

# Habitats Regulations Assessment

Regulation 18 Draft Local Plan

St Albans City & District Council

July 2023

## Quality information

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# 1. Introduction

## 1.1 Background

1.1.1 St Albans City & District Council (SADC) has commissioned AECOM to undertake a Habitats Regulations Assessment (HRA) of the emerging St Albans City and District Local Plan (LP), which will cover the period to 2041. The objective of an HRA is to identify any aspects of a Plan that may result in Likely Significant Effects (LSEs) and, where relevant, adverse effects on the integrity of the National Site Network (NSN), either in isolation or in combination with other plans and projects. The NSN is comprised of Habitats Sites (Special Areas of Conservation (SACs), Special Protection Areas (SPAs), and as a matter of Government policy, Ramsar sites). Furthermore, the HRA is also to advise on appropriate policy mechanisms for delivering mitigation where adverse effects on integrity are identified. Under the Conservation of Habitats and Species Regulations 2017 (as amended), an Appropriate Assessment of impact pathways is required, where a plan or project is likely to result in Likely Significant Effects (LSEs) upon a Habitats Site, either individually or in combination.

1.1.2 The LP to 2041 will guide future development in the City & District. It sets out the following key objectives:

- Promote adaptation and mitigation to the Climate Change Emergency; seek to achieve net zero by 2030, including through the Council doing everything reasonably within its power; promote the use of renewable resources, reduce carbon emissions, protect natural resources and reduce waste.
- Prioritise the effective use of land by locating new development on previously developed land first, where appropriate; and protecting and enhancing the Green Belt
- Provide a sufficient amount of good quality housing which meets the needs of all sections of society in sustainable locations
- Make sufficient provision for and access to community infrastructure in sustainable locations
- Encourage the use of active and sustainable means of transport and reduce the need for people to travel
- Ensure that essential utilities infrastructure, including broadband, is delivered to support our existing residents and services as well as growth.
- Encourage strong and resilient economic growth, employment and skills opportunities; including supporting growth in green and creative sectors; and supporting new ways of working across the district
- Support the role that the town, village and neighbourhood centres play at the heart of local communities, sustainable lifestyles and the visitor economy, by taking a positive approach to their growth, management and adaptation.
- Protect, maintain and enhance the natural environment, including biodiversity, the landscape, green infrastructure and our waterways

- Conserve and enhance our rich and varied historic assets and their settings, celebrating their local distinctiveness and character
- Achieve high quality, innovative, well designed and locally distinctive developments in existing and new places
- Promote active, healthy and sustainable communities and a high quality of life

1.1.3 SADC lies in the southwestern half of Hertfordshire and covers an area of 161 square kilometres and has a population of c. 147,200. Adjoining Authorities are Central Bedfordshire, North Hertfordshire District, Welwyn Hatfield Borough, Hertsmere Borough, Watford Borough, Three Rivers District, and Dacorum Borough. The south of the District is more heavily populated while the central and northern areas are more rural, with over 81% of the District being covered by the Metropolitan Green Belt. The District is 20 miles north of London. The largest settlements are St Albans City and Harpenden, followed in size by London Colney, then the two large, historic villages of Redbourn and Wheathampstead, and numerous smaller villages and hamlets. The District is very well connected by key national road routes, with the M25 running east west through the south of the District, paralleled by the A414 dual carriageway, while the M1 runs down the west and the A1M is just outside the district to the east. Luton Airport is approximately five miles north of the District, while Heathrow and Stansted are both within 25 miles.

1.1.4 St Albans Council is working with other Councils in South West Hertfordshire (Dacorum Borough Council, Hertsmere Borough Council, Three Rivers District Council and Watford Borough Council) to deliver a Joint Strategic Plan (JSP) for South West Hertfordshire. The JSP will provide a long-term blueprint for the area to 2050. It will be able to consider and address issues that cross council boundaries and set out a strategic vision for the area. It will also help guide future plans and strategies by setting out high level policies on topics such as climate change, infrastructure, environmental protection, employment and housing.

1.1.5 St Albans is also working jointly with Dacorum on proposed cross-boundary development at Hemel Garden Communities.

1.1.6 An initial appraisal of the Habitats Sites within and surrounding the District and the impact pathways linking to the proposed growth indicates that a single site requires consideration: Chilterns Beechwoods SAC, which, at its closest is located c. 7.3km from the District boundary.

## 1.2 Legislation

1.2.1 The UK left the European Union (EU) on 31 January 2020 under the terms set out in the European Union (Withdrawal Agreement) Act 2020 (“the Withdrawal Act”). While the UK is no longer a member of the EU, a requirement for Habitats Regulations Assessment will continue as set out in the Conservation of Habitats and Species Regulations 2017 (Amended) (incorporating The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019)

- 1.2.2 The HRA process applies the ‘Precautionary Principle’<sup>1</sup> to Habitats Sites. Plans and projects can only be permitted having ascertained that there will be no adverse effect on the integrity of the Habitats Site(s) in question. To ascertain whether or not site integrity will be affected, an Appropriate Assessment should be undertaken of the Plan or project in question. Figure 1 below sets out the legislative basis for Appropriate Assessment.
- 1.2.3 Plans and projects that are associated with potential adverse impacts on Habitats Sites may still be permitted if there are no reasonable alternatives and there are Imperative Reasons of Overriding Public Interest (IROPI) as to why they should go ahead. In such cases, compensation would be necessary to ensure the overall integrity of the site network.

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

The Regulations state that:

*“A competent authority, before deciding to ... give any consent, permission or other authorisation for, a plan or project which- (a) is likely to have a significant effect on a European site ... (either alone or in combination with other plans or projects)... must make an appropriate assessment of the implications of the plan or project in view of the sites conservation objectives... The competent authority may agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the European site”.*

**Figure 1: The legislative basis for Appropriate Assessment<sup>2</sup>**

- 1.2.4 Over time the phrase ‘Habitats Regulations Assessment’ (HRA) has come into wide currency to describe the overall process set out in the Regulations 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’.
- 1.2.5 In spring 2018 the ‘Sweetman’ European Court of Justice ruling<sup>3</sup> clarified that ‘mitigation’ (i.e., measures that are specifically introduced to avoid or reduce a harmful effect on a Habitats Site that would otherwise arise) 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. This HRA is cognisant of that ruling.

## **1.3 Scope of the Project**

- 1.3.1 There is no pre-defined guidance that dictates the physical scope of an HRA of a Plan document. Current guidance suggests that the following Habitats Sites should be included in the scope of an HRA assessment:

<sup>1</sup> The Precautionary Principle, which is referenced in Article 191 of the Treaty on the Functioning of the European Union, has been defined by the United Nations Educational, Scientific and Cultural Organisation (UNESCO, 2005) as: *“When human activities may lead to morally unacceptable harm [to the environment] that is scientifically plausible but uncertain, actions shall be taken to avoid or diminish that harm. The judgement of plausibility should be grounded in scientific analysis”.*

<sup>2</sup> Available at <https://www.legislation.gov.uk/uksi/2017/1012/contents/made> [accessed 16/06/2023]

<sup>3</sup> People Over Wind and Sweetman v Coillte Teoranta (C-323/17)



- All Habitats Sites within the boundary of the District; and,
  - Other Habitats Sites shown to be linked to development set out in the LP through a known 'pathway' (discussed below).
- 1.3.2 Generally, it is uncommon for development plans to be deemed to have significant impacts on Habitats Sites situated more than 10km from areas of growth. For example, most core recreational catchments (except for some coastal sites) are under 10km in size and the average vehicle commuting distance of a UK resident is approx. 10km. It should be noted that the presence of a conceivable impact pathway linking a Plan to a Habitats Site does not mean that Likely Significant Effects (LSEs) will occur.
- 1.3.3 In some cases, development impacts can extend beyond 10km, particularly where hydrological pathways are involved, which is why the source-pathway-receptor concept is also used to help determine whether there are potential pathways connecting development to Habitats Sites. This takes site-specific sensitivities into account, including issues such as nutrient neutrality or water levels, quantity and flow.
- 1.3.4 Briefly defined, impact pathways are routes by which the implementation of a policy within a Local Plan document can lead to an effect upon a Habitats Site. An example of this would be new residential development resulting in an increased population and thus increased recreational pressure, which could affect Habitats Sites through, for example, disturbance of ground-nesting birds. Guidance from the Ministry of Housing, Communities and Local Government (MHCLG) states that the HRA should be '*proportionate to the geographical scope of the [plan policy]*' and that '*an AA need not be done in any more detail, or using more resources, than is useful for its purpose*' (MHCLG, 2006, p.6).
- 1.3.5 This basic principle has also been reflected in court rulings. The Court of Appeal<sup>4</sup> has ruled that providing the Council (competent authority) was duly satisfied that proposed mitigation could be 'achieved in practice' to satisfy that the proposed development would have no adverse effect, then this would suffice. This ruling has since been applied to planning permissions (rather than a Plan level document)<sup>5</sup>. In this case the High Court ruled that for '*a multistage process, so long as there is sufficient information at any particular stage to enable the authority to be satisfied that the proposed mitigation can be achieved in practice it is not necessary for all matters concerning mitigation to be fully resolved before a decision maker is able to conclude that a development will satisfy the requirements of Reg 61 of the Habitats Regulations*'.
- 1.3.6 Given an initial assessment of the relevant Habitats Sites and the impact pathways present, this HRA will discuss a single Habitats Site:
- Chilterns Beechwoods SAC
- 1.3.7 The location and distribution of Chilterns Beechwoods SAC in relation to the District is shown in Appendix A. An introduction to, the qualifying features (species and habitats), Conservation Objectives, and threats and pressures to

<sup>4</sup>No Adastral New Town Ltd (NANT) v Suffolk Coastal District Council Court of Appeal, 17<sup>th</sup> February 2015

<sup>5</sup>High Court case of R (Devon Wildlife Trust) v Teignbridge District Council, 28 July 2015

the integrity of these Habitats Sites are set out in Chapter 3. The screening assessment of policies in the SHLP is provided in Appendix B.

1.3.8 In order to fully inform the HRA, several studies and online information databases have been consulted. These include:

- Future development proposed (and, where available, HRAs) for the adjoining authorities of Central Bedfordshire, North Hertfordshire District, Welwyn Hatfield Borough, Hertsmere Borough, Watford Borough, Three Rivers District, and Dacorum Borough;
- Evidence gathered on behalf of Dacorum Borough Council in relation to recreational impacts on Chilterns Beechwoods SAC. Including Topic Paper for the Chiltern Beechwoods SAC<sup>6</sup> and a visitor survey undertaken by Footprint Ecology<sup>7</sup>
- Site Improvement Plans and Supplementary Conservation Advice Notes for relevant Habitats Sites published by Natural England;
- The UK Air Pollution Information System ([www.apis.ac.uk](http://www.apis.ac.uk)); and
- Multi Agency Geographic Information for the Countryside (MAGIC) and its links to SSSI citations and the JNCC website ([www.magic.gov.uk](http://www.magic.gov.uk)).

## 1.4 Quality Assurance

1.4.1 This report was undertaken in line with AECOM's Integrated Management System (IMS). Our IMS places great emphasis on professionalism, technical excellence, quality, environmental and Health and Safety management. All staff members are committed to establishing and maintaining our certification to the international standards BS EN ISO 9001:2008 and 14001:2004 and BS OHSAS 18001:2007. In addition, our IMS requires careful selection and monitoring of the performance of all sub-consultants and contractors.

1.4.2 All AECOM Ecologists working on this project are members (at the appropriate level) of the Chartered Institute of Ecology and Environmental Management (CIEEM) and follow their code of professional conduct (CIEEM, 2019).

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<sup>6</sup> Available at [Chilterns Beechwoods Special Area of Conservation \(SAC\) - Background information \(dacorum.gov.uk\)](http://Chilterns Beechwoods Special Area of Conservation (SAC) - Background information (dacorum.gov.uk)) [accessed 30/06/2023]

<sup>7</sup> Available at [Chilterns Beechwoods Special Area of Conservation \(dacorum.gov.uk\)](http://Chilterns Beechwoods Special Area of Conservation (dacorum.gov.uk)) [accessed 30/06/2023]

## 2. Methodology

### 2.1 Introduction

- 2.1.1 The HRA has been carried out with reference to the general European Commission guidance on HRA<sup>8</sup> and general guidance on HRA published by government in July 2019<sup>9</sup>. AECOM has also been mindful of the implications of European case law in 2018, notably the Holohan ruling and the People over Wind ruling, both discussed below.
- 2.1.2 Figure 2 below outlines the stages of HRA according to most recent European Commission guidance. The stages are essentially iterative, being revisited as necessary in response to more detailed information, recommendations and any relevant changes to the Plan.

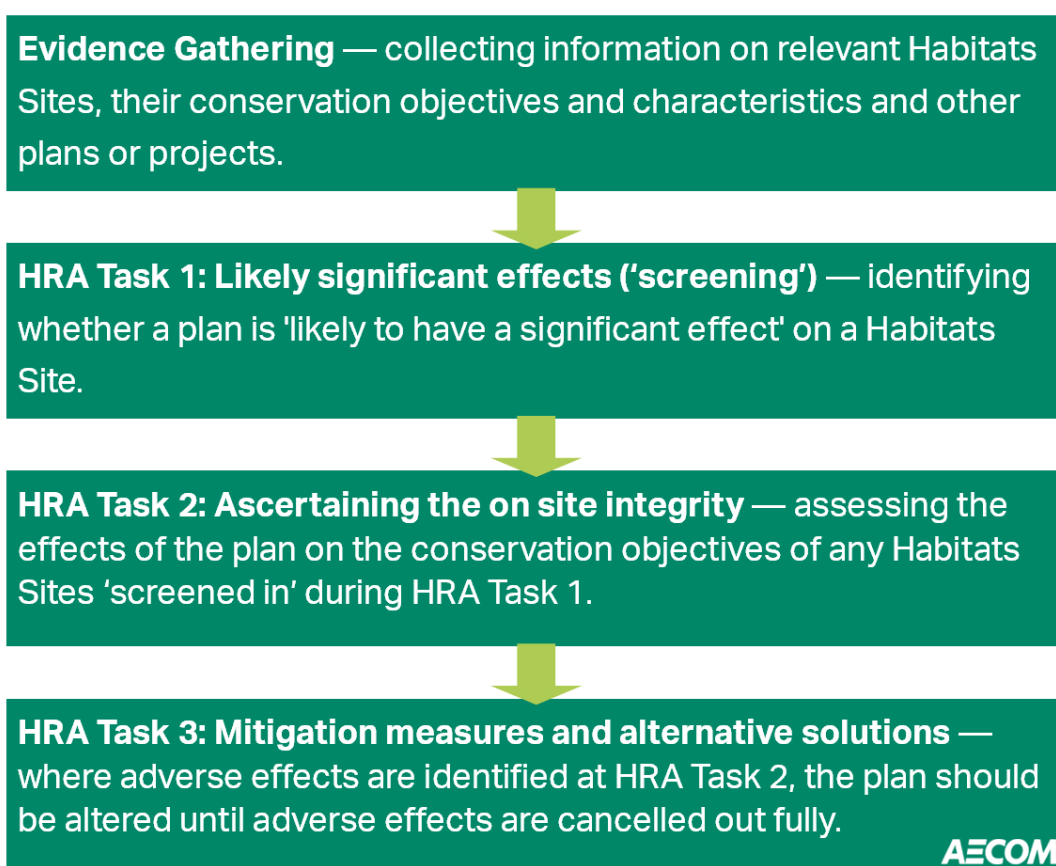


Figure 2: Four Stage Approach to Habitats Regulations Assessment. Source EC, 2001<sup>6</sup>.

