

Date: 22 February 2018  
Our ref: 236021  
Your ref: n/a



Local Plan  
Central Bedfordshire Council  
Priory House  
Monks Walk  
Chicksands  
Shefford  
SG17 5TQ

Customer Services  
Hornbeam House  
Crewe Business Park  
Electra Way  
Crewe  
Cheshire  
CW1 6GJ

[LocalPlan@centralbedfordshire.gov.uk](mailto:LocalPlan@centralbedfordshire.gov.uk)

## BY EMAIL ONLY

Dear Sir/Madam

### Central Bedfordshire Pre-Submission Local Plan Consultation

Thank you for your consultation regarding the above, dated 11 January 2018, which was received by Natural England on the same date.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

#### Local Plan – Pre-submission Consultation

Natural England welcomes the inclusion of amendments to address some of our comments at the draft Local Plan Regulation 18 stage (in our letter of response dated 29 August 2018 (our ref: 220143)). We re-iterate our previous outstanding advice regarding policies and specific allocations in Annex 1 and Annex 2, respectively to this letter. Please note that we have not reiterated previous supporting or general advice comments.

With regard to Natural England's interests we generally consider the Local Plan to be sound and legally compliant. However, we have highlighted a number of policies where amendments are required, in particular to Policy SA1: Land North of Luton, to ensure that development will deliver sufficient mitigation to demonstrate no adverse impact to designated sites and landscape, including the setting of the Chilterns AONB. This is required to ensure that the policy is sound and consistent with the requirements of the National Planning Policy Framework (NPPF) to protect nationally designated sites and landscapes.

#### Habitats Regulations Assessment

Natural England welcomes submission of the Habitats Regulations Assessment (HRA) Screening Report prepared by Enfusion (December 2017).

With regard to increased recreational pressure we agree that due to distance and the mitigation measures afforded through policies EE1, EE2, EE3 and EE13 the Local Plan alone, and in combination, is unlikely to have any adverse effect on Chiltern Beechwoods Special Area of

Conservation (SAC) and the Upper Nene Valley Gravel Pits Special Protection Area (SPA) and Ramsar site.

Natural England is satisfied that with the mitigation afforded through relevant Plan policies, adverse impacts to European sites alone, and in-combination, through changes in water level, water quality and air quality can be avoided. However, our advice remains that the Local Plan should take a strategic approach to water quality and air quality issues through an up to date Water Cycle Study and Air Quality Assessment to demonstrate that allocations are sustainable and that sufficient mitigation is deliverable to ensure no adverse effects to designated sites.

We agree that, due to distance, there are no potential pathways for impacts to European sites through habitat loss and fragmentation.

Natural England therefore supports the conclusion of the HRA that the Central Bedfordshire Local Plan is unlikely to give rise to significant effects on European sites hence further Appropriate Assessment is not required.

### **Sustainability Appraisal (SA)**

Natural England is satisfied that the SA objectives, assessment methodology and framework generally accord with the requirements of the Planning and Compulsory Purchase Act 2004 and the Strategic Environmental Assessment Regulations.

We welcome the incorporation of the summary findings of the Habitats Regulations Assessment (HRA) into the revised Sustainability Appraisal (SA) report (Enfusion, January 2018), in line with our previous advice. However, we cannot agree with the conclusions of the SA as we have significant outstanding concerns in relation to:

- the lack of proper assessment of the impacts of development on the AONB, including the production of an LVIA
- the need for the Sustainability Appraisal to be informed by an updated Water Cycle Study
- The need for the Sustainability Appraisal to properly address the impact of increased recreational pressure on designated sites.

We understand that the HRA has concluded that the Draft Plan will not have likely significant effects, individually or in-combination, on the identified European Sites. We welcome, in line with our previous advice, that the assessment has considered the potential for impacts to European sites beyond the district boundary, in accordance with the requirements of the Habitats Regulations.

