Leighton Linsdale Neighbourhood Plan

Habitat Regulations Assessment

Leighton-Linsdale Parish Council

March 2026

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Quality information

Prepared by	Checked by	Verified by	Approved by
Stephen Kenny Ecologist	Dr James Riley Technical Director (Ecology)	Dr James Riley Technical Director (Ecology)	Dr James Riley Technical Director (Ecology)

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Prepared for:

Leighton-Linsdale Parish Council

Prepared by:

AECOM Limited
3rd Floor, Portwall Place
Portwall Lane
Bristol BS1 6NA
United Kingdom

T: +44 (0)117 901 7000
aecom.com

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1. Introduction

1.1 Background

1.1.1 AECOM was appointed by Locality to undertake a Habitats Regulations Assessment (HRA) for the for the Leighton-Linslade Neighbourhood Plan 2024 – 2042 (LLNP). This is to inform the Central Bedfordshire District Council (as competent authority) of the potential effects of the Neighbourhood Plan (NP) development on Habitat sites ((Special Areas of Conservation (SACs), Special Protection Areas (SPAs), and Ramsar sites (designated under the Ramsar convention)), and how they are being or should be addressed in the NP.

1.1.2 The LLNP contains policies on housing, transport, community facilities, commercial developments and the environment.

1.1.3 The LLNP and any subsequent development would have to adhere to the Central Bedfordshire Local Plan 2015 to 2035 (Central Bedfordshire Council 2021), adopted on 22 July 2021. The CLBP HRA (Enfusion 2017) sets out impacts to Habitat sites and the mitigation required for the CBLP area.

1.1.4 The objective of this report is to identify if any policies and/or site allocations proposed in the LLNP have the potential to cause Likely Significant Effects (LSEs) and, where identified, adverse effects on the integrity of Habitat sites, either in isolation or in combination with other plans and projects, and to determine whether policy mitigation measures are required.

1.2 Local Context

1.2.1 The Parish of Leighton-Linslade covers an area of approximately 16.88km^2 and is located approximately 15 km south of Milton Keynes, within Bedfordshire.

1.2.2 The parish population, as recorded in the 2021 Census, is around 42,392 usual residents.

1.3 Legislative Framework

1.3.1 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 continues, as set out in the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019[1].

1.3.2 The HRA process applies the ‘Precautionary Principle’[2] 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.

1.3.3 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.

[1] These don’t replace the 2017 Regulations but are just another set of amendments.
[2] 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”.*

Conservation of Habitats and Species Regulations 2017 (as amended)

The Regulations state that:

"*A competent authority, before deciding to … give any consent for a plan or project which is likely to have a significant effect on a European site … shall make an appropriate assessment of the implications for the site in view of that sites conservation objectives… The authority shall 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

1.3.4 It is therefore important to note that this report has two purposes:

- To assist the Qualifying Body (Leighton-Linslade Town Council) in preparing their plan by recommending (where necessary) any adjustments required to protect international sites, thus making it more likely their plan will be deemed compliant with the Conservation of Habitats and Species Regulations 2017 (as amended); and
- On behalf of the Qualifying Body, to assist the Local Planning Authority (Central Bedfordshire District Council) to discharge their duty under Regulation 105 (in their role as 'plan-making authority' within the meaning of that regulation) and Regulation 106 (in their role as 'competent authority').

1.1 As 'competent authority', the legal responsibility for ensuring that a decision of 'likely significant effects' is made, for ensuring an 'appropriate assessment' (where required) is undertaken, and for ensuring Natural England are consulted, falls on the local planning authority and the Neighbourhood Plan examiner. However, they are entitled to request from the Qualifying Body the necessary information on which to base their judgment and that is a key purpose of this report.

1.2 Over the years the phrase 'Habitats Regulations Assessment' has come into wide currency to describe the overall process set out in the Conservation of Habitats and Species Regulations from screening through to Imperative Reasons of Overriding Public Interest (IROPI). This has arisen in order to distinguish the process from the individual stage described in the law as an 'Appropriate Assessment'. Throughout this report we use the term Habitats Regulations Assessment for the overall process.

1.1 In spring 2018 the 'Sweetman' European Court of Justice ruling[3], clarified that 'mitigation' (i.e., measures that are specifically introduced to avoid or reduce a harmful effect on a Habitat 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 has been cognisant of that ruling.

1.4 Scope of the Project

1.4.1 There is no pre-defined guidance that dictates the physical scope of an HRA of a Plan document. Therefore, in considering the physical scope of the assessment, we were guided primarily by the identified impact pathways (called the source-pathway-receptor model).

1.4.2 Briefly defined, impact pathways are routes by which the implementation of a project can lead to an effect upon a Habitat site. An example of this would be visual and noise disturbance arising from the construction/decommissioning work or operational phase associated with a project. If there are sensitive ecological receptors within a nearby Habitat site (e.g. non-breeding overwintering birds), this could alter their foraging and roosting behaviour and potentially affect the site's integrity. For some impact pathways (notably air pollution) there is guidance that sets out distance-based zones required for assessment. For others, a professional judgment must be made based on the best available evidence.

1.4.3 Generally, it is uncommon for development plans 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

[3] People Over Wind and Sweetman v Coillte Teoranta (C-323/17)

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.

1.4.4 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.

1.4.5 Given an initial assessment of the relevant Habitats sites and the impact pathways present, this HRA will discuss (at least as far as the LSEs stage) the following Habitats sites:

- Chilterns Beechwoods SAC

1.4.6 In order to fully inform the screening for LSEs stage, several studies and online information databases have been consulted. These include:

- Road traffic statistics from the Department for Transport (https://roadtraffic.dft.gov.uk);
- Journey-to-work data from the Population Census 2011 (https://www.nomisweb.co.uk/census/2011/WU03UK);
- 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); and
- Multi Agency Geographic Information for the Countryside (MAGIC) and its links to SSSI citations and the JNCC website (www.magic.gov.uk).

1.5 Quality Assurance

1.5.1 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.

1.5.2 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)

2. Methodology

2.1 Introduction

2.1.1 The HRA has been carried out with reference to the general EC guidance on HRA[4] and general guidance on HRA published by government in July 2019 and 2021[5]. 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 current guidance. The stages are essentially iterative, being revisited as necessary in response to more detailed information, recommendations and any relevant changes to the Plan until no significant adverse effects remain.