## 2.2 Description of HRA Tasks

### HRA Task 1 – Screening for Likely Significant Effects (LSEs)

- 2.2.1 Following evidence gathering, the first stage of any Habitats Regulations Assessment is the screening for Likely Significant Effects (LSEs), essentially

<sup>8</sup> European Commission (2001): Assessment of plans and projects significantly affecting Natura 2000 Sites: Methodological Guidance on the Provisions of Article 6(3) and 6(4) of the Habitats Directive.

<sup>9</sup> <https://www.gov.uk/guidance/appropriate-assessment>

a high-level assessment to decide whether the full subsequent stage known as Appropriate Assessment is required. The essential question is:

- 2.2.2 *"Is the project, either alone or in combination with other relevant projects and plans, likely to result in a significant effect upon Habitats Sites?"*
- 2.2.3 The objective is to filter out those Plans and projects that can, without any detailed appraisal, be concluded to be unlikely to result in any impacts upon Habitats Sites, usually because there is no mechanism for a negative interaction. This stage is undertaken in Chapter 5 of this report and in Appendix B.

## HRA Task 2 – Appropriate Assessment (AA)

- 2.2.4 Where it is determined that a conclusion of 'no Likely Significant Effects (LSEs)' cannot be drawn, the analysis proceeds to the next stage of HRA known as Appropriate Assessment. Case law has clarified that 'Appropriate Assessment' is not a technical term. In other words, there are no particular technical analyses, or level of technical analysis, that are classified by law as belonging to Appropriate Assessment compared to the screening stage.
- 2.2.5 By virtue of the fact that it follows screening for LSEs, there is a clear implication that the analysis will be more detailed than undertaken at the previous stage. One of the key considerations during Appropriate Assessment is whether there is available mitigation that would entirely address the potential effect. In practice, the Appropriate Assessment would take any policies or allocations that could not be dismissed following the high-level screening and assess the potential for an effect in more detail, with a view to concluding whether there would be a potential for an adverse effect on site integrity (in other words, disruption of the coherent structure and function of the Habitats Site(s)). A decision by the European Court of Justice<sup>10</sup> concluded that measures intended to avoid or reduce the harmful effects of a proposed Plan or project on a Habitats Site may no longer be considered by competent authorities at the screening for LSEs stage of HRA. That ruling has been taken into account in producing this HRA.
- 2.2.6 Also, in 2018 the Holohan ruling<sup>11</sup> was handed down by the European Court of Justice. Among other provisions paragraph 39 of the ruling states that 'As regards other habitat types or species, which are present on the site, but for which that site has not been listed, and with respect to habitat types and species located outside that site, ... typical habitats or species must be included in the appropriate assessment, if they are necessary to the conservation of the habitat types and species listed for the protected area' [emphasis added]. Due account of this decision has been given in this HRA in relation to the Thames Basin Heaths SPA, which is designated for mobile ground-nesting birds (although it is to be noted that the qualifying species are not considered to be critically dependent on functionally linked habitats).

## HRA Task 3 – Avoidance and Mitigation

- 2.2.7 Where necessary, measures are recommended for incorporation into the Plan in order to mitigate and / or avoid adverse effects on Habitats Site. There is

<sup>10</sup> People Over Wind and Sweetman v Coillte Teoranta (C-323/17)

<sup>11</sup> Case C-461/17

considerable precedent concerning the level of detail that a Local Plan document needs to contain regarding mitigation for impact pathways on Habitats Sites (e.g. regarding recreational pressure). The implication of this precedent is that it is not necessary for all measures to be fully developed prior to adoption of the Plan, but the Plan must provide an adequate policy framework within which these measures can be delivered.

2.2.8 When discussing mitigation for a Local Plan, one is concerned primarily with the policy framework to enable the delivery of such mitigation rather than the details of the mitigation measures themselves since a Local Plan document is a high-level policy document.

2.2.9 In any Local Plan, there are numerous policies for which there is a limit to the degree of assessment that is possible at the Plan level. This is because either:

- The policy in question does not contain any specifics as to what will be delivered or where, and so cannot be assessed in detail at the Plan level. In these cases, the Appropriate Assessment focusses on precautionary mitigation that can be included in the plan to ensure that whatever proposals come forward will not result in adverse effects on integrity; or
- The nature of potential impacts (e.g. visual and noise disturbance arising from construction or loss of functionally linked habitat) are related to how the development will be designed and constructed, and therefore cannot be assessed in detail at the plan level. In these instances, the Appropriate Assessment focusses on available mitigation measures, the extent to which such measures would be achievable and effective, and whether an adequate protective framework exists to ensure that the policy would not lead to an adverse effect on the integrity of any internationally designated sites.

2.2.10 In these instances, the advice of Advocate-General Kokott<sup>12</sup> is also worth considering. She commented that: *‘It would ...hardly be proper to require a greater level of detail in preceding plans [rather than planning applications] or the abolition of multi-stage planning and approval procedures so that the assessment of implications can be concentrated on one point in the procedure. Rather, adverse effects on areas of conservation must be assessed at every relevant stage of the procedure to the extent possible on the basis of the precision of the plan.*

## 2.3 Other Plans and Projects

2.3.1 Other plans and projects that will be considered when undertaking the Habitats Regulations Assessment include:

- Central Bedfordshire Local Plan 2015 to 2035
- North Hertfordshire Local Plan 2011 – 2031
- Welwyn Hatfield District Plan 2005 and the emerging New Local Plan (to 2032)<sup>13</sup>

<sup>12</sup> Opinion of Advocate General Kokott, 9th June 2005, Case C-6/04. Commission of the European Communities v United Kingdom of Great Britain and Northern Ireland, paragraph 49 <http://curia.europa.eu/juris/document/document.jsf?docid=58359&doclang=EN>

<sup>13</sup> June 2023 Local Plan Proposed Further Main Modifications Consultation was being undertaken)

- Hertsmere Local Plan 2012 -2027
- Watford Local Plan 2021 - 2038
- Three Rivers District Council Local Plan (new plan in preparation)
- Dacorum Local Plan (2020-2038)
- Hertfordshire Transport Strategy (LTP4 2018 -2031)
- Central Bedfordshire Local Transport Plan (LTP3
- Bedford Borough, Central Bedfordshire and Luton Borough Councils: Minerals and Waste Local Plan 2014
- Hertfordshire Minerals and Waste Local Plan (publication draft 2021)
- Affinity Water – Water Resource Management Plan 2024
- Thames Water – Water Resource Management Plan 2024.

2.3.2 It should be noted that rather than undertaking HRA of the individual projects and plans listed above, the HRA for the St Albans Local Plan will draw upon those HRAs of the projects and plans listed above in drawing its conclusions.

## 3. Habitats Site

### 3.1 Chilterns Beechwoods SAC

#### Introduction

- 3.1.1 The Chilterns Beechwoods SAC covers a vast area (c1,300ha). It is made up on multiple land parcels spread across four local authority boundaries (Dacorum, Buckinghamshire, South Oxfordshire, and Windsor and Maidenhead). At its closest, the SAC is located 7.3km from the St Albans District boundary (Ashridge Commons and Woods SSSI).
- 3.1.2 The Chilterns Beechwoods represent a very extensive tract of ancient semi-natural beech (*Fagus sylvatica*) forests in the centre of the habitat's UK range. The woodland is an important part of a mosaic with species-rich chalk grassland and scrub.
- 3.1.3 The large population of trees on the site, in combination with the historical continuity of the woodland cover, is the reason for this SAC being listed as the most important site in the UK for fauna associated with decaying timber. A distinctive feature in the woodland flora is the occurrence of the rare coralroot bittercress *Cardamine bulbifera*. Standing and fallen dead timber provide habitat for dead-wood (saproxylic) invertebrates, including stag beetle *Lucanus cervus*.

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

- 3.1.4 Annex I habitats that are a primary reason for selection of this site
- *Asperulo-Fagetum* beech forests. (Beech forests on neutral to rich soils)
- 3.1.5 Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site:
- Semi-natural dry grasslands and scrubland facies: on calcareous substrates (*Festuco-Brometalia*). (Dry grasslands and scrublands on chalk or limestone)
- 3.1.6 Annex II species that are a qualifying feature, but not a primary reason for selection of this site:
- Stag beetle (*Lucanus cervus*)

#### Conservation Objectives<sup>15</sup>

- 3.1.7 '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;
- 3.1.8 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;

<sup>14</sup> Available at: [Chilterns Beechwoods - Special Areas of Conservation \(jncc.gov.uk\)](https://jncc.gov.uk) Available at: [European Site Conservation Objectives for Chilterns Beechwoods SAC - UK0012724 \(naturalengland.org.uk\)](https://naturalengland.org.uk) [Accessed on the 28/06/2023]

<sup>15</sup> Available at: [European Site Conservation Objectives for Chilterns Beechwoods SAC - UK0012724 \(naturalengland.org.uk\)](https://naturalengland.org.uk) [Accessed on the 28/06/2023]

- *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.'*

## **Threats / Pressures to Site Integrity**<sup>16</sup>

3.1.9 The following threats and pressures to the site integrity of the Chilterns Beechwoods SAC have been identified in Natural England's Site Improvement Plan and the Supplementary Advice on the Conservation Objectives<sup>13</sup>:

- Forestry and woodland management
- Deer
- Changes in species distributions
- Invasive species
- Disease
- Public access/disturbance; and,
- Air pollution: Impact of atmospheric nitrogen deposition.

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<sup>16</sup> Available at: [SIP150304FINALv1.0 Chilterns Beechwoods \(1\).pdf](#) [Accessed on the 28/06/2023]]



## 4. Impact Pathways for Consideration

4.1.1 This section discusses potential impact pathways that could potentially link the LP to the Chilterns Beechwoods SAC (as identified in **Chapter 3**). These are briefly identified below. Where existing evidence exists in relation to a specific impact pathway or a Habitats Site, further discussion is undertaken in the subsequent section.

4.1.2 Potential impact pathways that could link the LP to the Chilterns Beechwoods SAC.

- Public access (recreation) / disturbance including adventure sports, soil compaction/loss, digging and creating mountain bike jumps, increased fire risk, dog fouling/eutrophication, gathering mushrooms, dead wood removal, introduction of invasive species such as holly etc.
- Any impact on stag beetle functionally linked habitat
- Air quality: impact of ammonia, NOx and the resulting atmospheric nitrogen deposition

4.1.3 Where present, current and relevant, existing evidence and stakeholder knowledge will be drawn upon to inform the Habitats Regulations Assessment of the Local Plan. The following discussion identifies existing evidence and includes a summary of its relevance to the District HRA.

4.1.4 Since leaving the EU (and thus the EUs network of internationally important wildlife sites, Natura 2000) the government has focussed greater attention on the fact that the UKs internationally important wildlife sites are also part of the Bern Convention Emerald Network. All English Emerald Network Sites (SPA and SAC sites), have Site Improvement Plans produced for them by Natural England. These documents identify existing pressures and threats to a designated site and have been used as a basis for this scoping report. At the same time, some of the Site Improvement Plans are several years old and therefore more recent Supplementary Advice for conservation objectives has also been used where available.

## 4.2 Recreational Pressure

4.2.1 There is concern over the cumulative impacts of recreation on key nature conservation sites in the UK, as most sites must fulfil conservation objectives while also providing recreational opportunity. Various research reports have provided compelling links between changes in housing and access levels<sup>17</sup>, and impacts on Habitats Sites<sup>18 19</sup>. This applies to any habitat, but recreational pressure from housing growth is of particular significance for Habitats Sites. Different Habitats 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. HRAs of planning documents tend to focus on recreational sources of

<sup>17</sup> Weitowitz D.C., Panter C., Hoskin R. & Liley D. (2019). The effect of urban development on visitor numbers to nearby protected nature conservation sites. *Journal of Urban Ecology* 5. <https://doi.org/10.1093/jue/iuz019>

<sup>18</sup> Liley D, Clarke R.T., Mallord J.W., Bullock J.M. (2006a). The effect of urban development and human disturbance on the distribution and abundance of nightjars on the Thames Basin and Dorset Heaths. Natural England / Footprint Ecology.

<sup>19</sup> Liley D., Clarke R.T., Underhill-Day J., Tyldesley D.T. (2006b). Evidence to support the appropriate Assessment of development plans and projects in south-east Dorset. Footprint Ecology / Dorset County Council.

disturbance due to new residents<sup>20</sup>. Housing developments within the LP will need to strongly consider their impact on Emerald Network sites. Mitigation already in consideration for a number of the Habitats Sites listed in section 3 of this report is discussed further in section 6.

