

ITEM NUMBER: 5d

22/02560/FUL	Removal of temporary dry bay practice structure, replacing with a permanent teaching and practicing building	
Site Address:	Ashridge Golf Club Golf Club Road Little Gaddesden Berkhamsted Hertfordshire HP4 1LY	
Applicant/Agent:	Mr Stephen Proudfoot	Mr Paul Sullivan
Case Officer:	Sally Robbins	
Parish/Ward:	Little Gaddesden Parish Council	Ashridge
Referral to Committee:	Contrary view of Parish Council	

1. RECOMMENDATION

That planning permission be **GRANTED**

2. SUMMARY

2.1 The principle of development for the provision of countryside recreation uses within the Rural Area, such as golf club facilities, is acceptable. The proposed teaching and practicing building would be situated close to the existing golf club facilities and would be finished in traditional materials. By virtue of its sympathetic siting, scale and design, the proposed development would integrate into the immediate surroundings of the golf course and wider landscape setting. The proposed structure would not cause harm to designated heritage assets and, when viewed in context with existing development, would be appropriate for the site. The proposal therefore complies with Core Strategy Policies CS7, CS12, CS24, CS27 and the NPPF.

3. SITE DESCRIPTION

3.1 The site is located on the southwest side of Golf Club Road, just off Ringshall Road (B4506). The application site comprises Ashridge Golf Club with its associated clubhouse, car park, driving range and ancillary structures.

3.2 The site is within the designated Rural Area and is located in the midst of Ashridge Historic Park and Garden, designated as a historic landscape of national importance. The site is also within the Chilterns Area of Outstanding Natural Beauty and an Area of Archaeological Significance.

4. PROPOSAL

4.1 The application seeks full planning permission for a permanent teaching and practicing building. The building would be situated on top of the existing embankment that is currently used as part of the driving range. It would comprise of a mono-pitched roof with three open bays and two enclosed studios. It would be finished in timber cladding and brick piers to the exterior walls, natural slate roof tiles and roller shutter doors on the east elevation. It would have a curved, arced footprint and would measure 30m wide, 10m deep with a maximum height of 5m.

5. PLANNING HISTORY

Planning Applications:

22/01586/FUL - Demolition of temporary structure and construction of a permanent building.
WITHDRAWN - 6th July 2022

4/00506/19/NMA - Non material amendment to planning permission 4/01767/00/ful (demolish and construct club house and extension to car park)
GRANTED - 3rd April 2019

4/02530/16/FUL - Re-paving and re-arrangement of existing car park and expansion of car park to create additional spaces
GRANTED - 15th November 2016

4/02529/16/FUL - Re-paving and re-arrangement of existing car park
GRANTED - 15th November 2016

4/00374/13/FUL - Demolition of existing timber shed and construction of storage facility and ancillary club room
GRANTED - 7th May 2013

4/02203/01/FUL - Extension of services enclosure to new clubhouse
GRANTED - 31st January 2002

4/00680/01/RET - Temporary buildings to accommodate changing rooms and shop
TEMPORARY CONSENT - 6th June 2001

4/01767/00/FUL - Demolish and construct club house and extension to car park
GRANTED - 10th January 2001

4/01334/99/FUL - Extension to car park and laying out of new practice tees
WITHDRAWN - 1st March 2000

4/00900/99/FUL - Demolition of existing clubhouse and rebuild new clubhouse, alterations to car park and access
WITHDRAWN - 28th February 2000

4/00362/99/FUL - Temporary buildings to accommodate changing rooms and shop
TEMPORARY CONSENT - 21st April 1999

4/00756/94/FUL - New porch and alterations to greenkeepers building
GRANTED - 1st August 1994

4/00843/92/RES - Submission of material details pursuant p/p4/o495/92 (greenkeeping machinery store)
GRANTED - 27th July 1992

4/00495/92/FUL - Greenkeeping machinery store
GRANTED - 9th June 1992

6. CONSTRAINTS

Area of Archaeological Significance: 28
Area of Outstanding Natural Beauty: CAONB outside Dacorum
CIL Zone: CIL1
Historic Park/Garden: ASHRIDGE, Grade: II*
National Trust Site: Ashridge Estate
Parish: Little Gaddesden CP
Rural Area: Policy: CS7
Parking Standards: New Zone 3
EA Source Protection Zone: 3

Wildlife Sites: Ashridge Park Golf Course & Cromer Wood

7. REPRESENTATIONS

Consultation responses

7.1 These are reproduced in full at Appendix A.

Neighbour notification/site notice responses

7.2 These are reproduced in full at Appendix B.

8. PLANNING POLICIES

Main Documents:

