

**Chilterns Beechwoods Special Area of Conservation
Mitigation Strategy for Ashridge Commons and Woods Site of
Special Scientific Interest**

**To support the Habitats Regulations Assessment for
Dacorum Borough Council; Buckinghamshire Council; Central
Bedfordshire Council; St. Albans City and District Council**

DRAFT

FOR DISCUSSION ONLY

12 Sept 2022

Part A – Strategic Guidance (common to all Local Authorities)

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1. INTRODUCTION

1.1. The Chilterns Beechwoods Special Area of Conservation

1.1.1. The Chilterns Beechwoods SAC represents the most extensive area of native beech woodland in England. The SAC extends for 1,276.5ha and is designated for the following qualifying features:

- H9130 *Asperulo-Fagetum* beech forests ('Beech forests on neutral to rich soils')
- H6210 Semi-natural dry grasslands and scrubland facies on calcareous substrates (*Festuco-Brometalia*). ('Dry grasslands and scrublands on chalk or limestone').
- S1083 Stag Beetle *Lucanus cervus*.

1.1.2. The Beech woods vary in composition and character depending on slope, substrate, aspect and soil depth. Notable or rare plants associated with the beech woodland include Coralroot *Cardamine bulbifera*, Southern Woodrush *Luzula forsteri*, Red Helleborine *Cephalanthera rubra* and Lesser Hairy-brome *Bromopsis benekenii*. The woods have also held Ghost Orchid *Epipogium aphyllum*.

1.1.3. The grassland interest of the SAC relates to species-rich chalk grassland and this has a restricted distribution within the SAC, with the main areas being Windsor Hill and Ellesborough and Kimble Warrens.

1.1.4. The Stag Beetle is the UK's largest terrestrial beetle and the larvae live in decaying tree stumps and fallen timber where these lie in contact with the ground. Population numbers of the stag beetle are generally in decline across Europe and the species is classified as 'near threatened' by the International Union for Conservation of Nature (IUCN)¹.

1.1.5. The Chilterns Beechwoods SAC is made up of nine separate sites scattered across the Chilterns. It includes sites within Berkshire (6.71%), Buckinghamshire (43.19%), Hertfordshire (35.07%) and Oxfordshire (15.03%). 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;
- Tring Woodlands SSSI; and
- Windsor Hill SSSI.

¹ <https://www.iucnredlist.org/species/157554/5094499>

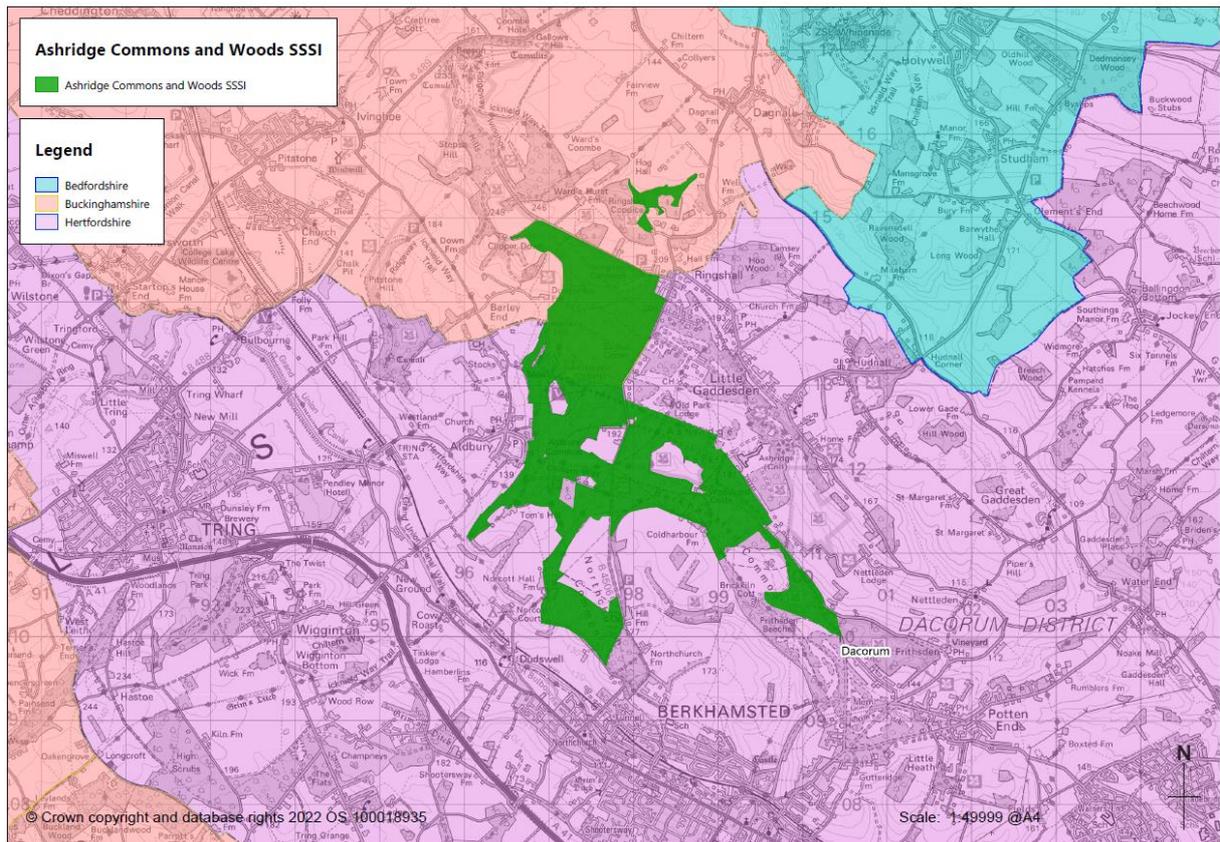


Figure 2: The extent of Ashridge Commons and Woods SSSI

1.2. Purpose and scope of the document

- 1.2.1. This document sets out a mitigation strategy to avoid adverse public access and disturbance impacts from development on the integrity of the Chilterns Beechwoods SAC at Ashridge Commons and Woods Site of Special Scientific Interest (SSSI).
- 1.2.2. **Part A** of this document provides common guidance for the planning areas of Dacorum Borough Council, Buckinghamshire Council, Central Bedfordshire Council and St. Albans City and District Council. More specifically it relates to land within and on the edge of the 12.6 kilometre zone of influence that extends from Ashridge Commons and Woods SSSI.
- 1.2.3. **Part B** of this document provides further guidance that is specific to each of the authorities.
- 1.2.2 This document is informed by the existing report '*Visitor survey, recreational impact assessment and mitigation requirements for the Chilterns Beechwoods SAC*' that was prepared by Footprint Ecology for Dacorum Borough Council and published in March 2022.

1.3. Legislation and Strategic policy framework

Habitats Regulations

- 1.3.1. The designation, protection and restoration of European sites is embedded in the Conservation of Habitats and Species Regulations 2017, as amended, the 'Habitats Regulations'. Importantly, the most recent amendments (the Conservation of Habitats and Species (amendment) (EU Exit) Regulations 2019²) take account of the UK's departure from the EU.
- 1.3.2. The Habitats Regulations require that any application for development or a strategic plan or policy that is likely to significantly affect a European site is subject to an Appropriate Assessment of the implications of the proposal for the site's conservation objectives.
- 1.3.3. The planning authority must ensure that a plan or project, including planning applications, will not have a negative effect on the integrity of the site, alone or in combination with other plans or projects. The planning authority must take account of any conditions or restrictions (including avoidance and mitigation measures) that would ensure no adverse effect, before granting permission or adopting a plan or policy.

National Planning Policy Framework (Updated 2021)

- 1.3.4. Para. 182 of the National Planning Policy framework states the following:

“The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an Appropriate Assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site.”

1.4. Partnership working and spatial area covered by this guidance

- 1.4.1. This document has been prepared through joint working between Dacorum Borough Council, Buckinghamshire Council, Central Bedfordshire Council and St. Albans City and District Council. The authorities have worked closely with Natural England in developing the guidance contained within this document, and with the National Trust on identifying the measures necessary to ensure compliance with the Habitats Regulations at Ashridge Commons and Woods SSSI.
- 1.4.2. The guidance applies to Ashridge Commons and Woods SSSI and a broader geographic area that extends 12.6 kilometres from this designated area. This is commonly referred to as the “Zone of Influence”. Further information on the geographic extent of this is presented in Sections 2 and 3 of this document.