## Trampling Damage, Nutrient Enrichment and Wildfires

4.2.2 Most terrestrial habitats (especially heathland, woodland and dune systems) can be affected by trampling and other mechanical damage. This dislodges individual plants, leads to soil compaction and erosion. The following studies have assessed the impact of trampling associated with different recreational activities in different habitats:

- Wilson & Seney<sup>21</sup> examined the degree of track erosion caused by hikers, motorcyclists, horse riders and cyclists in 108 plots along tracks in the Gallatin National Forest, Montana. Although the results proved difficult to interpret, it was concluded that horses and hikers disturbed more sediment on wet tracks, and therefore caused more erosion, than motorcycles and bicycles.
- Cole et al<sup>22</sup> conducted experimental off-track trampling in 18 closed forest, dwarf scrub and meadow & grassland communities (each trampled between 0 – 500 times) over five mountain regions in the US. Vegetation cover was assessed two weeks and one year after trampling, and an inverse relationship with trampling intensity was discovered, although this relationship was weaker after one year than two weeks indicating some recovery of the vegetation. Differences in plant morphology (structure) was found to explain more variation in response than soil and topographic factors. Low-growing, mat-forming grasses regained their cover best after two weeks and were considered most resistant to trampling, while tall forbs (non-woody vascular plants other than grasses, sedges, rushes and ferns) were considered least resistant. The cover of hemicryptophytes (plants with buds at or near the soil surface) and geophytes (plants with buds below the soil surface) was heavily reduced after two weeks but had recovered well after one year. These were therefore considered most resilient to trampling. Chamaephytes (plants with buds above the soil surface) were least resilient to trampling. It was concluded that these would be the least tolerant of a regular cycle of disturbance.
- Cole<sup>23</sup> conducted a follow-up study (across four vegetation types) in which shoe type (trainers or walking boots) and trampling weight were varied. Although immediate damage was greater with walking boots, there was no significant difference after one year. Heavier trampers caused a greater

<sup>20</sup> The RTP1 report 'Planning for an Ageing Population' (2004) which states that 'From being a marginalised group in society, the elderly are now a force to be reckoned with and increasingly seen as a market to be wooed by the leisure and tourist industries. There are more of them and generally they have more time and more money.' It also states that 'Participation in most physical activities shows a significant decline after the age of 50. The exceptions to this are walking, golf, bowls and sailing, where participation rates hold up well into the 70s'.

<sup>21</sup> Wilson, J.P. & J.P. Seney. (1994). Erosional impact of hikers, horses, motorcycles and off-road bicycles on mountain trails in Montana. *Mountain Research and Development* **14**:77-88

<sup>22</sup> Cole, D.N. (1995a). Experimental trampling of vegetation. I. Relationship between trampling intensity and vegetation response. *Journal of Applied Ecology* **32**: 203-214

Cole, D.N. (1995b). Experimental trampling of vegetation. II. Predictors of resistance and resilience. *Journal of Applied Ecology* **32**: 215-224

<sup>23</sup> Cole, D.N. (1995c). Recreational trampling experiments: effects of trampler weight and shoe type. Research Note INT-RN-425. U.S. Forest Service, Intermountain Research Station, Utah.

reduction in vegetation height than lighter trampers, but there was no differential impact on vegetation cover.

- Cole & Spildie<sup>24</sup> experimentally compared the effects of off-track trampling by hikers and horse riders (at two intensities – 25 and 150 passes) in two woodland vegetation types (one with an erect forb understorey and one with a low shrub understorey). Horse trampling was found to cause the largest reduction in vegetation cover. The forb-dominated vegetation suffered greatest disturbance but recovered rapidly. Generally, it was shown that higher trampling intensities caused more disturbance.

4.2.3 A major concern for nutrient-poor terrestrial habitats (e.g., heathlands, sand dunes, bogs and fens) is nutrient enrichment associated with dog fouling (addressed in various reviews<sup>25</sup>). It is estimated that dogs will defecate within 10 minutes of starting a walk and therefore most nutrient enrichment arising from dog faeces will occur within 400m of a site entrance. In contrast, dogs will urinate at frequent intervals during a walk, resulting in a more spread out distribution of urine. For example, in Burnham Beeches National Nature Reserve it is estimated that 30,000 litres of urine and 60 tonnes of dog faeces are deposited annually<sup>26</sup>. While there is limited information on the chemical constituents of dog faeces, nitrogen is one of the main components<sup>27</sup>. Nutrient availability is the major determinant of plant community composition and the effect of dog defecation in sensitive habitats is comparable to a high-level application of fertiliser, potentially resulting in a shift towards plant communities that are more typical of improved grasslands.

## Summary

4.2.4 Chilterns Beechwoods SAC is designated for habitats and species that are sensitive to recreational pressure. A likely increase in residential development across the District will lead to an increase in the local population and demand for access to outdoor spaces. The HRA process needs to adequately assess potential recreational pressure effects of the Plan on this Habitats Site.

4.2.5 At its closest, the Chilterns Beechwoods SAC is located c. 7.3km from the District boundary. Chilterns Beechwoods SAC (maximum core catchment for recreational pressure to this SAC is 12.6km), and as such this impact pathway will require further consideration within this HRA

## 4.3 Functionally Linked Habitat

4.3.1 Chilterns Beechwoods SAC is designated for its population of stag beetle. Adult stag beetles do not feed, and die shortly after mating, so colony persistence is associated with continued presence of larval dead wood habitat. Colonization of new nest sites is dependent on both reproductive female presence and availability of deadwood habitat for the larvae. In radio-telemetry studies of stag beetle dispersal, the maximum female dispersal distance for an adult female was 727 m from her point of emergence. However, once they

<sup>24</sup> Cole, D.N., Spildie, D.R. (1998). Hiker, horse and llama trampling effects on native vegetation in Montana, USA. *Journal of Environmental Management* 53: 61-71

<sup>25</sup> Taylor K., Anderson P., Taylor R.P., Longden K. & Fisher P. (2005). Dogs, access and nature conservation. English Nature Research Report, Peterborough.

<sup>26</sup> Barnard A. (2003). Getting the facts – Dog walking and visitor number surveys at Burnham Beeches and their implications for the management process. *Countryside Recreation* 11:16-19.

<sup>27</sup> Taylor K., Anderson P., Liley D. & Underhill-Day J.C. (2006). Promoting positive access management to sites of nature conservation value: A guide to good practice. English Nature / Countryside Agency, Peterborough and Cheltenham.

have mated, female stag beetles generally return to the spot where they emerged to lay their eggs<sup>28</sup>. This behaviour limits stag beetle dispersal and means stag beetle populations from an SAC will be largely restricted to that SAC.

4.3.2 At its closest, the Chilterns Beechwoods SAC is located c. 7.3km from the District boundary. Due to the distance involved, this impact pathway is scoped out from further consideration.

## 4.4 Atmospheric Pollution (Nitrogen and Ammonia Deposition)

4.4.1 The main pollutants of concern for Habitats Sites are oxides of nitrogen (NO<sub>x</sub>), ammonia (NH<sub>3</sub>) and sulphur dioxide (SO<sub>2</sub>), and these are summarised in Table 4. Ammonia can have a directly toxic effect upon vegetation, particularly at close distances to the source such as near road verges<sup>29</sup>. NO<sub>x</sub> can also be toxic at very high concentrations (far above the annual average Critical Level). NO<sub>x</sub> and NH<sub>3</sub> both contribute to the total N deposition to soils, potentially leading to deleterious knock-on effects in resident ecosystems. Increases in nitrogen deposition from the atmosphere can, if sufficiently great, enhance soil fertility and lead to eutrophication. This often has adverse effects on community composition and quality of semi-natural, nitrogen-limited terrestrial and aquatic habitats<sup>30 31</sup>.

**Table 1: Main sources and effects of air pollutants on habitats and species<sup>32</sup>**

Pollutant	Source	Effects on habitats and species
Sulphur Dioxide (SO <sub>2</sub> )	The main sources of SO <sub>2</sub> are electricity generation, and industrial and domestic fuel combustion. However, total SO <sub>2</sub> emissions in the UK have decreased substantially since the 1980's. Another origin of sulphur dioxide is the shipping industry and high atmospheric concentrations of SO <sub>2</sub> have been documented in busy ports. In future years shipping is likely to become one of the most important contributors to SO <sub>2</sub> emissions in the UK.	Wet and dry deposition of SO <sub>2</sub> acidifies soils and freshwater, and may alter the composition of plant and animal communities. The magnitude of effects depends on levels of deposition, the buffering capacity of soils and the sensitivity of impacted species. However, SO <sub>2</sub> background levels have fallen considerably since the 1970's and are now not regarded a threat to plant communities. For example, decreases in Sulphur dioxide concentrations have been linked to returning lichen species and improved tree health in London.
Acid deposition	Leads to acidification of soils and freshwater via atmospheric deposition of SO <sub>2</sub> , NO <sub>x</sub> , ammonia and	Gaseous precursors (e.g. SO <sub>2</sub> ) can cause direct damage to sensitive

<sup>28</sup> <https://ptes.org/campaigns/stag-beetles/stag-beetle-facts/>

<sup>29</sup> [http://www.apis.ac.uk/overview/pollutants/overview\\_NOx.htm](http://www.apis.ac.uk/overview/pollutants/overview_NOx.htm).

<sup>30</sup> Wolseley, P. A.; James, P. W.; Theobald, M. R.; Sutton, M. A. (2006). Detecting changes in epiphytic lichen communities at sites affected by atmospheric ammonia from agricultural sources. *Lichenologist* **38**: 161-176.

<sup>31</sup> Dijk, N. (2011). Dry deposition of ammonia gas drives species change faster than wet deposition of ammonium ions: evidence from a long-term field manipulation. *Global Change Biology* **17**: 3589-3607.

<sup>32</sup> Information summarised from the Air Pollution Information System (<http://www.apis.ac.uk/>).

Pollutant	Source	Effects on habitats and species
	hydrochloric acid. Acid deposition from rain has declined by 85% in the last 20 years, which most of this contributed by lower sulphate levels.	vegetation, such as lichen, upon deposition. Can affect habitats and species through both wet (acid rain) and dry deposition. The effects of acidification include lowering of soil pH, leaf chlorosis, reduced decomposition rates, and compromised reproduction in birds / plants. Not all sites are equally susceptible to acidification. This varies depending on soil type, bed rock geology, weathering rate and buffering capacity. For example, sites with an underlying geology of granite, gneiss and quartz rich rocks tend to be more susceptible.
Ammonia (NH <sub>3</sub> )	Ammonia is a reactive, soluble alkaline gas that is released following decomposition and volatilisation of animal wastes. It is a naturally occurring trace gas, but ammonia concentrations are directly related to the distribution of livestock. It is also emitted from some vehicles. Ammonia reacts with acid pollutants such as the products of SO <sub>2</sub> and NO <sub>x</sub> emissions to produce fine ammonium (NH <sub>4</sub> <sup>+</sup> ) - containing aerosol. Due to its significantly longer lifetime, NH <sub>4</sub> <sup>+</sup> may be transferred much longer distances (and can therefore be a significant trans-boundary issue). While ammonia deposition may be estimated from its atmospheric concentration, the deposition rates are strongly influenced by meteorology and ecosystem type.	The negative effect of NH <sub>4</sub> <sup>+</sup> may occur via direct toxicity, when uptake exceeds detoxification capacity and via N accumulation. Its main adverse effect is eutrophication, leading to species assemblages that are dominated by fast-growing and tall species. For example, a shift in dominance from heath species (lichens, mosses) to grasses is often seen. As emissions mostly occur at ground level in the rural environment and NH <sub>3</sub> is rapidly deposited, some of the most acute problems of NH <sub>3</sub> deposition are for small relict nature reserves located in intensive agricultural landscapes.
Nitrogen oxides (NO <sub>x</sub> )	Nitrogen oxides are mostly produced in combustion processes. Half of NO <sub>x</sub> emissions in the UK derive from motor vehicles, one quarter from power stations and the rest from other industrial and domestic combustion processes. In contrast to the steep decline in Sulphur dioxide emissions, nitrogen oxides are falling slowly due to control	Direct toxicity effects of gaseous nitrates are likely to be important in areas close to the source (e.g. roadside verges). A critical level of NO <sub>x</sub> for all vegetation types has been set to 30 ug/m <sup>3</sup> . Deposition of nitrogen compounds (nitrates (NO <sub>3</sub> ), nitrogen dioxide (NO <sub>2</sub> ) and nitric acid (HNO <sub>3</sub> )) contributes to the total nitrogen

Pollutant	Source	Effects on habitats and species
	strategies being offset by increasing numbers of vehicles.	deposition and may lead to both soil and freshwater acidification. In addition, NO <sub>x</sub> contributes to the eutrophication of soils and water, altering the species composition of plant communities at the expense of sensitive species.
Nitrogen deposition	The pollutants that contribute to the total nitrogen deposition derive mainly from oxidized (e.g. NO <sub>x</sub> ) or reduced (e.g. NH <sub>3</sub> ) nitrogen emissions (described separately above). While oxidized nitrogen mainly originates from major conurbations or highways, reduced nitrogen mostly derives from farming practices. The N pollutants together are a large contributor to acidification (see above).	All plants require nitrogen compounds to grow, but too much overall N is regarded as the major driver of biodiversity change globally. Species-rich plant communities with high proportions of slow-growing perennial species and bryophytes are most at risk from N eutrophication. This is because many semi-natural plants cannot assimilate the surplus N as well as many graminoid (grass) species. N deposition can also increase the risk of damage from abiotic factors, e.g. drought and frost.
Ozone (O <sub>3</sub> )	A secondary pollutant generated by photochemical reactions involving NO <sub>x</sub> , volatile organic compounds (VOCs) and sunlight. These precursors are mainly released by the combustion of fossil fuels (as discussed above). Increasing anthropogenic emissions of ozone precursors in the UK have led to an increased number of days when ozone levels rise above 40ppb ('episodes' or 'smog'). Reducing ozone pollution is believed to require action at international level to reduce levels of the precursors that form ozone.	Concentrations of O <sub>3</sub> above 40 ppb can be toxic to both humans and wildlife, and can affect buildings. High O <sub>3</sub> concentrations are widely documented to cause damage to vegetation, including visible leaf damage, reduction in floral biomass, reduction in crop yield (e.g. cereal grains, tomato, potato), reduction in the number of flowers, decrease in forest production and altered species composition in semi-natural plant communities.