To reiterate our comments at the previous consultation stage, section 4.10 indicates that despite mitigation to address negative effects through the emerging development management policies, uncertainty of the significance of effects remains until further studies on the water cycle and transport impacts/capacities are completed. Natural England again advises that these studies should be completed as soon as possible to provide the evidence required to inform the SA and enable sound judgements to be made regarding which allocations are sustainable and can be taken forward. We note that paragraph 70 of the SA Technical Summary report states that there are uncertainties in relation to some of the negative cumulative impacts on the AONB from the proposed development North of Luton and given the scale of the proposed development we advise that further work is required to understand the cumulative impacts and to determine whether the impacts can be mitigated.

As previously advised, the SA cannot rely alone on the emerging development management policies to mitigate the potential adverse effects of proposals on the natural environment, including designated sites and landscapes. An up to date Stage 2 Water Cycle Study, Landscape and Visual Impact Assessment (LVIA) and assessment of air quality and recreational pressure should be provided to inform the SA and demonstrate that allocations will not have any adverse effect on the Chilterns Area of Outstanding Natural Beauty (AONB) or its setting and designated nature conservation and geological sites. Agricultural Land Classification (ALC surveys) are also required, where possible, to assess the impacts of allocations on best and most valuable land (BMV land) and identify measures to mitigate adverse effects.

For any queries relating to the specific advice in this letter only please contact Louise Oliver on [REDACTED]. For any new consultations, or to provide further information on this consultation please send your correspondences to [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).

Yours faithfully



John Torlesse  
Manager



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## Annex 1: Central Bedfordshire Draft Local Plan (2015-35) Natural England Detailed Comments

### Central Bedfordshire Draft Local Plan

#### Section 2.3.2

In accordance with paragraph 111 of the NPPF we advise that the re-use of brownfield land needs to make explicit that brownfield land will be brought forward for development provided that it is not of high environmental value. This should be inherent in the site allocation process and development management policies.

#### Vision and Objectives

We would expect the Vision for Central Bedfordshire 2035 to aspire to a high quality **natural environment**, rather than just a high quality landscape.

#### Section 7.5 Spatial Strategy Approach

We welcome recognition of the environmental constraints and opportunities across the district such as Greensand Ridge NIA and the proposed extension to Forest of Marston Vale. The Plan includes generic policies to protect and enhance these areas; however, **relevant site allocations policies will need to include robust requirements to deliver specific mitigation and enhancement measures in these areas, along with a clear mechanism for their delivery / funding**.

#### Section 8.5 Summary of Housing Growth Locations

A number of allocation policies include land within or close to sites designated as SSSI. Natural England will object to any allocation where policy requirements are not sufficiently robust to demonstrate that development will not have an adverse effect on a SSSI.

As previously advised the SA should have carefully assessed the potential impacts of development in these locations, alone and cumulatively, on the natural environment, including designated sites. Potential pathways for impacts include increased recreational pressure, changes in air quality and changes in water quantity and water quality should have been assessed in detail through the SA and recommendations for mitigation measures to address adverse effects, and a mechanism for their funding / delivery identified. These recommendations should then have been translated into robust policy requirements. We have provided further advice on this in our comments on the SA and site allocation policies below.

Policy SA1: Land North of Luton and proposals in Barton-le-Clay are within / within the setting of, the Chilterns AONB. A Landscape and Visual Impact Assessment (LVIA) has yet to be undertaken to assess the impact of development in these locations on the AONB and its setting, and to identify whether mitigation measures could adequately address adverse effects. Our advice, in the context of paragraphs 115 and 116 of the NPPF, is that a new link road or new housing in the AONB would be classed as major development. Consequently any proposals taken forward in these locations will need to:

- demonstrate **need** for the development in that location, including national considerations and the impact of permitting it, or refusing it, upon the local economy. Justification and robust evidence to demonstrate need will be required.
- show what reasonable **alternatives** have been considered. The LPA must consider the cost of, and scope for, developing outside the designated area, or meeting the need for the development in some other way. The SA should set out the alternative locations/sites considered to meet the major development need elsewhere or alternative ways of meeting the need, as well as the rationale for selecting the allocation site.
- provide detailed **mitigation** measures to demonstrate that any detrimental effects on the AONB and/or its setting can be moderated.