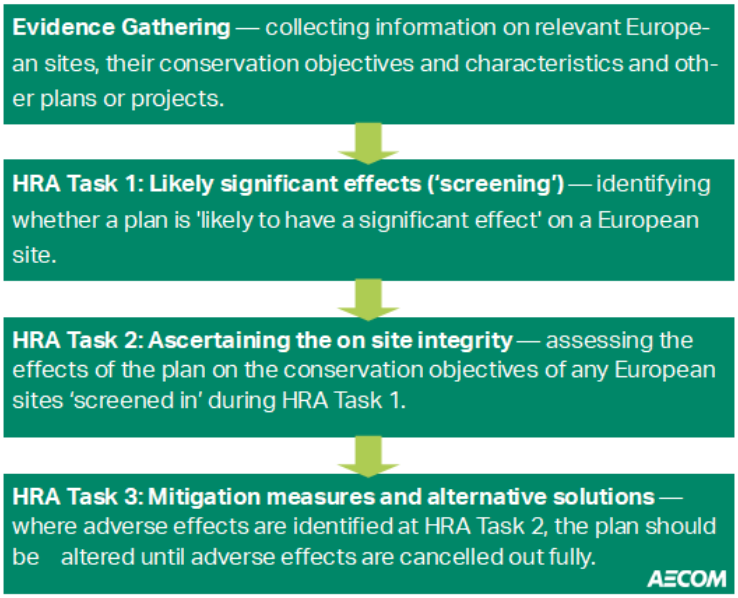

Figure 2: Four Stage Approach to Habitats Regulations Assessment.

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

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

2.2.2 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 with Habitats sites. It is important to note that the test of LSE must generally follow the precautionary principle as its main purpose is to determine whether the subsequent stage of 'Appropriate Assessment' (i.e., a more detailed investigation) is required.

2.2.3 This stage is undertaken in Chapter 4 of this report and in Appendix B.

[4] European Commission (2021): 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.
[5] https://www.gov.uk/guidance/appropriate-assessment and https://www.gov.uk/guidance/habitats-regulations-assessments-protecting-a-european-site

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 AA 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 AA is whether there is available mitigation that would entirely address the potential effect. In practice, the AA 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[6] 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[7] 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].

2.2.7 One of the key considerations during Appropriate Assessment is whether there is available mitigation that would address the potential effect. In evaluating significance, AECOM will rely on professional judgement as well as the results of bespoke studies, supported by appropriate evidence/data within this assessment.

HRA Task 3 – Avoidance and Mitigation

2.2.8 Where necessary, measures are recommended for incorporation into the Plan in order to mitigate and / or avoid adverse effects on Habitats Sites. There is considerable precedent concerning the level of detail that a Neighbourhood 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.

2.2.9 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 detail of the mitigation measures themselves since a Local Plan document is a high-level policy document.

2.2.10 When discussing 'mitigation' for a Neighbourhood Plan document, one is concerned primarily with the policy framework to enable the delivery of such mitigation rather than the detail of the mitigation measures themselves since the Local Development Plan document is a high-level policy document. A Neighbourhood Plan is a lower level constituent of a Local Development Plan.

2.3 Confirming Other Plans and Projects That May Act 'In Combination'

2.3.1 It is a requirement of the Regulations that the impacts of any land use plan being assessed are not considered in isolation but in combination with other plans and projects that may also be affecting the Habitat site(s) in question.

2.3.2 In considering the potential for combined regional housing development to impact on Habitat sites the primary consideration is the impact of visitor numbers – i.e., recreational pressure and urbanisation.

[6] People Over Wind and Sweetman v Coillte Teoranta (C-323/17)
[7] Case C-461/17

2.3.3 When undertaking this part of the assessment it is essential to bear in mind the principal intention behind the legislation i.e., to ensure that those projects or plans (which in themselves may have minor impacts) are not simply dismissed on that basis but are evaluated for any cumulative contribution they may make to an overall significant effect. In practice, in combination assessment is therefore of greatest relevance when the plan or policy would otherwise be screened out because its individual contribution is inconsequential. The overall approach is to exclude the risk of there being unassessed likely significant effects in accordance with the precautionary principle. This was first established in the seminal Waddenzee[8] case.

2.3.4 For the purposes of this assessment, we have determined that, due to the nature of the identified impacts, the key other plans and projects with potential for in combination likely significant effects are those schemes that have the following impact pathways: Loss of functionally linked land, recreational pressure, air quality impacts, water quality impacts and water quantity level and flow. The following plans have been assessed for their in-combination impact to interact with the LLNP:

- Central Bedfordshire Local Plan 2015-2035 (Central Bedfordshire Council 2021)
- Anglian Water, Water Resources Management Plan 2019 (Anglian Water 2019).
- Affinity Water, Water Resources Management Plan 2024 (Affinity Water 2024).
- Thames Water, Water Resources Management Plan 2024 (Thames Water 2024).
- Plan:MK 2016-2031 (Milton Keynes Local Plan) (Milton Keynes City Council 2019).

2.3.5 It should be noted that, while the broad potential impacts of these other projects and plans have been considered, this assessment does not undertake full HRA on each of these plans. Instead, existing HRAs that have been carried out for surrounding authorities and plans were drawn upon.

2.3.6 Within this document, each policy within the LLNP is subjected to HRA screening (summarised in Appendix B). LSEs are then scrutinised in more detail in the main body of the report and where necessary an AA is undertaken.

[8] Waddenzee case (Case C-127/02, [2004] ECR-I 7405)

3. Identified Impact Pathways

3.1.1 The Chilterns Beechwoods SAC is made up of nine separate sites scattered across the Chilterns. The component parts of the SAC are also Sites of Special Scientific Interest (SSSIs) and are listed as follows:

- Ashridge Commons and Woods SSSI;
- Aston Rowant Woods SSSI;
- Bisham Woods SSSI;
- Bradenham Woods, Park Wood and the Coppice SSSI;
- Ellesborough and Kimble Warrens SSSI;
- Hollowhill & Pullingshill Woods SSSI;
- Naphill Common SSSI;
- Tring Woodlands SSSI; and
- Windsor Hill SSSI.

3.2 Atmospheric Pollution (Nitrogen Deposition)

3.2.1 The main emitted pollutants of concern for Habitats Sites are oxides of nitrogen (NOx), ammonia (NH_3) and sulphur dioxide (SO_2) and are summarised in Table 1. Ammonia can have a directly toxic effect upon vegetation, particularly at close distances to the source such as near road verges[9]. NOx can also be toxic at very high concentrations (far above the annual average Critical Level). Elevated NOx and NH_3 also increases the total N deposition to soils, potentially leading to deleterious knock-on effects in resident ecosystems depending on sensitivity, extent of area affected and other factors. Increases in nitrogen deposition from the atmosphere can, if sufficiently great, enhance soil fertility and lead to eutrophication. This can have adverse effects on the community composition and quality of semi-natural, nitrogen-limited terrestrial and aquatic habitats (Wolseley, et al. 2006) (Dijk 2011).

