape Buffer	<i>The Neighbourhood Plan designates land west of Great Kimble (Smoky Row) to the Parish boundary, as shown on the Policies Map, as a landscape buffer. Development proposals within the buffer will only be supported if they can demonstrate that they will not lead to the visual coalescence of Great Kimble (Smoky Row) with the strategic allocation at Princes Risborough.</i>	<p><b>No HRA implications</b></p> <p>This policy relates to spatial management of development proposals, which does not have any HRA implications.</p>
KIM6 Employment	<p><i>Proposals to extend or intensify an established employment use will be supported, provided:</i></p> <ul style="list-style-type: none"> <li><i>i. If located in the Green Belt and in the Area of Outstanding Natural Beauty, the proposal accords with the relevant national and development plan policies;</i></li> </ul>	<p><b>No HRA implications</b></p> <p>As this policy specifically requires that proposals relating to employment deliver a net biodiversity gain, no HRA implications are expected.</p>

Policy	Description	Likely Significant Effects
	<ul style="list-style-type: none"> <li>ii. any new buildings are of a similar scale and height to the existing buildings on the relevant site;</li> <li>iii. the existing vehicular access is capable of accommodating additional traffic movements without causing harm to local residential amenity;</li> <li>iv. additional car parking spaces are provided on the relevant site in accordance with adopted standards;</li> <li>v. the operation hours of the occupiers will be no longer than those of the established users;</li> <li>vi. there will be no significant increase in light or noise pollution arising from any new buildings or operations; and</li> <li>vii. the landscape scheme makes provision for a habitat corridor along the site boundaries to deliver a net biodiversity gain and planting to screen the site from the countryside.</li> </ul> <p>Proposals for the development of new employment uses will only be supported if they are located within a Settlement Boundary or if they will reuse redundant brownfield land that is suited to an employment use.</p>	
KIM7 Community & Leisure Uses	Proposals to improve or create new community or leisure facilities will be supported, provided they are of a scale and type that it is compatible to the rural location of the Parish in the District and they accord with national and development plan policies.	<p><b>No HRA implications</b></p> <p>This policy does not allocate any specific community and leisure uses and any applications that come forward will need to be subject to their own HRA,</p>
KIM8 Protecting International Habitats	Development proposals will only be supported if it can be demonstrated that they will not have an adverse effect on the integrity of the Chiltern Beechwoods Special Area of Conservation or other European sites.	<p><b>No HRA implications</b></p> <p>This is a positive policy with respect to ensuring that Neighbourhood Plan development proposals do not adversely affect the integrity of any European sites.</p>