Natural England will not support any proposals for development within the AONB or its setting without adequate and robust evidence to address the above requirements. Our advice is that these requirements can be most appropriately addressed through an LVIA. We recommend that the Council seeks further advice on this matter from the Chilterns Conservation Board

### Policy SP8 Gypsy and Traveller and Travelling Showpeople Pitch Requirement

Natural England advises that potential site allocations will need to be assessed through the HRA and SA to ensure development will not have an adverse effect on the natural environment including designated sites and landscapes. This should be acknowledged in Policy SP8 along with a requirement for mitigation to address adverse effects.

### Policies EMP1, EMP2 and EMP4

Natural England advises that these policies promoting new employment sites / uses should include a requirement for proposals to demonstrate no adverse impact to the natural environment including designated sites and landscapes.

### Policy EMP4: Rural and Visitor Economy

We welcome that proposals for static holiday and touring caravan parks and holiday chalet developments will be considered against the need to protect valuable landscapes and environmentally sensitive sites. Our advice is that this should apply to **all** rural and visitor economy proposals, hence the policy should be amended accordingly.

### Section 15 Transport

We advise that policies (such as Policy T2) are strengthened with links to policies on GI and ecological networks in order to recognise the contribution that highways verges and railway embankments can make to local biodiversity and in strengthening ecological networks, in accordance with NPPF requirements to protect and enhance ecology and deliver net biodiversity gain

This section should also recognise the potential for transport proposals to protect and enhance the natural environment including designated sites. Proposals should be required to demonstrate no adverse effect to air quality sensitive designated sites, directly or indirectly, including through changes in air quality. This is required in the absence of a strategic transport / air quality assessment to inform the Local Plan, to ensure the policy is consistent with paragraph 118 NPPF requirements to protect designated sites.

### Section 16 Environmental Enhancement

#### Policy EE1 Green Infrastructure

Natural England generally supports this policy; however, we advise that the first sentence should be reworded as follows:

- Proposed development must demonstrate a net gain in green infrastructure;

The issue of additional recreational pressure associated with proposed growth, and measures needed to address this, should have been addressed through the SA, having regard to the objectives of the strategic and district Green Infrastructure strategies. The findings and recommendations of the SA, relating to GI, should then be translated into robust requirements in the relevant site allocation policies and Policy EE1. These policies should also include a clear delivery/funding mechanism.

We advise that this policy needs to include more robust requirements for proposals to deliver the objectives of the strategic and district GI strategies and thus achieve net gain.

Central Bedfordshire includes areas identified by Natural England where landscape scale biodiversity enhancement is needed to enhance resilience of designated sites through creation of buffering and connecting habitat. We welcome reference to the Greensand Ridge NIA and a specific policy EE8: Greensand Ridge NIA, to ensure its protection and enhancement. However, as previously advised similar references and policy requirements are required to ensure protection and enhancement of the landscape and habitats of the Ouse Valleys and the West Cambridgeshire Hundreds ancient woodlands (located within/close to the CBC district boundary). It is not clear how the plan makes provision for an appropriate quality and quantity of natural green space to meet identified local needs, as part of wider open space provision, and to plan positively

to remedy any deficiencies. This should be addressed / clarified within Policy EE1, or Policy EE12, although this latter policy seems to be more about formal open space provision.

#### Policy EE2 Enhancing biodiversity

To make developers aware of the benefits of the emerging district level great crested newt (GCN) licence we advise inclusion of additional wording along the following lines:

- *A District Level Licence for GCN in Central Bedfordshire is currently being prepared. The aim of this licence is to reduce delays, costs and uncertainty for developers whilst providing strategic habitat compensation to improve long-term nature conservation for GCNs.*

We recommend that reference is made to the work of the Bedfordshire Local Nature Partnership and its role in the planned Natural Capital Investment Plan for the Oxford-Milton Keynes-Cambridge Growth Corridor.