National Planning Policy Framework (2021)

Dacorum Borough Core Strategy 2006-2031 (adopted September 2013)

Dacorum Borough Local Plan 1999-2011 (adopted April 2004)

Relevant Policies:

Dacorum Borough Core Strategy Policies:

NP1 - Supporting Development

CS1 - Distribution of Development

CS7 - The Rural Area

CS8 – Sustainable Transport

CS10 - Quality of Settlement Design

CS11 - Quality of Neighbourhood Design

CS12 - Quality of Site Design

CS24 – Chilterns Area of Outstanding Natural Beauty

CS27 - Quality of the Historic Environment

CS29 - Sustainable Design and Construction

Saved Policies of the Dacorum Borough Local Plan:

Policy 78 – Golf Courses

Policy 97 – Chilterns Area of Outstanding Natural Beauty

Policy 99 – Preservation of Trees, Hedgerows and Woodlands

Policy 100 – Tree and Woodland Planting

Policy 118 – Important Archaeological Remains

Supplementary Planning Guidance/Documents:

Car Parking Standards (2020)

Chilterns Building Design Guide (2010)

9. CONSIDERATIONS

Main Issues

9.1 The main issues to consider are:

Principle of Development

Quality of Design / Impact on Chilterns Area of Outstanding Natural Beauty (AONB)
Impact on Heritage Assets
Impact on Residential Amenity
Impact on Highway Safety and Parking
Other Material Planning Considerations.

Principle of Development

9.2 Core Strategy Policy CS7 provides a list of acceptable development within the Rural Area, which includes countryside recreation uses. Policy 78 of the Local Plan deals principally with new golf courses, however it does state that clubhouses, other buildings and associated car parking must be ancillary to the golfing use of the site, and well screened and landscaped, with any intrusion from lighting kept to a minimum.

9.3 The proposed building would be an additional facility that would be ancillary to the golfing use of the wider site. It is considered that the proposed nature and scale of development is appropriate for the size of the golf club and course. The proposed development is therefore acceptable in principle, subject to the below assessment.

Quality of Design / Impact on Chilterns Area of Outstanding Natural Beauty (AONB)

9.4 The NPPF states that planning policies and decisions should ensure that new development is sympathetic to local character and history, including the surrounding landscape setting. Policy CS7 of the Core Strategy seeks to ensure that new development has no significant impact on the character and appearance of the countryside. Furthermore, in terms of the Chilterns Area of Outstanding Natural Beauty (AONB), Saved Policy 97 of the Local Plan, Core Strategy Policy CS24, paragraph 176 of the NPPF and the Chilterns Building Design Guide seek to ensure that development conserves the beauty of the area, is not intrusive in terms of noise and light pollution, is sympathetically designed and uses materials that fit in with the traditional character of the area.

9.5 The proposed building would be single storey with a mono-pitched roof measuring 5m high. The structure would be finished externally with a natural slate roof, facing brickwork piers and timber cladding, to match the existing structures on site. The use of natural and traditional materials would help the development to assimilate into the landscape.

9.6 The existing clubhouse, car park and ancillary structures are nestled within the wider golf course, which is well screened by mature trees and other vegetation. It is considered that the proposed siting of the building is well-related to the existing structures on site and is also well-screened from wider views. There are public footpaths running along the northwest (Little Gaddesden No. 005) and northeast (Little Gaddesden No. 003) of the site. From footpath no. 003 to the northwest there would be limited views of the structure due to intervening built form and substantial mature trees. From footpath no. 005 to the northeast, the proposed dry bay structure would be visible across the open setting of the driving range. It would however be seen against the backdrop of the existing golf club house, car park and other ancillary structures as well as the surrounding mature trees. Furthermore, footpath no. 005 cuts across the distal end of the driving range, which is a managed and maintained landscape feature. As such, it is considered that the proposed structure would not be an incongruous addition but would be appropriate for the site.

9.7 The Council's Conservation and Design Officer has been consulted and raised no objection to the proposal, recommending that the roller shutter doors be finished in a dark matt painted finish. This would be secured by condition, should planning permission be granted. It is also considered reasonable and necessary to impose a condition that prevents any external lighting.

9.8 Taking all of the above into account, the proposed development complies with the above-mentioned policies in terms of the quality of design and impact on Chilterns AONB.