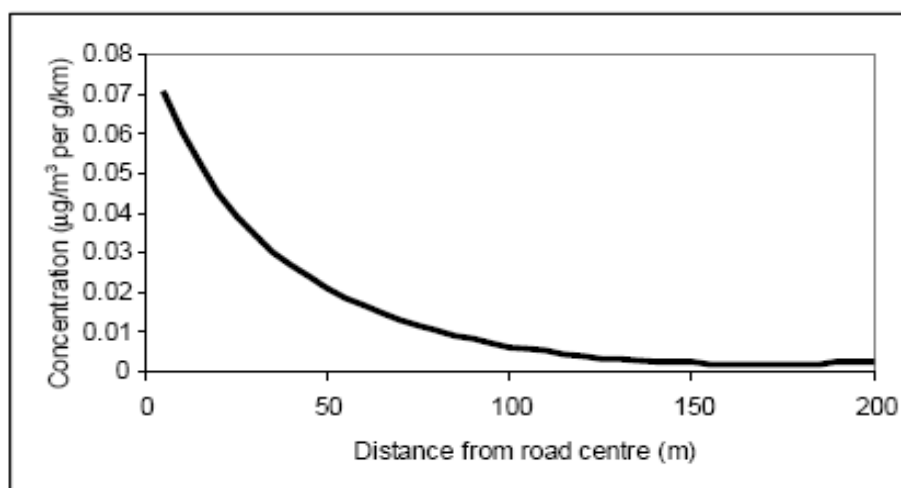
4.4.2 Sulphur dioxide emissions overwhelmingly derive from power stations and industrial processes that require the combustion of coal and oil, as well as (particularly on a local scale) shipping<sup>33</sup>. As such, it can be excluded that material increases in SO<sub>2</sub> emissions will not be associated with this HRA. In contrast, NO<sub>x</sub> emissions are dominated by the output of vehicle exhausts (more than half of all emissions). A 'typical' housing development will contribute by far the largest portion of its overall NO<sub>x</sub> footprint (92%) through associated road traffic. Other sources, although relevant, are of minor

<sup>33</sup> [http://www.apis.ac.uk/overview/pollutants/overview\\_SO2.htm](http://www.apis.ac.uk/overview/pollutants/overview_SO2.htm).

importance (8%) in comparison<sup>34</sup>. Emissions of ammonia can also be linked to traffic although vehicles are not the major source. Therefore, emissions of NOx and ammonia can reasonably be expected to increase primarily due to an increase in the volume of commuter traffic associated with housing growth.

4.4.3 The World Health Organisation has the following critical thresholds for plant communities: The critical NOx concentration (also known as the Critical Level) for the protection of vegetation is 30  $\mu\text{g}/\text{m}^3$ , that for vascular plants for ammonia is 3  $\mu\text{g}/\text{m}^3$  and the threshold for sulphur dioxide is 20  $\mu\text{g}/\text{m}^3$ . Additionally, ecological studies have determined 'Critical Loads'<sup>35</sup> of atmospheric nitrogen deposition (that is, NOx combined with ammonia NH<sub>3</sub>). Natural England has published guidance regarding the early stages of air quality impact assessment<sup>36</sup>.

4.4.4 According to Design Manual for Roads and Bridges Volume LA105 (Air Quality)<sup>37</sup>, beyond 200m, the contribution of vehicle emissions from the roads to local pollution levels is insignificant. Therefore, this distance has been used throughout this HRA to determine whether Likely Significant Effects (LSEs) on sensitive Habitats Sites may arise due to implementation of the Plan.



**Figure 3 Schematic representation of the reduction in traffic contribution to concentrations of pollutants at different distances from a road**

4.4.5 Chilterns Beechwoods SAC is the only European site located within 10km of the District boundary and is sensitive to an increase in atmospheric pollution, primarily as a result of an increased number of commuter journeys due to residential development. As such this impact pathway will be considered further within this HRA.

<sup>34</sup> Proportions calculated based upon data presented in Dore CJ et al. 2005. UK Emissions of Air Pollutants 1970 – 2003. UK National Atmospheric Emissions Inventory. <http://www.airquality.co.uk/archive/index.php> [Accessed on the 21/10/2021]

<sup>35</sup> The critical load is the rate of deposition beyond which research indicates that adverse effects can reasonably be expected to occur.

<sup>36</sup> [Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations - NEA001](#)

<sup>37</sup> <https://www.standardsforhighways.co.uk/prod/attachments/10191621-07df-44a3-892e-c1d5c7a28d90?inline=true> [Accessed 23/01/23]

## 5. Existing Strategic Mitigation Solutions and Future Opportunities

### 5.1 Chilterns Beechwoods SAC

- 5.1.1 Chilterns Beechwoods SAC is located within Dacorum Borough Council. To support the planning of development within Dacorum, the Council commissioned a Topic Paper for the Chilterns Beechwoods SAC: A Summary / overview of available evidence<sup>38</sup>. Following the provision of the Topic Paper, a significant number of surveys and additional work was undertaken at two fragments of the SAC: Ashridge Commons and Woods SSSI (located c 7.3km from the District boundary) and Tring Woodlands SSSI (located c 16.5km from the District boundary). This included further Ecological surveys, Visitor Survey and Identification of Potential Impacts of Recreation and Conservation/Management/Mitigation Plans. These concluded that recreation has a range of impacts on the SAC qualifying features, particularly at Ashridge Commons and Woods. The research also identified a core recreational Zone of Influence (ZOI) or 12.6km from the SAC (Ashridge Commons & Woods SSSI only).
- 5.1.2 The National Trust have instigated a range of measures at the site already including logs to minimise and control levels of verge parking along the public highway, path edging and dead hedging to contain access and demarcation of parking bays along Monument Drive. The Topic paper and mitigation strategy concluded that despite these measures, impacts are widespread and recreation pressure is impacting the integrity of Ashridge Commons and Woods.
- 5.1.3 On the basis of the evidence as summarised in the reports, housing growth will result in further damage to this part of the Chilterns Beechwoods SAC. For this reason, avoidance or mitigation measures are required for new residential development and some other forms of development within a Zone of Influence (Zoi) around the Chilterns Beechwoods SAC at Ashridge Commons and Woods SSSI.
- 5.1.4 At a meeting held on 15 November 2022, Dacorum Council's Cabinet approved the Chilterns Beechwoods Special Area of Conservation Mitigation Strategy which is targeted specifically at Ashridge Commons & Woods SSSI. Based on current survey data, Ashridge Commons & Woods SSSI is the most heavily recreationally used part of the SAC. Dacorum Council also approved two Suitable Alternative Natural Greenspace (SANG) Management Plans in Dacorum District for Bunkers Park and Chipperfield Common<sup>39</sup>. This process set the background against which surrounding local authorities within the affected area around Chilterns Beechwoods SAC will address the issue.
- 5.1.5 In addition to SANG, the Dacorum Mitigation Strategy sets out targeted measures to protect the site. This will enable it to accommodate the predicted

<sup>38</sup> Dacorum Borough Council 2020. Topic Paper for the Chilterns Beechwoods SAC – A Summary/overview of available evidence. [https://www.dacorum.gov.uk/docs/default-source/strategic-planning/topic-paper-for-the-chilterns-beechwoods-sac---summary-of-evidence.pdf?sfvrsn=d9da0c9e\\_4](https://www.dacorum.gov.uk/docs/default-source/strategic-planning/topic-paper-for-the-chilterns-beechwoods-sac---summary-of-evidence.pdf?sfvrsn=d9da0c9e_4) [accessed 28/06/2023]

<sup>39</sup> Dacorum Borough Council 2022 <https://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning/new-single-local-plan/chilterns-beechwoods-special-area-of-conservation> [accessed 28/06/2023]



pressures associated with future growth within the 12.6 km recreational catchment zone that extends around Ashridge Commons and Woods SSSI. These measures will be delivered through a range of projects by the National Trust over a period of around 80 years (to 2102-2103)<sup>40</sup>. The National Trust has also confirmed that these Strategic Access Management and Monitoring (SAMMS) measures will cost a total of £18.2 million. This cost will be shared across all of the affected local authorities, including the District.

- 5.1.6 To help to reduce recreational pressure on Ashridge Commons and Woods SSSI, alternative green spaces therefore need to be identified. All new developments within the 12.6km Zone of Influence will need to make provision for a new SANG, or alternatively contribute towards the maintenance of a suitable SANG project elsewhere. Larger developments (10 or more new homes) must be located close to a suitable SANG. Smaller developments could contribute towards an existing SANG. Developers that are unable to provide a suitable new SANG would be required to make a payment towards the long-term management and maintenance of strategic SANG sites, per new home.
- 5.1.7 The District has so far published details on their website regarding the Chiltern Beechwoods SAC<sup>41</sup>. The Council website refers to the need for future residential development within the Zone of Influence (12.6km) to meet '*tests... before planning approvals*'. The District's website refers to the lead authority's (Dacorum Council) website<sup>42</sup>.
- 5.1.8 Any net new residential development within the 12.6 km recreational catchment around Chilterns Beechwoods SAC (which encompasses the following local authorities: Dacorum, Buckinghamshire, Central Bedfordshire, St Albans, Three Rivers District and Luton), will be required to provide strategic avoidance and mitigation measures as detailed above.

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<sup>40</sup> Dacorum Borough Council; Buckinghamshire Council; Central Bedfordshire Council; St. Albans City and District Council 2022. Chilterns Beechwoods Special Area of Conservation Mitigation Strategy for Ashridge Commons and Woods Site of Special Scientific Interest.

<sup>41</sup> [Chilterns Beechwoods SAC | St Albans City and District Council](#) [accessed 28/06/2023]

<sup>42</sup> [Chilterns Beechwoods Special Area of Conservation \(dacorum.gov.uk\)](#) [accessed 28/06/2023]

## 6. Test of Likely Significant Effects

6.1.1 The full Test of Likely Significant Effects is undertaken in Appendix B. This section provides a summary of the Test of Likely Significant Effects Assessment provided in Appendix B. Note that, to comply with case law, the Test of Likely Significant Effects does not take account of the strategic recreational pressure mitigation strategy identified in Section 5 above.

### 6.2 In Isolation Assessment

6.2.1 Due to the distances involved from LP policies/ allocations to Chilterns Woodlands SAC (c.7.3km), it is considered that all impact pathways can be screened out from resulting in likely significant affects in isolation. Further discussions are continued below in relation to the in combination assessment.

### 6.3 In Combination Assessment

#### LP Policies

6.3.1 The Test of Likely Significant Effects for the LP Policies undertaken in Appendix B identified the following policies that could potentially result in a linking impact pathways to the SAC and thus result in a Likely Significant Effect:

- Strategic Policy SP1: A Spatial Strategy for St Albans District. Whilst much of this policy supports development, it identifies a quantum of housing to be delivered to 2041 (at least 15,096 net new dwellings; 888 per annum). Potential linking impact pathway(s): recreational pressure and atmospheric pollution.
- Strategic Policy SP3 – Land and the Green Belt. This policy identifies the Council’s commitment to delivering at least 15,096 net new dwellings; 888 per annum to 2041 and to increase overall floorspace in the District. Potential linking impact pathway(s): recreational pressure and atmospheric pollution.
- Policy LG2 – Support for Transformation of Hemel Hempstead. This policy identifies the Council’s commitment to delivering at least 4,750 net new homes during the plan period in land surrounding Hemel Hempstead (Hemel Garden Communities). Potential linking impact pathway(s): recreational pressure and atmospheric pollution.
- HOU7 – Gypsies, Travellers and Travelling Show People. This policy provides for accommodation of Gypsies, Travellers and Travelling Showpeople within the 12.6km core recreational ZOI. Potential linking impact pathway(s): recreational pressure and atmospheric pollution.
- Strategic Policy SP5 - Employment and the Local Economy. This policy provides for 55ha of employment land at East Hemel Hempstead (Central) and 33.16ha Strategic Rail Freight Interchange. It also identifies that the Policies Map allocates new employment sites. Potential linking impact pathway(s): atmospheric pollution.

## LP Allocations

6.3.2 The Test of Likely Significant Effects of the LP Allocations identified nine allocations for residential development are located within the 12.6km core recreational ZOI and that these could result in a Likely Significant Effect upon the SAC in combination. These are:

- B3 - West Redbourn, Redbourn, AL3 7HZ
- H3 & H4 - East Hemel Hempstead (Central and South)
- M6 - South of Harpenden Lane, Redbourn, AL3 7RQ
- M16 - Falconers Field, Harpenden, AL5 3ES
- M7 - Townsend Lane, Harpenden, AL5 2RH
- H1 - North Hemel Hempstead, AL3 7AU
- H2 - East Hemel Hempstead (North), HP2 7HT
- UC33 - Land Rear of 53 Snatchup, Redbourn, AL3 7HF

6.3.3 Due to their location, there is potential for the residential allocations identified above to result in an increase in recreational pressure on the SAC in combination with other projects and plans and as such appropriate assessment is undertaken.