1.5. Strategic Environmental Appraisal of this Mitigation Strategy

² The amending regulations generally seek to retain the requirements of the 2017 Regulations but with adjustments for the UK's exit from the European Union. Regulation 4 confirms that the interpretation of these Regulations as they had effect, or any guidance as it applied, before exit day, shall continue to do so.

- 1.5.1. The European Union Directive 2001/42/EC1 (Strategic Environmental Assessment Directive) applies to a wide range of public plans and programmes on land use, energy, waste, agriculture, transport and more (see Article 3(2) of the Directive for other plan or programme types). The objective of the Strategic Environmental Assessment (Strategic Environmental Assessment) procedure can be summarised as follows: “the objective of this Directive is to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development”.
- 1.5.2. Under Article 3(3) and 3(4) of the Strategic Environmental Assessment Directive, Strategic Environmental Assessment is not required for plans and programmes which “determine the use of small areas at a local level” or which only propose “minor modifications to plans and programmes”, except where the plan or programme is determined to be likely to have a significant environmental effect.
- 1.5.3. Dacorum Borough Council, acting on behalf of the partner authorities, are undertaking a Strategic Environmental Assessment Screening of this document. The three statutory consultees (Natural England, the Environment Agency, and Historic England) are consulted from XX XXXX 2022 to XX XXXX 2022 (under Regulation 9 of the Strategic Environmental Assessment Screening determination). The consultation responses will be taken account of in this document.
- 1.5.4. The Councils have concluded that this document is not likely to have a significant environmental effect and accordingly will not require a Strategic Environmental Assessment. The main reasons for this conclusion are as follows:
- The document expands on policies and principles set out in the National Planning Policy Framework (NPPF) and relevant adopted policies set out in the respective development plan documents for Dacorum Borough Council, Buckinghamshire Council, Central Bedfordshire Council and St. Albans City and District Council; and
 - The document does not present any policies, and serves only to provide greater clarity about the Council's expectations in relation to existing policies within existing development plan documents.

1.6. Habitats Regulations Assessment of this Mitigation Strategy

- 1.6.1. The application of Habitats Regulations Assessment to land-use plans is a requirement of the Conservation of Habitats and Species Regulations 2017 (as amended), the UK’s transposition of European Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora (the Habitats Directive). Habitats Regulations Assessment applies to plans and projects, including all Local Development Documents in England and Wales.
- 1.6.2. Under Article 6(3) of the Habitats Directive, Competent Authorities have a duty to ensure that all the activities they regulate have no adverse effect on the integrity of the national

sites network³. The competent authorities (in this instance Dacorum Borough Council, Buckinghamshire Council, Central Bedfordshire Council and St. Albans City and District Council) must assess the possible effects of a plan or project on the national sites network through a Habitats Regulations Assessment.

- 1.6.3. This process must identify any likely significant effects on a National site which may arise, either alone or in combination with other plans and projects in view of the site's conservation objective. Where likely significant effects are identified then the plan or project must be subject to an Appropriate Assessment. As part of the Appropriate Assessment, the adoption of mitigation measures may be considered to mitigate adverse impacts on site integrity.
- 1.6.4. Dacorum Borough Council, acting on behalf of the partner authorities, undertook a Habitats Regulations Assessment of this document. Natural England, the environment Agency and Historic England are consulted on the HRA Screening Report from XX XXXX 2022 to XX XXXX 2022. The HRA Screening Report concludes that the document would have no adverse impact on the integrity of any European sites either alone or in combination with other plans.

³ Following the United Kingdom's withdrawal from the European Union, the national sites network replaces the Natura 2000 ecological network.

2. BACKGROUND: THE EVIDENCE OF EXISTING RECREATIONAL PRESSURE AT THE SAC

2.1. Recreational Use of Ashridge Commons and Woods SSSI

2.1.1. Ashridge Commons and Woods is almost entirely publicly accessible; only the northern part of Ashridge Commons and Woods SSSI (Ringshall Coppice) has no public access. Ashridge Commons and Woods is managed for its conservation and recreation value and is used for a range of outdoor activities including walking, dog walking and cycling.

Visitor surveying

2.1.2. *'Visitor survey, recreational impact assessment and mitigation requirements for the Chilterns Beechwoods SAC'* summarise visitor trends for the site. The surveys recorded an average of around 318 parked cars at Ashridge Commons and Woods SSSI. These counts indicated potentially around 4,700 people per day on average visiting Ashridge Commons and Woods SSSI during the summer. This roughly equates to 1.7 million visitors to the site each year.

2.1.3. The visitor surveys included 951 interviews with 97% of interviewees visiting directly from home, 2% visiting whilst on holiday and 1% were staying locally with friends/family. The most common activity undertaken was dog walking which accounted for almost half of all interviewees. This was closely followed by walking with less frequent activities including jogging/running and cycling.

2.1.4. The reason that most interviewees gave for visiting the Chilterns Beechwoods SAC at Ashridge was that it was close to home (22% of interviewees). At six of the ten locations surveyed at the site, in excess of 95% of interviewees arrived by car. Travelling by car was also high at the other locations, however higher rates of visitors by foot (20-30%) were evident at Northchurch Common, Aldbury and Norcott Hill.

2.1.5. Visitors typically spent around 1.5 hours on site, with some variation between survey locations and time of year. Routes walked on site were typically (median) around 3.0km.

2.1.6. The median distance between the interview location and the home postcode for those that travelled from home that day was 5.7km, with 75% living within 12.6km of Ashridge.

2.1.7. A survey of visitor parking was also undertaken at Ashridge. It was determined that Monument Drive accounts for 60% of all vehicles at car parks within 500 metres of Ashridge Commons and Woods SSSI. It was also concluded that the number of cars was generally 40% more at weekends than during the week.

2.2. Impacts from recreation

2.2.1. Recreation has a range of impacts on the SAC qualifying features. The impacts from recreation use at the site are summarised in Table 1.

Table 1: Summary of recreation impact pathways for the Chilterns Beechwoods SAC at Ashridge Commons and Woods SSSI.

Type of impact	Impact	Relevant activities	Further details
Damage	Vegetation wear	All	Results in changes to vegetation composition, loss of species and structure
	Soil compaction	All	Health implications for trees through reduced water uptake, root damage i.e. verge parking
	Erosion	All	Soil loss and can include wear of historic environment features such as wood banks which add to the biodiversity importance
	Removal of deadwood	Den building	Implications for invertebrates
	Vandalism	Anti-social behaviour	Can include graffiti, damage to signs, infrastructure etc.
Contamination	Dog fouling	Dog walking	Resulting in eutrophication. Urine and faeces an issue.
	Litter	All	Risk of contamination depending on composition
	Invasive species	All	Can be spread on clothes, fur and even deliberately
Fire	Increased fire incidence	Barbeques, camp fires, arson, cigarettes	Risks from a range of activities, with scope for major incident
Other	Harvesting	Fungi harvesting/wild food collection	
	Damage to visitor infrastructure	All	Detracts staff time from conservation management
	Challenges to achieving grazing	All	Ability to graze sites can be compromised by high levels of access through conflicts between users
	Changes to public perception	All	Access results in demand for visitor infrastructure and opposition from established visitors to changes in site management

2.3. Ecological Impacts and the Need for Mitigation

- 2.3.1. Current impacts and future risk from recreation impacts are primarily focussed at Ashridge Estate, where visitor pressure is highest. Ecological surveys were undertaken in 2021 by Footprint Ecology across the whole of the site.
- 2.3.2. These surveys recorded substantial evidence of recreational impacts throughout Ashridge and were severe in some ‘hot spot’ areas. Impacts were particularly intense in the central areas north and south of Monument Drive and also at Northchurch Common.
- 2.3.3. Just under 500 incidences of recreational damage were recorded. Damage through trampling was the most widespread impact, with widened paths and widespread incidence

of bare compacted and sometimes churned ground with some path junctions now supporting extensive areas of poached ground.

- 2.3.4. In many areas, but particularly the narrower desire lines through wooded areas, trampling had resulted in the exposure of tree roots (including those of veteran trees) and damage to tree roots.
- 2.3.5. Other issues included widespread den building and damage from bikes. Eutrophication from dog fouling was widespread and a number of campfires/barbeque remains were noted.