Impact on Heritage Assets

9.9 The site lies within the Historic Park and Garden of Ashridge, which is grade II* listed. It also resides within an Area of Archaeological Significance. The NPPF, Core Strategy Policy CS27 and Saved Policy 118 of the Local Plan seeks to ensure that heritage assets and features of archaeological interest are protected. The integrity, setting and distinctiveness of designated and undesignated heritage assets will be protected, conserved and if appropriate enhanced. Paragraph 199 of the NPPF requires great weight to be given to an asset's conservation, irrespective of the level of harm. In accordance with paragraph 202, any harm must then be weighed against the public benefits of a proposal.

9.10 Historic England initially raised concerns because the proposed development would be within a registered park and garden and would result in an increase of permanent built form within it. However, a representative from Historic England subsequently visited the site and made the following representation:

“The proposed area for the development would be on raised ground but broadly associated with other built form in the vicinity. Ashridge is a grade II registered park and garden and as such, new built form within it needs to be considered carefully. The golf club is in a discreet area of the parkland with limited views from it. While the building would be raised, its form and materials would be such that, in time it would blend into the environment. We therefore do not object to this proposal on heritage grounds.*”

Any future proposals for development would need to be carefully considered by Historic England, as we would not wish to see a proliferation of buildings on this site. While we recognise that the golf club is in itself important to the understanding of the later development of the park and garden, a proliferation of built form where there was not designed to be any, would be unlikely to be supported.”

9.11 The Council's Conservation and Design Officer has been consulted and raised no objection, subject to a materials condition to ensure that the structure sits comfortably within its surroundings.

9.12 In accordance with paragraph 194 of the NPPF, the applicant has described the significance of the heritage asset through the submitted Heritage Statement (HS). The HS identifies that the key matters of identified significance in the context of the application site relate to the vision to develop the park with houses and a golf course in the 1920s-30s while retaining the parkland character. In addition, the HS states that links with well-known golf course designers and landscape designers add to its significance. The HS states that the golf course is of historic significance in its own right, being constructed 1929-32 by renowned designers.

9.13 The statutory consultees with regards to heritage impacts, i.e. Historic England and the Council's Conservation & Design Officer, have identified that there would not be any harm to the registered park and garden or its setting. The proposed dry bay practice structure would be well-sited in relation to the existing built form on site and would be finished in traditional materials. Furthermore, given that part of the significance of the registered park and garden relates to the design of the parkland, golf course and surrounding modern housing layout, it is not considered that a well-designed ancillary golf club structure would have a significant impact. Historic England has confirmed that the site is within a discrete area of the parkland and the proposed form and materials would help the building to assimilate into its surroundings.

9.14 As no harm has been identified, the balancing exercise outlined in paragraph 202 of the NPPF need not be undertaken, and it is considered that the impact on heritage assets is acceptable.

Impact on Residential Amenity

9.15 The nearest residential properties are situated in excess of 100m away, therefore there are no concerns in terms of the visual impact of the proposed structure or privacy / overlooking. In terms of noise and disturbance, the dry bay structure would be situated on an area of land that is currently used as a driving range, therefore there would not be any increase in noise and disturbance over the current situation. The proposal complies with Policy CS12 in terms of residential amenity.

Impact on Highway Safety and Parking

9.16 The proposed development would not give rise to an increase in member or staff numbers. As such, there would not be any increase in parking requirement for the golf club as a whole. Furthermore, there would not be any changes that would affect the nearest public highway. The proposal therefore complies with Policies CS8 and CS12 of the Core Strategy and the Parking Standards SPD in terms of highway safety and parking.

Other Material Planning Considerations

Impact on Trees and Landscaping

9.17 The proposed siting of the dry bay structure would be situated within 16.4m of existing mature trees. No trees are proposed to be removed as part of this proposal, however it is reasonable and necessary to secure an arboricultural impact assessment and tree protection plan by condition, given that the nearest trees are situated within relatively close proximity of the proposed structure. The applicant has stated that no trees would be impacted by the proposed development, however in order to ensure that the trees are fully protected during the construction period, an assessment of the trees and proposed root protection measures is necessary. Furthermore, the proposed development does provide an opportunity to soften the built form by way of additional planting and landscaping. Subject to the above conditions, the proposed development would meet the requirements of Saved Policies 99 and 100 of the Local Plan and Policy CS12 of the Core Strategy.

Amenity Societies

9.18 The Chiltern Society, The Gardens Trust and the Rural Heritage Society (Little Gaddesden, Hudnall, Ringshall and Ashridge) object to the proposal. The objections centre around the principle of introducing built form to the site, with concerns relating to the impact on the sensitive historic, open landscape, that it would be publicly visible and that it would harm the character and appearance of the Chilterns AONB.

