



Habitats Regulations Assessment

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1. Introduction

1.1. Purpose of this document

- 1.1.1. Amey Consulting has been commissioned by Central Bedfordshire Council (CBC) to produce a Habitats Regulation Assessment (HRA). The requirement for an Habitat Regulations Assessment of plans (including Local Transport Plans), policies and projects is outlined in article 6(3) and (4) of the Habitats Directive 92/43/EEC, and its stated purpose is to provide a critical examination of the likelihood of significant individual and in-combination impacts upon the nature conservation objectives of Natura 2000 sites (also known as Sites of European Significance, or European Sites) arising from the Central Bedfordshire Local Transport Plan 3.
- 1.1.2. While HRA at plan level can not be as detailed as at project level the approach should still be as rigorous as possible. The findings of the HRA process will need to be integrated into the plan making process. If the Appropriate Assessment cannot rule out adverse effects on the integrity of a European Site then the LTP or proposed project should be amended to eliminate the adverse potential effects of the plan on Natura 2000 sites. Where significant effects cannot be eliminated then the plan can only proceed if there are no satisfactory alternatives to the relevant element(s) of the plan, there are imperative reasons of overriding public interest and adequate compensatory measures are secured to ensure the overall coherence of the network of Natura 2000 sites.
- 1.1.3. The purpose of the HRA process is to consider the potential significant effects of a proposed development plan or programme on any European Sites designated for nature conservation interest. Accordingly, this first document forms the 'screening' stage of the HRA.
- 1.1.4. The purpose of the screening document is to identify the likely significant effects resulting from implementation of LTP3 on any designated European Site located in or close to the authoritative boundary. The outcome of this report will determine whether 'Appropriate Assessment' is required as part of a full HRA.

1.2. Legislative background

- 1.2.1. Habitats and species of European nature conservation importance are protected by the European Directive (92/43/EEC) on the Conservation of Natural Habitats and Wild Flora and Fauna (Habitats Directive). A network of internationally important sites is designated under the Habitats Directive. These can be collectively referred to as Natura 2000 sites or European Sites, which include:
 - Special Areas for Conservation (SAC)
 - Special Protection Areas (SPA)
- 1.2.2. A European Site designation provides a high level of ecological protection for areas regarded to be of exceptional importance owing to the presence of endangered or vulnerable natural habitats and species.



- 1.2.3. In addition to European Sites, legislation requires authorities to treat the following under an equal level of protection:
- Offshore Marine sites
 - Ramsar sites (UK) and potential Ramsar sites
- 1.2.4. Article 6(3) and 6(4) of the Habitats Directive require an HRA to be undertaken to consider the potential effect of local plans on any European site either individually, or in combination with other plans or projects. This requirement became UK law as part of the Habitats Regulations (The Conservation (Natural Habitats, & c.) (Amendment) (England and Wales) Regulations 2007).

1.3. Central Bedfordshire's Local Transport Plan 3

- 1.3.1. The Transport Act 2000 introduced a statutory requirement for local transport authorities to produce a LTP every five years and keep it under review. This statutory requirement was retained in the Local Transport Act 2008 although other aspects of the statutory framework have changed. The Act now requires that LTPs contain policies (referred to as the Strategy) and Implementation Plans (the proposals for delivery of the policies contained in the strategy) and there is no longer the requirement for LTPs to be reviewed every five years but that review should be decided at the local level to best fit with other local policies and plans.
- 1.3.2. A LTP is a statutory document which sets out the authority's transport strategy and development policies for all modes of transport. LTP3 will supersede the current plan (LTP2), which expires on 31 March 2011. CBC, as the transport authority for the area, has a legal duty to produce their LTP3 by 1st April 2011.
- 1.3.3. LTP3 is the first transport plan to focus on the whole of Central Bedfordshire as a single entity, and so comprises the area formed by the former Mid Bedfordshire and South Bedfordshire authorities.
- 1.3.4. In accordance with best practice principles, LTPs include a strategy, policies and a programme of improvements to guide the development of transport within each authoritative area.

1.4. The HRA process

- 1.4.1. The purpose of HRA is to identify and examine any significant adverse impacts to European Sites resulting from the implementation of a plan, programme or project. The identification of impacts at an early stage of the process provides the opportunity to make strategic alterations to mitigate the adverse impacts.
- 1.4.2. Before full 'Appropriate Assessment' is required, it must be considered whether or not the LTP3 is likely to have a significant effect on any European Site, either alone or in combination with other plans. This process, known as 'Screening', will ensure that only plans which impact the integrity of a European Site designation will undergo a full HRA. The three stages of the HRA process are shown in Table 1.



Table 1: Key stages of the HRA process		
	Process	Description
Stage 1	Screening	The identification of the likelihood of significant effects on Natura 2000 sites occurring as a result of the plan. If effects are judged likely, or there is a lack of information to prove otherwise, proceed to Stage 2.
Stage 2	Appropriate Assessment	An examination of the adverse effects resulting from the plan and strategy on how effects could be avoided. If effects remain after full consideration of alternatives and mitigation options, proceed to Stage 3.
Stage 3	Procedures where significant effect remains	Consider of alternative solutions, identify 'imperative reasons for overriding public interest' (IROPI) economic, social, environmental, human health, public safety and development of compensatory measures. Stage 3 should be avoided if possible.