Detailed information on the ecological impacts recorded at Ashridge Commons and Woods SSSI are set out in **Section 3** of the Footprint Ecology Report “*Visitor survey, recreation impact assessment and mitigation requirements for the Chilterns Beechwoods SAC*” which was published in March 2022.

Click here for the [High resolution version](#)

Click here for the [Low Resolution version](#)



Figure 3: Examples of recreation impacts at Ashridge Commons and Woods. Verge parking image courtesy of National Trust, all other images by Footprint Ecology.

- 2.3.6. The National Trust have instigated a range of measures at the site already, these include:
- Logs to minimise and control levels of verge parking along the public highway;
 - Demarcation of parking bays along Monument Drive;
 - Signs asking visitors to remain on paths, shut gates etc at key locations to react to current damage;
 - Path edging, dead hedging etc. to contain access;

- Social media posts when Monument Drive is closed due to volumes of visitors on site or to educate the public i.e. highlight important features on the site;
- Ranger presence;
- Improved education via the visitor centre; and
- Automated counters to count vehicles at selected locations.

2.3.7. Despite these measures, impacts are widespread and recreation pressure is impacting the integrity of the site. On the basis of the evidence as summarised in the earlier sections of this strategy, housing growth will result in further damage to the Chilterns Beechwoods SAC.

2.3.8. Additional recreation activity may make any measures to address and resolve current impacts more difficult. Natural England has advised that the cumulative effects of housing growth will therefore have a likely significant effect and mitigation measures are necessary to ensure adverse effects on integrity can be ruled out.

2.3.9. For this reason, avoidance or mitigation measures are required for new residential development and some other forms of development within a Zone of Influence (Zoi) around the Chilterns Beechwoods SAC at Ashridge Commons and Woods SSSI. Further guidance on this is set out in the next section of this strategy.

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3. STRATEGIC GUIDANCE FOR DEVELOPERS AND LANDOWNERS

3.1. Overview of the Habitats Regulations Assessment

- 3.1.1. The Habitats Regulations Assessment applies to plans or projects which are likely to have a significant effect on a National site (either alone or in combination with other plans or projects), and / or not directly connected with or necessary to the management of that site.
- 3.1.2. There is no set methodology or specification for carrying out and recording the outcomes of the assessment process. The Habitats Regulations Assessment Handbook, produced by David Tyldesley Associates (referred to hereafter as the 'DTA Handbook'), provides an industry recognised good practice approach to the Habitats Regulations Assessment.
- 3.1.3. The DTA Handbook⁴ has been used to prepare this strategy, alongside reference to Government Guidance on Appropriate Assessment. The DTA Handbook is used by Natural England, the Government's statutory nature conservation organisation and is widely considered to be an appropriate basis for the Habitats Regulations Assessment of plans and projects.
- 3.1.4. Having regard to the above, the process of the Habitats Regulations Assessment is summarised in four key stages as follows:
- **Stage 1. Screening:** Screening to determine if the plan or project would be likely to have a significant effect on a protected site. This stage comprises the identification of potential effects associated with a plan or project on protected sites and an assessment of the likely significance of these effects.
 - **Stage 2. Appropriate Assessment and the 'Integrity Test':** Assessment to ascertain whether or not the plan or project would have a significant adverse effect on the integrity of any protected site to be made by the Competent Authority. This stage comprises an impact assessment and evaluation in view of a protected site's conservation objectives. Where adverse impacts on site integrity are identified, consideration is given to alternative options and mitigation measures which are tested.
 - **Stage 3. Alternative solutions:** Deciding whether there are alternative solutions which would avoid or have a lesser effect on a protected site.
 - **Stage 4. Imperative reasons of overriding public interest and compensatory measures:** Considering imperative reasons of overriding public interest and securing compensatory measures.
- 3.1.5. This section provides practical guidance and makes clear the process that the authorities will follow for the first two stages of the Habitats Regulations Assessment, namely "Screening" and the "Appropriate Assessment". If the guidance is followed, then the legal requirements of the Habitats Regulations will be satisfied for the significant majority of applications which are affected.

⁴ Tyldesley, D., and Chapman, C. (2013) The Habitats Regulations Assessment Handbook (September) (2013) edition UK: DTA Publications Limited. Available at: www.dtapublications.co.uk

3.2. Stage 1: Screening Proposals

3.2.1. The purpose of the screening stage is to determine which plans and projects have the potential to negatively impact upon the protected site at Ashridge as a result of increased recreational pressure and disturbance.

3.2.2. The key objective of this stage is to determine if a proposal is “screened in” or “screened out”. If following stage 1 a proposal is “screened in”, then it must proceed to stage 2 and be subject to Appropriate Assessment.

3.2.3. If a proposal is “screened out”, then it is considered unlikely to give rise to negative impacts at Ashridge due to recreational pressure and disturbance. It does not need to proceed to stage 2 (Appropriate Assessment) and can be progressed as normal.

3.2.4. There are a number of factors that we will consider as part of the screening process when a proposal is submitted and these are presented in turn below. These factors are informed by the background evidence set out in Section 2 of this document, and importantly considers the potential for in-combination effects with other plans and projects.

Buffer Zones and the Location of Development – 12.6 kilometre Zone of Influence

3.2.5. The recreational ‘Zone of Influence’ is an area across which 75% of people will travel to use a designated site for recreational purposes. The process for establishing this zone is calculated using an industry standard approach and informed by the visitor survey data presented in Section 2 of this document.

3.2.6. Based on the evidence gathered to date, a Zone of Influence extending from 500 metres from the edge of the Ashridge Commons and Woods SSSI to 12.6 kilometres from the edge of the same SSSI. Within this zone, new growth will likely result in an increase in visitors and use of those sites. This results in increasing recreational disturbance and adversely affect the species and habitats of the protected sites.

3.2.7. The Zone of Influence applies to the whole of Dacorum Borough Council, and some land within the administrative area of Buckinghamshire Council, Central Bedfordshire Council and St. Albans City and District Council.

3.2.8. The Zone of Influence is based on evidence gathered from visitor surveys at the site in 2021 which demonstrates that 75% of all visitors to the site fall within that zone. The map on the following page presents this zone.