9.19 The views of the amenity societies have been taken into consideration and, whilst it is acknowledged that the introduction of built form to this part of the wider historic park and Chilterns AONB would have some visual impact, when viewed in the context of its immediate surroundings it is not considered that the impact would be significant. The proposed siting of the dry bay structure is close to existing buildings / structures, adjacent to the car park and with substantial mature trees surrounding it to the south. The proposed building would be finished in traditional materials, would be well-sited in relation to existing development and is considered to be an appropriate facility given the current use of the site.

9.20 On balance, it is considered that the proposed development would not have a significant impact on the parkland setting or wider Chilterns AONB by virtue of its sympathetic scale, siting and design. The principle of providing countryside recreation uses is acceptable, in accordance with Core Strategy Policy CS7, and it is considered that in this instance the benefits of the scheme outweigh the minor visual impact.

Habitats Regulations Assessment – Chilterns Beechwoods SAC

9.21 As part of its ongoing work to prepare the Local Plan, Dacorum Borough Council is required by law to undertake a Habitats Regulations Assessment (HRA) to understand the impacts that current and planned future growth is having on sites designated under the Habitats and Birds Directive. Evidence gathered to date concludes that the integrity of the Chilterns Beechwoods SAC, particularly at Ashridge Commons and Woods SSSI, is being harmed as a result of public access and disturbance.

9.22 It is the Council's legal duty as competent authority to protect the Chilterns Beechwoods SAC from the alone and in-combination cumulative effects of new development. The application site resides within the Chilterns Beechwoods 'exclusion zone' (within 500m of Ashridge Commons and Woods SSSI) wherein there is a heightened risk to the designated site from development that is in close proximity to it, particularly additional housing that could increase recreational pressure. Therefore, an Appropriate Assessment must be undertaken for each planning application involving 'qualifying development'.

9.23 Given the nature and scale of development, whereby the proposed development would involve improvements to existing facilities at the golf club but would not result in an increase in member numbers, it is not considered that the proposal amounts to 'qualifying development'. The proposed development would not result in increased recreational pressure on Ashridge Commons and Woods SSSI, and has therefore been screened out of the stage 1 assessment under the Habitats Regulations 2017. An Appropriate Assessment under stage 2 is therefore not required. To confirm this view, Natural England has been consulted and raised no objection to the proposal.

Response to Neighbour Comments

9.24 No comments received.

Community Infrastructure Levy (CIL)

9.25 Policy CS35 requires all developments to make appropriate contributions towards infrastructure required to support the development. These contributions will normally extend only to the payment of CIL where applicable. The Council's Community Infrastructure Levy (CIL) was adopted in February 2015 and came into force on the 1st July 2015. The application site resides within CIL Zone 3, however the application is not CIL Liable.

10. CONCLUSION

10.1 By virtue of its sympathetic siting, scale and design, the proposed teaching and practicing building would integrate into the immediate surroundings of the golf course and wider landscape setting. The proposed structure would not cause harm to designated heritage assets and, when viewed in context with existing development, would be appropriate for the site. The proposed materials would be traditional and further landscaping would be secured to soften its impact, the proposal therefore complies with Core Strategy Policies CS7, CS12, CS24, CS27 and the NPPF.

11. RECOMMENDATION

11.1 That planning permission be **GRANTED**

Condition(s) and Reason(s):

- 1. The development hereby permitted shall begin before the expiration of three years from the date of this permission.**

Reason: To comply with the requirements of Section 91 (1) of the Town and Country Planning Act 1990, as amended by Section 51 (1) of the Planning and Compulsory Purchase Act 2004.

2. **No development (other than groundworks) shall take place until full details of both hard and soft landscape works has been submitted to and approved in writing by the Local Planning Authority. These details shall include:**

- all external hard surfaces within the site
- other surfacing materials
- soft landscape works including a planting scheme with the number, size, species and position of trees, plants and shrubs.

The hard and soft landscape works, including planting, must be carried out within one planting season of completing the development.

Any tree or shrub which forms part of the approved landscaping scheme which within a period of 5 years from planting fails to become established, becomes seriously damaged or diseased, dies or for any reason is removed shall be replaced in the next planting season by a tree or shrub of a similar species, size and maturity.

Reason: To improve the appearance of the development and its contribution to biodiversity and the local environment, as required by saved Policy 99 of the Dacorum Borough Local Plan (2004) and Policies CS12 (e) and CS24 of the Dacorum Borough Council Core Strategy (2013).