1.5. Methodology

- 1.5.1. This screening report was completed following guidance produced by RSPB¹ and Natural England².
- 1.5.2. The screening process requires an assessment of significance with regard to potential impacts affecting European Sites resulting from CBC's LTP3 both singularly, and in combination with subsidiary plans, strategies and policies. There are four key elements to the HRA screening process, which are shown in Table 2.
- 1.5.3. 'Significant effect' in the context of HRA is, according to the RSPB, 'a predicted effect arising as a consequence from a particular plan from which the conservation objectives of a European Site are undermined'.

Table 2: HRA screening elements	
Phase	Tasks
1. Site identification and baseline	Identification and characterisation of European Sites
2. LTP3 effects	Review and screening of LTP3 to identify potential impacts on European Sites
3. Cumulative effects	Consideration of 'in-combination' effects from other plans
4. Screening assessment	Screening opinion



- 1.5.4. The scope of HRA includes European Sites both within and outside the plan area - typically within 10-15km of the plan boundary. This coverage is however not a definitive guide and judgement is made giving consideration to factors such as direction of prevailing wind and water flow, rather than distance. European Sites will be included where there is a known pathway between source (CBC administrative area) and receptor (European site).
- 1.5.5. To understand the nature of the European Site and the reasons for its designation, a site characterisation was undertaken. Information regarding conservation objectives, ecological condition and environmental sensitivities for each European Site necessary to screen the potential impacts of the LTP3 are set out in Section 3 of this report.
- 1.5.6. A review of the LTP3 to assess the potential impacts to European Sites was then undertaken at a strategic level to determine whether the implementation of the plan is likely to result in significant effects and more specifically which elements of the plan have the potential to generate adverse effects. This process, presented in Section 4, enables low-risk plans to be screened out from further consideration.
- 1.5.7. Potentially adverse effects resulting from LTP3 could be exacerbated when experienced in combination with the effects of other plans and policies, leading to an insignificant effect becoming significant. To ensure the effects of the plan as a whole were assessed, the cumulative effects created by interactions between LTP3 strategies and other plans, as well as the individual effects resulting from each strategy were considered.
- 1.5.8. The 'screening opinion' is a result of information gathered during each phase of the assessment. The opinion is based on the significance of the effect when considered against the factors necessary to support the integrity of a European Site.
- 1.5.9. If significant adverse impacts are considered likely or there is insufficient information to prove otherwise, progression to Appropriate Assessment is required. If the screening opinion is 'no significant effect', then the HRA Screening Report concludes the process.
- 1.5.10. Consultation with external bodies to discuss the findings of the screening assessment was undertaken to inform the final screening opinion. Natural England is the statutory consultee for HRA and is consulted alongside other relevant bodies considered appropriate such as; Environment Agency, Local Wildlife Trusts and the RSPB.



2. European Sites and Potential Impacts of LTP3

2.1. Site identification

- 2.1.1. European Sites have been identified using information provided by MAGIC, Natural England and Joint Nature Conservation Council. Sites were located using a mapping search for the Central Bedfordshire district and surrounding area shown in Figure 1.



Figure 1: Natural England International sites for CBC and the surrounding area. (Yellow sites shown are SSSI. No European Sites are within the CBC area)

Source: www.natureonthemap.org.uk

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- 2.1.2. No RAMSAR, SAC or SPA sites were identified inside CBC's boundary. Two SACs were identified within close proximity to the CBCs boundary and a further five sites located downstream of the CBC boundary were also identified (Table 3).

Table 3: European sites within a 15km buffer and/or downstream



Site	Designation
Chilterns Beechwoods	SAC
Eversden and Wimpole Woods	SAC
Chippenham Fen	Ramsar
Wicken Fen	Ramsar
Woodwalton Fen	Ramsar
Ouse Washes	SPA / SAC / Ramsar
Portholme	SAC

2.1.3. Summary information regarding the site description, reason for designation, vulnerabilities, conservation objectives and environmental condition for each SAC is detailed in Table 4. Due to the downstream sites being some distance from the Central Bedfordshire boundary a less detailed site description is required, this is given in Section 2.4.

Table 4: European sites information						
European site	Grid Reference	Area	Administrative region (approximate distance from Central Bedfordshire boundary)	Key features	Conservation objectives and potential impact of the LTP	Environmental condition
Eversden and Wimpole Woods SAC	534533, 252999	66 ha	Cambridgeshire (6km)	Broad-leaved deciduous woodland (100% coverage). Estimated 11-50 resident barbastelle bats.	To maintain, and where possible, enhance the barbastelle population.	Considered one of the best barbastelle habitat areas for the UK.
Chilterns Beechwoods SAC	497627, 213412	1276 ha (9 sites)	Berkshire, Buckinghamshire, Hertfordshire, Oxfordshire (nearest site 2km)	Extensive tract of <i>Asperulo-Fagetum</i> beech forest. Alluvial forest habitats; semi-natural dry grasslands and scrubland. Occurrence of populations of the rare coralroot. Semi-natural dry grasslands and scrubland facies: on calcareous substrates (<i>Festuco-Brometalia</i>) Great crested newt populations present and stag beetles resident.	Minimise atmospheric pollution to reduce stress the risk of susceptibility of beech trees to disease.	Recent dry years are believed to be putting trees under stress.