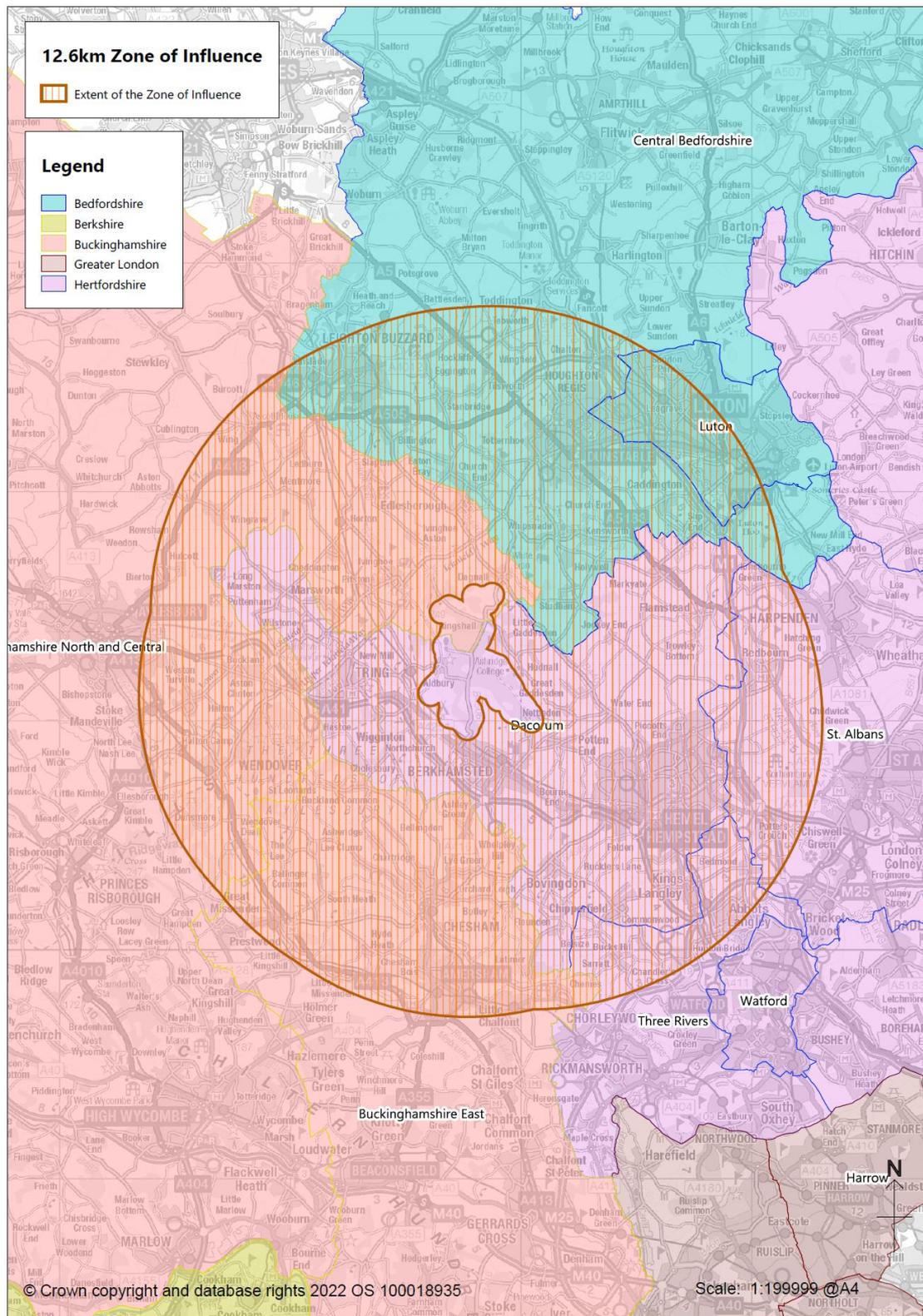


Figure 4: Map showing the defined 500 metre - 12.6km Zone of Influence

An interactive map with more detail on the extent of the 12.6 kilometre Zone of Influence is available to view online using the following link:

<http://dacorumbc.maps.arcgis.com/apps/instant/lookup/index.html?appid=a59b90f9d66f44828d802b867e6c4276>

Buffer Zones and the Location of Development – 500 metre Avoidance Zone

3.2.9. Based on the evidence gathered to date, a 500 metre 'Avoidance Zone' is established for residential development around Ashridge Commons and Woods SSSI. Within the zone there is a presumption against development, i.e. ensuring no increase in the number of dwellings there.

3.2.10. The 500 metre 'Avoidance Zone' applies only to land within the administrative area of Dacorum Borough Council and Buckinghamshire Council (North and Central).

3.2.11. There is a heightened risk to designated sites (such as the Chilterns Beechwoods SAC) from development in such close proximity to them. Recreational use is much higher from homes that are in easy walking distance of the site, and it is considered very difficult to deflect such access with alternative greenspace.

3.2.12. Fire risk, fly-tipping, light and noise and other urban effects are also more acute close to their boundary. Furthermore, mitigation approaches, such as access management and warden control, are less effective. The map on the following page presents the 500 metre Avoidance Zone.

3.2.13. The extent of the 12.6 kilometre Zone of Influence and 500 metre Avoidance Zone may change through future reviews of the evidence base and this strategy.

Buffer Zones and the Location of Development – Proposals that are partly located within a zone

3.2.14. Where a proposal partly falls within the Zone of Influence or 500 metre Avoidance Zone, only the affected development that is located wholly within the boundary of zone will be screened in.

3.2.15. As an example, there is a development proposal for five new dwellings and two of these dwellings are to be built on land within the defined zone, only those two dwellings will be screened in and subject to stage 2 (Appropriate Assessment). The remainder will be screened out.

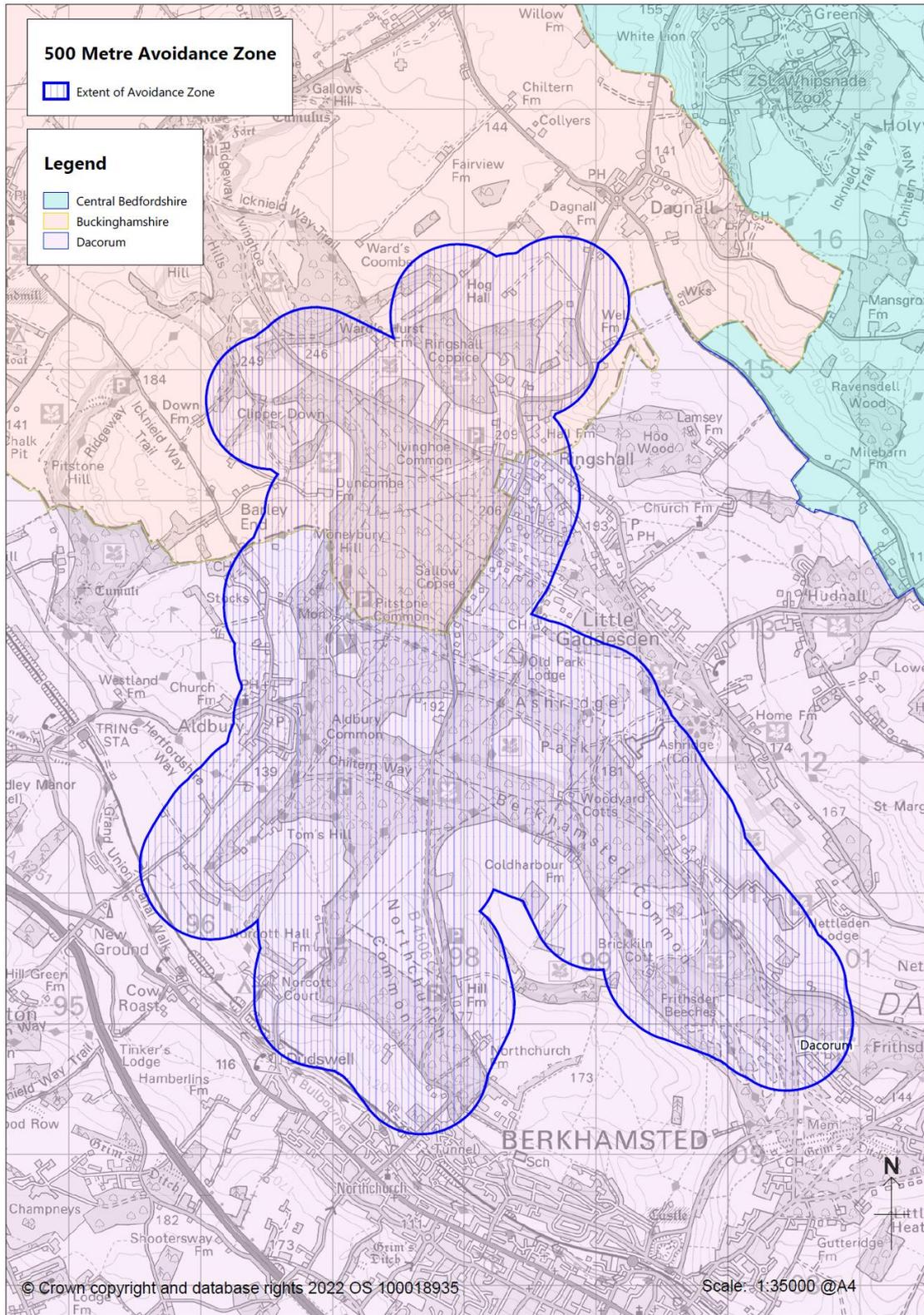


Figure 5: Map showing the defined 500 metre Avoidance Zone

An interactive map with more detail on the extent of the 500 metre avoidance zone is available to view online using the following link:

<http://dacorumbc.maps.arcgis.com/apps/instant/lookup/index.html?appid=a59b90f9d66f44828d802b867e6c4276>

Types of development proposals affected

3.2.16. All proposals which seek to deliver a **net increase in residential dwellings** and are located within the 500 metres Avoidance Zone or the wider Zone of Influence will be screened in and subject to stage 2 (Appropriate Assessment). These include proposals for mixed use schemes that include net new residential dwellings as part of a wider development.

3.2.17. Affected proposals are then subject to what is known as ‘Appropriate Assessment’, which is led by the competent authority. More information on what needs to be considered for the Appropriate Assessment stage is set out in Section 3.2 of this Document.