Table 1: Main sources and effects of air pollutants on habitats and species[10]

Pollutant	Source	Effects on habitats and species
Sulphur Dioxide (SO_2)	The main sources of SO_2 are electricity generation, and industrial and domestic fuel combustion. Total SO_2 emissions in the UK have decreased substantially since the 1980's and are concentrations are now generally very low. Another origin of sulphur dioxide is the shipping industry and high atmospheric concentrations of SO_2 have been documented in busy ports. In future years shipping is likely to become one of the most important contributors to SO_2 emissions in the UK.	Wet and dry deposition of SO_2 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_2 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_2, NOx, ammonia and hydrochloric acid. Acid deposition from rain has declined by 85% in the last 20 years, which most of this contributed by lower sulphate levels.	Gaseous precursors (e.g. SO_2) can cause direct damage to sensitive 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

[9] http://www.apis.ac.uk/overview/pollutants/overview_NOx.htm.
[10] Information summarised from the Air Pollution Information System (http://www.apis.ac.uk/).

Pollutant	Source	Effects on habitats and species
	Although future trends in S emissions and subsequent deposition to terrestrial and aquatic ecosystems will continue to decline, increased N emissions may cancel out any gains produced by reduced S levels.	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_3)	Ammonia is a reactive, soluble alkaline gas 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 the catalytic converters of certain vehicles, particularly petrol cars. Ammonia reacts with acid pollutants such as the products of SO_2 and NO_X emissions to produce fine ammonium (NH_4+) - containing aerosol. Due to its significantly longer lifetime, NH_4+ 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_4+ 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_3 is rapidly deposited, some of the most acute problems of NH_3 deposition are for small relict nature reserves located in intensive agricultural landscapes.
Nitrogen oxides (NO_x)	Nitrogen oxides are mostly produced in combustion processes. Half of NO_X emissions in the UK derive from motor vehicles, one quarter from power stations and the rest from other industrial and domestic combustion processes. Nitrogen oxides, particularly from traffic, have been consistently falling for many years, notwithstanding an increase in traffic on the network, due to improved vehicle emissions technology.	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 NOx for all vegetation types has been set to 30 ug/m3. Deposition of nitrogen compounds (nitrates (NO_3), nitrogen dioxide (NO_2) and nitric acid (HNO_3)) contributes to the total nitrogen deposition and may lead to both soil and freshwater acidification. In addition, NO_x 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_X) or reduced (e.g. NH_3) nitrogen emissions (described separately above). While oxidized nitrogen mainly originates from major conurbations or highways, reduced nitrogen mostly derives from farming practices but at a local scale road traffic makes a significant contribution. 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.

Pollutant	Source	Effects on habitats and species
Ozone (O_3)	A secondary pollutant generated by photochemical reactions involving NOx, 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_3 above 40 ppb can be toxic to both humans and wildlife, and can affect buildings. High O_3 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.

3.2.2 Emissions of NOx and, at a local scale, ammonia can reasonably be expected to increase as a result of the Plan, primarily due to an increase in the volume of commuter traffic associated with housing growth.

3.2.3 The World Health Organisation has the following critical thresholds for plant communities: The critical NOx concentration (critical threshold) for the protection of vegetation is 30 μgm^{-3}, that for ammonia is 3 μgm^{-3} (1 μgm^{-3} for lower plants) and the threshold for sulphur dioxide is 20 μgm^{-3}. Additionally, ecological studies have determined 'Critical Loads'[11] of atmospheric nitrogen deposition (that is, NOx combined with ammonia NH_3).

3.2.4 According to the Department of Transport's Transport Analysis Guidance, beyond 200m, the contribution of vehicle emissions from the roads to local pollution levels is insignificant (Figure 3 and reference (Department for Transport 2025)). 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.

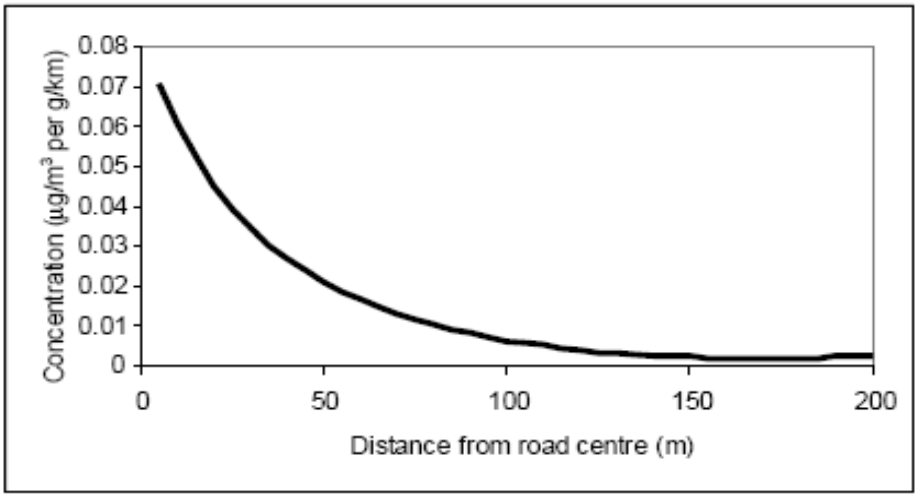

Figure 3: Traffic contribution to concentrations of pollutants at different distances from a road (Source: DfT[12])

Chiltern Beechwoods SAC

3.2.5 The Chilterns Beechwoods SAC is made up of nine separate SSSIs. Of these Ashridge Commons and Woods SSSI lies within 10 km of the southern edge of Leighton-Linslade Parish boundary this could lead to LSEs on the Chilterns Beechwoods SAC.

[11] The critical load is the rate of deposition beyond which research indicates that adverse effects can reasonably be expected to occur.
[12] Available at: https://webarchive.nationalarchives.gov.uk/ukgwa/20140715150031/http://www.dft.gov.uk/ha/standards/dmrb/vol11/section3/ha20707.pdf [Accessed on the 05/03/2026]

3.2.6 This component for the Chilterns Beechwoods SAC is within 200m of several major roads:

- B4506 which is a possible commuting route to Berkhampsted.
- Stocks Road which runs north from Aldbury to Ivinghoe.
- Newground Road which runs south from Aldbury towards the A4251.

3.2.7 Given this, atmospheric pollution is considered in the test of likely significant effects as a potential impact pathway.

3.3 Recreational Pressure

3.3.1 There is concern over the cumulative impacts of recreation on key nature conservation sites in the UK, as most sites must fulfill conservation objectives while also providing recreational opportunity. Various research reports have provided compelling links between changes in housing and access levels (D. Weitowitz, et al. 2019), and impacts on Habitats Sites (Liley, Clarke and Mallord, et al. 2006a) (Liley, Clarke and Underhill-Day, et al. 2006b). This applies to any habitat, but recreational pressure from housing growth is of particular significance for Habitats sites designated for their bird interest. 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 disturbance as a result of new residents[13].

Trampling Damage, Nutrient Enrichment and Wildfires

3.3.2 Most terrestrial habitats (especially heathland, woodland and dune systems) can be affected by trampling and other mechanical damage, which 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 (1994) 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 (1995a) (1995b) 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 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 and geophytes (plants with buds below the soil surface) was heavily reduced after two weeks but had recovered well after one year and as such these were 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 (1995c) 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 tramplers caused a greater reduction in vegetation height than lighter tramplers, but there was no differential impact on vegetation cover.