## 7. Appropriate Assessment

### 7.1 Recreational Pressure

- 7.1.1 Strategic Policy SP1: A Spatial Strategy for St Albans District, Strategic Policy SP3 – Land and the Green Belt, Policy LG2 – Support for Transformation of Hemel Hempstead, and Policy HOU7 – Gypsies, Travellers and Travelling Show People, and allocations B3, H3&H4, M6, M16, M7, H1 and UC33 all provide for new residential development within the 12.6km core recreational ZOI and as such could provide a linking impact pathway to Chilterns Beechwoods SAC via increased recreational pressure (in combination) as a result of increased population living in the new dwellings provided by the LP. No further analysis is necessary or possible given the strategic work already undertaken. Rather the focus of appropriate assessment needs to be on mitigation.
- 7.1.2 Paragraph 10.11 of the LP of the LP acknowledges this issue. It states:
- 7.1.3 *'10.11 An assessment of the Chiltern Beechwoods Special Area of Conservation (SAC) by Dacorum Borough Council in 2022 revealed that more action is needed to help protect Ashridge Estate on the Hertfordshire-Buckinghamshire border, and Tring Woodlands, which are under increasing visitor pressure from the surrounding areas. If nothing is done, new development will lead to further visitor pressures and damage to the integrity of the SAC. A buffer Zone of Influence of 12.6km around this covers part of St Albans District, and the Council is legally required not to issue decisions within this buffer until appropriate mitigation is secured through a Mitigation Strategy. A key element in the Mitigation Strategy will be the identification and/ or creation of Suitable Alternative Natural Greenspace (SANG) to draw people away from using the SAC.'*
- 7.1.4 All allocations located within the 12.6km core recreational ZOI include text that acknowledges the relevance of the ZOI by stating *'Appropriate contributions must be made towards the Strategic Access Management and Monitoring Strategy (SAMMS). Development proposals will also need to make provision for a new Suitable Alternative Natural Greenspace (SANG), or alternatively contribute towards the maintenance of a suitable SANG project elsewhere.'*
- 7.1.5 In addition, suitable policy wording of the Draft Local Plan is included within Policy SP10 to ensure that any windfall development that falls within the 12.6km core recreational ZOI does not result in a likely significant effect and also adheres to the forthcoming Mitigation Strategy.
- 7.1.6 Policy SP10 states:
- 'To ensure the protection and improvement of the District's green infrastructure and the wider natural environment, development proposals are required to: ...*
- f) Make appropriate contributions towards the Strategic Access Management and Monitoring Strategy (SAMMS), where the proposal is for additional housing within the Chilterns Beechwoods Special Area of Conservation (CBSAC) Zone of Influence (ZOI). Such development proposals will also need to make provision for a new Suitable Alternative Natural Greenspace (SANG),*

*or alternatively contribute towards the maintenance of a suitable SANG project elsewhere.'*

- 7.1.7 At this stage it is premature to draw a definitive conclusion as to whether adverse effects on the integrity of European sites can be avoided. This is because no strategic mitigation strategy as yet exists to address impacts on Chilterns Beechwoods SAC. While large developments may well be able to deliver their own effective mitigation, smaller developments will need to contribute to a strategic solution. However, provided such a mitigation strategy is devised prior to submission of this Local Plan for Examination, it is considered that the above policy wording would be sufficient to avoid adverse effects on integrity.

## **7.2 Atmospheric Pollution**

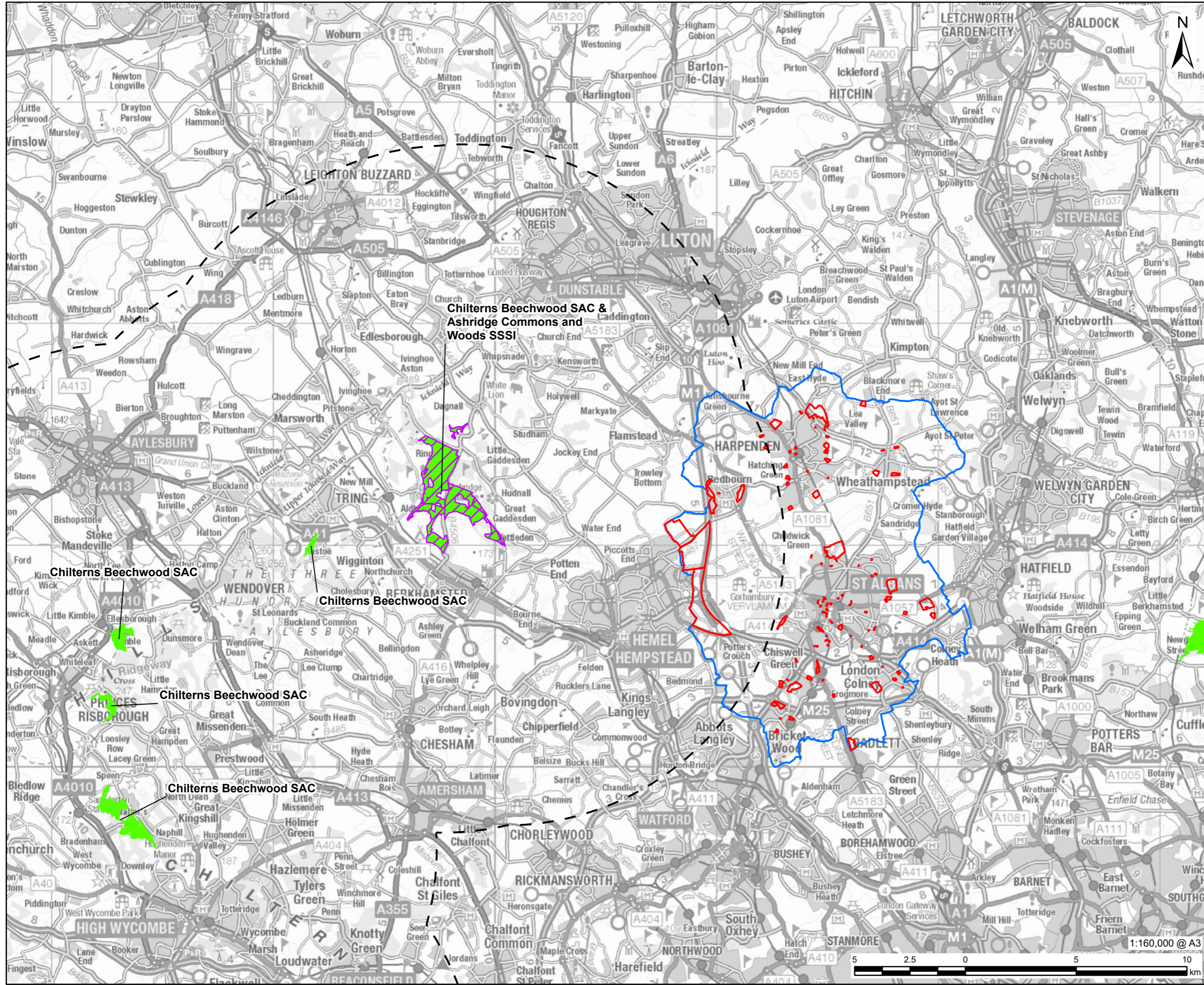
- 7.2.1 The closest portion of the Chilterns Beechwoods SAC to the District is Ashridge Commons and Woods SSSI (located c 7.3km from the District boundary). Most traffic movements associated with a Local Plan are from journeys to and from work. There are no key road routes within 200m of the SAC that would be used by residents of St Albans and District for regular journeys to work, and as such it is not considered that any additional traffic flows resulting from the LP will result in increased nitrogen levels within this portion of the SAC and as such it will not result in a likely significant effect.
- 7.2.2 The next closest portion of the Chilterns Beechwoods SAC to the District is Tring Woodlands SSSI (located c 16.5km from the District boundary). This SSSI does lie within 200m of a key road (c.100m), the A41. However, the average vehicle commuting distance of a UK resident is approx. 10km and beyond this distance traffic has generally dispersed across the network. As such the Tring Woodland SSSI is located beyond this distance. Due the large distance involved, it is considered that the LP would not result in an increase in traffic flows (and thus atmospheric nitrogen deposition) on the A41 at Tring Woodland SSSI. As such atmospheric pollution is not considered to be a realistic linking impact pathway between the LP and Chilterns Woodlands SAC. It is considered that this impact pathway would not result in an adverse effect on integrity even in combination with other project and plans.

## 8. Conclusion

- 8.1.1 A single realistic linking impact pathway between the LP and a Habitats Site was identified. This was recreational pressure (in combination) on Chilterns Beechwoods.
- 8.1.2 Paragraph 10.11 of the LP identifies the need for mitigation to ensure that no adverse effects upon the SAC result (in combination).
- 8.1.3 An assessment of the Chiltern Beechwoods Special Area of Conservation (SAC) by Dacorum Borough Council in 2022 revealed that more action is needed to help protect Ashridge Estate on the Hertfordshire-Buckinghamshire border, and Tring Woodlands, which are under increasing visitor pressure from the surrounding areas. If nothing is done, new development will lead to further visitor pressures and damage to the integrity of the SAC. A buffer Zone of Influence of 12.6km around this covers part of St Albans District, and the Council is legally required not to issue decisions within this buffer until appropriate mitigation is secured through a Mitigation Strategy. A key element in the Mitigation Strategy will be the identification and/ or creation of Suitable Alternative Natural Greenspace (SANG) to draw people away from using the SAC.'
- 8.1.4 All allocations located within the 12.6km core recreational ZOI include text that identifies that they are located within the core recreational ZOI and that... *'Appropriate contributions must be made towards the Strategic Access Management and Monitoring Strategy (SAMMS). Development proposals will also need to make provision for a new Suitable Alternative Natural Greenspace (SANG), or alternatively contribute towards the maintenance of a suitable SANG project elsewhere.'*
- 8.1.5 The Local Plan contains suitable policy wording to ensure that any allocations and any windfall development that falls within the 12.6km core recreational ZOI does not result in a likely significant effect and also adheres to the forthcoming Mitigation Strategy.
- 8.1.6 At this stage it is premature to draw a definitive conclusion as to whether adverse effects on the integrity of European sites can be avoided. This is because no strategic mitigation strategy as yet exists to address impacts on Chilterns Beechwoods SAC. While large developments may well be able to deliver their own effective mitigation, smaller developments will need to contribute to a strategic solution. However, provided such a mitigation strategy is devised prior to submission of this Local Plan for Examination, it is considered that the above policy wording would be sufficient to avoid adverse effects on integrity.

# Appendix A Location of Site Allocations and Habitats Sites

**Figure A1 – Location of Habitats Sites and the 12.6km core recreational ZOI**



**PROJECT**  
HRA of the St Albans City and District Local Plan

**CLIENT**  
St Albans City and District Council

**CONSULTANT**  
AECOM Limited  
5th Floor  
2 City Walk  
Leeds, LS11 9AR  
www.aecom.com

- LEGEND**
- ▭ Site Allocation
  - ▭ St. Albans City and District Council Boundary
  - 12.6km Recreational Zone of Influence
  - Site of Special Scientific Interest (SSSI)
  - Special Area of Conservation (SAC)

**NOTES**  
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Note: Site Allocation ID's displayed on Figure A2

**ISSUE PURPOSE**  
FINAL

**PROJECT NUMBER**  
60667196

**FIGURE TITLE**  
European Sites

**FIGURE NUMBER**  
A1

1:160,000 @ A3



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## **Figure A2 Location of Site Allocations and the 12.6km core recreational ZOI**



# Appendix B LP Test of Likely Significant Effects

## B.1 LP Policies Test of Likely Significant Effects

**Table 2: LP Policies Test of Likely Significant Effects**

8.1.7 Where the HRA Implications cell is coloured **green**, this means that there is no potential for a linking impact pathway between the policy and a Habitats Site; there **is no potential for Likely Significant Effect**, and thus it will not be discussed further within the report. Where the HRA Implications cell is coloured **orange**, this means that there is potential for a linking impact pathway between the policy and a Habitats Site; there **is potential for Likely Significant Effect**, and thus it has been discussed further within the report.

Policy Reference	HRA Implications
<b>Strategic Policy SP1: A Spatial Strategy for St Albans District</b>	<p>Potential for Likely Significant Effect.</p> <p>Whilst much of this policy supports development, it identifies a quantum of housing to be delivered to 2041 (at least 15,096 net new dwellings; 888 per annum).</p> <p>Potential linking impact pathways are recreational pressure, and atmospheric pollution.</p>
<b>Strategic Policy SP2 – Responding to the Climate Emergency</b>	<p>No.</p> <p>This is a development management policy relating to responding to the climate emergency. There are no realistic linking impact pathways present.</p>
<b>CE1 - Promoting Sustainable Design, Construction and Building Efficiency</b>	<p>No.</p> <p>This is a development management policy relating to promoting sustainable design, construction and building efficiency. There are no realistic linking impact pathways present.</p>
<b>CE2 - Renewable and Low Carbon Energy</b>	<p>No.</p>

	<p>This is a development management policy relating to renewable and low carbon energy. There are no realistic linking impact pathways present.</p>
<b>CE3 - Carbon Offsetting</b>	<p>No.</p> <p>This is a development management policy relating to carbon offsetting. There are no realistic linking impact pathways present.</p>
<b>Strategic Policy SP3 – Land and the Green Belt</b>	<p>Potential for Likely Significant Effect.</p> <p>This policy identifies the Council’s commitment to delivering at least 15,096 net new dwellings; 888 per annum to 2041 and to increase overall floorspace in the District.</p> <p>Potential linking impact pathways are recreational pressure, and atmospheric pollution.</p>
<b>LG1 – Broad Locations</b>	<p>No.</p> <p>This is a development management policy relating to broad locations of development. There are no realistic linking impact pathways present.</p>
<b>Policy LG2 – Support for Transformation of Hemel Hempstead</b>	<p>Potential for Likely Significant Effect.</p> <p>This policy identifies the Council’s commitment to delivering at least 4,750 net new homes during the plan period in land surrounding Hemmel Hempstead (Hemel Garden Communities).</p> <p>Potential linking impact pathways are recreational pressure, and atmospheric pollution.</p>
<b>LG3 - Hemel Garden Communities Place Principles</b>	<p>No.</p> <p>This is a development management policy relating to Hemel Garden Communities Place Principles. There are no realistic linking impact pathways present.</p> <p>This is a positive policy as includes the requirement of SANG to divert recreational pressure away from the sensitive Chilterns Beechwoods SAC.</p>

<p><b>LG4 – Large, Medium and Small Sites</b></p>	<p>No.</p> <p>This is a development management policy relating to large, medium and small sites. There are no realistic linking impact pathways present.</p>
<p><b>LG5 – Green Belt</b></p>	<p>No.</p> <p>This is a development management policy relating to the green belt. There are no realistic linking impact pathways present.</p>
<p><b>LG6 - Green Belt Compensatory Improvements</b></p>	<p>No.</p> <p>This is a development management policy relating to the green belt compensatory improvements. There are no realistic linking impact pathways present.</p>
<p><b>LG7 – Affordable housing development in the Green Belt (rural exception sites)</b></p>	<p>No.</p> <p>This is a development management policy relating to affordable housing development in the green belt (rural exception sites). There are no realistic linking impact pathways present.</p>
<p><b>LG8 – Small Scale Development in Green Belt Settlements</b></p>	<p>No.</p> <p>This is a development management policy relating to small scale development in green belt settlements. There are no realistic linking impact pathways present.</p>
<p><b>LG9 – Extension or Replacement of Buildings in the Green Belt</b></p>	<p>No.</p> <p>This is a development management policy relating to extension or replacement of buildings in the green belt. There are no realistic linking impact pathways present.</p>
<p><b>Strategic Policy SP4 - Housing</b></p>	<p>No.</p> <p>This is a development management policy relating to housing. There are no realistic linking impact pathways present.</p>