#### Policy EE3 Nature conservation

Recognising that there are no European designated sites within the administrative boundary of Central Bedfordshire, we re-iterate our advice of 31 August 2016 (our ref:190688), that “a number of European designated sites will fall under the influence of the Plan” and therefore European Sites should be referenced in Policy EE3 in accordance with paragraph 113 of the National Planning Policy Framework (NPPF). Natural England advises that the following additional policy wording, or similar, is included:

*Developments that are likely to have an adverse effect, either alone or in-combination, on European designated sites must satisfy the requirements of the Habitats Regulations, determining site specific impacts and avoiding or mitigating against impacts where identified. Mitigation may involve providing or contributing towards a combination of the following measures:*

- Access and visitor management measures within the SAC;*
- Improvement of existing greenspace and recreational routes;*
- Provision of alternative natural greenspace and recreational routes;*
- Monitoring of the impacts of new development on European designated sites to inform the necessary mitigation requirements and future refinement of any mitigation measures.*
- Other potential mitigation measures to address air pollution impacts e.g. emission reduction measures, on site management measures.*

Policy EE3 should also require development proposals to:

- Conserve and enhance the network of habitats, species and sites (both statutory and non-statutory) of international, national and local importance commensurate with their status and give appropriate weight to their importance;
- Avoid negative impacts on biodiversity and geodiversity, mitigate unavoidable impacts and as a last resort compensate for residual impacts;
- Deliver a net gain in biodiversity where possible, by creating, restoring and enhancing habitats and enhancing them for the benefit of species.

We support the recognition in this Policy that indirect effects can occur at some distance from a development site and that mitigation will be required in these circumstances, and advise that developer contributions may be required as a mechanism to mitigate these impacts.

#### Policy EE7 The Chilterns Area of Outstanding Natural Beauty

Natural England fully supports this policy which includes robust requirements to ensure that development will protect and enhance the nationally designated landscape of the AONB and its setting, in accordance with the requirements of paragraphs 115 and 116 of the NPPF.

As previously advised Natural England will not support housing growth locations which are within, or within the setting of the Chilterns AONB unless robust evidence is provided to 1) justify the need for development in that location; 2) demonstrate that suitable alternatives have been fully explored; and 3) demonstrate that adequate mitigation can be delivered to address adverse effects.

#### Policy EE8 Greensand Ridge Nature Improvement Area

Natural England supports this policy to ensure development will protect and enhance the landscape and habitats of the NIA.

#### Policy EE14 Applications for Minerals and Waste Development

As previously advised, to ensure that the policy is sound and compliant with NPPF requirements, the policy should include a requirement for proposals to demonstrate no adverse effect to the natural environment, including designated sites. To ensure soundness and compliance with the NPPF a specific requirement for proposals to be accompanied by Ecological Impact Assessment, including consideration of hydrogeological impacts, should be added.

#### Policy CC4 Development Close to Watercourses

We advise that a requirement to protect and enhance priority and protected species such as otter and water vole is added to ensure that the policy is sound and compliant with paragraph 117 of the NPPF.

#### Policy CC5: Sustainable Drainage

Natural England generally supports this policy including requirements to protect and enhance the natural environment.

#### Policy CC6: Water Supply and Sewerage Infrastructure

In the absence of a Stage 2 Water Cycle Study being undertaken it is unclear how the issue of waste water management and water treatment capacity is dealt with through the Plan, and how it has been demonstrated that sufficient infrastructure / Waste Water Treatment Works capacity exists to serve the proposed development without adverse effect to designated sites. Any measures needed to ensure this, including implementation of any infrastructure /upgrades to meet development timescales, should be included within the relevant plan policies.

Notwithstanding the above we note that Policy CC6 includes requirements for proposals to demonstrate adequate water / wastewater treatment capacity / infrastructure to serve the development. Whilst this does not represent good planning we are satisfied that the policy requirements offer sufficient protection to the natural environment.

We advise that Natural England will not support Local Plan allocations where appropriate measures to address adverse impacts to internationally and nationally designated sites cannot be demonstrated.