[13] The RTPI 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'.

- Cole & Spildie (1998) 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.

- 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, e.g. (Taylor K. 2005)). 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 (Barnard 2003). While there is limited information on the chemical constituents of dog faeces, nitrogen is one of the main components (Taylor, et al. 2006). 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.

3.3.3 Recreational catchments vary from Habitat site to Habitat site but for catchments for inland sites are often in the range of 2-7km. Various research reports have provided compelling links between changes in housing and access levels. The results of studies compiling visitor survey data for a range of Habitats sites (D. C. Weitowitz, et al. 2019) demonstrate that more housing consistently means more visitors to protected sites, across most habitats. This is particularly the case for on-foot visitors that originate from housing within 1.5 km, highlighting that additional housing development in close proximity to protected sites is likely to significantly increase recreation pressure. For those sites with car parks, levels of housing within 15 km of protected sites were also a significant predictor of visitor pressure but depended on habitat type.

Chiltern Beechwoods SAC

3.3.4 The Chilterns Beechwoods SAC is made up of nine separate SSSIs. Of these only Ashridge Commons and Woods SSSI and Tring Woodlands SSSI list recreational pressure as a threat or pressure.

3.3.5 Ashbridge Commons and Woods SSSI is 9km distant from the southernmost part of the Leighton-Linslade Parish boundary. Tring Woodlands SSSI is 12 km distant from the southernmost part of the Leighton-Linslade Parish boundary, however, in consultation with Buckinghamshire Council over their emerging Local Plan, Natural England advised there is no current evidence to suggest that there are recreational pressures occurring at Tring Woodlands SSSI.

3.3.6 No other component SSSI of the Chilterns Beechwoods SAC listed recreational pressure as a threat or pressure.

4. Test of Likely Significant Effects (ToLSE) - Screening

4.1 Introduction

4.1.1 When seeking to identify relevant Habitat sites, consideration has been given primarily to identified impact pathways and the source-pathway-receptor approach, rather than adopting purely a 'zones'-based approach. The source-pathway-receptor approach is a standard tool in environmental assessment. In order for an effect to occur, all three elements of this mechanism must be in place, whereas the absence of one or more of the elements means there is no possibility for an effect. Furthermore, even where an impact is predicted to occur, it may not result in significant effects (i.e., those which undermine the Conservation Objectives of a Habitats site).

4.1.2 The likely zone of impact (also referred to as the likely Zone of Influence, ZoI) of a plan or project is the geographic extent over which significant ecological effects are likely to occur. The ZoI of a plan or project will vary depending on the specifics of a particular proposal and must be determined on a case-by-case basis with reference to a variety of criteria, including:

- the nature, size / scale and location of the plan;
- the connectivity between the plan and Habitat sites, for example through hydrological connections or because of the natural movement of qualifying species;
- the sensitivity of ecological features under consideration; and,
- the potential for in-combination effects.

4.2 Approach to LLNP Policy Screening

4.2.1 There are 17 policies within the LLNP. Policies were screened out of having LSEs on a Habitat site where any of the following reasons applied:

- they are environmentally positive;
- they will not themselves lead to any development or other change;
- they make provision for change but could have no conceivable effect on a Habitat site. This can be because there is no pathway between the policy and the qualifying features or a Habitat site, or because any effect would be positive;
- they make provision for change but could have no significant effect on a Habitat site (i.e., the effect would not undermine the conservation objectives of a Habitat site); or,
- the effects of a policy on any particular Habitat site cannot be ascertained because the policy is too general. For example, a policy may be screened out if, based on absence of detail in the policy, it is not possible to identify where, when, or how the policy may be implemented, where effects may occur, or which sites, if any, may be affected.

4.2.2 Any 'criteria-based' policy (i.e., those that simply list criteria with which development needs to comply) or other general policy statements that have no spatial element were also screened out. Likewise, policies that simply 'safeguard' an existing resource (e.g., existing green infrastructure or mineral resources) by preventing other incompatible development, were also screened out.

4.2.3 The appraisal therefore focussed on those policies with a definable spatial component. Having established which policies required scrutiny by virtue of being spatially defined, consideration was given as to whether LSEs could be dismissed due to a lack of connectivity to any Habitat site for one of the following reasons:

- a potentially damaging activity may occur as a result of the policy but there is no pathway connecting it to a Habitat site (due to distance, for example);
- there are no Habitat sites vulnerable to any of the activities that the policy will deliver; or,

- the policy will not result in any damaging activities.

4.2.4 The initial scoping of Habitat sites identifies that potential vulnerabilities exist for the Chilterns Beechwoods in relation to:

- Recreational pressure
- Atmospheric pollution (nitrogen deposition)

4.3 Results of Policy Screening

4.3.1 The results of the LSEs screening of policies included in the LLNP are presented in Appendix B. Where a policy is shaded green, there are no linking impact pathways to Habitat sites and LSEs can be excluded. Where the screening outcome is shaded orange, LSEs cannot be excluded, and the policy is screened in for AA.

4.3.2 Of the 13 LLNP policies, one is considered to have the potential to result in LSEs, alone and therefore or in combination with other plans and projects, as such an AA is required. This is:

- Policy LL5: Land south of the high street. This site allocation includes provision for residential development.

4.3.3 This policy is taken forward for appropriate assessment for the Chilterns Beechwoods SAC in relation to recreational disturbance and atmospheric pollution.

5. Appropriate Assessment

5.1 Introduction

5.1.1 The law does not prescribe how an AA should be undertaken or presented, but it must consider all impact pathways that have been screened in, whether they arise alone or in combination with other projects and plans. That analysis is the purpose of this section. The law does not require the different effects to be examined separately provided all effects are discussed.

5.1.2 The HRA screening exercise undertaken in Appendix B indicates that policy LL5, which references a site allocation for residential development, was considered to pose LSEs to Habitats sites, either alone or in combination with other projects and plans, due to contributing to the following impact pathways: recreational pressure and atmospheric pollution.

5.1.3 This assessment is undertaken for the Neighbourhood Plan 'in combination' with other plans and projects since the Neighbourhood Plan alone is unlikely to result in adverse effects on integrity of any Habitats Sites given the distance from those sites and the relatively modest number of dwellings allocated.

5.2 Recreational Pressure

5.2.1 Numbers of residential dwellings are not provided for policy LL4.

5.2.2 CBLP policy EE3 notes that "Adverse impacts, such as disturbance through increased recreational pressure can result from new development and require mitigation to prevent detrimental impacts to the ecological resource." This policy permits development where "They do not have an adverse effect, either alone or in-combination, on [Habitats] sites, unless they satisfy the requirements of the Habitats Regulations". This requires development to demonstrate that it will not negatively impact Habitats sites or to conduct a project level HRA prior to development.