2.2. Eversden and Wimpole Woods SAC

- 2.2.1. The Eversden and Wimpole Woods contain a mix of ancient coppice woodland and high forest woods covering approximately 66 ha in the county of Cambridgeshire. The trees provide a roosting site and foraging ground for an internationally important colony of barbastelle bats.
- 2.2.2. As a means of European protection, the SAC designation has a woodland management conservation objective that is aimed at maintaining, and where possible, enhancing the resident barbastelle population.

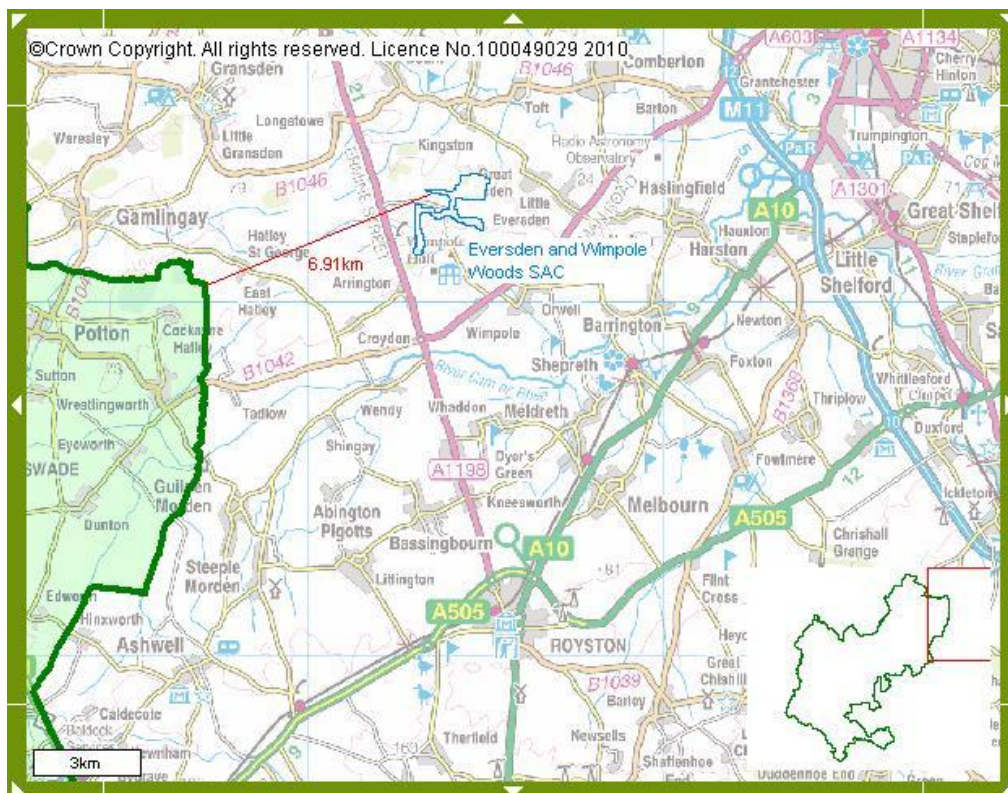


Figure 2: Eversden and Wimpole SAC site location in relation to the Central Bedfordshire district

Source: <http://www.centralbedfordshire.gov.uk/online/mapping/map.aspx>

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2.3. Chilterns Beechwoods SAC

- 2.3.1. The Chilterns Beechwoods SAC includes nine areas of *Asperulo-Fagetum* beech forests in the centre of the habitat's UK range which forms an important part of grassland-scrub-woodland mosaic. Distinctive features of the flora and fauna include the occurrence of the rare coralroot and the presence of stag beetles.



2.4. Other European sites

- 2.4.1. Chippenham Fen, Wicken Fen and Woodwalton Fen Ramsar sites are in three separate locations all in excess of 25km from CBC. Habitats range from species-poor *Cladium*-dominated fen to species-rich fen containing species such as black bog-rush *Schoenus nigricans*, and meadow thistle *Cirsium dissectum*. The designations contain one of the most extensive examples of the tall herb-rich fen-meadow, considered important for the conservation of the geographical and ecological range of the habitat type. The environmental quality of the each site is dependant upon management including cutting and grazing by livestock.
- 2.4.2. The Ouse Washes SAC/ SPA/ Ramsar, located on one of the major tributaries of The Wash, is an extensive area of seasonally flooding wet grassland approximately 30km NE of the Central Bedfordshire district. The mosaic of rough grassland and wet pasture supports both breeding and wintering birds, as well as spined loach *Cobitis taenia* populations within the River Ouse catchment.
- 2.4.3. Portholme SAC is a large site approximately 15.8 km from the CBC boundary which represents the UK's largest lowland hay meadows, including an area of alluvial flood meadow (7% of the total UK resource). The SAC is vulnerable to eutrophication and flooding.
- 2.4.4. Changes to the hydrological regime including flooding and downstream water pollution due to implementation of CBC's LTP3 may undermine the conservation objectives of the above European Sites and therefore a consideration of the potential impacts is included in this report.