<p><b>HOU1 – Housing Mix</b></p>	<p>No.</p> <p>This is a development management policy relating to housing mix. There are no realistic linking impact pathways present.</p>
<p><b>HOU2 – Affordable Housing</b></p>	<p>No.</p> <p>This is a development management policy relating to affordable housing. There are no realistic linking impact pathways present.</p>
<p><b>HOU3 – Specialist Housing</b></p>	<p>No.</p> <p>This is a development management policy relating to specialist housing. There are no realistic linking impact pathways present.</p>
<p><b>HOU4 – Accessible and Adaptable Housing</b></p>	<p>No.</p> <p>This is a development management policy relating to accessible and adaptable housing. There are no realistic linking impact pathways present.</p>
<p><b>HOU5 – Self-Build and Custom-Build Housing</b></p>	<p>No.</p> <p>This is a development management policy relating to self-build and custom build housing. There are no realistic linking impact pathways present.</p>
<p><b>HOU6 – Gypsies, Travellers and Travelling Show People</b></p>	<p>Potential for Likely Significant Effect.</p> <p>This policy provides for accommodation of Gypsies, Travellers and Travelling Showpeople within the 12.6km core recreational ZOI.</p> <p>Potential linking impact pathways include recreational pressure and atmospheric pollution.</p>
<p><b>Strategic Policy SP5 - Employment and the Local Economy</b></p>	<p>Potential for Likely Significant Effect.</p>

	<p>This policy provides for 55ha of employment land at East Hemel Hempstead (Central) and 33.16ha Strategic Rail Freight Interchange. It also identifies that the Policies Map allocates new employment sites.</p> <p>Potential linking impact pathways is atmospheric pollution.</p>
<b>EMP1 - Protected Employment Areas</b>	<p>No.</p> <p>This is a development management policy relating to protected employment areas. There are no realistic linking impact pathways present.</p>
<b>EMP2 – Strategic Rail Freight Interchange (SRFI)</b>	<p>No.</p> <p>This is a development management policy relating to the SRFI. This policy supports the development rather than allocating it. There are no realistic linking impact pathways present.</p>
<b>EMP3 - St Albans City Core Principal Office Location</b>	<p>No.</p> <p>This is a development management policy relating to St Albans City Core Principle Office Location. This. There are no realistic linking impact pathways present.</p>
<b>EMP4 - Hertfordshire Innovation Quarter (Herts IQ)</b>	<p>No.</p> <p>This is a development management policy supporting development at the Herts IQ. There are no realistic linking impact pathways present.</p>
<b>EMP5 – Employment Skills</b>	<p>No.</p> <p>This is a development management policy supporting development at employment skills. There are no realistic linking impact pathways present.</p>
<b>Strategic Policy SP6 – City, Town and Village Centres and Retail</b>	<p>No.</p>

	<p>This is a development management policy supporting development in city, town and village centres and retail. No specific type, location or quantum of development is mentioned. There are no realistic linking impact pathways present.</p>
<b>TCR1 – Protecting Retail and Main Town Centre Uses</b>	<p>No.</p> <p>This is a development management policy protecting retail and main town centre uses. There are no realistic linking impact pathways present.</p>
<b>TCR2 –Retail Uses outside Existing Centres</b>	<p>No.</p> <p>This is a development management policy relating to retail uses outside existing centres. There are no realistic linking impact pathways present.</p>
<b>TCR3 - Out-of-Centre Retail Parks</b>	<p>No.</p> <p>This is a development management policy relating to out of centre retail parks. There are no realistic linking impact pathways present.</p>
<b>TCR4 - Visitor Economy</b>	<p>No.</p> <p>This is a development management policy relating to the visitor economy. No type, location or quantum of development is identified. There are no realistic linking impact pathways present.</p>
<b>TCR5 – St Albans City Centre Culture, Heritage, Civic Pride and the Leisure Economy</b>	<p>No.</p> <p>This is a development management policy relating to St Albans City Centre Culture, Heritage, Civic Pride and the Leisure Economy. There are no realistic linking impact pathways present.</p>
<b>TCR6 – St Albans City Centre Public Realm and movement</b>	<p>No.</p> <p>This is a development management policy relating to St Albans City Centre Public realm and movement. There are no realistic linking impact pathways present.</p>



<b>TCR7 – St Albans City Centre – Vibrant and Mixed City Centre Economy</b>	<p>No.</p> <p>This is a development management policy relating to St Albans City Centre Vibrant and Mixed City Centre Economy. There are no realistic linking impact pathways present.</p>
<b>Strategic Policy SP7 - Community Infrastructure</b>	<p>No.</p> <p>This is a development management policy relating to community infrastructure. There are no realistic linking impact pathways present.</p>
<b>COM – Education</b>	<p>No.</p> <p>This is a development management policy relating to education. There are no realistic linking impact pathways present.</p>
<b>COM2 - Cemeteries and Burial Grounds</b>	<p>No.</p> <p>This is a development management policy relating to cemeteries and burial grounds. There are no realistic linking impact pathways present.</p>
<b>COM3 - Community, Leisure and Sports Facilities</b>	<p>No.</p> <p>This is a development management policy relating to community, leisure and sports facilities. There are no realistic linking impact pathways present.</p>
<b>COM4 - Public Houses</b>	<p>No.</p> <p>This is a development management policy relating to public houses. There are no realistic linking impact pathways present.</p>
<b>COM5 - St Albans City Football Club</b>	<p>No.</p> <p>This is a development management policy relating to St Albans City Football Club. There are no realistic linking impact pathways present.</p>
<b>Strategic Policy SP8 - Transport Strategy</b>	<p>No.</p>

	<p>This is a development management policy relating to transport strategy. There are no realistic linking impact pathways present.</p>
<b>TRA1 – Transport Considerations for New Development</b>	<p>No.</p> <p>This is a development management policy relating to transport considerations for new development. There are no realistic linking impact pathways present.</p>
<b>TRA2 – Major Transport Schemes</b>	<p>No.</p> <p>This is a development management policy relating to major transport schemes. This policy does not allocation these schemes, but supports them. There are no realistic linking impact pathways present.</p>
<b>TRA3 – Development Generating New Lorry Movements</b>	<p>No.</p> <p>This is a development management policy relating to development that generates new lorry movements. There are no realistic linking impact pathways present.</p>
<b>TRA4 – Parking</b>	<p>No.</p> <p>This is a development management policy relating to parking. There are no realistic linking impact pathways present.</p>
<b>Strategic Policy SP9 – Utilities Infrastructure</b>	<p>No.</p> <p>This is a development management policy relating to utilities infrastructure. There are no realistic linking impact pathways present.</p>
<b>UIN1 – Broadband</b>	<p>No.</p> <p>This is a development management policy relating to broadband. There are no realistic linking impact pathways present.</p>
<b>UIN2 – Telecommunications</b>	<p>No.</p>

	<p>This is a development management policy relating to telecommunications. There are no realistic linking impact pathways present.</p>
<p><b>Strategic Policy SP10 – Natural Environment and Biodiversity</b></p>	<p>No.</p> <p>This is a development management policy relating to natural environment and biodiversity. There are no realistic linking impact pathways present.</p> <p>This is a key positive hook policy that ensures that no net increase in residential development will result in an increase in recreational pressure on the Chilterns Beechwoods SAC.</p>
<p><b>NEB 1 – Woodlands, Trees and Landscape Features</b></p>	<p>No.</p> <p>This is a development management policy relating to woodlands, trees and landscape features. There are no realistic linking impact pathways present.</p>
<p><b>NEB 2 – Local Green Spaces</b></p>	<p>No.</p> <p>This is a development management policy relating to local green spaces. There are no realistic linking impact pathways present.</p>
<p><b>NEB 3 – Non-Designated Local Green Space</b></p>	<p>No.</p> <p>This is a development management policy relating to non-designated local green spaces. There are no realistic linking impact pathways present.</p>
<p><b>NEB 4 - Significant Publicly Accessible Green Areas</b></p>	<p>No.</p> <p>This is a development management policy relating to non-significant publicly accessible green areas. There are no realistic linking impact pathways present.</p>
<p><b>NEB 5 - Blue Infrastructure</b></p>	<p>No.</p> <p>This is a development management policy relating to blue infrastructure. There are no realistic linking impact pathways present.</p>

<p><b>NEB 6 – Biodiversity and Biodiversity Net Gain</b></p>	<p>No. This is a development management policy relating to biodiversity. There are no realistic linking impact pathways present.</p>
<p><b>NEB 7 - Biodiversity Provision in the Design of New Buildings and Open Spaces</b></p>	<p>No. This is a development management policy relating to Biodiversity Provision in the Design of New Buildings and Open Spaces. There are no realistic linking impact pathways present.</p>
<p><b>NEB 8 – Managing Flood Risk</b></p>	<p>No. This is a development management policy relating to managing flood risk. There are no realistic linking impact pathways present.</p>
<p><b>NEB 9 – Agricultural Land</b></p>	<p>No. This is a development management policy relating to agricultural land. There are no realistic linking impact pathways present.</p>
<p><b>NEB 10 – Landscape and Design</b></p>	<p>No. This is a development management policy relating to landscape and design. There are no realistic linking impact pathways present.</p>
<p><b>NEB 11 - Green Space Standards and New Green Space Provision</b></p>	<p>No. This is a development management policy relating to Green Space Standards and New Green Space Provision. There are no realistic linking impact pathways present.</p>
<p><b>Strategic Policy SP11 – Historic Environment</b></p>	<p>No. This is a development management policy relating to the historic environment. There are no realistic linking impact pathways present.</p>

<b>HE1 – Designated heritage assets</b>	<p>No.</p> <p>This is a development management policy relating to designated heritage assets. There are no realistic linking impact pathways present.</p>
<b>HE2 – Non-designated heritage assets</b>	<p>No.</p> <p>This is a development management policy relating to non-designated heritage assets. There are no realistic linking impact pathways present.</p>
<b>HE3 – Archaeology</b>	<p>No.</p> <p>This is a development management policy relating to archaeology. There are no realistic linking impact pathways present.</p>
<b>HE4 – Scheduled Ancient Monuments</b>	<p>No.</p> <p>This is a development management policy relating to scheduled ancient monuments. There are no realistic linking impact pathways present.</p>
<b>HE5 – Archaeological Sites for Local reservation</b>	<p>No.</p> <p>This is a development management policy relating to archaeological sites for local preservation. There are no realistic linking impact pathways present.</p>
<b>HE6 – Archaeological Sites Subject to a Recording Condition</b>	<p>No.</p> <p>This is a development management policy relating to archaeological sites subject to a recording condition. There are no realistic linking impact pathways present.</p>
<b>HE7 – Change of use and heritage assets</b>	<p>No.</p> <p>This is a development management policy relating to change of use and heritage assets. There are no realistic linking impact pathways present.</p>
<b>HE8 – Responsible retrofitting</b>	<p>No.</p>

	This is a development management policy relating to responsible retrofitting. There are no realistic linking impact pathways present.
<b>Strategic Policy SP12 – High-Quality Design</b>	No. This is a development management policy relating to high quality design. There are no realistic linking impact pathways present.
<b>DES1 – Design of New Development</b>	No. This is a development management policy relating to design of new development. There are no realistic linking impact pathways present.
<b>DES2 – Public Space</b>	No. This is a development management policy relating to public space. There are no realistic linking impact pathways present.
<b>DES3 – Efficient Use of Land</b>	No. This is a development management policy relating to effective land use. There are no realistic linking impact pathways present.
<b>DES4 – Extensions to Existing Buildings</b>	No. This is a development management policy relating to extensions to existing buildings. There are no realistic linking impact pathways present.
<b>DES5 – Residential Amenity Standards</b>	No. This is a development management policy relating to residential amenity standards. There are no realistic linking impact pathways present.
<b>DES6 – Building Heights</b>	No.

	<p>This is a development management policy relating to building heights. There are no realistic linking impact pathways present.</p>
<b>DES7 – Building Servicing</b>	<p>No.</p> <p>This is a development management policy relating to building servicing. There are no realistic linking impact pathways present.</p>
<b>DES8 – Shopfronts and Advertisements</b>	<p>No.</p> <p>This is a development management policy relating to shopfronts and advertisements. There are no realistic linking impact pathways present.</p>
<b>Strategic Policy SP13 – Health and Wellbeing</b>	<p>No.</p> <p>This is a development management policy relating to health and wellbeing. There are no realistic linking impact pathways present.</p>
<b>HW1 – Noise and Air Pollution</b>	<p>No.</p> <p>This is a development management policy relating to noise and air pollution. There are no realistic linking impact pathways present.</p>
<b>HW 2 – Light Pollution</b>	<p>No.</p> <p>This is a development management policy relating to light pollution. There are no realistic linking impact pathways present.</p>
<b>HW3 – Health Impact Assessments</b>	<p>No.</p> <p>This is a development management policy relating to health impact assessments. There are no realistic linking impact pathways present.</p>
<b>HW4 – New development and existing uses</b>	<p>No.</p>

	This is a development management policy relating to new development and existing uses pollution. There are no realistic linking impact pathways present.
<b>Strategic Policy SP14 - Delivery of Infrastructure</b>	No. This is a development management policy relating to delivery of infrastructure. There are no realistic linking impact pathways present.
<b>IMP1 – Additional Infrastructure Requirements for Strategic Scale Development</b>	No. This is a development management policy relating to additional infrastructure requirements or strategic scale development. There are no realistic linking impact pathways present.