5.2.3 The Mitigation Strategy for Ashbridge Commons and Woods SSSI applies to development within the Chiltern Beechwoods SAC Zone of Influence (Central Bedfordshire Council 2025). This mitigation strategy was agreed in March 2023 (after the CBLP was adopted). The strategy consists of two separate elements:

- Strategic Access Management and Monitoring ('SAMMS') involving access management and engagement work wholly within the boundary of the SAC.
- Suitable Alternative Natural Greenspace ('SANG') involving the provision of alternative recreation opportunities away from the SAC.

5.2.4 The mitigation strategy states that *"proposals that are located within the Zone of Influence will be required to make financial contributions toward SAMM; and*

a) direct delivery of a bespoke SANG solution in accordance with the guidance set out in Part A of the mitigation strategy; or
b) contributions towards strategic SANG."

5.2.5 Where qualifying development is located within the 500m to 12.6 km ZoI, Natural England has advised that LSEs "*can be sufficiently mitigated through the measures set out in this policy*".

5.2.6 As of September 2025, Central Bedfordshire District Council have successfully designated seven areas of strategic SANG capacity (Central Bedfordshire Council 2025) with varying capacity:

- Sundon Hills: full
- Linslade Woods: limited capacity available
- Cottage Bottom Fields: limited capacity available
- Studham Common: capacity available
- Tiddenfoot, Southern Meadows, and Grovebury Quarry: capacity available
- Whipsnade Heath: Capacity available

5.2.7 Given the requirements in the CBLP and the Mitigation Strategy for Ashbridge Commons and Woods SSSI it can be concluded that **the LLNP will not lead to adverse effects regarding the impact pathway recreational pressure either alone or in combination**.

5.3 Atmospheric pollution (nitrogen deposition)

5.3.1 An increase in commuter traffic both alone and in combination with other plans has been brought forward to appropriate assessment as a result of the potential to damage habitats of the Chiltern Beechwoods through nitrogen deposition.

5.3.2 Three roads were identified as passing within 200m of the Chiltern Beechwoods SAC. These roads are potential commuting routes to areas south of the Leighton-Linslade Parish; specifically, Tring and Berkhamsted. Although the larger town of Hemel Hempstead is also south of the parish, the most direct route is via the B440 which does not impinge upon the SAC in the same way.

5.3.3 The quantum of housing included in the LLNP although undefined is relatively small.

5.3.4 The CBLP HRA (Enfusion 2017) concluded that following consideration of the mitigation measures, there would be no significant effects on air pollution for any of the Habitats sites considered in the CBLP which includes Chilterns Beechwoods SAC.

5.3.5 The site identified in policy LL5 is approximately 12km distance from the Chiltern Beechwoods SAC (Ashridge Commons and Woods SSSI). This is beyond the average commuting distance of 10.1km of a UK resident. Therefore, it is considered that relatively few future residents of the identified site would commute along the identified routes which come within 200m of the SAC.

5.3.6 It is therefore concluded that the LLNP will not lead to adverse effects regarding the impact pathway atmospheric pollution (nitrogen deposition) either alone or in combination.

5.4 In combination effects

5.4.1 The recreational catchment of Ashridge Commons and Woods SSSI (Chilterns Beechwoods SAC) is specifically intended to capture effects from multiple developments and plans across the catchment. Therefore, the use of that catchment in this HRA means that recreational pressure has already been considered ‘in combination’ with other plans and projects since growth in Leighton Linslade alone would not adversely affect the integrity of Chilterns Beechwoods SAC due to the distance and small size of the allocated site.

5.4.2 Similarly, the HRA of the CBLP assesses all growth across Central Berkshire and in surrounding authorities, so use of the conclusions of that HRA takes account of all in combination effects.

6. Conclusions and Recommendations

6.1.1 The LLNP has a total of 13 policies. Of these policies only policy LL5 had the potential to cause a likely significant effect and were discussed with regards to their impacts upon Habitat sites.

6.1.2 Policy LL5: Land south of the high street includes provision for residential development. The policy was found to have a potential likely significant effect upon the Habitat sites with regards to the following impact pathways; recreational pressure and atmospheric pollution (nitrogen deposition) in combination with other plans and projects. These pathways and the policy were discussed within the AA.

6.1.3 CBLP policy EE3 notes that “Adverse impacts, such as disturbance through increased recreational pressure can result from new development and require mitigation to prevent detrimental impacts to the ecological resource.” This policy permits development where “They do not have an adverse effect, either alone or in-combination, on [Habitats] sites, unless they satisfy the requirements of the Habitats Regulations”. This requires development to demonstrate that it will not negatively impact Habitats sites or to conduct a project level HRA prior to development.

6.1.4 The Mitigation Strategy for Ashridge Commons and Woods Site of Special Scientific Interest is considered by Natural England to provide suitable mitigation for the development for residential dwellings and any increase in recreational pressure which may result from these.

6.1.5 Given the requirements in the CBLP and the Mitigation Strategy for Ashbridge Commons and Woods SSSI it is concluded that the LLNP would not adversely impact Habitat sites through recreational pressure either alone or in-combination with other plans and projects.

6.1.6 The area covered by policy LL5 is located approximately 12km distance from the Chiltern Beechwoods SAC. This is beyond the average commuting distance of 10.1km of a UK resident. Therefore, it is considered that relatively few future residents of the identified site would commute along routes within 200m of the SAC. It is therefore concluded that the LLNP will not lead to adverse effects regarding the impact pathway atmospheric pollution (nitrogen deposition) either alone or in combination.

Appendix A - Habitats Sites Background

A.1 The Chilterns Beechwoods SAC

Conservation Objectives (Natural England 2018)

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

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

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

Qualifying Features (Natural England 2018)

- H6210 Semi-natural dry grasslands and scrubland facies: on calcareous substrates (*Festuco-Brometalia*), (note that this includes the priority feature "important orchid rich sites")
- H9130 *Asperulo-Fagetum* beech forests
- S1083 Stag beetle (*Lucanus cervus*)

Environmental Vulnerabilities

With regards to this SAC, the Chilterns Beechwoods SIP (Natural England 2015) identifies the following threats and pressures:

- Forestry and woodland management
- Deer
- Changes in species distribution
- Invasive species
- Disease
- Public access/disturbance
- Air pollution: impact of atmospheric nitrogen deposition