2.5. Air Quality

- 2.5.1. Nitrogen Oxides (NO_x) emissions and particular matter (PM10) from vehicle exhausts can have a directly toxic effect to vegetation. Greater atmospheric concentrations of NO_x will lead to greater rates of nitrogen deposition to soils, having a serious adverse effect on the quality of nitrogen poor semi-natural habitats. Particulate emissions from transport can block plant stomatal openings and inhibit photosynthesis.
- 2.5.2. The most significant impacts of NO_x occur in close proximity to where they are emitted. Vehicle emissions will however also contribute to an increase in general background levels of nitrogen as pollutants are dispersed more widely by prevailing winds, though the effects of nitrogen deposition will decrease with distance.
- 2.5.3. Ozone (O₃) is a secondary pollutant which is produced photochemically by reactions involving nitrogen oxides (NO_x) and volatile organic compounds (VOC) in the presence of sunlight. Ozone causes damage to vegetation through stomatal closure and oxidative tissue damage.



2.6. Fragmentation, disturbance and severance

- 2.6.1. Fragmentation of foraging routes due to removal of vegetation and changes in land use can adversely affect barbastelle bats up to 20km from their roosts. The installation of lighting in locations previously unlit within the barbastelle foraging area can alter the availability of prey and impact of bat populations.

2.7. Hydrology and Water Quality

- 2.7.1. Transport activities cause surface to groundwater flow modifications, as well as a reduction in water quality through the run-off of oil, heavy metals, salts and fertilisers from road surfaces. Modification in the flow of surface and groundwater caused by the impermeable nature of transport infrastructure can also increase the effects of water run-off contributing to flooding and soil erosion.

2.8. Public access and recreation

- 2.8.1. New footpaths and cycleways, or increased use of existing paths near to European sites can cause disturbance to designated habitats and species. Residential development can further compound trampling and disturbance through increased visitor numbers.



3. LTP3 Policy Assessment

3.1. Screening Assessment

- 3.1.1. The draft LTP3 has been considered in relation to the European Sites identified for assessment in this report. To inform a screening opinion, the individual strategies, sub-strategies and measures of the draft LTP3 have been assessed against the conservation integrity of each site (Appendix A1 and A2). The in-combination impacts of LTP3 with other local plans such as the emergent Core Strategy and Area Plans of the CB LDF, the Bedfordshire Waste Core Strategy, Bedfordshire Sustainable Communities Strategy, Bedfordshire Biodiversity Action Plan and Bedfordshire Outdoor Access Improvement Plan were also included in the assessment table. Where no impact was considered likely to result from LTP3, consideration of in-combination effects was not required.
- 3.1.2. A judgement regarding 'significance' was made in relation to the qualifying features of interest and the conservation objective for each European Site and considered in relation to pathways that could link the site with LTP3. Accordingly, two forms of impact were considered:
- Direct Impact – LTP3 policy activity or objective occurring within European Site boundary
 - Indirect Impact – policy activity or objective occurring outside European Site boundary but could have subsidiary impact on site

3.2. Assessment Findings

- 3.2.1. LTP3 strategies are designed to reduce transport demand and use of unsustainable travel modes. LTP3 is therefore unlikely to contribute to additional NO_x background emissions. Furthermore, prevailing winds from the SW disperse the district's transport emissions away from the nitrogen sensitive Chiltern Beechwoods SAC. With regard to direct toxification of a European site resulting from exhaust emissions, proposed road schemes in Central Bedfordshire are not in close proximity (less than 200m) to a European Site and it is therefore unlikely that significant effects will result from increased levels of NO_x.
- 3.2.2. LTP3 is expected to have a positive impact to the reduction of traffic therefore reducing existing traffic movement and noise disturbance to barbastelle foraging routes. Proposed new infrastructure schemes, including the Biggleswade Eastern Relief located near the fringe of the barbastelle foraging area, will not lead to habitat fragmentation, direct land take or habitat disturbance due to the schemes not falling within the area of importance for the Eversden and Wimpole barbastelle population.



- 3.2.3. Proposed infrastructure schemes for Central Bedfordshire have the potential to introduce a downstream risk of water pollution and flooding through diffuse pollution, increased run-off and loss of floodplain storage space, though it is unlikely that these risks will cause significant impact to the identified European sites downstream. Best practice design will offset the potential for pollutants entering water courses through sustainable drainage systems (SUDS) with pollution control mechanisms. The risk of flooding will also be minimised through drainage management for the proposed schemes, which are likely to improve flood storage capacity.
- 3.2.4. Recreation impacts resulting from CBC's LTP3 are likely to be minimal. LTP3 policies will not lead to significant recreational impacts to the European sites since the sites are located outside of the authoritative boundary and so would not contribute a regular high level of public access. The private management of Eversden and Wimpole SAC also restricts hours and type of recreation.
- 3.2.5. A fundamental principle of the LTP3 is to work towards a reduction in transport's contribution to the causes of climate change. Accordingly, LTP3 is considered to have a positive impact to European sites with regard to addressing the detrimental impacts of climate change, through limitation of greenhouse gas emissions.

3.3. Screening statement

- 3.3.1. Based on the information provided in this report, it is assessed that CBC's LTP3 will not have significant effects on the European Sites considered either alone or in combination with other plans and policies identified at the time of the production of this assessment (Table 5). Progressing to Appropriate Assessment is therefore not considered necessary.