## B.2 LP Site Allocation Test of Likely Significant Effects

8.1.8 Where the HRA Implications cell is coloured **green**, this means that there is no potential for a linking impact pathway between the policy and a Habitats Site; there **is no potential for Likely Significant Effect**, and thus it will not be discussed further within the report. Where the HRA Implications cell is coloured **orange**, this means that there is potential for a linking impact pathway between the policy and a Habitats Site; there **is potential for Likely Significant Effect**, and thus it will be discussed further within the report.

**Table 3: LP Site Allocation Test of Likely Significant Effects**

Site Allocation	Notes	HRA Implications
<b>H1 - North Hemel Hempstead, AL3 7AU</b>	In addition to built development (Primarily residential 1,500 units (indicative) in total (1,250 in Plan period)), the site will include SANG/ Country Park provision	Potential for Likely Significant Effect.  Located within the 12.6km core recreational Zone of Influence of Chilterns Beechwoods SAC.  The allocation states that:  <i>'The site lies within the Chilterns Beechwoods Special Area of Conservation (CBSAC) Zone of Influence (ZOI).'</i>



		<p><i>Appropriate contributions must be made towards the Strategic Access Management and Monitoring Strategy (SAMMS). Development proposals will also need to make provision for a new Suitable Alternative Natural Greenspace (SANG), or alternatively contribute towards the maintenance of a suitable SANG project elsewhere.'</i></p>
<p><b>H2 - East Hemel Hempstead (North), HP2 7HT</b></p>	<p>In addition to built development (Primarily residential 1,600 units (indicative) in total (1,335 in Plan period), the site will include SANG/ Country Park provision</p>	<p>Potential for Likely Significant Effect.</p> <p>Located within the 12.6km core recreational Zone of Influence of Chilterns Beechwoods SAC.</p> <p>The allocation states that:</p> <p><i>'The site lies within the Chilterns Beechwoods Special Area of Conservation (CBSAC) Zone of Influence (ZOI). Appropriate contributions must be made towards the Strategic Access Management and Monitoring Strategy (SAMMS). Development proposals will also need to make provision for a new Suitable Alternative Natural Greenspace (SANG), or alternatively contribute towards the maintenance of a suitable SANG project elsewhere.'</i></p>
<p><b>H3 - East Hemel Hempstead (Central), HP2 7LF</b></p>	<p>In addition to built development (Employment Led Mixed Use (Enterprise Zone)), the site will include improvements to Green Loops</p>	<p>Potential for Likely Significant Effect.</p> <p>Located within the 12.6km core recreational Zone of Influence of Chilterns Beechwoods SAC.</p> <p>The allocation states that:</p> <p><i>'The site lies within the Chilterns Beechwoods Special Area of Conservation (CBSAC) Zone of Influence (ZOI). Appropriate contributions must be made towards the Strategic Access Management and Monitoring Strategy (SAMMS). Development proposals will also need to</i></p>

		<i>make provision for a new Suitable Alternative Natural Greenspace (SANG), or alternatively contribute towards the maintenance of a suitable SANG project elsewhere.'</i>
<b>H4 - East Hemel Hempstead (South), HP2 4PA4</b>	In addition to built development (Primarily residential 2,400 units (indicative) in total (2,165 in Plan period)), the site will include Strategic and local public open space improvements to Green Loops and SANG provision	<p>Potential for Likely Significant Effect.</p> <p>Located within the 12.6km core recreational Zone of Influence of Chilterns Beechwoods SAC.</p> <p>The allocation states that:</p> <p><i>'The site lies within the Chilterns Beechwoods Special Area of Conservation (CBSAC) Zone of Influence (ZOI). Appropriate contributions must be made towards the Strategic Access Management and Monitoring Strategy (SAMMS). Development proposals will also need to make provision for a new Suitable Alternative Natural Greenspace (SANG), or alternatively contribute towards the maintenance of a suitable SANG project elsewhere.'</i></p>
<b>B1 - North St Albans, AL3 6DD</b>	Primarily residential 1,146 units (indicative) (this includes 150 from planning permission 5/2021/0423)	<p>No.</p> <p>Located outside of the Chilterns Beechwoods SAC Recreational 12.6km ZOI.</p>
<b>B2 - North East Harpenden, AL5 5EG</b>	Primarily residential 762 units (indicative)	<p>No.</p> <p>Located outside of the Chilterns Beechwoods SAC Recreational 12.6km ZOI.</p>
<b>B3 - West Redbourn, Redbourn, AL3 7HZ</b>	Primarily residential 593 units (indicative) and care home development.	<p>Potential for Likely Significant Effect.</p> <p>Located within the 12.6km core recreational Zone of Influence of Chilterns Beechwoods SAC.</p>

		<p>The allocation states that:</p> <p><i>'The site lies within the Chilterns Beechwoods Special Area of Conservation (CBSAC) Zone of Influence (ZOI). Appropriate contributions must be made towards the Strategic Access Management and Monitoring Strategy (SAMMS). Development proposals will also need to make provision for a new Suitable Alternative Natural Greenspace (SANG), or alternatively contribute towards the maintenance of a suitable SANG project elsewhere.'</i></p>
<b>B4 - East St Albans, AL4 9JJ</b>	Primarily residential 522 units (indicative) (additional to adjoining permission)	<p>No.</p> <p>Located outside of the Chilterns Beechwoods SAC Recreational 12.6km ZOI.</p>
<b>B5 - Glinwell, Hatfield Road, St Albans, AL4 0HE</b>	Primarily residential 436 units (indicative)	<p>No.</p> <p>Located outside of the Chilterns Beechwoods SAC Recreational 12.6km ZOI.</p>
<b>B6 - West of London Colney, AL2 1LN</b>	Primarily residential 405 units (indicative)	<p>No.</p> <p>Located outside of the Chilterns Beechwoods SAC Recreational 12.6km ZOI.</p>
<b>B7 - North West Harpenden, AL5 3NP</b>	Primarily residential 293 units (indicative)	<p>No.</p> <p>Located outside of the Chilterns Beechwoods SAC Recreational 12.6km ZOI.</p>
<b>B8 - Harper Lane, north of Radlett, WD7 7HU</b>	Primarily residential 274 units (indicative)	<p>No.</p> <p>Located outside of the Chilterns Beechwoods SAC Recreational 12.6km ZOI.</p>

<b>L1 - Burston Nurseries, North Orbital Road, St Albans, AL2 2DS</b>	Residential 180 units (indicative) (additional to permission 5/2020/3022)	No.  Located outside of the Chilterns Beechwoods SAC Recreational 12.6km ZOI.
<b>L2 - West of Watling Street, Park Street, AL2 2PZ</b>	Primarily residential 104 units (indicative)	No.  Located outside of the Chilterns Beechwoods SAC Recreational 12.6km ZOI.
<b>M1 - East and West of Miriam Lane, Chiswell Green, AL2 3NY</b>	Primarily residential 98 units (indicative)	No.  Located outside of the Chilterns Beechwoods SAC Recreational 12.6km ZOI.
<b>M1a - Cross Lane, Harpenden, AL5 1BX</b>	Primarily residential 95 units (indicative)	No.  Located outside of the Chilterns Beechwoods SAC Recreational 12.6km ZOI.
<b>M2 - Hill Dyke Road, Wheathampstead, AL4 8TR</b>	Primarily residential 85 units (indicative)	No.  Located outside of the Chilterns Beechwoods SAC Recreational 12.6km ZOI.
<b>M3 - Bedmond Lane, St Albans, AL3 4AH</b>	Primarily residential 78 units (indicative)	No.  Located outside of the Chilterns Beechwoods SAC Recreational 12.6km ZOI.
<b>M4 - North of Oakwood Road, Bricket Wood, AL2 3PT</b>	Primarily residential 74 units (indicative)	No.  Located outside of the Chilterns Beechwoods SAC Recreational 12.6km ZOI.

<p><b>M5 - Sewage Treatment Works, Piggottshill Lane, Harpenden, AL5 5UN</b></p>	<p>Primarily residential 70 units (indicative)</p>	<p>No.  Located outside of the Chilterns Beechwoods SAC Recreational 12.6km ZOI.</p>
<p><b>M6 - South of Harpenden Lane, Redbourn, AL3 7RQ</b></p>	<p>Housing 68 units (indicative)</p>	<p>Potential for Likely Significant Effect.  Located within the 12.6km core recreational Zone of Influence of Chilterns Beechwoods SAC.  The allocation states that:  <i>‘This site lies within the Chilterns Beechwoods Special Area of Conservation (CBSAC) Zone of Influence (ZOI). Appropriate contributions must be made towards the Strategic Access Management and Monitoring Strategy (SAMMS). Development proposals will also need to make provision for a new Suitable Alternative Natural Greenspace (SANG), or alternatively contribute towards the maintenance of a suitable SANG project elsewhere.’</i></p>
<p><b>M7 - Townsend Lane, Harpenden, AL5 2RH</b></p>	<p>Housing 65 units (indicative)</p>	<p>Potential for Likely Significant Effect.  Located within the 12.6km core recreational Zone of Influence of Chilterns Beechwoods SAC.  The allocation states that:  <i>‘The site lies within the Chilterns Beechwoods Special Area of Conservation (CBSAC) Zone of Influence (ZOI). Appropriate contributions must be made towards the Strategic Access Management and Monitoring Strategy (SAMMS). Development proposals will also need to make provision for a new Suitable Alternative Natural</i></p>

		<i>Greenspace (SANG), or alternatively contribute towards the maintenance of a suitable SANG project elsewhere.'</i>
<b>M8 - Verulam Golf Club, St Albans, AL1 1JG</b>	Housing 65 units (indicative)	No.  Located outside of the Chilterns Beechwoods SAC Recreational 12.6km ZOI.
<b>M9 - Amwell Top Field, Wheathampstead, AL4 8DZ</b>	Residential 60 units (indicative)	No.  Located outside of the Chilterns Beechwoods SAC Recreational 12.6km ZOI.
<b>M10 - Tippendell Lane and Orchard Drive, How Wood, AL2 2HJ</b>	Residential 51 units (indicative)	No.  Located outside of the Chilterns Beechwoods SAC Recreational 12.6km ZOI.
<b>M11 - Rothamsted Research, Harpenden Campus, AL5 2JQ</b>	Residential 55 units (indicative)	No.  Located outside of the Chilterns Beechwoods SAC Recreational 12.6km ZOI.
<b>M12 - North of The Slype, Gustard Wood, AL4 8SA</b>	Residential 49 units (indicative)	No.  Located outside of the Chilterns Beechwoods SAC Recreational 12.6km ZOI.
<b>M13 – North of Boissy Close, Colney Heath, AL4 0UE</b>	Residential 49 units (indicative)	No.  Located outside of the Chilterns Beechwoods SAC Recreational 12.6km ZOI.
<b>M14 - Beesonend Lane, Harpenden, AL5 2AB</b>	Residential 43 units (indicative)	No.

		Located outside of the Chilterns Beechwoods SAC Recreational 12.6km ZOI.
<b>M15 - Bucknalls Drive, Bricket Wood, AL2 3YT</b>	Residential 44 units (indicative)	No.  Located outside of the Chilterns Beechwoods SAC Recreational 12.6km ZOI.
<b>M16 - Falconers Field, Harpenden, AL5 3ES</b>	Residential 39 units (indicative)	Potential for Likely Significant Effect.  Located within the 12.6km core recreational Zone of Influence of Chilterns Beechwoods SAC.  The allocation states that:  <i>'Most of the site lies within the Chilterns Beechwoods Special Area of Conservation (CBSAC) Zone of Influence (ZOI). Appropriate contributions must be made towards the Strategic Access Management and Monitoring Strategy (SAMMS). Development proposals will also need to make provision for a new Suitable Alternative Natural Greenspace (SANG), or alternatively contribute towards the maintenance of a suitable SANG project elsewhere.'</i>
<b>M17 - North of Wheathampstead Road, Harpenden, AL5 1AB</b>	Residential 38 units (indicative)	No.  Located outside of the Chilterns Beechwoods SAC Recreational 12.6km ZOI.
<b>M18 - East of Kay Walk, St Albans, AL4 0XH</b>	Residential 37 units (indicative)	No.  Located outside of the Chilterns Beechwoods SAC Recreational 12.6km ZOI.

<b>M19 - Piggottshill Lane, Harpenden, AL5 5UN</b>	Residential 29 units (indicative)	No.  Located outside of the Chilterns Beechwoods SAC Recreational 12.6km ZOI.
<b>M20 - Lower Luton Road, Harpenden, AL5 5AF</b>	Residential 25 units (indicative)	No.  Located outside of the Chilterns Beechwoods SAC Recreational 12.6km ZOI.
<b>M21 - Rothamsted Lodge, Hatching Green, AL5 2GT</b>	Residential 25 units (indicative) (this includes 5 units from planning permission 5/2022/1814)	No.  Located outside of the Chilterns Beechwoods SAC Recreational 12.6km ZOI.
<b>M22 - Wood End, Hatching Green, Harpenden, AL5 2JT</b>	Residential 14 units (indicative)	No.  Located outside of the Chilterns Beechwoods SAC Recreational 12.6km ZOI.
<b>M23 - Ashdale Lye Lane, Bricket Wood, AL2 3LQ</b>	Residential 14 units (indicative)	No.  Located outside of the Chilterns Beechwoods SAC Recreational 12.6km ZOI.
<b>M24 - South of Codicote Road, Wheathampstead, AL4 8GD</b>	Residential 12 units (indicative)	No.  Located outside of the Chilterns Beechwoods SAC Recreational 12.6km ZOI.
<b>M25 - Baulk Close, Harpenden, AL5 4LY</b>	Residential 8 units (indicative)	No.  Located outside of the Chilterns Beechwoods SAC Recreational 12.6km ZOI.