**Table 3. Screening table of housing sites proposed in the Neighbourhood Plan**

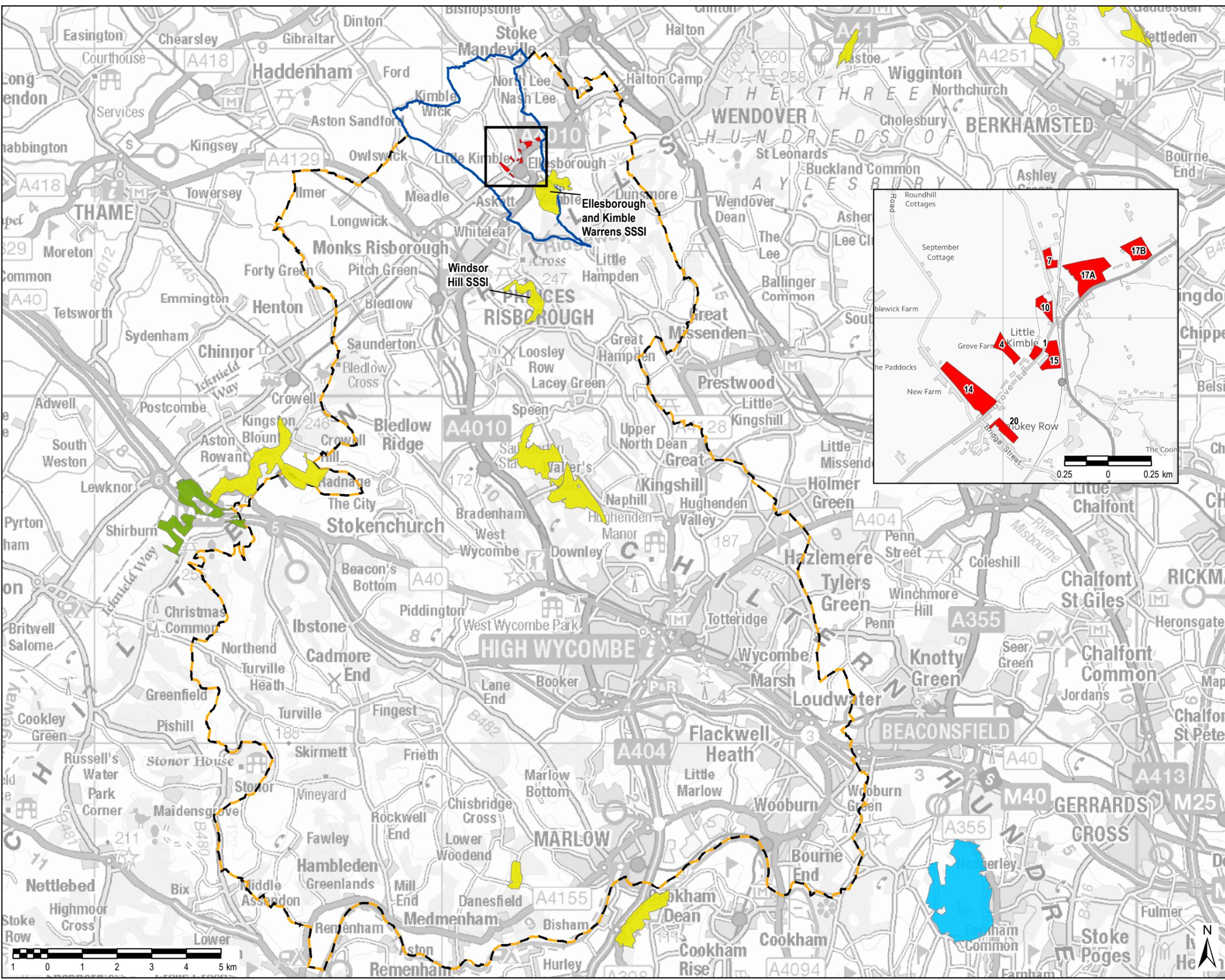
Housing Site	Expected Number of Dwellings	Screening Outcome
1 Grove Lane (west)	11 (possibly plus a new village shop)	<p><b>HRA implications</b></p> <p>This housing site is approximately 0.7km northwest of Chilterns Beechwoods SAC: Ellesborough and Kimble Warrens SSSI and approximately 3.3km north of Chilterns Beechwoods SAC: Windsor Hill SSSI.</p> <p>There are no HRA implications with regards to other European sites.</p>
4 Grove Barn	23	<p><b>HRA implications</b></p> <p>This housing site is approximately 0.8km northwest of Chilterns Beechwoods SAC: Ellesborough and Kimble Warrens SSSI and approximately 3.3km north of Chilterns Beechwoods SAC: Windsor Hill SSSI.</p> <p>There are no HRA implications with regards to other European sites.</p>
7 Birdbrook, Marsh Rd	15	<p><b>HRA implications</b></p> <p>This housing site is approximately 1.0km northwest of Chilterns Beechwoods SAC: Ellesborough and Kimble Warrens SSSI and approximately 3.9km north of Chilterns Beechwoods SAC: Windsor Hill SSSI.</p>