#### Policy CC7: Water Quality

We support this policy and requirement for relevant proposals to be accompanied by a Water Framework Directive assessment and to contribute positively to the water environment and its ecology. However, this appears to be deferring the sustainability assessment of proposals to the project stage. In our view this poses a potential risk to designated sites and to the deliverability of sustainable development. This could have been addressed by assessing water quality effects and deliverability of measures to address adverse effects through the SA (informed by an up to date Water Cycle Strategy).

Notwithstanding the above we note that Policy CC7 includes requirements for proposals to demonstrate no adverse impact to the natural environment / WFD compliance and to protect and enhance the water environment and associated ecology. Whilst this does not represent good planning we are satisfied that the policy requirements offer sufficient protection to the natural environment.

We advise that Natural England will not support Local Plan allocations where appropriate measures to address adverse impacts to internationally and nationally designated sites cannot be demonstrated.

Policy HQ9: Larger Sites

Natural England advises the inclusion of an additional requirement for proposals to be accompanied by an Ecological Mitigation and Enhancement Plan, to demonstrate delivery of biodiversity net gain in accordance with paragraph 109 of the NPPF.

Section 19 Development in the Countryside: this section appears to provide adequate consideration and protection to the natural environment hence we are generally supportive of related policies. However, we would advocate cross-reference with the requirements of policies EE3 and EE7 to ensure the protection of designated sites and landscapes.

Natural England's detailed advice on the potential allocations is provided in Annex 2 to this letter.



## Annex 2 Natural England's Detailed Advice on Potential Allocations

### Policy SA1: North of Luton

We welcome the requirement for development to provide appropriate mitigation, compensation and/or enhancement of key features of biodiversity, to ensure a net gain for biodiversity including but not limited to Sundon Chalk Quarry SSSI, Barton Hills SSSI and NNR. However, as currently worded this policy does not provide sufficient mitigation, nor a mechanism for its delivery, to demonstrate that development will not have an impact on these designated sites, particularly through increased recreational pressure. Natural England therefore objects to this policy as currently worded.

To reiterate previous advice, the major increase in local population associated with this development has the potential to increase recreational pressure on a number of designated sites overlying chalk geology. These sites include Sundon Chalk Quarry SSSI, Smithcombe, Sundon and Sharpenhoe Hills SSSI, Barton Hills SSSI and NNR, Deacon Hill SSSI, Knocking Hoe SSSI and NNR and Pegsdon Hill CWS. Town expansion proposals in the North of Luton will need a coherent package of funding for off-site mitigation measures to make these designated sites more resilient to visitor pressure on their sensitive chalk grassland habitats, whilst also contributing to provision of buffer land around the designated sites. These areas of buffer land will create the opportunity to link habitats through restoration and creation. Provisions could also include new or improved areas of attractions/visitor parks to 'divert' population from SSSI/CWS sites to help decrease visitor pressure on them.

Policy SA1 should be amended in accordance with the above advice to ensure it is sound and compliant with NPPF requirements.

Natural England supports the requirement for the design and construction of the development as a whole, including the A6 to M1 junction 11a link road, to ensure no undue impact on the AONB, heritage assets and biodiversity and provide for mitigation and enhancements where feasible. However, as previously advised, we have concerns about the general location and alignment of the proposed link road with regard to potential air quality and other impacts on nationally designated sites<sup>1</sup> and on the Chilterns AONB protected landscape. There is also the potential for impacts from the East Luton Circular Road (a 'safeguarded road' policy in the recently examined Luton Local Plan).

The impacts of this allocation and the proposed link road on biodiversity, including nationally designated sites and on the nationally important landscape setting of the Chilterns AONB have not been properly assessed through the SA. Appropriate mitigation, and a clear mechanism for its delivery, has not been identified and included within Policy SA1. Consequently Natural England objects to the inclusion of Policy SA1, as currently worded, in the Local Plan. Consequently Natural England advises that this policy is unsound, as currently worded, in the Local Plan as it is not consistent with paragraphs 109 115 and 118 of the NPPF. In our opinion this policy / allocation is not compliant with the Plan's own policy to protect the AONB i.e. Policy EE7 The Chilterns Area of Outstanding Natural Beauty.