Appendix B Policy Screening

Table 2 Leighton-Linslade Neighbourhood Plan Policy Screening

Policy Name	Policy	Potential Likely Significant Effect?
LL1: Centre of Town Renewal	Proposals for new development and changes of the use of buildings and land in the centre of town, as shown on the Policies Map, will be supported provided they can show they have had full regard to the land use, design and development principles established in the "Wider Town Centre Spatial Framework" for Leighton Buzzard Town Centre, the Waterside Corridor and the centre of Linslade. Thes key principles are: A. Development should celebrate and make the most of its special historic character, reusing old buildings and with heritage informing the design of new ones. B. Leighton Buzzard Town Centre will be a community hub for a friendly town, creating spaces for people to come together in and providing vital local services. C. Be known for a rich mix of town centre uses which contribute to local character, support local employment and entrepreneurship, and enhance the vitality and viability of the town centre. D. Actively nurture creativity with affordable spaces for creative expression. E. Be a greener, more biodiverse town centre than now, linking to the canal, river, parks, and countryside. F. Be easy and pleasant to move around on foot, by bicycle or wheeling, encouraging non-car modes of transport for short trips to reduce congestion and cut pollution, including pedestrianisation measures where these are locally supported. G. Strengthen the Linslade cluster to support this local centre with an identity of its own with places to meet and socialise. H. Ensure the backland space between the High Street, Recreation Ground and Church (Land South of the High Street) is reborn as a culture and community mixed-use hub, including enabling residential development for all ages, which promotes low car ownership through connectivity to active and sustainable modes of travel, and provides vital local services, sensitively designed to complement its historic surroundings. I. Support measures which promote a vibrant and lively evening economy.	**No likely significant effects.** This is a management policy providing guidance for future developments in the town centre. It does not directly lead to any development. There are no pathways linking this policy to any Habitat sites.
LL2: Leighton Buzzard Town Centre	The Neighbourhood Plan defines Leighton Buzzard Town Centre and the Primary Shopping Area, known as "Cluster One", as shown on the Policies Map, for the purpose of managing proposals for retail, leisure, commercial, residential and other forms of development. All development proposals should demonstrate full regard to the spatial objectives for Cluster One in the Wider Town Centre Spatial Framework In addition: A. All proposals should retain or create, where appropriate to the use, an active street frontage and should seek to enhance the public realm through street planting and other measures intended to enhance the vitality of the Town Centre and to increase footfall. B. Within the Primary Shopping Area, where change of use is required, proposals for new community and social infrastructure uses, including health and wellbeing and cultural uses defined under class F1, F2(b) and appropriate Sui Generis* uses will be supported on both ground and upper floors where it can be demonstrated that the building has been marketed unsuccessfully for 6 months for its current town centre use and where the proposals will enhance	**No likely significant effects.** This is a management policy providing guidance for future development in Leighton Buzzard Town Cantre and the Primary Shopping Area. It does not directly lead to any development. There are no pathways linking this policy to any Habitat sites.

Policy Name	Policy	Potential Likely Significant Effect?
	the vitality of the town centre by extending the range of facilities offered and/or stimulating activity for the evening economy. C. All proposals for development within the Conservation Area including a change of use, must demonstrate how they preserve or enhance its character or appearance. D. Proposals that prioritise heritage led placemaking, sensitively reusing and adapting historic spaces whilst preserving their heritage features through refurbishment (rather than demolition) will be supported. E. Residential development at ground floor level will only be supported outside of the Primary Shopping Area and where proposals are highly accessible with direct links to active travel routes and provide access to existing or new local green spaces. F. Proposals for new and altered shopfronts should demonstrate how they have responded to the Wider Town Centre Spatial Plan (p44 – 45). The use of uPVC shopfronts, oversized signage, and poorly proportioned modern interventions should be discouraged, as they detract from the town's historic character. G. Within the Primary Shopping Area, experiential businesses which provide engaging and interactive opportunities for visitors, particularly where they promote the evening economy, will be welcomed. H. Proposals for partial pedestrianisation or measures to restrict traffic movements at identified times which encourage people to move safely and freely around the Town Centre will be supported.	
LL3: Bridge Meadow/Canal Quater	The Neighbourhood Plan identifies Bridge Meadow/Canal Quarter, as shown on the Policies Map, for the purpose of managing proposals for retail, leisure, commercial, housing and other forms of development. Development and redevelopment proposals should have full regard to the principles set out in the Leighton Linslade Wider Town Centre Spatial Framework as they relate to Bridge Meadow/Canal Quarter, (known as in the document as Cluster Three) and demonstrate how they improve both the area around the canal and active and sustainable travel connections between the two centres of Leighton Buzzard and Linslade. A. For the area to the south of Leighton Road, a comprehensive site redevelopment masterplan is encouraged. Proposals which demonstrate an integrated mix of uses in this location, to benefit the local community will be supported. This may include leisure or sports facilities, a care home or health hub. Uses across the site which are not heavily car dominated will also be supported as will proposals which seek to promote the waterside setting through the inclusion of the provision of a food and drink offer, such as family style pub, café or restaurant. B. Residential development across the Bridge Meadow/Canal Quarter should be designed with properties fronting onto the river or the canal to capitalise on this attractive location whilst safeguarding access to the towpath, improving permeability and preserving the openness of the setting. As such, building heights at Bridge Meadow/ Canal Quarter should not exceed four storeys. C. Due to flood risk, the south-east area of the land south of Leighton Road must be preserved as green infrastructure, complementing the enhancement of the River Ouzel. All other development on the site should be responsive to flood risk and allow for the areas potential to flood. This must include appropriate mitigation measures for development and to prevent pollution of the river as well opportunities to reduce the existing surface flood risk on site, to store flood water and help reduce flood risk elsewhere. D. Any development within Bridge Meadow/Canal Quarter must demonstrate how it protects and enhances both the river and canal corridors including access routes, as part of a wider Green & Blue Infrastructure network, in a safe and attractive setting. E. All proposals should: i) respond positively to the waterside setting of the immediate area in their design and layout, ii) enhance the waterways of river Ouzel and Grand Union Canal as community and biodiversity assets,	**No likely significant effects.** This is a management policy providing guidance for future development in Bridge Meadow/Canal Quater. It does not directly lead to any development. There are no pathways linking this policy to any Habitat sites.