Table 5: HRA screening table summary		
European Site	AA required alone?	AA required in combination?
Chilterns Beechwoods SAC	x	x
Eversden and Wimpole Woods SAC	x	x
Chippenham Fen Ramsar	x	x
Wicken Fen Ramsar	x	x
Woodwalton Fen Ramsar	x	x
Ouse Washes SPA / SAC / Ramsar	x	x

- 3.3.2. This screening report does identify minor potential for impacts to adversely affect European Sites. Where this is the case however, impacts are not regarded to be significant or are not caused or notably enhanced by the policies of the LTP3.
- 3.3.3. This opinion was consulted with Natural England and other key stakeholders such as the Environment Agency and local wildlife trusts. Following consultation on this report, CBC are not required to undertake Appropriate Assessment prior to adoption of the LTP3.



3.3.4. Natural England (Jonathan Bustard) states “I can confirm that we agree with your assessment that no likely significant effect exists to European sites, and that no Appropriate Assessment is required”. The full e-mail is in Appendix A3.

References

- ¹ Dodd A.M., Cleary B.E., Dawkins J.S., Byron H.J., Palframan L.J. and Williams G.M. (2007) The Appropriate Assessment of Spatial Plans in England: a guide to why, when and how to do it. The RSPB, Sandy
- ² Natural England; Natural England guidance on Local Transport Plans and the natural environment



Appendix A



A1. European sites; Conservation objectives and environmental considerations

Eversden and Wimpole woods SAC	
Qualifying feature: <i>A roosting foraging ground for an internationally important colony of barbastelle bats</i>	
Conservation objective and requirements to maintain favourable condition status of site:	Key factors affecting site integrity:
<p><i>To maintain, and where possible, enhance the resident barbastelle population</i></p> <ul style="list-style-type: none"> - Maintain existing populations and known roosts - Enhance the suitability of potential roosts that are currently unoccupied, to increase populations - Ensure that consideration is given to habitat surrounding key bat sites - Manage potential insect prey populations 	<ul style="list-style-type: none"> - Land take; loss, destruction and disturbance of roosts or potential roosts in trees. - Land take in surrounding areas; Loss or fragmentation of feeding areas. Barbastelle travel up to 20km away to forage using hedgerows and riparian corridors as flight lines. - Land use change; changes to feeding areas which impact populations of macro-invertebrates. - Loss of prey; habitat simplification acting through factors such as fertiliser use and intensive grazing regimes in feeding areas. - Noise and lighting; changes to highway network and or construction of new developments causes disturbance. - Recreational disturbance/pressure; increased use of breeding and foraging area may disturb bats at critical stages of their life cycle. - Climate change; habitat loss/change due to extreme weather events and temperature change.
Chilterns Beechwoods SAC	
Qualifying feature: <i>Semi-natural dry grasslands and scrublands on chalk. Beech forests. Significant presence of the Stag beetle.</i>	
Conservation objective and requirements to maintain favourable condition status of site:	Key factors affecting site integrity:
<p><i>To maintain in favourable condition the beech forest habitat</i></p> <ul style="list-style-type: none"> - Maintain presence of species throughout the site - Minimise atmospheric pollution - Management of public access to forest and nearby dry calcareous grasslands - Appropriate management of grasslands - Absence of direct fertilization 	<ul style="list-style-type: none"> - Land take; direct loss, destruction and disturbance of tree stands. - Air pollution; increased nitrogen deposition may affect habitat structure and vegetation diversity. If excess nitrogen deposition occurs, this favours the growth of undesirable species (typically grasses) with the key threat to the site being lack of replacement of ancient trees. High nitrogen levels may also increase the susceptibility of beech trees to disease. - Invasive species; presence of which may out-compete young trees of desirable species. - Recreational pressure; abundance of recreational activity may harm forest and grassland condition. - Climate change; habitat loss/change due to extreme weather events and temperature change.



A2. LTP3 Screening assessment

LTP3 strategies	Sub-strategy	Strategy measures	HRA screening	Consideration of other relevant policies (where appropriate)
Journey to work strategy Access to services strategy	Land use planning	<u>Mixed use development</u> -located near employment provisions to reduce the need for long distance commuter travel	No significant adverse effects likely; depends on location of current housing allocations and future LDF strategies. Potentially negative impacts associated with expansion of the highway network to support growth. However, it is unlikely that the LTP3 policies in themselves will impact on the integrity of the European sites. Potentially positive impacts associated with reduced need to travel.	In order to safeguard the countryside, the Core Strategy preferred options aims to limit to development outside principal settlements. An 'urban area first' principle is preferred regarding the delivery of new development thereby making full use of previously developed land and buildings. By locating development close to existing urban centres it will benefit from existing transport corridors, public transport connections and interchange points, reducing the need for new infrastructure or capacity enhancements. Additionally, the provision of integrated development including, homes, employment and social/community infrastructure will minimise travel demand.
		<u>Links to existing transport networks</u> – location of development near to existing cycle and footways and public transport routes		
		<u>Sustainable transport provision</u> – embedded in new development to reduce car reliance		
	Smarter choices	<u>Travel plans</u> – reduce number of people driving to work by encouraging staff to use non-car alternatives	No direct or indirect pathway of impact to European site. Potentially positive impact associated with smarter travel choice.	
		<u>Car sharing</u> – will reduce the number of cars through two or more travelling together		
		<u>Car clubs</u> – hire cars available; reduce car ownership and therefore minimise car reliance		
		<u>Ticketing</u> – integration of public transport to increase attractiveness of non-car alternative modes		
		<u>Information and marketing</u> – increased awareness of non-car alternatives to maximise usage of non-car travel alternatives		
	Infrastructure and service provision	<u>Connectivity</u> – improved connectivity between transport networks to maximise the attraction of all travel modes	No direct or indirect pathway of impact to European site.	