Natural England does not agree with the apparent judgement in section 8.80 of the SA that the policy is acceptable on the basis of a requirement that the whole development including the A6 to M1J11a Link Road, should have no undue impacts on the AONB and biodiversity and that it should provide mitigation where feasible. This requirement and the generic requirements of policy EE2 Enhancing Biodiversity are not sufficiently robust for Natural England to be satisfied that an appropriate level of mitigation can and will be delivered to ensure no adverse impact on statutorily designated sites and landscapes.

As previously advised, the proposal is likely to have direct impact on a nationally designated landscape and/or its setting. This will require strategic landscape and GI master planning to enhance and to link development to existing landscape and ecological networks. We advised that we wish to engage with site promoters through our [Discretionary Advice Service](#) (DAS) to advise

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<sup>1</sup> Potentially Sundon Chalk Quarry SSSI and Smithcombe, Sundon and Sharpenhoe Hills SSSI

on avoidance and minimisation of impacts to the Chilterns AONB. We also encouraged the Council to engage with the Chiltern Conservation Board regarding impacts of the potential development. We are not aware that any such engagement has been undertaken. Consequently Policy SA1 does not include sufficiently robust requirements for mitigation, and clear mechanisms to deliver this, for NE to be satisfied that the development will not have a significant adverse effect on nationally designated sites and landscapes.

The policy does not provide sufficient requirement to protect Best and Most Versatile agricultural land in accordance with paragraph 112 of the NPPF. We advise that the policy be amended accordingly to ensure that it is sound and consistent with NPPF requirements.

#### Policy SA2: Marston Vale New Villages

Natural England supports policy requirements for delivery of multi-functional green infrastructure and appropriate mitigation, compensation and/or enhancement of key features of biodiversity including great crested newts.

As we stated in our previous advice, the allocation area is in close proximity to a number of designated sites, including Marston Thrift SSSI, Cooper's Hill SSSI and Kings Wood and Glebe Meadows, Houghton Conquest SSSI and County Wildlife Sites (CWS). In order to ensure that the policy is sound and consistent with the requirements of paragraphs 117 and 118 of the NPPF to protect and enhance designated sites, we advise that the policy be amended to include a requirement for proposals to deliver sufficient mitigation to demonstrate no adverse impact to designated sites, including through the effects of increased recreational pressure.

The area contains habitat known to support Great Crested Newt meta-populations. In order to ensure that the policy is sound and consistent with the requirements of paragraphs 117 of the NPPF to protect and enhance biodiversity including protected species, we advise that the policy be amended to include a requirement for proposals to assess and mitigate / compensate impacts to known meta-populations of GCN in accordance with the requirements of the Conservation (of Habitats and Species) Regulations 2010 (as amended) and /or any agreed District Level Licence for GCN.

Natural England advises that this policy be amended to include a requirement for relevant proposals to protect and enhance the objectives of the Greensand Ridge Nature Improvement Area (NIA). This will ensure that the plan is consistent with the requirements to paragraph 117 of the NPPF.

We support recognition that the site is within the Forest of Marston Vale, and therefore any development must provide a total of 30% tree cover.

Natural England welcomes policy EE10 which seeks to protect and enhance the Bedford and Milton Keynes Waterway Park.

We provide the following advice on the potential Marston Vale New Villages sites:

Natural England previously advised that the opportunity exists to highlight the importance of geodiversity, particularly in the context of the local historic use of the Marston Vale for brick working. In order to ensure that the policy is sound and consistent with the requirements to prevent harm to geodiversity interests we advise that the policy be amended to include a requirement for proposals to demonstrate no adverse effect to geodiversity assets.

The policy does not provide sufficient requirement to protect Best and Most Versatile agricultural land in accordance with paragraph 112 of the NPPF. We advise that the policy be amended accordingly to ensure that it is sound and consistent with NPPF requirements.