3. **No work (including site clearance) in relation to the development hereby approved shall be undertaken until full details setting out how retained trees shall be protected, in accordance with BS5837:2012 (Trees in relation to design, demolition and construction), have been submitted to and approved in writing by the Local Planning Authority. Details shall include:**

- o A scaled Tree Protection Plan showing the approved development layout and retained trees (surveyed in accordance with BS5837:2012), to include their accurate crown spreads and root protection areas (RPAs)
- o The sequential order of events required for tree protection
- o The position and specification of tree protection fencing in accordance with BS5837:2012 (as applicable)
- o The position and specification of ground protection in accordance with BS5837:2012 (as applicable)
- o Details of hard surfacing constructed using no-dig techniques where proposed over the RPA of retained trees (as applicable)
- o Details of proposed levels
- o The position of service routes and drainage, and means of installation if these encroach through the RPA of retained trees.

There shall be no excavation, changes in levels, storage of materials or access within the RPA of retained trees unless previously specified and agreed. The works must be carried out according to the approved details.

Reason: In order to ensure that damage does not occur to trees and hedges during building operations in accordance with saved Policy 99 of the Dacorum Borough Local Plan (2004), Policy CS12 of the Dacorum Borough Core Strategy (2013) and Paragraph 174 of the National Planning Policy Framework (2021).

4. **No development (excluding groundworks) shall take place until details of the materials to be used in the construction of the external surfaces of the development hereby permitted have been submitted and approved in writing by the Local Planning Authority. Development shall be carried out in accordance with the approved details.**

Reason: To ensure satisfactory appearance to the development and to safeguard the visual character of the countryside, the Chilterns Area of Outstanding Natural Beauty and the Historic Park and Garden, in accordance with Policies CS7, CS12, CS24 and CS27 of the Dacorum Borough Core Strategy (2013).

5. **No new floodlighting, security lighting or other external means of illumination of the site shall be provided, installed or operated at the site.**

Reason: To preserve the rural amenity of the locality, to minimise impacts on biodiversity and to avoid unnecessary light pollution in accordance with Policies CS7, CS24 and CS26 of the Dacorum Borough Core Strategy (2013) and Paragraphs 130 and 174 of the National Planning Policy Framework (2021).

6. **The development hereby permitted shall be carried out in accordance with the following approved plans/documents:**

001 P4 (Site Location, Block and Aerial Plans and site photos)
002 P4 (Plan on new facility)
003 P3 (Perimeter Elevations and Cross Section)
Heritage Statement

Reason: For the avoidance of doubt and in the interests of proper planning.

Informatives:

1. Planning permission has been granted for this proposal. Discussion with the applicant to seek an acceptable solution was not necessary in this instance. The Council has therefore acted pro-actively in line with the requirements of the Framework (paragraph 38) and in accordance with the Town and Country Planning (Development Management Procedure) (England) (Amendment No. 2) Order 2015.

APPENDIX A: CONSULTEE RESPONSES

Consultee	Comments
The Chiltern Society	<p>Thank you for consulting the Chilterns Society (CS). The Society strongly objects to the application.</p> <p>Ashridge Golf Club is situated within the Ashridge Estate which is a grade II* Registered Park and Garden and lies within the area of parkland to the north of the grade I listed Ashridge House. The whole Estate and the golf course lies within the Chilterns Area of Outstanding Natural Beauty (CAONB).</p>

Within the CAONB the prime planning consideration will be the conservation of the beauty of the area. Any development proposal which would seriously detract from this will be refused. Wherever development is permitted it will be on the basis of its satisfactory assimilation into the landscape. Paragraph 172 of the NPPF (2019) states that great weight should be given to conserving and enhancing landscape and scenic beauty in AONBs, which have the highest status of protection in relation to these issues. In the Dacorum Core Strategy (2013) Policy CS24 and Saved Local Plan (2004) Policy 97, the AONB designation affords special status in the control of development and establishes the primary aim as the conservation of the scenic beauty of its countryside and settlements.

Whilst it is acknowledged that the current practice bay is not particularly attractive, it is a very modest, lightweight, temporary structure which can be removed at any time. However, the construction of this permanent and substantially larger building will have a seriously detrimental effect on this sensitive landscape. It will enlarge the area of built environment and further encroach onto open land. Whilst it will not be visible from Ashridge House itself, it will be more prominent than the existing structure and will be clearly visible from nearer views. By its very nature it is a utilitarian building and will severely compromise the character and appearance of this very sensitive registered parkland. It fails to assimilate into the landscape by some considerable degree and the cumulative effect of further buildings within this parkland will be severely detrimental to the character, appearance and openness of the CAONB.