LTP3 strategies	Sub-strategy	Strategy measures	HRA screening	Consideration of other relevant policies (where appropriate)
		<u>Accessibility</u> – provide sustainable infrastructure and services available to everyone	No impact assuming related developments are not located in close proximity to European sites. If so, project level environmental assessment is undertaken to identify potential risks. It is unlikely that the LTP3 policies in themselves will impact on the integrity of the European sites. Potentially positive impact associated with increased sustainable travel options.	In order to safeguard the countryside, the Core Strategy preferred options aims to limit development outside principal settlements. An 'urban area first' principle is preferred regarding the delivery of new development.
		<u>Reallocation of road space</u> – reduce the dominance of the private car and encourage sustainable use	No direct or indirect pathway of impact to European site. Potentially positive impact associated with development of a sustainable transport network.	
	Network management	<u>Network management duty</u> – maintain the free flow of traffic on the road network	No direct or indirect pathway of impact to European site. Potentially positive impact associated with reduced congestion and air pollution resulting from more efficient transport network.	
		<u>Signage</u> – enable trips to be concentrated on appropriate routes and reduce the number of 'lost' travellers		
		<u>Intelligent transport systems</u> – influence traffic movements to maintain free flow of traffic		
		<u>Maintenance</u> – ensure efficient operation of routes and services		
	Demand management	<u>Car parking provision</u> – encourage economic growth but influence travel choice and curb car reliance	No direct or indirect pathway of impact to European site.	
		<u>Access restrictions</u> – reduce the impact of through traffic on town centres and communities	While encouraging through traffic to use primary routes could theoretically lead to an increase in traffic on A roads, any air pollution impact resulting from this measure is unlikely to affect roads within 200m of the European sites for this study.	
		<u>Teleworking</u> – to reduce trip generation and minimise traffic using the network	No direct or indirect pathway of impact to European site. Potentially positive impact associated with smarter travel choice.	
Freight strategy	Managing freight on the roads	<u>Improve major freight routes</u> – proposed road schemes to improve freight access and journey time reliability	No impact assuming related developments are not located in close proximity to European sites. If so, project level environmental assessment is undertaken to identify potential risks. It is unlikely that the LTP3 policies in themselves will impact on the integrity of the European sites. Potentially positive impact associated with increased sustainable travel	



LTP3 strategies	Sub-strategy	Strategy measures	HRA screening	Consideration of other relevant policies (where appropriate)
			options.	
		<u>Construction travel plans</u> – to reduce the volume of road vehicle movements associated with a development site	No direct or indirect pathway of impact to European site. Decrease in HGV traffic will lead to improvements in air, noise and water pollution.	
		<u>Traffic management</u> – utilise TM techniques to ensure freight uses designate road freight network	Not considered to have an impact on European sites. Could theoretically lead to an increase in HGV traffic on A roads but when considered in combination with other freight measures, an overall reduction in freight traffic is the policy goal.	
		<u>Land use planning</u> – to ensure developments likely to generate significant freight movements are focused in existing industrial areas or close to strategic network	No impact likely however, may create additional HGV traffic on roads within 200m of European sites. A project level assessment of potential impacts would be undertaken for proposed developments.	The Core Strategy identifies the need to locate all development within or close to existing urban centres where it will benefit from existing transport corridors, reducing the need for new infrastructure or capacity enhancements.
	Freight facilities	<u>Provision of lorry parking and driver facilities</u> – to facilitate safe freight operations and minimise adverse impacts of freight transport	No impact assuming that designated lorry parking sites are not located in close proximity to European sites. However, it is unlikely that the LTP3 policies in themselves will impact on the integrity of the European sites.	
		<u>Designated freight lay-bys</u> – in appropriate locations in terms of safety and amenity		
		<u>Lorry parking</u> – at all new industrial and commercial units		
	Servicing and delivering	<u>Consolidation centres for deliveries and construction materials</u> – to enable more efficient and less intrusive transport operations in urban areas and to address the environmental impacts of freight resulting from congestion, noise and pollution of deliveries	No impact to European sites assuming that centres are not located in close proximity to European sites. However, it is unlikely that the LTP3 policies in themselves will impact on the integrity of the European sites. Will contribute to overall reduction in freight traffic.	
		<u>Freight vehicle restrictions</u> – introduce restrictions for weight, emissions and timing of delivery in particular areas	No direct or indirect pathway of impact to European site.	
	Communicating freight management	<u>Road signs</u> – inform drivers of freight management measures such as restrictions or lay-by parking	No direct or indirect pathway of impact to European site.	