3.2.18. There are other forms of development which may cause additional harm and these will be considered on a case by case basis. Table 2 below presents types of development likely to be affected within the zones, highlighting which are likely to be screened in and therefore subject to stage 2 (Appropriate Assessment):

Table 2: Development Types

Use Type/Class	Screening Determination	
	500m Avoidance Zone	Zone of Influence
Dwelling Houses (C3) <i>Any net new additional dwellings</i>	Screened In	Screened In
Dwelling Houses (C3) <i>Extension or residential ‘Granny’ annexe</i>	Case by Case <i>Depends if it functions as a separate unit to the main dwelling.</i>	Case by Case <i>Depends if it functions as a separate unit to the main dwelling.</i>
Dwelling Houses (C3) <i>Replacement dwellings</i>	Screened Out	Screened Out
Residential Institutions (C2/C2A) <i>Accommodation and care to people in need of care, including Nursing Homes, hospitals and secure institutions</i>	Case by Case <i>Depends on the type of scheme proposed, the level of mobility of residents and potential for parking to be used by visitors to the SAC.</i>	Case by Case <i>Depends on the type of scheme proposed, the level of mobility of residents and potential for parking to be used by visitors to the SAC.</i>
Residential Institutions (C2) <i>School, college or training centre</i>	Case by Case <i>Depends on the type of scheme and its functional relationship to the SAC</i>	Screened Out
Hotels (C1) <i>A hotel, boarding or guest house</i>	Case by Case <i>Depends on offer and type of users expected</i>	Case by Case <i>Depends on offer and type of users expected</i>
House in Multiple Occupation (C4 / Sui Generis) <i>This also includes managed student accommodation.</i>	Screened In	Screened In
Holiday Dwellings (Sui Generis) <i>Self-contained holiday accommodation, caravan and touring holiday accommodation</i>	Screened In	Case by Case <i>Depends on offer and type of users expected</i>
Gypsy and Traveller Pitches (Sui Generis) <i>Net new pitches that are either temporary or permanent.</i>	Screened In	Screened In
Residential Boat Moorings ()	Screened In	Screened In
Café/Shop/Visitor Centre/Museum ()	Case by Case <i>Depends on offer and type of users expected</i>	Screened Out

- 3.2.19. It is important to note that the table above is not definitive. While it may be considered that the majority of affected development proposals within the 500 metres Avoidance Zone are unlikely to receive planning permission, there may be exceptions cases where development could be allowed.
- 3.2.20. Equally, there may be situations where some forms of development are considered to be screened out above, but may give rise to increased visitor pressures at Ashridge Commons and Woods SSSI. This may be due to their scale, location (within the wider Zone of Influence) and particular details. Such situations are likely to be rare. If there is uncertainty, applicants are encouraged to seek early engagement with the respective Council or with Natural England.

Application types - General

- 3.2.21. There are many avenues available for applicants to obtain permission for new development. Proposals will be 'screened' at the earliest stage in the planning process for their potential to impact upon the Chilterns Beechwoods SAC at Ashridge Commons and Woods SSSI.
- 3.2.22. The publication of the evidence demonstrating harm to the site in March 2022 resulted in an immediate halt in the determining of applications for those affected development types listed above. This included some applications which had already received permission but which require subsequent applications to be submitted, such as applications for reserved matters and those seeking to discharge conditions.

3.2.23. An affected development, once it has been screened-in and the Appropriate Assessment has demonstrated the risk of harm at Ashridge Commons and Woods SSSI can be mitigated (or avoided), may be granted permission. If the development is permitted and the necessary mitigation and/or contributions are secured, any related application (such as the discharging of conditions or reserved matters) can be screened out provided no further material amendments are made.

- 3.2.24. The following section presents guidance on how the Councils will approach different types of applications submitted.

Application types – Full and Outline Planning Applications

- 3.2.25. All full and outline planning applications will be screened based on the location of the scheme and type of development proposed. All applications that are screened in must be subject to stage 2 (Appropriate Assessment).

Application types – Prior Approvals / Permitted Development

- 3.2.26. Applications for Prior Approval/Permission in Principle will be screened in a similar manner to full and outline planning applications. Where such applications are acceptable, these

will be granted⁵. When this occurs, an informative must be added to the grant of permission requiring the applicant to satisfy stage 2 (Appropriate Assessment) prior to commencement of works, if it has not been demonstrated already.

Post-permission application types – Reserved Matters, Discharge of Conditions, Non-Material Amendments and Removal/variation of conditions.

- 3.2.27. These applications will be subject to screening if the affected development has not already been subject to this process at an earlier stage and/or suitable mitigation or avoidance measures have not been secured. This will normally apply to permissions granted prior to 14 March 2022.
- 3.2.28. **Planning conditions** have an important role in ensuring the delivery of high quality schemes. They are most often used to enable development to proceed (i.e. the grant of permission), where it would otherwise have been necessary to refuse planning permission.
- 3.2.29. Case law⁶ has determined that where applications for the discharge, removal or variation of planning conditions *may* be ‘screened in’, the case officer will need to undertake an exercise to determine if the condition “goes to the heart of the planning permission”. With this the case officer will determine whether the condition is an implementing one and the details are fundamental to the acceptability of the site.
- 3.2.30. The nature and wording of conditions vary greatly as no two applications are ever the same. Many require further evidence or documentation to be submitted and agreed with the relevant authority in order for development to be considered acceptable.
- 3.2.31. Applications for **minor material amendments (under section 73)** *may* be screened in if the affected proposal was not implemented prior to 14 March 2022. This includes circumstances where the original permission has fully discharged its conditions. Evidence would be required to demonstrate implementation prior to that date.

Application types not affected

- 3.2.32. The following application types will be screened out as they have no bearing on recreational pressures at Ashridge Commons and Woods SSSI.
- Lawful Development Certificates⁷
 - Householder applications
 - Demolition
 - Advertisements
 - Works to trees

⁵ The decision to grant is subject to other material planning considerations.

⁶ There are a number of cases relevant to this matter, including: *Whitley & Sons v Secretary of State for Wales* (1992) 64 P&CR 296; *R (Hart Aggregates Ltd) v Hartlepool Borough Council* [2005] EWHC 840 (Admin); *Bedford Borough Council v The Secretary of State for Communities and Local Government and Aleksander Stanislaw Murzyn* [2008] EWHC 2304 (Admin); *Greyfort Properties Ltd v SSCLG* [2011] EWCA Civ 908; and *R (Howell) v Waveney District Council* [2018] EWHC 3388

⁷ There may be some very limited circumstances where lawful development certificates may be screened in.

Pre-application Advice

- 3.2.33. As no decision is provided through this service, such advice is not subject to the Habitats Regulations and therefore are not screened in. The pre-application advice service can assist a prospective applicant in better understanding the likely impacts that a proposed development may have on the Chilterns Beechwoods SAC at Ashridge Commons and Woods SSSI. This may be the case for more complex applications or where it is felt that a proposed scheme *could* be screened in, having regard to the type of development proposed (see Table 2).

3.3. Stage 2: An Appropriate Assessment of Proposals

- 3.3.1. As set out in Section 3.2 above, where proposals are screened in, they must be subject to what is known as “Appropriate Assessment”. This stage seeks to understand the impacts that development will have, alone or in combination with other plans and projects, and where possible identify measures to avoid/mitigate these likely effects.
- 3.3.2. This process is led by the respective Council to which the proposal relates, having regard to the particular merits of the proposal and evidence submitted.
- 3.3.3. The National Planning Practice Guidance⁸ sets out in more detail what an Appropriate Assessment should contain. Importantly, it states the following:

An Appropriate Assessment must contain complete, precise and definitive findings and conclusions to ensure that there is no reasonable scientific doubt as to the effects of the proposed plan or project. The competent authority [e.g. the local planning authority] will require the applicant to provide such information as may reasonably be required to undertake the assessment.