The NPPF identifies that heritage assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations (paragraph 189). In addition, local planning authorities should look for opportunities for new development in the setting of heritage assets to enhance or better reveal their significance and any harm or loss to designated heritage assets requires clear and convincing justification (paragraph 200). Harm must then be weighed against any public benefits (paragraph 202). It cannot be said that this large utilitarian structure will enhance the parkland and given that this is a members only golf club there are no public benefits to the proposal to justify it.

Therefore, the development is considered to neither conserve nor enhance the natural beauty of CAONB. It is contrary to planning policies and there are no overriding circumstances that would outweigh the clear harm to the character and appearance of the CAONB and this registered landscape. It is a large permanent building and the cumulative harm from this additional development will cause severe

	<p>harm to this historic landscape in the CAONB.</p> <p>Therefore the Society objects to the application.</p>
<p>Parish/Town Council</p>	<p>Little Gaddesden Parish Council are in receipt of the planning application 22/02560/FUL, together with the Heritage Statement prepared by Emma Adams and Partners.</p> <p>We would comment as follows:-</p> <p>Existing Golf Club Buildings and Surrounds</p> <p>These comprise the following:-</p> <ol style="list-style-type: none"> 1) Club House. Replacement Club House is sensitively positioned and is of a style of construction that reflects but does not detract from its rural setting. 2) Staff accommodation. Replacement for an unattractive building with the same sensitivity both in terms of positioning and construction as the Club House. 3) New Trolley Building. Although located some distance from the main built area it is low in profile and does not detract from the ambience of the immediate area; it does not dominate 4) It is stressed that all the aforementioned buildings are replacements for buildings that had outlived their usefulness 5) Teaching Area. A lightweight structure of metal frame construction, limited in size (no doubt the applicant can provide dimensions) and easily demountable and does not, as has been suggested, require demolition but removal (proposed to be replaced by the new bulky building) 6) An earth bund conceals the new trolley building and a tree screen does likewise with the staff accommodation. <p>History of Ashridge Estate.</p> <p>The Heritage Statement provides an in-depth history of the Ashridge Estate, the content of which is well known to Little Gaddesden Parish Council and Dacorum Borough Council. However, we do not see the relevance of the proposed housing development of the parkland in the 1920s and 1930s (which was never constructed) to the effect of the proposed new building on the significance of the heritage asset as it exists at the moment.</p>

The Site

1) The site is bounded by the earth bund to north-west (concealing the car park and the new trolley-shed from the surrounding landscape when viewed from the south-east), substantial and mature rear gardens to north-east, the open driving range to the south-east (bounded by trees approximately 500 m distant) and trees to the south. Much of the driving range itself is in fact on National Trust land, the boundary between the National Trust and the Golf Club running from a point very close to the southern end of the proposed new building to a point about 35m to the south-east of the northern end of the proposed building, and beyond along the same line up to the rear gardens.

Footpath

There is a public footpath (Little Gaddesden FP3) that crosses the driving range (It should be stressed, that in no part of the Heritage Statement has this been highlighted) from the south-west corner running across to the rear gardens to the north-eastern boundary. There is also a National Trust permissive footpath along the tree line to the south-east of the proposed building which then turns to the north-east to join FP3 close to the rear gardens. The proposed building will therefore be prominent when viewed from publicly accessible National Trust land.

The proposed building is sited in an area of Outstanding Natural Beauty, in the Grade II* Ashridge Registered Park and Garden and in an area visible from publicly accessible National Trust land.

Proposed Building

1) It is a new structure, unlike those buildings highlighted in the foregoing which were replacements for existing buildings.

2)

a) It is proposed that it should be sited on the existing bund although it should be noted that it will be at a reduced level. It will nevertheless be significantly above ground level.

b) It is a bulky structure of some mass being 32m in length 10m in depth and 2.4m in height (excluding the distance from the base of the structure to ground floor level)

c) In terms of comparison, it will be of a similar size to Little Gaddesden Village Hall