LTP3 strategies	Sub-strategy	Strategy measures	HRA screening	Consideration of other relevant policies (where appropriate)
		<u>Freight quality partnerships</u> – provide a forum where all stakeholders can work together to address specific issues	No direct or indirect pathway of impact to European site.	
		<u>Promote fuel efficiency</u> – encourage safer more fuel efficient driving	No direct or indirect pathway of impact to European site. Reducing fuel consumption has positive environmental effects.	
	Non-road modes	<u>Land use planning</u> – encourage new development at locations which can access and utilise alternative modes to road freight	No impact to European sites assuming that related developments are not located in close proximity to European sites. It is unlikely that the LTP3 policies in themselves will impact on the integrity of the European sites. A shift in freight movement from road to rail creates local air quality benefits.	
		<u>Existing rail network</u> – increase rail's freight capacity and support continued growth in rail freight		
		<u>East- West rail link</u> – new rail alternative to long distance freight haulage between the ports and growth areas of the East of England and to the north and south		
		<u>Rail freight interchanges</u> – proposed new strategic rail freight interchange facilities		
Walking strategy	Infrastructure	<u>Bedford-Milton Keynes Waterway</u> – extension to the canal network may provide opportunity to facilitate low impact freight activities		
		<u>Shared space</u> – increase pedestrian priority in areas whilst maintaining vehicle access	No direct or indirect pathway of impact to European site. Potentially positive impact associated with smarter travel choice.	
		<u>Footways</u> – improve quality of footways through removal of street clutter, shared street space, and general maintenance		
		<u>Lighting</u> – installation of high quality street lighting to improve walking safety	Potential impact to bat roost: Lighting alters flight rhythm and causes bats to reduce foraging activity. Impacts would be minimised through best practice such as down lighting.	
		<u>Signage</u> – enhance the legibility of market towns and increase the ease of use of the Rights of Way Network	Recreational levels and access to European sites may increase as a result of LDF housing allocations and measures that target enhancing Public Rights of Way Network. However, it is unlikely that the LTP3 policies in themselves will impact on the integrity of the	The Bedfordshire Rights of Way Improvement Plan recognises a need to protect the environment while promoting greater access to the countryside. Priority areas for access improvement in the plan include those located near to significant housing areas within the Bedfordshire. Access



LTP3 strategies	Sub-strategy	Strategy measures	HRA screening	Consideration of other relevant policies (where appropriate)
			European sites.	enhancements to European sites do not form part of the plan.
		<u>Routes to schools</u> – package of engineering measures to support and promote Safer Routes to Schools	No direct or indirect pathway of impact to European site. Potentially positive impact associated with smarter travel choice.	
		<u>Road Safety</u> – Speed and access restrictions and route prioritisation	No direct or indirect pathway of impact to European site.	
	Promotion	<u>Information provision and marketing campaigns</u> – raise awareness and address pre-conceptions of walking and related benefits	No direct pathway of impact to European site. Potentially positive impact associated with smarter travel choice.	
		<u>Travel plans</u> – encourage trips on foot through the promotions of sustainable travel to and from the workplace		
		<u>Walking to school</u> – encourage children to walk to school through delivery of incentives including ‘walking buses’ and ‘park and stride’		
		<u>Promoted Walks</u> –guided walks and promoted routes predominately (initially) to encourage walking for leisure	Recreational levels and access to European sites may increase as a result of LDF housing allocations and measures that target enhancing Public Rights of Way Network. However, it is unlikely that the LTP3 policies in themselves will impact on the integrity of the European sites.	The Bedfordshire Rights of Way Improvement Plan recognises a need to protect the environment while promoting greater access to the countryside. Priority areas for access improvement in the plan include those located near to significant housing areas within the Bedfordshire. Access enhancements to European sites do not form part of the plan.
Cycling strategy	Infrastructure	<u>Cycle Paths</u> – segregated off-road provision for cyclists	No direct pathway of impact to European site. Potentially positive impact associated with smarter travel choice.	
		<u>Cycle Lanes</u> – provision of cycle lanes to increase priority of cyclists in the street hierarchy		
		<u>Advanced Stop Lines</u> – road space for cyclists to get ahead of queuing traffic at signalised junctions		



LTP3 strategies	Sub-strategy	Strategy measures	HRA screening	Consideration of other relevant policies (where appropriate)
		<u>Signage</u> – ease navigation for cyclists on the network and support the provision of cycle lanes		
		<u>Road Safety</u> – interventions that reduce the speed and volume of general traffic to protect and prioritise cyclists on the network		
		<u>Cycle Parking</u> – provision of secure, dedicated cycle parking to address security concerns, whilst reducing the potential for clutter of footways		
	Training	<u>Child cycle training</u> – development of cycle skills among young people	No direct pathway of impact to European site. Potentially positive impact associated with smarter travel choice.	
		<u>Adult and cycle training</u> – development of cycle competencies and safety to enable confidence to cycle on the highway network		
	Promotion	<u>Cycle access schemes</u> – increasing the affordability and availability of bicycles to the public	No direct pathway of impact to European site. Potentially positive impact associated with smarter travel choice.	
		<u>Information provision</u> – raising awareness of the cycling facilities available and the benefits of cycling as a means of travel		
		<u>Travel Plans</u> - to encourage the take-up of cycling as a form of sustainable travel		
		<u>Marketing campaigns</u> – dedicated cycle campaigns to alter perceptions of cycling and attract new cyclists		
Road safety strategy	Pedestrian and cycle safety	<u>Hard engineering</u> – engineering schemes to reduce speed differences between cars and non-motorised travel	No impact assuming related developments (i.e. street lighting schemes) are not located in close proximity to European sites. If so, project level environmental impact assessment is undertaken to identify potential impacts. It is unlikely that the LTP3 policies in themselves will impact on the integrity of the European sites.	
		<u>Cycling proficiency</u> – ‘bikability’ to improve cyclists’ skills and confidence	No direct pathway of impact to European site. Potentially positive impact associated with smarter travel choice.	
		<u>Child pedestrian training</u> – to give children basic walking skills to cope better with road environment		
	Protect children and young people	<u>Education</u> – to ensure children are equipped with essential skills to cope safely with the road	No direct or indirect pathway of impact to European site.	