An Appropriate Assessment must consider the indirect effects on the designated features and conservation objectives, including the following principles:

- *an Appropriate Assessment must catalogue the entirety of habitat types and species for which a site is protected.*
- *an Appropriate Assessment must identify and examine the implications of the proposed plan or project for the designated features present on that site, including for the typical species of designated habitats as well as the implications for habitat types and species present outside the boundaries of that site and functionally linked; insofar as those implications are liable to affect the conservation objectives of the site.*
- *where the competent authority rejects the findings in a scientific expert opinion recommending additional information, the Appropriate Assessment must include an explicit and detailed statement of reasons which is capable of dispelling all reasonable scientific doubt on the effects of the proposal on the site.*
- *a competent authority [e.g. a local planning authority] is permitted to grant a plan or project consent which leaves the applicant free to determine subsequently certain*

⁸ The full guidance on Appropriate Assessments is available to view online at <https://www.gov.uk/guidance/appropriate-assessment#what-must-an-appropriate-assessment-contain>

parameters relating to the construction phase, only if that authority is certain that the consent includes conditions that are strict enough to guarantee that those parameters will not adversely affect the integrity of the site.

In the light of this the competent authority must determine whether the proposal will not adversely affect the integrity of the site(s) [e.g. the Chilterns Beechwoods SAC]. The integrity of a site is the coherence of its ecological structure and function, across its whole area, that enables it to sustain the habitat, complex of habitats and/or the levels of populations of the species for which it was designated.

3.3.4. In light of the evidence gathered by Footprint Ecology for Ashridge Commons and Woods SSSI and presented in Section 2 of this document, proposals that are screened in at stage 1 have the potential to adversely affect the integrity of the site, either alone or in combination with other proposals within the 500 metre Avoidance Zone and the wider Zone of Influence. For this reason, such proposals are subject to Appropriate Assessment.

3.3.5. Mitigation measures are therefore required for Ashridge Commons and Woods SSSI. The core objective of these measures are to:

- Deflect visitors away from the site so that housing does not result in a proportionate increase in access to the site, by providing alternative options;
- Better manage visitor distribution and numbers within the SAC (and ideally wider area) to reduce pressures in certain areas;
- Reduce impacts of recreation by influencing visitors to change their damaging behaviours (e.g. verge parking, dogs off-lead, barbeques, straying from marked paths and trampling flora);
- Reduce impacts of recreation within the site by protecting sensitive features (veteran trees, future veterans, vegetation communities) and increasing the resilience of the site (e.g. to impacts of climate change which can exacerbate recreation impacts).

3.3.6. **Where proposals are screened in and within the 500 metre Avoidance Zone**, Natural England has advised that **there is a presumption against such development being granted** as it is unlikely that any mitigation or avoidance measures would be effective. Sufficient evidence needs to be produced by the applicant to demonstrate how their scheme would not result in a net increase in visitors to Ashridge Commons and Woods SSSI. This will be taken into account as part of the Appropriate Assessment undertaken by the Council.

3.3.7. **Where proposals are screened in and within the wider 500 metre - 12.6km Zone of Influence**, Natural England has advised that **these can be sufficiently mitigated (or avoided) through measures set out in this strategy.**

3.3.8. These measures comprise of two separate elements that all proposals will be expected to contribute towards or directly deliver and are considered in turn below:

- Strategic Access Management and Monitoring ('SAMM') 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.

3.4. Strategic Access Management and Monitoring Strategy (SAMM)

Key Principles

- 3.4.1. The intention of the Strategic Access Management and Monitoring Strategy is to directly manage and avoid impacts at its source and to better educate those visiting the Chilterns Beechwoods SAC at Ashridge Commons and Woods SSSI.
- 3.4.2. These measures are in addition to the regular habitat management of the site, which is also undertaken by the National Trust. Since the publication of evidence by Footprint Ecology which demonstrate harm to the integrity of the site, the National Trust have enhanced measures of their own across the site. These do not form part of the cost of SAMMs, which solely relate to predicted harm arising from future growth in the Zone of Influence.

Overall Cost of SAMM

- 3.4.3. The Strategic Access Management and Monitoring Strategy consists of six projects as set out in Appendix A. The table provides a description and cost of the projects. These costs cover a minimum period of 80 years from 2022. Each of these projects are costed on the best available information and evidence in consultation with the National Trust who manage the majority of the designated site.
- 3.4.4. The projects detailed in Appendix A have been designed to mitigate the likely scale of development that will come forward within the 12.6 kilometres Zone of Influence. Strategic Access Management and Monitoring Strategy projects will be subject to regular review to ensure that they remain fit for purpose.

3.4.5. **The total cost of SAMM, as agreed with Natural England and the National Trust is £XX,XXX,XXX.**

Apportionment of Cost to each Authority

- 3.4.6. The total cost of SAMMs is to be apportioned between the four authorities as follows:

Table 3: Apportionment of SAMM to each authority

Council (Administrative Area)	SAMMS apportionment
Dacorum Borough Council	£X,XXX,XXX
Central Bedfordshire	£X,XXX,XXX
St. Albans City and District	£X,XXX,XXX
Buckinghamshire (North and Central)	£X,XXX,XXX
Buckinghamshire (East)	£X,XXX,XXX

3.4.7. The precise method to which the apportioned cost of SAMMs is secured through development and processed is a decision for each individual authority and will vary. Part B of this document sets out the details of how the total apportionment will be secured for XXXX Council.

3.5. Suitable Alternative Natural Greenspace (SANG)

Key Principles

- 3.5.1. Suitable Alternative Natural Greenspace, or “SANG”, is the term given to greenspaces that are created or enhanced with the specific purpose of absorbing recreation pressure that would otherwise occur at National Sites, such as Ashridge Commons and Woods SSSI. New SANGs can be created, or existing greenspaces enhanced to create a SANG, in order to absorb the level of additional recreation pressure associated with new development.
- 3.5.2. SANG projects dovetail with SAMM in that they provide additional space for recreation and provide attractive alternatives for people who may otherwise choose to visit Ashridge Commons and Woods SSSI. With SAMM, visitors will become more aware of their impacts and access to Ashridge better managed. Over time the emphasis for recreation use will shift to other sites enhanced for recreation, such as SANG.

Guidance on securing SANG as part of new Development

- 3.5.3. All new residential development within the zone of influence must contribute towards either a) a new (bespoke) SANG or b) contribute towards suitable SANG projects elsewhere. This is in addition to the necessary SAMM contributions as set out in the previous section.
- 3.5.4. The identification of new (bespoke) SANG will need to be agreed with Natural England, or agreed with both and the Competent Authority and Natural England who will subject it to Appropriate Assessment. The following is required to support this proposal:
- 1: A Management Plan setting out the projects and interventions required to deliver the SANG.
 - 2: An agreement with the landowner that the SANG will be secured for a minimum period of 80 years.
 - 3: If the candidate SANG is already accessible to the public, visitor surveys are likely to be required to determine the capacity of the candidate SANG to accommodate an uplift in visitor numbers.
- 3.5.5. SANG needs to be delivered ahead of occupation of any affected development that is directly linked to it. For larger scale SANG, delivery can be phased in a proportionate manner alongside new development, reflecting the short, medium and longer term projects and interventions as outlined in the accompanying Management Plan.
- 3.5.6. Part B of this document sets out the details of how SANG will be secured for XXXX Council.

Scale of SANG

3.5.7. SANG will be provided at a rate of eight hectares per 1,000 new residents; this is equivalent to 0.0192ha per dwelling.

3.5.8. SANG needs to be of a scale for it to function properly as a space.

3.5.9. Formal open spaces such as sports grounds, playing fields or some children's play areas (i.e. those not constructed from natural materials, such as wood) are unlikely to meet the criteria for SANG. If such features are present, they should not be counted towards the overall area of SANG.

Catchment of SANG

3.5.10. The catchment of SANG will depend on their particular characteristics and location, and also their location within a wider green infrastructure network. As a guide:

i) SANG of 2-12ha will have a catchment of 2km

ii) SANG of 12-20ha will have a catchment of 4km

iii) SANG of 20ha+ will have a catchment of 5km

3.5.11. Any development seeking to deliver 10 or more net new residential dwellings (or equivalent) must be located within (or on the edge of) the catchment of a SANG project. That SANG must have existing capacity, and meets any further criteria necessary to accommodate the proposed scheme.

3.5.12. Smaller development proposals for up to 9 net new residential dwellings (or equivalent) are not restricted to catchment areas for SANG. If such a development is not within the catchment area of a SANG with sufficient capacity, it can contribute towards an existing SANG elsewhere.