	<p>d) The front elevation is bland and intrusive to the eye with part elevation to the driving range being roller shutter doors.</p> <p>e) Its effect on the eye is far more substantial and prominent than the framework structure currently in place and it is a new permanent structure.</p> <p>f) It affects near views from the close-by public and permissive footpaths.</p> <p>3) Unlike the existing buildings it is visible from the National Trust woodlands to the south and south-east which are themselves part of the old north park and the surrounding historic environment.</p> <p>Impact on Significant Heritage Assets</p> <p>For the reasons stated above, the heritage asset will suffer a detrimental impact by the introduction of a new, permanent, bulky building within the registered landscape and having regard to the cumulative effect of the modern Golf Club buildings in close proximity. This harm has to be considered in the context of the NPPF.</p> <p>Conclusion</p> <ol style="list-style-type: none"> 1. Great weight should be given to the heritage asset's conservation irrespective of the level of harm to the asset. 2. There is no clear and convincing justification for the harm which would be caused, as described above. 3. There are no public benefits suggested in support of the proposed development which could not be achieved by re-siting the training facilities proposed to be included in the new building elsewhere within the area of the golf course, closer to the existing modern buildings and where there would be no detrimental effect on the heritage asset. The leisure/recreational offer and other (non-training) facilities proposed to be provided by the new building are already provided by the existing driving range structure. 4. The proposed building does not enhance or better reveal the significance of the heritage asset. <p>For the reasons scheduled in the foregoing Little Gaddesden Parish Council objects to this Planning Application and ask that the application in its current form be refused.</p>
Conservation & Design	This is a site adjacent to the current club house. The area in question is

(DBC)	<p>used for golf practice. It is within the Ashridge registered park and garden. A heritage statement has been submitted and confirms that there would not be harm to the designated heritage asset.</p> <p>In relation to the design and location we would not object subject to the external materials to be conditioned and that the roller shutters have a dark matt painted finish. This is to ensure that they do not draw the eye and sit comfortably within the background. It may be useful to consider using a dark green for the shutters rather than black which could appear somewhat out of keeping within the golf parkland landscape.</p> <p>Recommendation: Conditions as noted above.</p>
Historic England	<p>The proposed area for the development would be on raised ground but broadly associated with other built form in the vicinity.</p> <p>Ashridge is a grade II* registered park and garden and as such, new built form within it needs to be considered carefully. The golf club is in a discreet area of the parkland with limited views from it. While the building would be raised, its form and materials would be such that, in time it would blend into the environment. We therefore do not object to this proposal on heritage grounds.</p> <p>Any future proposals for development would need to be carefully considered by Historic England as we would not wish to see a proliferation of buildings on this site. While we recognise that the golf club is in itself important to the understanding of the later development of the park and garden, a proliferation of built form where there was not designed to be any, would be unlikely to be supported. Please let us know at pre-application stage if you are considering any further development so early discussions can be progressed.</p>
Natural England	<p>SUMMARY OF NATURAL ENGLAND'S ADVICE</p> <p>NO OBJECTION</p> <p>Based on the plans submitted, Natural England considers that the proposed development will not have significant adverse impacts on statutorily protected nature conservation sites.</p> <p>Natural England's generic advice on other natural environment issues is set out at Annex A.</p> <p>European sites</p> <p>Based on the plans submitted, Natural England considers that the proposed development will not have likely significant effects on</p>

statutorily protected sites and has no objection to the proposed development. To meet the requirements of the Habitats Regulations, we advise you to record your decision that a likely significant effect can be ruled out.

Sites of Special Scientific Interest

Based on the plans submitted, Natural England considers that the proposed development will not have likely significant effects on statutorily protected sites and has no objection to the proposed development.

Protected Landscapes - Chilterns AONB

The proposed development is for a site within or close to a nationally designated landscape namely Chilterns AONB. Natural England advises that the planning authority uses national and local policies, together with local landscape expertise and information to determine the proposal. The policy and statutory framework to guide your decision and the role of local advice are explained below.

Your decision should be guided by paragraph 176 and 177 of the National Planning Policy Framework which gives the highest status of protection for the 'landscape and scenic beauty' of AONBs and National Parks. For major development proposals paragraph 177 sets out criteria to determine whether the development should exceptionally be permitted within the designated landscape.

Alongside national policy you should also apply landscape policies set out in your development plan, or appropriate saved policies.

We also advise that you consult the relevant AONB Partnership or Conservation Board. Their knowledge of the site and its wider landscape setting, together with the aims and objectives of the AONB's statutory management plan, will be a valuable contribution to the planning decision. Where available, a local Landscape Character Assessment can also be a helpful guide to the landscape's sensitivity to this type of development and its capacity to accommodate the proposed development.