Policy Name	Policy	Potential Likely Significant Effect?
	iii) maximise opportunities to strengthen active travel connections between Leighton Buzzard and Linslade including routes alongside and over the canal and river, including proposed Green Wheel routes, links identified in the Local Cycling and Walking Infrastructure Plans and improving access to the Town Centre and to local green spaces, and facilitate bus or Digital Demand Responsive Travel use into and through the area. iv) respond to and enhance the heritage of the area, with careful consideration of local architectural styles, building forms and taking the opportunity to promote the history of the canal in this area.	
LL4: Linslade Cluster	A. The Neighbourhood Plan identifies Linslade, between the Grand Union Canal and Leighton Buzzard Railway Station, as shown on the Policies Map for the purpose of managing proposals for retail, leisure, commercial and housing. Proposals will be supported where they align with the objectives of the Wider Town Centre Spatial Framework as they relate to Linslade (known in the document as Cluster Two) as follows: i) A new multi-modal hub and improved public realm at Leighton Buzzard railway station to include mixed travel uses. This should include a bus stop/interchange, cycle storage, e-bike hire, e-car sharing/ car club space, additional seating and shelters to facilitate onwards active travel, enhance passenger comfort andencourage use of the railway over car use. ii) Within the area identified on the Policies Map as the "Mixed-use Focus Area" development which strengthens and reinforces the function of the local centre for the community, including the creation of new retail or community facilities. Change of use to residential at ground floor level will only be supported where it can be demonstrated that it would not be result in an erosion of the function of the local centre. iii) New secure cycle parking, walking and cycling routes around the Heritage Focus Area, (located within the conservation area and the setting of the listed building cluster around St Barnabas Church,) which enable better access to the Station, St Barnabas Church and Linslade Recreation Ground will be supported where proposals demonstrate how they preserve local character and heritage in their design and layout. B. Where required to deliver Ai) and Aiii) support will be given for enabling residential development through the re-purposing of car parking area(s) at the Station, where it can be demonstrated that they are underutilised and there is no significant harm to the setting of the adjacent designated heritage assets.	**No likely significant effects.** This is a management policy providing guidance for future development in Linslade, between the Grand Union Canal and Leighton Buzzard Railway Station. It does not directly lead to any development. There are no pathways linking this policy to any Habitat sites.
LL5: Land south of the high street	The Neighbourhood Plan identifies approximately 2.65 hectares of land to the south of the High Street, as shown on the Policies Map, for a mix of uses, including housing, cultural, community, employment and leisure facilities, together with associated green and active travel infrastructure. A. Development proposals will be supported where they meet the following objectives: a) They deliver key identified community facilities, particularly supporting health, culture and small businesses, appropriate for the town centre and identified in Policy LL11 Infrastructure Priorities. b) Re-use and repurpose existing buildings where appropriate and viable. c) Connect the High Street through to Parsons Close Recreation Ground providing greater flow of people between two key community assets, d) Promote active travel, providing genuine alternatives to car ownership for future residents and visitors. e) Continue to provide an appropriate level of public parking required for the town centre visitors and market traders. f) They are heritage-led; conserving and enhancing the significance of designated and non-designated heritage assets and the character and appearance of the Leighton Buzzard Conservation Area in their design, layout, form, height and massing, sensitive to ridgeline and historic landscape patterns. B. Proposals should demonstrate how they have been informed by, and responded to, the "Land South of High Street Spatial Framework"	**Likely significant effects.** This policy relates to land which includes an allocation for residential development. The potential pathways linking this policy to Habitats sites are: – Recreational disturbance – Atmospheric pollution (Nitrogen deposition)

Policy Name	Policy	Potential Likely Significant Effect?
LL6: Housing Mix and Type	A. Proposals for residential development will be expected to provide a mix of dwelling types and sizes to address the nature of local needs and contribute to the objective of creating a mixed and balanced community. To achieve this objective, provision should prioritise smaller and medium sized dwellings which should result in the majority of homes being 1 bedroom - 3 bedroom), unless viability considerations demonstrate that an alternative mix would better meet local need. B. All Development proposals should be delivered as accessible and adaptable dwellings in accordance with Building Regulations M4(2) or M4(3), unless evidence can be provided to demonstrate that such provision would be impracticable or render the scheme unviable.	**No likely significant effects.** This is a management policy providing guidance on housing mix. It does not directly lead to any development. There are no pathways linking this policy to any Habitat sites.
LL7: Local Community Assets	The Neighbourhood Plan identifies existing community facilities [policy lists 17 existing community facilities] A. Proposals that will result in either the loss of, or cause significant harm to, an existing facility will be resisted, unless it can be clearly demonstrated that the operation of the facility is no longer viable or surplus to requirement and that the facility has been actively marketed for alternative community uses for a minimum of 12 months consecutively or it can be re-provided in an alternative location with the neighbourhood plan area. Where the building is also a heritage asset, proposals will need to demonstrate compliance with national policy in respect of their protection. B. Proposals to sustain or extend the viable use of existing community facilities and the development of new facilities, to ensure local residents have sufficient good quality social infrastructure, will be supported. C. The Neighbourhood Plan identifies the designated Asset of Community Value (ACV) at Tiddenfoot Leisure Centre. Re-development within the existing use class E(d) or re-purposing of this building for appropriate use class F1 and/or use class F2 uses will be supported to ensure the continued use of this existing community facility, following the opening of the new Leisure Centre in Leighton Buzzard.	**No likely significant effects.** This policy is designed to protect community facilities. It does not directly lead to any development. There are no pathways linking this policy to any Habitat sites.
LL8: Green and Blue Infrastructure	The Neighbourhood Plan identifies a Green and Blue Infrastructure (GBI) Network, as shown on the Biodiversity Map, for the purpose of illustrating existing biodiversity interest and opportunities where biodiversity enhancement would make the greatest, most effective contribution to nature recovery over the next 5-10 years, in line with Bedfordshire Local Nature Recovery Strategy and local aspirations. A. Development proposals that lie within or adjoining the Network are required to have full regard to creating, maintaining and improving the functionality of the Network in the design of their layouts, landscaping schemes and public open space provisions, including: i) Improving the natural environment of existing green spaces through hedge/tree planting, grassland management to support a more diverse sward, provision of bat/bird boxes. ii) Developing connections between existing areas of habitat within urban areas, including hedgerow planting and management and sensitive roadside verge management. iii) Enhance the river and canal corridors through restoration and re-naturalisation of river channels and ecological enhancement of adjacent corridors, enhancing habitat connectivity. iv) Create wetland and woodland habitats in the river corridor, especially where these contribution to flood risk and pollution reduction. v) Demonstrate how they protect and enhance/connect wider habitats and corridors, including heathland, acid grassland and woodland, in line with Greensand Ridge Nature Improvement Area status (CBC Local Plan Policy EE8). B. Development proposals must : i) take account of existing biodiversity interest and nature recovery in scheme design and layout, species mixes and mitigation measures and	**No likely significant effects.** This policy is designed to strengthen protection for local green and blue infrastructure. This policy requires development in proximity to the green and blue infrastructure network support the network, for all development to account for biodiversity and contribute to the GBI network. This policy also supports development creating green space. There are no pathways linking this policy to any Habitat sites.

