

ITEM NUMBER: 5a

24/01239/MFA	Change of use from agricultural land to Suitable Alternative Natural Green Space (SANG), together with a vehicular access, car park, paths, fencing and landscaping	
Site Address:	Land at Nettleden Road, Potten End, Berkhamsted, Hertfordshire	
Applicant/Agent:	c/o Agent	Mr Roger Smith
Case Officer:	Sally Robbins	
Parish/Ward:	Great Gaddesden Parish Council	Watling
Referral to Committee:	Call in by Ward Cllr & Contrary views of Parish Councils	

1. RECOMMENDATION

1.1 That the application be **delegated with a view to APPROVAL** subject to the completion of an agreement under Section 106 of the Town and Country Planning Act 1990 which secures, inter alia, the management and maintenance of the land as SANG for a minimum period of 80 years, and subject to the conditions set out below.

2. SUMMARY

2.1 The principle of the change of use of the land from agriculture to informal outdoor recreation is acceptable, both in terms of the Green Belt and the designated Rural Area, in accordance with Policies CS5 and CS7 of the Core Strategy. The development would have a negligible impact on Green Belt openness as the areas residing within the Green Belt would remain in a natural state and free from built form, other than minor features including stock-proof fencing and benches. Located within the designated Rural Area, the proposed new access and car park would have no significant impact on the character and appearance of the countryside, to accord with Policy CS7, subject to appropriate screening.

2.2 The grant of planning permission for this application would permit the above change of use but would not automatically result in the site constituting a SANG (Suitable Alternative Natural Greenspace). However, as the description includes reference to SANG, it is appropriate to consider whether the land is, in fact, capable of becoming a SANG. Following an assessment of the criteria set out in the Chiltern Beechwoods Mitigation Strategy, it is considered that the site is considered to be suitable and capable of becoming a SANG. Natural England are also in agreement that the site complies with the relevant criterion and is a good candidate for a SANG. The proposed level of parking is in accordance with Natural England Guidance and thus does not give rise to concerns.

2.3 The proposal would reduce the cumulative impacts of new development and reduce visitor pressure on a sensitive site, i.e. on the Chilterns Beechwoods Special Area of Conservation (SAC). Any limited and localised harm to the character and appearance of the countryside, the setting of nearby heritage assets and the Chilterns National Landscape by virtue of the urbanising effect of the new access and car park, would be outweighed by the benefits of the scheme including offsetting harm to the SAC and enabling the Council to deliver the required housing numbers within the Borough.

2.4 The Highway Authority are satisfied that the proposal will not have an unreasonable or severe impact on the safety and operation of the surrounding highway. The new access would require a section of the roadside hedge to be removed and relocated to allow for visibility splays, however the proposed amount of new hedging either side of the new access and across the wider site, in addition to new woodland and parkland planting, would deliver significant environmental, biodiversity and landscape gains. The proposed SANG would result in a high-quality open space

that is accessible to the public and would encourage the enjoyment of the Chilterns National Landscape.

2.5 As detailed in the following assessment, the proposed change of use from agricultural land to informal outdoor recreation, together with new access, car park, paths, fencing and landscaping is in accordance with Core Strategy Policies CS5, CS7, CS12, CS24, CS25 and CS27.

3. SITE DESCRIPTION

3.1 The application site is located to the northeast of Potten End and comprises a 47.23-hectare area of open land that gently slopes downwards to the northeast. It is located on the western valley side of the River Gade. The site is bounded to the north by Nettleden Road, to the southeast by Potten End Hill and the western boundary is partly contiguous with a public right of way (Nettleden with Potten End footpath no. 007). The site is also intersected by a number of public rights of way, namely Great Gaddesden footpath nos. 062, 063, 064 and 067 and Nettleden with Potten End footpath no. 031.

3.2 The site resides wholly within the Chilterns National Landscape (formerly the Area of Outstanding Natural Beauty) and partially within the Metropolitan Green Belt, the designated Rural Area and Water End Conservation Area. There is an ancient woodland within the site known as Heizdin's Wood. There are listed buildings / structures in the vicinity, including the grade II listed bridge at Water End and grade II* listed Moor Cottage on Potten End Hill.

3.3 It is noted that the area is covered by an Article 4 Direction, which restricts agricultural development, including construction of agricultural buildings and engineering operations.