3.5.13. Strategic SANG sites will serve developments within the administrative area of that SANG. For example, a SANG in Dacorum will serve proposals in Dacorum, unless an agreement has been made with a neighbouring authority that its capacity can be shared.

Guidance for Creating a Suitable SANG

3.5.14. The guidance below is broken down into relevant components. They have been compiled from a variety of sources but principally from visitor surveys⁹ undertaken across Ashridge Commons and Woods SSSI.

3.5.15. The core objective for SANG is to deliver an attractive space that is publically accessible and which would likely deflect visitors, or a reasonable proportion of their trips, away from Ashridge Commons and Woods SSSI.

⁹ "Visitor survey, recreational impact assessment and mitigation requirements for the Chilterns Beechwoods SAC", Footprint Ecology, March 2022. Available to view online at www.dacorum.gov.uk/sac

3.5.16. Candidate SANG that meet the criteria below are highly likely to be accepted by Natural England and the Competent Authority. Should a candidate SANG not meet all of the criteria, then these will be assessed on a case by case basis, having regard to the particular measures proposed. Such proposals will need to demonstrate equivalent effectiveness of mitigation being provided to ensure a robust, consistent approach is followed. Any shortfall in the criteria should be offset by other complementary means, such as an elevated provision rate, size or high-quality features.

3.5.17. Candidate SANG that deliver a 2.3 – 2.5km circular walk are considered a basic requirement by Natural England, although it is recognised that this is unlikely to be achieved on a small or linear site. This guideline does not mean that the candidate SANG will not be accepted as in specific circumstances the walk does not have to be included. It is however desirable to provide all of the criteria listed below across a local SANG network, taking into account other sites in the nearby area.

3.5.18. Table 4 below presents the criteria for new SANG to offset pressures at Ashridge Commons and Woods SSSI.

Table 4: Criteria for the consideration of a site as Suitable Alternative Natural Greenspace

Paths	A minimum circular walk of 2.3-2.5 kilometres to be provided.	Expected
	Paths easily used and well maintained but mostly unsurfaced.	Expected
	Where parking is provided, circular path should start and finish at that location.	Expected
	Paths should be safe, easily identifiable and kept clear of obstructions, such as scrub cover for example.	Expected
	Information boards and/or signage at access points outlining the layout of the site and routes available to visitors.	Desirable
Parking	Parking, including for cyclists, to be provided on sites larger than four hectares, unless the site is solely intended for residents within 500 metres only.	Expected
	Parking areas are to be easily and safely accessible by car and to be clearly sign posted.	Expected
	Visitor to be able to take dogs from the parking area to the site safely off the lead	Desirable
Access	Access points to be provided based on the intended visitors of the SANG.	Expected
	Safe access route on foot from nearest car park and/or footpath.	Expected
	Access should be unrestricted within the site, with plenty of space for dogs to exercise freely and safely off the lead.	Expected

Character of space	Needs to be semi-natural, or perceived as such where close to existing development.	Expected
	If the site is larger than 12 hectares, a range of habitats should be present.	Expected
	No unnatural intrusions (e.g. odour from sewage treatment works, noise from busy roads).	Expected
	There should be little intrusion of built structures such as dwellings, buildings, fencing (not constructed using natural materials), etc.	Expected
	Naturalistic space with areas of open countryside with dense and scattered trees and shrubs.	Desirable
	Gentle undulating topography. Steep slopes are likely to deter visitors.	Desirable
	Focal point such as a viewpoint or monument within the site.	Desirable
	Provision of open water, however large areas of open water cannot count towards SANG capacity.	Desirable

3.5.19. The following section provides additional guidance to support the criteria listed above.

Paths, Roads and Tracks

3.5.20. SANG should aim to supply a choice of routes of around 2.3 - 2.5km in length with both shorter and longer routes of at least 5km as part of the choice, where space permits.

3.5.21. Paths have to be of a width acceptable to visitors.

3.5.22. Paths should be routed so that they are perceived as safe by the users, with some routes being through relatively open (visible) terrain (with no trees or scrub, or well-spaced mature trees, or wide rides with vegetation back from the path), especially those routes which are 1-3 km long.

3.5.23. Routes should make use of important views and vistas where possible.

Accessibility and Parking

3.5.24. Most visitors to Ashridge Commons and Woods SSSI come by car and want the site to be fairly close to home. Unless SANG is provided for the sole use of a local population living within a 500-metre catchment around the site, then the availability of adequate car and cycle parking on SANG sites that are larger than four hectares is essential.

- 3.5.25. The amount and nature of parking provision should reflect the anticipated use of the site by visitors and the catchment size of the SANG. A guide to parking provision should be in the region of 1.5 spaces per hectare of SANG. Parking should be clearly signposted, easily accessed and advertised as necessary for potential visitors.

Target groups of Visitors

- 3.5.26. This should be viewed from two perspectives, the local use of a site where it is accessed on foot from the visitor's place of residence, and a wider catchment use where it is accessed by car. Most of the visitors to Ashridge Commons and Woods SSSI come by car and therefore should be considered as a pool of users from beyond the immediate vicinity of the site. All but the smallest SANG should therefore target this type of visitor.

- 3.5.27. It is apparent from access surveys that a significant proportion of those people who visit the site on foot, also visit alternative sites on foot and so this smaller but significant group look for local sites. Where large populations are close to Ashridge Commons and Woods SSSI, the provision of SANG should be attractive to visitors on foot.

Buildings and other manmade infrastructure

- 3.5.28. Little or no buildings or other manmade infrastructure is found within Ashridge Commons and Woods SSSI at present apart from the provision of some surfaced tracks, car parks and facilities close to Monument Drive. Generally, an urban influence is not what people are looking for when they visit the site and many people visit because it has a naturalness about it that would be marred by such features.

- 3.5.29. However, SANG would be expected to have adequate parking with good information about the site and the routes available. Some subtle way marking would be expected for those visitors not acquainted with the layout of the site.

- 3.5.30. Other infrastructure would not be expected other than on the largest of SANG where toilets and other facilities such as a café could be provided. Such infrastructure should generally be restricted to the vicinity of parking areas where good information and signs of welcome should be the norm, though discretely placed benches or information boards along some routes would be acceptable.

Landscape and Vegetation

- 3.5.31. SANG do not have to contain beech woods or chalk grasslands (i.e. protected features) to provide an effective alternative to Ashridge Commons and Woods SSSI.

- 3.5.32. SANG should seek to avoid sites of high nature conservation value which are likely to be damaged by increased visitor numbers. Such damage may arise, for example, from increased disturbance, erosion, input of nutrients from dog faeces, and increased incidence of fires. Where sites of high nature conservation value are considered as SANG, the impact on their nature conservation value should be assessed and considered alongside relevant policy in the development plan. These sites may require an ecological discount of their proposed SANG area.

- 3.5.33. A semi-natural looking landscape with plenty of variation is regarded as most desirable by visitors and some paths through quite enclosed woodland scored highly. There is clearly a

balance to be struck between what is regarded as an exciting landscape and a safe one and so some element of choice between the two would be highly desirable. The semi-wooded and undulating nature of most of the Ashridge Commons and Woods SSSI gives it an air of relative wildness, even when there are significant numbers of visitors on site. SANG should aim to reproduce this quality.

3.5.34. Hills do not put people off visiting a site, particularly where these are associated with good views, but steep hills are not appreciated. An undulating landscape is preferred to a flat one.

3.5.35. Water features, particularly ponds and lakes, act as a focus for visitors for their visit, but are not essential.

Networks of SANG

3.5.36. The use of SANG networks, including narrow linear sites and small sites of no smaller than two hectares have potential to provide effective mitigation where traditional SANG is unavailable. These SANG areas will need to be linked and/or in proximity to an already established SANG. If effectiveness can be demonstrated of small or linear SANGs working alone, then we will assess this on a case by case basis, taking in to account the site's context amongst the wider greenspace network.

3.5.37. The provision of longer routes within larger SANG is important in determining the effectiveness of the authorities' network of SANG as mitigation. The design of routes within sites will be critical to providing routes of sufficient length and attractiveness for mitigation purposes.

3.5.38. Though networks of SANG may accommodate long visitor routes and this is desirable, they should not be solely relied upon to provide long routes.