#### Policy SA3: East of Arlesey

Natural England has no objection to this policy as the allocated area avoids designated sites<sup>2</sup> and protected landscapes. We welcome the provision of a country park between Arlesey and Fairfield. We also support requirements for delivery of net biodiversity gain and for development to maximise opportunities to create Green Infrastructure corridors and meet the aims and objectives of the Etonbury Green Wheel.

The policy does not provide sufficient requirement to protect Best and Most Versatile agricultural land in accordance with paragraph 112 of the NPPF. We advise that the policy be amended accordingly to ensure that it is sound and consistent with NPPF requirements.

#### SA4: East of Biggleswade

Natural England welcomes policy requirements to deliver net biodiversity gain. We would welcome an amendment to encourage opportunities for biodiversity enhancement to complement the A1 Route Enhancement strategic transport scheme.

As advised in our previous response Biggleswade Common, Potton Wood SSSI, Sandy Warren SSSI and the adjacent RSPB. The Lodge site are likely to be at risk from additional recreational impacts from the proposed development of ~1500 new dwellings. In order to ensure that the policy is sound and consistent with the requirements of paragraphs 117 and 118 of the NPPF to protect and enhance designated sites, we advise that the policy be amended to include a requirement for the proposal(s) to deliver sufficient mitigation to demonstrate no adverse impact to designated sites, including through the effects of increased recreational pressure. Mitigation measures are likely to require developer contributions to mitigate off-site impacts and/or strategic GI within the development.

#### Land South of Wixams

As previously advised we welcome the proposed country park which should deliver important early-successional habitats for invertebrates, and waterbodies including habitats for Great Crested Newts. The creation of temporary early-successional habitats will provide valuable places for species and habitats to use in the intervening period before the site is developed. Proposals should seek to create temporary habitat on areas that will be developed in future phases, rather than sterilise the site.

We advise that the masterplan of this proposed site should ensure that sufficient landscape buffer is designed together with suitable quantity and quality of GI to satisfy the requirements of new residents together with existing residents at the existing allocated site of MA2 at Wixams itself. This would serve the purpose of minimising the impact of additional recreational pressure on the nearby Kings Wood and Glebe Meadows, Houghton Conquest SSSI (~1.5km to the south) and the cluster of three SSSIs that are ~3.75km to the south (Maulden Wood and Pennyfather's Hill SSSI, Maulden Heath SSSI and Maulden Church Meadow SSSI). Proposals should seek to contribute to the delivery of the objectives of the Forest of Marston Vale's Forest Plan.

#### HAS04 and HAS05, Barton-le-Clay

Please refer to our advice and comments on Policy SA1. Natural England advises that similar requirements should apply to proposals in Barton-le-Clay to ensure protection of designated sites and the Chilterns AONB and its setting

#### RAF Henlow

The site includes a significant area of brownfield land which may be of high biodiversity value. Proposals should be required to undertake detailed Ecological Impact Assessment and demonstrate net biodiversity gain in accordance with paragraph 117, 118 of the NPPF.

#### **Future sites**

We note that the following sites have been identified as providing further opportunities for Strategic Growth in a Partial Plan Review. Natural England provided advice on these sites through the Regulation 18 consultation. We have reiterated our advice below so that this can be considered

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<sup>2</sup> The Detail section of the Draft Plan describes on page that the site contains a SSSI however we do not believe that there is a SSSI in this area

early in the process of any plan review.

### Land West of Luton

This general area within the urban fringe of Luton contains a number of potential development sites e.g. NLP436 West of Luton ~6K dwellings. We have the following general comments:

1. Existing biodiversity habitats. We draw your attention to a number of high-value sensitive biodiverse CWSs in the vicinity together with two SSSIs (Kenworth Chalk Pits ~2km away and Blow's Down ~2.5km away). We understand from the recent consultation on Sustainability Appraisal and Strategic Environmental Assessment for the Luton Borough Gypsy and Traveller Local Plan Part 2 (2011-2031) that development has recently taken place on CWSs. This unwelcome activity, when combined with the lack of provision of open space, exposes the SSSIs and CWSs to a greater risk of adverse impacts: such as unsustainable increases in recreational access or the unauthorised dumping of materials. Ancient woodland also occurs in this area and in accordance with paragraph 118 of the NPPF we advise that inappropriate development would have a detrimental impact on these assets.
2. *Protected landscapes*. The sites in this area are either within the Chilterns AONB or are within the setting of the AONB. We encourage the Council to engage with the Chilterns' AONB Board regarding impacts of the potential development.
3. *Agricultural land quality*. We note from the Site Assessment Forms it is not known whether the soils are ALC Grade 3a or 3b. See our advice under *General advice on potential allocations* regarding BMV agricultural land, below.