The statutory purpose of the AONB is to conserve and enhance the area's natural beauty. You should assess the application carefully as to whether the proposed development would have a significant impact on or harm that statutory purpose. Relevant to this is the duty on public bodies to 'have regard' for that statutory purpose in carrying out their functions (S85 of the Countryside and Rights of Way Act, 2000). The Planning Practice Guidance confirms that this duty also applies to

	<p>proposals outside the designated area but impacting on its natural beauty.</p> <p>Sites of Special Scientific Interest Impact Risk Zones</p> <p>The Town and Country Planning (Development Management Procedure) (England) Order 2015 requires local planning authorities to consult Natural England on "Development in or likely to affect a Site of Special Scientific Interest" (Schedule 4, w). Our SSSI Impact Risk Zones are a GIS dataset designed to be used during the planning application validation process to help local planning authorities decide when to consult Natural England on developments likely to affect a SSSI. The dataset and user guidance can be accessed from the data.gov.uk website</p> <p>Further general advice on the consideration of protected species and other natural environment issues is provided at Annex A.</p> <p>We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.</p> <p>For any queries regarding this letter, for new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.</p>
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APPENDIX B: NEIGHBOUR RESPONSES

Number of Neighbour Comments

Neighbour Consultations	Contributors	Neutral	Objections	Support
9	2	0	2	0

Neighbour Responses

Address	Comments
78 Broadstone Road Harpenden AL5 1RE	<p>Thank you for consulting The Gardens Trust, of which HGT is a member.</p> <p>The area where the new building proposed to be is part of the Registered (II*) historic landscape of Ashridge, with important rides and views across the landscape, enhanced by 'Capability' Brown in the 18th century.</p> <p>The current building, although unattractive, is temporary and could be removed to enhance the landscape. The proposal for a new more</p>

	<p>substantial building would cause harm to the landscape by being an inappropriate intrusion into the overall pattern of rides and views to the detriment of the significance of the landscape.</p> <p>We note that the heritage statement submitted does not take into account the wider historic landscape, as required by the NPPF.</p> <p>The NPPF further states that any proposals should conserve, and if possible, enhance the heritage asset. This proposal would cause serious harm to the registered landscape and we thus object to it.</p>
<p>The Old Rectory Nettleden Road North Little Gaddesden Berkhamsted Hertfordshire HP4 1PA</p>	<p>This objection is made on behalf of the Rural Heritage Society of Little Gaddesden, Hudnall, Ringshall and Ashridge ("RHS").</p> <p>The Application</p> <p>The application relates to the proposed replacement of a lightweight and removable metal frame structure sited on top of a grassed embankment with a bulky permanent structure, also sited on top of the same embankment. The proposed building's dimensions will be 5m high (on the side facing the driving range), 10.1m in depth and 32m in overall length.</p> <p>The Site</p> <p>There are mature rear gardens to north east of the site, the open driving range to the south east (bounded by trees approximately 500m distant) and trees to the south. The driving range itself is mainly on National Trust land.</p> <p>There is a public footpath (LGFP 3) which crosses the driving range and a permissive National trust footpath which follows the tree line to the south east of the site.</p> <p>The site is within the Chilterns AONB, in the Grade II* Ashridge Registered Park and Garden and in an area visible from publicly accessible National Trust land.</p> <p>Effect and Impact of the Development</p> <p>The proposed new building will be bulky and visually intrusive, not least because it will be sited above natural ground level and therefore stand out even more than if it were sited at ground level. It will be visible from publicly accessible land which is itself part of the historical landscape.</p> <p>In the RHS's view, there will be a significant detrimental impact on the heritage asset by the introduction of such a bulky and visually intrusive building. Irrespective of the degree of the detriment, great weight should be given to the heritage asset's conservation. There is no clear and convincing justification for that detrimental impact.</p> <p>There are no public benefits in support of the proposed development. Such as may exist could be achieved elsewhere within the existing Golf Club building complex. There are no benefits to be enjoyed by the heritage asset derived from the development, which will not enhance or</p>

better reveal the significance of that asset.

From the above, it follows that that the harm to the heritage asset outweighs any public benefits.

As far as the site's status within the Chilterns AONB is concerned, the conservation of the AONB's beauty is the prime planning consideration. Great weight should be given to conserving and enhancing landscape and scenic beauty in AONBs, which have the highest status of protection in relation to these issues. As will be apparent from the description of the proposed building above, there will be a severe detrimental impact on to the beauty and open landscape of the AONB. The building will be permanent, will encroach onto the open landscape when compared with the existing temporary structure, particularly in light of its height above ground level, and will be clearly visible from publicly accessible land.

For this reason, the RHS objects to this application.