LTP3 strategies	Sub-strategy	Strategy measures	HRA screening	Consideration of other relevant policies (where appropriate)
		environment		
		<u>Young driver safety</u> – training and awareness and publicity programmes to target safe road user behaviour among young people		
		<u>School travel plans</u> – improve school journeys by safe and sustainable modes of transport using safer routes t schools initiative		
		<u>'Passport for Life'</u> – series of road safety projects, programmes and campaigns that ensure all children reach road safety standard		
	Protect motorcyclists	<u>'Think'</u> – develop motorcycle publicity campaigns to increase driver awareness	No direct or indirect pathway of impact to European site.	
	Safety on rural roads	<u>Engineering solutions</u> – to address specific safety risks on rural roads including maintenance and improvements	No impact assuming related developments (i.e. street lighting schemes) are not located in close proximity to European sites. If so, project level environmental assessment is undertaken to identify potential impacts. It is unlikely that the LTP3 policies in themselves will impact on the integrity of the European sites.	
	Road user behaviour	<u>Drink/drug driving</u> – raise awareness and issues arising from driving under the influence	No direct or indirect pathway of impact to European site.	
		<u>Seat belt</u> – campaigns to increase the proportion of drivers who comply with this law		
Speeding	<u>Speed management strategy</u> – including road safety cameras	No impact assuming related developments (i.e. street lighting schemes) are not located in close proximity to European sites. If so, project level environmental impact assessment is undertaken to identify potential impacts. It is unlikely that the LTP3 policies in themselves will impact on the integrity of the European sites.		
Work related traffic	<u>'At work road risk'</u> – guide for local businesses to deliver safety benefits	No direct or indirect pathway of impact to European site.		
Major Schemes	Luton Dunstable Busway	Dedicated bus route that will increase the accessibility of Dunstable and Houghton Regis from Luton	Increase in public transport related schemes likely to result in decrease in road traffic. Reduced traffic volume will have beneficial impact to air quality and create an overall reduction in the need for new road infrastructure which may have a direct or indirect impact to European sites in future.	
	East–West Rail	Continuous rail route between		

Oxford and Cambridge. Central



LTP3 strategies	Sub-strategy	Strategy measures	HRA screening	Consideration of other relevant policies (where appropriate)
		Bedfordshire is affected by the Western and Central section proposals		
	M1 widening Junctions 10-13	Hard Shoulder Running Scheme to increase road capacity		
	A5 – M1 Link (Dunstable Bypass)	Alternative route acting as a Northern Bypass for Dunstable through traffic		
	Woodside Connection	Provides access to the Woodside Industrial area without the need to go through Dunstable and Houghton Regis		
	M1 Junction 10A	New grade separated junction at Junction 10A to improve access to Luton and the Airport		
	Luton Northern Bypass	A new link into Junction 11A of the M1 and thus into the A5-M1 link (Dunstable Northern Bypass) to allow for North Luton Strategic Site Specific Allocation		
	East of Leighton Distributor Road	An Eastern Distributor Road will be provided through New road between Heath Road and Stanbridge Road to support urban extension and minimise impact on the existing road network		
	A421 (M1 to Bedford)	Dual carriageway link between Junction 13 of the M1 and the Bedford Southern Bypass improving access to parts of Central Bedfordshire from the East and West		
	Flitwick Westoning Bypass	A bypass to the West of Flitwick and Westoning to remove through traffic on the A5120 from the town		
	Biggleswade Eastern Relief Road	remove some through traffic from the town centre and support the eastern expansion of the town		
			Major new road schemes are subject to individual project level HRA. No planned road schemes in close proximity of European sites. In relation to the LTP3, schemes are designed to improve road network efficiency which may have the effect of reducing traffic on the A roads adjacent to European sites, leading to beneficial effects or reduced noise, congestion, air pollution in relation to the baseline of the proposed growth in the LDF without the major schemes.	



Appendix A3: Natural England response to HRA Screening consultation

Our ref:- LA.CBC.04/cons16358

Dear Adam

Your request for comments on the HRA for Central Beds Council's LTP has been passed to me, and I've now had opportunity to review the document. Generally, Natural England agrees with the conclusions of the report, that no 'likely significant effects' exist to European sites. We support the approach to consider those sites which lie outside (even at considerable distance) the Council's boundary.

The report has taken a precautionary view, and includes all the likely impact receptors with reasoned conclusions. I add the caveat that I have not seen the accompanying LTP, so can't comment on how well the HRA relates to the policies, however the HRA has made clear statements around impact levels which we have no reason to question. I note from your website that the LTP has been out for consultation since October, however I can find no reference to comments from Natural England on this document – are you able to confirm this? If not, it appears the consultation closes next week, so there may be scope to comment on our priority work areas as appropriate.

Mindful of the above, I can confirm that we agree with your assessment that no likely significant effect exists to European sites, and that no Appropriate Assessment is required. I hope the above is helpful to you at this time, but please contact us again should this be required.

Kind regards

Jonathan

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