		There are no HRA implications with regards to other European sites.
10 The Laurels, Marsh Rd	14 (plus a playing field area)	<p><b>HRA implications</b></p> <p>This housing site is approximately 0.8km northwest of Chilterns Beechwoods SAC: Ellesborough and Kimble Warrens SSSI and approximately 3.6km north of Chilterns Beechwoods SAC: Windsor Hill SSSI.</p> <p>There are no HRA implications with regards to other European sites.</p>
14 Kimblewick Rd, Grove Lane	45	<p><b>HRA implications</b></p> <p>This housing site is approximately 0.8km northwest of Chilterns Beechwoods SAC: Ellesborough and Kimble Warrens SSSI and approximately 3.1km north of Chilterns Beechwoods SAC: Windsor Hill SSSI.</p> <p>There are no HRA implications with regards to other European sites.</p>
15 Village Foundations, Grove Lane	20	<p><b>HRA implications</b></p> <p>This housing site is approximately 0.6km northwest of Chilterns Beechwoods SAC: Ellesborough and Kimble Warrens SSSI and approximately 3.3km north of Chilterns Beechwoods SAC: Windsor Hill SSSI.</p> <p>There are no HRA implications with regards to other European sites.</p>
17A Doe Hill Farm (lower)	40 (possibly plus a new village shop)	<p><b>HRA implications</b></p> <p>This housing site is approximately 0.9km northwest of Chilterns Beechwoods SAC: Ellesborough and Kimble Warrens SSSI and approximately 3.8km north of Chilterns Beechwoods SAC: Windsor Hill SSSI.</p> <p>There are no HRA implications with regards to other European sites.</p>
17B Doe Hill Farm (upper)	35	<p><b>HRA implications</b></p> <p>This housing site is approximately 0.9km northwest of Chilterns Beechwoods SAC: Ellesborough and Kimble Warrens SSSI and approximately 3.9km north of Chilterns Beechwoods SAC: Windsor Hill SSSI.</p> <p>There are no HRA implications with regards to other European sites.</p>
20 Rear of Chequers/Hawthorn, Bridge St	Up to 15 dwellings (likely to be fewer, such that 50-65 dwellings are delivered in combination with 19 The Orchards, for which planning permission has already been granted)	<p><b>HRA implications</b></p> <p>This housing site is approximately 0.6km northwest of Chilterns Beechwoods SAC: Ellesborough and Kimble Warrens SSSI and approximately 2.9km north of Chilterns Beechwoods SAC: Windsor Hill SSSI.</p> <p>There are no HRA implications with regards to other European sites.</p>

# Appendix C Figures

Figure 1. Map of housing sites and relevant European sites

File Name: I:\004 - Information Systems\60571087 - Neighbourhood Plan\_CPB\_2018\_202202\_Maps\Great and Little Kimble-cum-Marsh\Figure 1 - Map of Housing Sites and Relevant European Sites.mxd



THIS DRAWING IS TO BE USED ONLY FOR THE PURPOSE OF ISSUE THAT IT WAS ISSUED FOR AND IS SUBJECT TO AMENDMENT

**LEGEND**

- Great & Little Kimble-cum-Marsh Parish Boundary
- Wycombe District Boundary
- Special Area of Conservation (SAC)**
  - Aston Rowant
  - Burnham Beeches
  - Chilterns Beechwoods
  - Housing Sites

1 - Grove Lane (west)  
 4 - Grove Barn  
 7 - Birdbrook, Marsh Road  
 10 - The Laurels, Marsh Road  
 14 - Kimblewick Road, Grove Lane  
 15 - Village Foundations Grove Lane  
 17A - Doe Hill Farm (lower)  
 17B - Doe Hill Farm (upper)  
 20 - Rear of Chequers/Hawthorn, Bridge Street

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Purpose of Issue			
FINAL			
Client			
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Project Title			
KIMBLE NEIGHBOURHOOD PLAN HRA			
Drawing Title			
HOUSING SITES AND RELEVANT EUROPEAN SITES			
Drawn TD	Checked BB	Approved GW	Date 08/04/2019
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FIGURE 1			