Restrictions on usage

3.5.39. A significant proportion of visitors to Ashridge Commons and Woods SSSI use the space to exercise their dogs and so it is important that SANG allow for pet owners to let dogs run freely over a significant part of the walk. Access on SANG should be largely unrestricted, with both people and their pets being able to freely roam across significant parts of the site. This means that sites where freely roaming dogs will cause a nuisance, disturb wildlife, or where they might be in danger (from traffic or such like) should not be considered for SANG.

Additional guidance for enhancing an existing open space to become SANG

3.5.40. SANG may be provided by the enhancement of existing open land, including those already accessible to the public that have a low level of use and could be enhanced to attract more visitors. The extent of enhancement and the number of extra visitors to be attracted would vary and principally relates to the existing level of visitors that use each site.

3.5.41. Those sites which are enhanced only slightly would be expected to provide less of a mitigation effect than those enhanced greatly, in terms of the number of people they would divert away from Ashridge Commons and Woods SSSI. Examples include enhanced

access through guaranteed long-term availability of the land, the creation or expansion of a car park or the provision of a network of paths.

3.5.42. SANG which have an appreciable but clearly low level of public use and can be substantially enhanced to greatly increase the number of visitors also count in full. The identification of these sites should arise from evidence of low current use. This could be in a variety of forms, for example:

- Experience of managing the site, which gives a clear qualitative picture that few visitors are present;
- Quantitative surveys of visitor numbers;
- Identified constraints on access, such as lack of gateways at convenient points and lack of parking;
- Lack of usable routes through the site; and
- Evidence that existing routes through the site are rarely used (paths may show little wear, be narrow and encroached on by vegetation)

Management Plans for Candidate SANGs

3.5.43. A management plan is required to support any candidate SANG proposal. This must include:

- An overview of the site, its description, location and adjoining uses;
- An understanding of its topography and existing accessibility;
- Information on the recreational routes proposed within the site, including if necessary where it links to other sites in the area;
- An evaluation of the site against the preferred and desirable criteria set out earlier in this section (see Table 4);
- The proposed location of an parking, points of access and the indicative routes for visitors to use on site;
- Mechanisms for funding, including plans for enhancements, management and maintenance in the short, medium and longer term; and
- Approach to monitoring the site for its effective use as a SANG

Visitor Surveys for Candidate SANGs

3.5.44. If required, visitor surveys will determine how much capacity exists for an existing public open space to support additional visitors in the future. This will determine the extent to which that site could support new residential development, should it be taken forward as a SANG.

3.5.45. It is advised that a clear methodology is prepared and where feasible agreed with Natural England and/or the competent authority in advance of the surveys being undertaken. The following guidance is provided on what are key considerations for any such survey:

- A tally count is required for at least two weekdays and one weekend day for each candidate SANG with existing public access.

- Days do not need to be consecutive, however all tally counts should normally be undertaken in close proximity to one another (within 2-3 weeks)
- The hours of surveying should respond to the season and the amount of daylight available, taking account of other factors such as wooded areas which can generally be darker. A total of 8 hours of surveying per day is expected in summer months between 7am and 7pm. This reduces to 6 hours in winter months.
- Weather should be reasonably good for the time of year that the survey is being undertaken.
- Surveys should capture visitor access points that are generally well used.

3.5.46. Sites are likely to have additional capacity where average visitor use is less than 1 person per ha per hour¹⁰.

3.6. Gateway site(s)

- 3.6.1. A gateway site is an innovative and emerging concept with regards to avoidance and mitigation measures at Ashridge Commons and Woods SSSI. The purpose of a Gateway is similar to that of SANG, to create an attractive alternative to Ashridge that deflect users away from there, reducing recreational pressures as a result.
- 3.6.2. A key difference between SANG and a gateway site is that the later needs to be well related to the existing Ashridge Estate and importantly on land outside of the Chilterns Beechwoods SAC. A gateway site should provide equivalent attractions and facilities sufficient to draw people away from more sensitive areas within Ashridge Estate that suffer the most from substantial recreational damage.
- 3.6.3. An example of this would be the honeypot location of Monument Drive which draws the majority of visitors from the surrounding area. If sufficient visitors were drawn to a nearby gateway site, it is likely that substantially less damage would occur.
- 3.6.4. A gateway site would need to demonstrate with reasonable certainty how visitors would be drawn away from the site, rather than encouraging more visitors through the provision of more facilities and attractions. With this, it is likely that further interventions within the protected parts of Ashridge Estate would likely need to occur in tandem.
- 3.6.5. Depending on the scale and location of a gateway site, it could serve as an alternative to SANG delivery that could serve one or more of the Councils within the Zone of Influence.
- 3.6.6. Gateway sites are expected to be a medium-term project, which will be worked upon once SANG and SAMM are secured. The Councils will continue to work together with the National Trust and Natural England on exploring options for gateway sites alongside the delivery of SAMM and SANG. Further guidance may be provided on this through a future review of this strategy.

¹⁰ This provides a guide or approximate benchmark, typically busier than the relevant National Sites but less than an urban park (see Liley et al., 2015). Sites will need to be considered on a case-case basis.

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4. Implementation, Monitoring, Review and Governance

4.1. Implementation

- 4.1.1. All net new homes granted planning permission from 14 March 2022 will need to contribute towards the Strategic Access Management and Monitoring (SAMMs) Projects (listed in Appendix A or as superseded) and secure or make proportionate contributions towards the delivery of Suitable Alternative Natural Greenspace (SANG).
- 4.1.2. The developer of each net new home is required to pay the Council to which the affected development is located, a financial contribution to support the implementation of SAMMs projects in Appendix A. The Council will pass on these contributions to the National Trust for the sole purpose of implementing these or successor Strategic Access Management and Monitoring Strategy projects for the Chilterns Beechwoods SAC at Ashridge Commons and Woods SSSI.
- 4.1.3. The approach to the delivery of suitable SANG is a matter that is being progressed separately by each Council, reflecting the different stages each authority has reached with possible SANG and their respective Local Plans. Each authority will manage and maintain a list of SANG that have been agreed with Natural England, providing sufficient clarity on their status and capacity to accommodate additional growth as well as the catchment to which they serve.
- 4.1.4. The sums of monies will be secured via appropriate mechanisms as set out in Part B of this document and will be subject to an inflation related clause. In addition, the costs of individual components may be reviewed as part of the annual update based on the outcomes of individual project evaluation if this identifies that there has been either an underestimation or overestimation of the costs attributed. These contributions are in addition to any CIL, Section 278, Section 106 or other requirements that may arise through reforms to the planning system.

4.2. Monitoring and Review

- 4.2.1. It is important to recognise that the SAMMs costs provided in Appendix A are taken from a base year of 2022. Consequently, these costs will be updated on 1 April each year to take account of inflation. Build costs will be based on the Construction Output Price Indices published by the Office for National Statistics. Staff and consultancy costs will be based on any annual wage increase proposed by the National Trust, changes to on-costs as a result for changes in nationally set levels of employer contributions for National Insurance purposes, and Consumer Price Index for consultancy costs.
- 4.2.2. Monitoring of the SAMMs projects and further visitor surveys have been identified within the costings set out in Table 3. The Mitigation Strategy will be reviewed in three years' time (2025) and following that every five years. Should circumstances require it, future reviews may be brought forward. This will ensure that the strategy remains appropriate and fit for purpose to mitigate the impact of public access and disturbance threats for the Chilterns Beechwoods SAC at Ashridge Commons and Woods SSSI.
- 4.2.3. Monitoring of SANG will be undertaken by each Council respectively.

4.3. Governance

4.3.1. Dacorum Borough Council, Buckinghamshire Council, Central Bedfordshire Council, St. Albans City and District Council, Hertfordshire County Council and the National Trust will operate and implement governance arrangements to ensure the mitigation strategy remains relevant and is monitored, reviewed and delivered.

4.3.2. The governance arrangements will cover a range of processes including:

- the effective project management of the strategy;
- the resources required to ensure it is maintained for a minimum period of 80 years;
- timescales for implementation of avoidance and mitigation measures including SAMM and SANG
- future reviews of the strategy;
- the responsibilities of each party involved;
- dispute resolution; and
- any other general provisions.

4.3.3. The partner authorities and the National Trust will continue to liaise with Natural England on a regular basis to ensure the strategy remains effective and that mitigation is secured.

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