<b>M26 - Highway Chipping Depot, Lower Luton Road, AL4 8JJ</b>	Residential 7 units (indicative)	No.  Located outside of the Chilterns Beechwoods SAC Recreational 12.6km ZOI.
<b>M27 - Frogmore Vicarage, Frogmore, AL2 2JU</b>	Residential 5 units (indicative)	No.  Located outside of the Chilterns Beechwoods SAC Recreational 12.6km ZOI.
<b>P1 - Smallford Works, Smallford Lane, AL4 0SA</b>	Housing 80 units (indicative)	No.  Located outside of the Chilterns Beechwoods SAC Recreational 12.6km ZOI.
<b>P2 – Land at North Orbital Road, AL2 1DL</b>	Housing 64 units (indicative)	No.  Located outside of the Chilterns Beechwoods SAC Recreational 12.6km ZOI.
<b>U1 - East of Morris Recreation Ground, adjacent to A1081 and White Horse Lane</b>	Residential 53 units (indicative)	No.  Located outside of the Chilterns Beechwoods SAC Recreational 12.6km ZOI.
<b>U2 - Land South West of London Colney Allotments, AL2 1RG</b>	Residential 25 units (indicative)	No.  Located outside of the Chilterns Beechwoods SAC Recreational 12.6km ZOI.
<b>U3 - Former Bricket Wood United Reformed Church, AL2 3QR</b>	Residential 10 units (indicative)	No.  Located outside of the Chilterns Beechwoods SAC Recreational 12.6km ZOI.

<b>U4 – Greenwood United Reformed Church AL2 3HG</b>	Residential 5 units (indicative)	No.  Located outside of the Chilterns Beechwoods SAC Recreational 12.6km ZOI.
<b>UC1 – Sainsbury’s Supermarket, Everard Close, St Albans AL1 2QU</b>	Residential 92 units (indicative)	No.  Located outside of the Chilterns Beechwoods SAC Recreational 12.6km ZOI.
<b>UC2 - Civic Close Car Park Bricket Road, St Albans, AL1 3JX</b>	Residential 57 units (indicative)	No.  Located outside of the Chilterns Beechwoods SAC Recreational 12.6km ZOI.
<b>UC3 - London Road Car Park, London Road, St Albans, AL1 1NG</b>	Residential 36 units (indicative)	No.  Located outside of the Chilterns Beechwoods SAC Recreational 12.6km ZOI.
<b>UC4 - Car Park to rear of 32-34 Upper Marlborough Road, St Albans, AL1 3 UU</b>	Residential 35 units (indicative)	No.  Located outside of the Chilterns Beechwoods SAC Recreational 12.6km ZOI.
<b>UC5 - 18- 20 Catherine Street St Albans, AL3 5BY</b>	Residential 31 units (indicative)	No.  Located outside of the Chilterns Beechwoods SAC Recreational 12.6km ZOI.
<b>UC6 - 13-19 Sutton Road &amp; 5-11a Pickford Road St Albans, AL1 5JH</b>	Residential 29 units (indicative)	No.  Located outside of the Chilterns Beechwoods SAC Recreational 12.6km ZOI.

<b>UC7 - 5 Spencer Street, St Albans, AL3 5EH</b>	Residential 28 units (indicative)	No.  Located outside of the Chilterns Beechwoods SAC Recreational 12.6km ZOI.
<b>UC8 - Public Hall, 6 Southdown Road, Harpenden, AL5 1TE</b>	Residential 26 units (indicative)	No.  Located outside of the Chilterns Beechwoods SAC Recreational 12.6km ZOI.
<b>UC9 - Keyfield Terrace Car Park, Keyfield Terrace, St Albans, AL1 1PD</b>	Residential 25 units (indicative)	No.  Located outside of the Chilterns Beechwoods SAC Recreational 12.6km ZOI.
<b>UC10 - Garage Block rear of 109-179 Hughenden Road, St Albans, AL4 9QW</b>	Residential 24 units (indicative)	No.  Located outside of the Chilterns Beechwoods SAC Recreational 12.6km ZOI.
<b>UC11 - 50 Victoria Street St Albans, AL1 3HZ</b>	Residential 10 units (indicative)	No.  Located outside of the Chilterns Beechwoods SAC Recreational 12.6km ZOI.
<b>UC12 - Garage Block Between Hughenden Road and The Ridgeway, St Albans, AL4 9RH</b>	Residential 20 units (indicative)	No.  Located outside of the Chilterns Beechwoods SAC Recreational 12.6km ZOI.
<b>UC13 - Car Park adjacent to Verulam House, Verulam Road, St Albans, AL3 5EN</b>	Residential 19 units (indicative)	No.  Located outside of the Chilterns Beechwoods SAC Recreational 12.6km ZOI.

<b>UC14 - Car Park to rear of 3 Church Green (Waitrose), Harpenden, AL5 2TJ</b>	Residential 19 units (indicative)	No.  Located outside of the Chilterns Beechwoods SAC Recreational 12.6km ZOI.
<b>UC15 - Bowers Way East Car Park Bowers Way, Harpenden, AL5 4EQ</b>	Residential 18 units (indicative)	No.  Located outside of the Chilterns Beechwoods SAC Recreational 12.6km ZOI.
<b>UC16 - Garage Block west of Thirlestane, St Albans, AL1 3PE</b>	Residential 17 units (indicative)	No.  Located outside of the Chilterns Beechwoods SAC Recreational 12.6km ZOI.
<b>UC17 - Garage Block off Cotlandswick, London Colney, AL2 1ED</b>	Residential 15 units (indicative)	No.  Located outside of the Chilterns Beechwoods SAC Recreational 12.6km ZOI.
<b>UC18 - Garage block to front of 94-142 Riverside Road, Riverside Road, St Albans, AL1 1SE</b>	Residential 14 units (indicative)	No.  Located outside of the Chilterns Beechwoods SAC Recreational 12.6km ZOI.
<b>UC19 - 54 Lemsford Road St Albans, AL1 3PR</b>	Residential 14 units (indicative)	No.  Located outside of the Chilterns Beechwoods SAC Recreational 12.6km ZOI.
<b>UC20 - 104 High Street London Colney, AL2 1QL</b>	Residential 13 units (indicative)	No.  Located outside of the Chilterns Beechwoods SAC Recreational 12.6km ZOI.

<b>UC21 - Garages off Chapel Place, St Albans, AL1 2JZ</b>	Residential 12 units (indicative)	No.  Located outside of the Chilterns Beechwoods SAC Recreational 12.6km ZOI.
<b>UC22 - Car Park to rear of 77-101 Hatfield Road, Hatfield Road, St Albans, AL1 4JL</b>	Residential 12 units (indicative)	No.  Located outside of the Chilterns Beechwoods SAC Recreational 12.6km ZOI.
<b>UC23 - Garage Site adj. Verulam House, Verulam Road, St Albans, AL3 5EN</b>	Residential 11 units (indicative)	No.  Located outside of the Chilterns Beechwoods SAC Recreational 12.6km ZOI.
<b>UC24 - Garages Rear of Hill End Lane (North), St Albans, AL4 0AE</b>	Residential 10 units (indicative)	No.  Located outside of the Chilterns Beechwoods SAC Recreational 12.6km ZOI.
<b>UC25 - 318 Watford Road, Chiswell Green, AL2 3DP</b>	Residential 10 units (indicative)	No.  Located outside of the Chilterns Beechwoods SAC Recreational 12.6km ZOI.
<b>UC26 - Garage Block to Malvern Close, St Albans, AL4 9SZ</b>	Residential 10 units (indicative)	No.  Located outside of the Chilterns Beechwoods SAC Recreational 12.6km ZOI.
<b>UC27 - Berkeley House, Barnet Road, London Colney, AL2 1BG</b>	Residential 9 units (indicative)	No.  Located outside of the Chilterns Beechwoods SAC Recreational 12.6km ZOI.

<p><b>UC28 - New Greens Residents Association, 2 High Oaks, St Albans, AL3 6DL</b></p>	<p>Residential 8 units (indicative)</p>	<p>No.  Located outside of the Chilterns Beechwoods SAC Recreational 12.6km ZOI.</p>
<p><b>UC29 - Garage Block off Noke Shot, Harpenden, AL5 5HS</b></p>	<p>Residential 8 units (indicative)</p>	<p>No.  Located outside of the Chilterns Beechwoods SAC Recreational 12.6km ZOI.</p>
<p><b>UC30 - Garages Between Abbots Avenue West and Abbey Line, St Albans, AL1 2JH</b></p>	<p>Residential 8 units (indicative)</p>	<p>No.  Located outside of the Chilterns Beechwoods SAC Recreational 12.6km ZOI.</p>
<p><b>UC31 - Garages rear of Tudor Road, St Albans, AL3 6AY</b></p>	<p>Residential 8 units (indicative)</p>	<p>No.  Located outside of the Chilterns Beechwoods SAC Recreational 12.6km ZOI.</p>
<p><b>UC32 - Garages off Creighton Avenue, St Albans, AL1 2LZ</b></p>	<p>Residential 8 units (indicative)</p>	<p>No.  Located outside of the Chilterns Beechwoods SAC Recreational 12.6km ZOI.</p>
<p><b>UC33 - Land Rear of 53 Snatchup, Redbourn, AL3 7HF</b></p>	<p>Residential 7 units (indicative)</p>	<p>Potential for Likely Significant Effect.  Located within the 12.6km core recreational Zone of Influence of Chilterns Beechwoods SAC.  The allocation states that:  <i>‘This site lies within the Chilterns Beechwoods Special Area of Conservation (CBSAC) Zone of Influence (ZOI). Appropriate contributions must be made towards the Strategic Access Management and Monitoring Strategy</i></p>

		<i>(SAMMS). Development proposals will also need to make provision for a new Suitable Alternative Natural Greenspace (SANG), or alternatively contribute towards the maintenance of a suitable SANG project elsewhere.'</i>
<b>UC34 - Garages Rear of Hill End Lane (South), St Albans, AL4 0AE</b>	Residential 7 units (indicative)	No.  Located outside of the Chilterns Beechwoods SAC Recreational 12.6km ZOI.
<b>UC35 - Market Depot, Drovers Way, St Albans, AL3 5FA</b>	Residential 7 units (indicative)	No.  Located outside of the Chilterns Beechwoods SAC Recreational 12.6km ZOI.
<b>UC36 - Garages off Park Street Lane, Park Street, AL2 2ND</b>	Residential 7 units (indicative)	No.  Located outside of the Chilterns Beechwoods SAC Recreational 12.6km ZOI.
<b>UC37 - Garages off Watling View (East), St Albans, AL1 2NT</b>	Residential 7 units (indicative)	No.  Located outside of the Chilterns Beechwoods SAC Recreational 12.6km ZOI.
<b>UC38 - Garage block to rear of 27-32 St Pauls Place, St Pauls Place, St Albans, AL1 4JW</b>	Residential 6 units (indicative)	No.  Located outside of the Chilterns Beechwoods SAC Recreational 12.6km ZOI.
<b>UC39 - Garage Block to east of 8 Heath Close, Harpenden, AL5 1QN</b>	Residential 6 units (indicative)	No.  Located outside of the Chilterns Beechwoods SAC Recreational 12.6km ZOI.

<b>UC40 - Land Rear of New House Park Shops, St Albans, AL1 1UJ</b>	Residential 6 units (indicative)	No.  Located outside of the Chilterns Beechwoods SAC Recreational 12.6km ZOI.
<b>UC41 - Garages at Grindcobbe, St Albans, AL1 2ED</b>	Residential 6 units (indicative)	No.  Located outside of the Chilterns Beechwoods SAC Recreational 12.6km ZOI.
<b>UC42 - Garages off Thirlmere Drive, St Albans, AL1 5QS</b>	Residential 6 units (indicative)	No.  Located outside of the Chilterns Beechwoods SAC Recreational 12.6km ZOI.
<b>UC43 - Garage block to west of 32-46 Riverside Road, St Albans, AL1 1SD</b>	Residential 6 units (indicative)	No.  Located outside of the Chilterns Beechwoods SAC Recreational 12.6km ZOI.
<b>UC44 - Garage Block off Millford Hill, Harpenden, AL5 5BN</b>	Residential 6 units (indicative)	No.  Located outside of the Chilterns Beechwoods SAC Recreational 12.6km ZOI.
<b>UC45 - Garages off Watling View (West), St Albans, AL1 2PA</b>	Residential 6 units (indicative)	No.  Located outside of the Chilterns Beechwoods SAC Recreational 12.6km ZOI.
<b>UC46 - Garage Blocks adj. to 76 Oakley Road and 151 Grove Road, Harpenden, AL5 1HJ</b>	Residential 6 units (indicative)	No.  Located outside of the Chilterns Beechwoods SAC Recreational 12.6km ZOI.



<b>UC47 - Crabtree Fields / Land at Waldegrave Park, Harpenden, AL5 5SA</b>	Residential 5 units (indicative)	No.  Located outside of the Chilterns Beechwoods SAC Recreational 12.6km ZOI.
<b>UC48 - Car Park adj. to 42-46 Adelaide Street, St Albans, AL3 5BH</b>	Residential 5 units (indicative)	No.  Located outside of the Chilterns Beechwoods SAC Recreational 12.6km ZOI.
<b>UC49 - Garage Block rear of 18-30 Furse Avenue, St Albans, AL4 9NE</b>	Residential 5 units (indicative)	No.  Located outside of the Chilterns Beechwoods SAC Recreational 12.6km ZOI.
<b>UC50 - Southview Car Park, Lower Luton Road, Harpenden, AL5 5AW</b>	Residential 5 units (indicative)	No.  Located outside of the Chilterns Beechwoods SAC Recreational 12.6km ZOI.
<b>UC51 - Garage Block to south of Abbots Park Abbots Park, St Albans, AL1 1TW</b>	Residential 5 units (indicative)	No.  Located outside of the Chilterns Beechwoods SAC Recreational 12.6km ZOI.
<b>UC52 - Garage Block off Tallents Crescent, Harpenden, AL5 5BS</b>	Residential 5 units (indicative)	No.  Located outside of the Chilterns Beechwoods SAC Recreational 12.6km ZOI.
<b>OS1 - Land to the North of Bricket Wood, bounded by the M25 and A405 North Orbital</b>	Community facilities	No.  Located outside of the Chilterns Beechwoods SAC Recreational 12.6km ZOI.

		<p>Further, this allocation does not provide residential development and as such recreational pressure is not relevant linking impact pathways.</p>
<p><b>OS2 - Toulmin Drive / Highelms, St Albans, AL3 6DX</b></p>	<p>Community facilities</p>	<p>No.</p> <p>Located outside of the Chilterns Beechwoods SAC Recreational 12.6km ZOI.</p> <p>Further, this allocation does not provide residential development and as such recreational pressure is not relevant linking impact pathways.</p>