To provide for net gain in biodiversity, appropriately designed and sufficient area of GI and landscaping are required to ensure that impacts on designated sites and ancient woodland are minimised, and the development harmonised within the context of the AONB. One possibility could be developer contributions towards the management and facilities at Stockwell Park in order to make the Park more resilient to larger numbers of visitors.

### Tempsford

This location is within/close to areas which Natural England believes should be prioritised for delivery of landscape scale biodiversity net gain (Ouse Valley, Bedfordshire Greensand Ridge and West Cambridgeshire Hundreds Woodlands). Consequently we strongly advocate that proposals in these locations are able to demonstrate delivery / contribution towards delivery of landscape scale biodiversity net gain. Two potential allocations - NLP450 Tempsford Airfield and NLP452 Land South of Tempsford – have the potential for ~5K dwellings in addition to potential allocations for employment land. Place-shaping through development should enable clear demonstration of net-gain in biodiversity by capitalising on environmental opportunities. **For a proposal of this scale we strongly recommend the commissioning of research to examine the opportunities to increase natural capital and ecosystem services in this area.** Such research would then inform the design, and would usefully also identify whether any areas of brownfield site are of high environmental value, and the masterplan adjusted in accordance with paragraph 111 of the NPPF. Please also see our advice on the loss of BMV agricultural land in *General advice on potential allocations*, above.

Whilst we recognise the opportunities for green and blue infrastructure, the description is currently generic and hence our advice at this stage can only be general in nature. There is no mention of strategic infrastructure such as a country park, which might be expected in a potential new market town of this size. There is the potential for off-site impacts to nearby designated sites such as the cluster of SSSI Woodlands in West Cambridgeshire Hundreds around 3km away to the east (Weaveley and Sand Woods SSSI, Gamlingay Woods SSSI, Potton Wood SSSI, Buff Wood SSSI and Waresley Wood SSSI) and at Sandy Warren SSSI (~5km to the south) which is included within the RSPB's The Lodge reserve. There are also a number of CWSs. These potential impacts will need to be evaluated and addressed at an early stage through discussion with the land managers of nearby designated sites, and a coherent package of mitigation and funding contributions prepared.

We advised on 21 July 2016 (our ref: 189708) that that the Local Plan's Technical Site Appraisal should "*assess the strategic spatial relationship of Site(s) to facilitate the connection and enhancement of environmental qualities and networks*". We would expect to see evidence of how this proposal connects with and enhances the Ivel River Valley strategic GI corridor<sup>3</sup>, together with connections to the Greensand Ridge NIA. There are particular risks of the severing of ecological corridors from the A1 Route Enhancement and East West Rail strategic transport schemes. Any proposals should demonstrate how opportunities might be created from such transport schemes – for example the use of green bridges and creation of a diversity of new habitat.

We note that the Site Assessment Form for Tempsford parish that development of NLP450 Tempsford Airfield has the risk of the "loss of old grassland" and from the Site Assessment Form for Everton parish that NLP452 Land South of Tempsford there is significant areas of Grade 2 and 3 BMV agricultural land.

#### Aspley Triangle

Given the close proximity of the site to the nearby mature habitats and open space at Aspley Heath (which includes this Wavendon Heath Ponds SSSI), there is a need to ensure good quality on-site GI provision to reduce potential impacts on adjacent areas and nearby areas of biodiversity interest and public open space. We also advise that appropriate off-site measures to connect and enhance nearby natural greenspace and biodiversity habitats.

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<sup>3</sup> as shown in the [Environmental Framework](#) that has been produced by the Council