Policy Name	Policy	Potential Likely Significant Effect?
	ii) seek to create new green and blue infrastructure in areas which deliver wider environmental benefits through "Nature based solutions" including flood risk mitigation and nutrient pollution reduction, mitigation of urban heating and iii) wherever possible, deliver BNG on-site. Where this is not possible, delivered as close to the development site as possible. C. All proposals, other than householder applications, must make an overall positive contribution to the GBI Network. Proposals that will harm the functionality or connectivity of the Network, or contribute to or exacerbate existing surface, groundwater or fluvial flooding will not be supported. D. Proposals for new development requiring the provision of on-site open space will be supported where the design of open space is integral to the scheme and is effectively connected to any adjoining green infrastructure assets. Proposals within built up and previously developed areas will be required to create new natural green spaces, providing benefits for wildlife and people, particularly where there are existing greenspace deficits. Where appropriate, developers will be expected to enter into a planning obligation to secure satisfactory arrangements for the long-term management of this open space. E. The Neighbourhood Plan identifies the following biodiversity and GBI priority projects which will be supported: i) Grovebury/Southern Meadows for Habitat (wetland and wet woodland/woodland) creation, ii) Riverside Walk habitat enhancement iii) Southern Meadows, including wetland habitat creation for nature recovery and flood risk reduction iv) River restoration/enhancement of Ouzel and Clipstone corridors.	
LL9: Local Green Spaces	A. The Neighbourhood Plan designates as Local Green Spaces [policy lists 39 local green spaces] B. New development will not be permitted on land designated as Local Green Space except in very special circumstances or where it is ancillary to the use of the land for public recreational purposes.	**No likely significant effects.** This policy is designed to protect greenspace by qualification as "Local Green Space". There are no pathways linking this policy to any Habitat sites.
LL10: Active and Sustainable Travel	The Neighbourhood Plan identifies the existing Active and Sustainable Travel Network and opportunities for improvements, as shown on the Policies Map for the purpose of prioritising walking, wheeling and cycling in Leighton Linslade and encouraging the use of public transport. A. Development proposals on land that lies within or adjacent to the Network should avoid harm, should sustain and where practicable enhance the connectivity of the Network by virtue of their layout, means of access and landscape treatment, including the creation of safe and suitable links to the existing footways, footpaths, cycling and walking routes. B. The Leighton Linslade Green Wheel identifies opportunities where public realm improvements are required to improve highway safety. Development which lies within or adjacent to areas identified within the Green Wheel must avoid measures which would adversely affect the ability to implement these proposals. C. The Active Travel Network identifies opportunities where public realm improvements are required to enhance the walking, wheeling and cycling environment, improve residential amenity, improve connectivity between community and recreational facilities, schools and the railway station, improve highway safety and create new links into the town centre across the Grand Union Canal and the River Ouzel. Development should avoid measures which would adversely impact the ability to implement improvements. Proposals which deliver opportunities for improvement will be supported, where proposals also accord with the other policies of the Development Plan. D. New developments should encourage the provision of conveniently located bus shelters, with seating and step-free access at boarding points. All major residential developments must, where appropriate, incorporate or fund measures that improve local bus services, including but not limited to, route extensions, frequency enhancements, flexible bus services (Demand Responsive Transport) or community transport services, in support of the Central Bedfordshire Bus	**No likely significant effects.** This policy supports the existing Active and Sustainable Travel Network. This policy highlights opportunities for improvements for highway safety and enhancing active travel opportunities, and encourages new development to encourage sustainable and active travel, with major development being required to support local bus services or community transport. It does not directly lead to any development. There are no pathways linking this policy to any Habitat sites.

Policy Name	Policy	Potential Likely Significant Effect?
	Service Improvement Plan (2024 or subsequent edition), and safe, accessible walking routes around the development providing opportunities for rest and enabling access to the bus network.	
LL11: Infrastructure Priorities	The Neighbourhood Plan identifies the following priorities to create additional social infrastructure within the town: 1. A new Neighbourhood Health Centre. 2. A multi-purpose indoor space that can host large-scale meetings and events. 3. An indoor exhibition space to display Leighton Buzzard's history. 4. A indoor space for creative and cultural activities. 5. Additional outdoor and indoor sports courts/hall space. A. Proposals which result in the creation and development of such facilities will be supported where both the social infrastructure and any enabling development to facilitate its delivery, are in accordance with the other policies within the Neighbourhood Plan. B. Where any social infrastructure facilities are proposed within the intention of being community owned and operated, these should be secured via legal agreement, including an option to transfer ownership of the facility to either the Town Council or other nominated community group upon completion. C. The Neighbourhood Plan is particularly keen for the creation of such facilities where there is an opportunity to reuse or repurpose an existing building due to the reduced carbon emissions associated with construction and the preservation of any historical and cultural heritage associated with the premises.	**No likely significant effects.** This policy provides priority and focus for infrastructure developments. It does not directly lead to any development. There are no pathways linking this policy to any Habitat sites.
LL12: Education	The Neighbourhood Plan identifies the following educational establishments in Leighton Linslade. [policy lists 20 educational establishments] A. Development proposals to expand or extend these facilities where they enhance the educational offering and viability of the establishment will be supported where appropriate; this would include opportunities to facilitate the provision of further education and early years settings. B. Where an educational facility is no longer required, for example, as a result of restructuring to a two-tier educational system, proposals to re-purpose any location for an alternative community use, including the retention of playing field provision on site, will be supported.	**No likely significant effects.** This policy supports proposals to expand or extend education facilities. This policy also supports re-use and redevelopment of no longer required education facilities for community use. It does not directly lead to any development. There are no pathways linking this policy to any Habitat sites.
LL13: Energy Efficiency	A. All development should be 'zero carbon ready' by design to minimise the amount of energy needed to heat and cool buildings through landform, layout, building orientation, massing and landscaping. Consideration should be given to resource efficiency at the outset and whether existing buildings can be re-used as part of the scheme to capture their embodied carbon. B. All development proposals, other than householder applications, should be accompanied by a proportionate Sustainability Statement. The Statement should explain how the proposal responds to climate change mitigation and adaptation in accordance with Local Plan Policy CC1 and demonstrate how the following matters have been addressed, where relevant to the scale and nature of development: a) Energy efficiency and carbon reduction, including how building orientation, layout, fabric performance and passive design measures have been used to minimise energy demand; b) Low-carbon and renewable energy, including opportunities for on-site generation where feasible and viable and where compatible with local character and heritage considerations; c) Climate change adaptation and resilience, including measures to reduce overheating, manage increased rainfall and surface water, and respond to water scarcity;	**No likely significant effects.** This policy requires development proposals to be 'zero carbon ready'. Developments are also required to provide a Sustainability Statement and where appropriate a Whole Life Carbon Assessment. This policy also supports development that exceeds minimum standards. It does not endorse any specific projects nor allocate any sites for this purpose. There are no pathways linking this policy to any Habitat sites.

Policy Name	Policy	Potential Likely Significant Effect?
	d) Sustainable movement and infrastructure, including how the proposal reduces reliance on private car use and supports active travel, public transport accessibility and low-carbon technologies; and e) Sustainable construction and materials, including measures to reduce waste, resource consumption and environmental impact where proportionate. C. For major development, applicants are strongly encouraged to submit a Whole Life Carbon Assessment (WLCA), alongside their Sustainability Statement, using a recognised methodology, to demonstrate actions taken to reduce embodied carbon resulting have been minimised across the construction, operational and end-of-life stages of development, having regard to viability and proportionality. D. Proposals that voluntarily exceed the minimum standards required by national policy or building regulations, including through zero-carbon-ready development or recognised high-performance standards, such as PassivHaus or BREEAM “Excellent” or “Outstanding” will be supported.	

Appendix C References

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