4. PROPOSAL

4.1 Planning permission is sought for a change of use from agriculture to Suitable Alternative Natural Greenspace (SANG), the construction of a new access, car park, paths, fencing and landscaping. The SANG would be delivered in two phases: the Phase 1 SANG area (28ha) can be delivered as a fully functioning SANG in its own right; and the Phase 2 SANG area (19.23ha) as an extension to deliver greater SANG capacity. The delivery of both phases would be secured by legal agreement.

4.2 Phase 1 involves the delivery of the eastern part of the SANG (28ha) and includes a new access and car park. Phase 1 would include a stock proof fencing enclosure to the Phase 1 area and kissing gates to facilitate access to the wider right of way network. A 2.3km circular route that both starts and finishes at the SANG car park is included in Phase 1. It would not be formally surfaced and would comprise of mown grass, resulting in a more naturalistic appearance.

4.3 Phase 2 involves the delivery of the western part of the SANG (19.23ha) and comprises the installation of stock-proof fencing and pedestrian kissing gates in the extended area. The circular SANG walk in the form of mown pathways would be extended in Phase 2.

4.4 The new access would be created off Potten End Hill as a simple priority junction, to the west of the junction with Willow Lane. The new vehicle crossover would be composed of bituminous macadam and access to the car park would be restricted by a height restriction barrier. A section of the existing hedgerow along Potten End Hill would be removed and replanted / transplanted behind the visibility splay.

4.5 The new car park would be located on lower ground to the east of the site and would provide 50 car parking spaces. The new car park hardstanding would be composed of a type 1 gravel surface with crushed granite dust and the car park would be enclosed by stock proof fencing surrounded by new landscaping.

4.6 The proposed SANG would include new hedgerows, grassland and new parkland-style tree planting in the east of the site. The creation of grassland would be via seeding rather than stripping or removal of soils and the new hedges and fences would reintroduce historic field boundaries. The proposal includes the installation of interpretation signage, waymarking signage and benches in key viewpoint locations.

5. BACKGROUND

SANG and Interaction with Planning Permission

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.

5.2 The grant of planning permission for this application would permit a change of use from agriculture to informal outdoor recreation, but would not automatically result in the site constituting a SANG. This is because whether the site is ultimately considered to be a SANG will depend on the outcome of an Appropriate Assessment carried out pursuant to Regulation 63 of the Conservation of Habitats and Species Regulations 2017 in relation to whichever application(s) rely on it for mitigation.

5.3 Therefore, this application should be seen as an important first step in the site becoming a SANG for which housing developments can rely on for mitigation. Nonetheless, as the description includes reference to SANG, it is appropriate to consider whether the land is, in fact, capable of becoming a SANG. This will be addressed later in the report.

The Need for Private SANG in Dacorum

5.4 There are currently two Council-led Strategic SANGs that provide mitigation capacity for developments within their catchments and which were instrumental in allowing a partial lifting of the moratorium on new housing that was in effect from March to November 2022. Since November 2022, qualifying developments have been able to avail of SANG capacity, enabling new housing to be approved.

5.5 The Council's SANG sites are located within the south and east of the borough. This, combined with the SANG catchment area, results in the Council not being able to offer its SANG capacity to developments of ten or more new homes in Berkhamsted, Tring or the west of the Borough.

5.6 The capacity of a SANG – i.e. the number of dwellings it can mitigate for - is directly proportional to its size. As the capacity of Council-led strategic SANG is finite, an allocations protocol has been instituted to ensure that a SANG solution is provided only to those developments where it is genuinely not possible for provision to take place on site, and in order to ensure a continual and predictable supply of new homes across the Borough. It is important to note that once Council-led strategic SANG capacity has been exhausted, new housing which does not provide its own SANG solution cannot be granted. This would disproportionately affect sites which, due to their limited size, would not be able to provide their own on-site SANG.

5.7 Consequently, the Council will need to bring more SANG sites online in order to provide a future supply for new homes. At present there are a total of four sites in Council ownership under consideration – i.e. Gadebridge Park, Margaret Lloyd Park, Howe Grove and an extension to Bunkers Park.

5.8 Until such point as the adverse impacts of recreational pressure on the Chiltern Beechwoods Special Area of Conservation are reversed, the Council will be continually required to identify and bring forward new SANG solutions. This is currently being done by utilising land already in the Council's ownership, but there will clearly come a point where there are no further suitable sites that can be upgraded and used for SANG; therefore, it is submitted that third party SANG solutions have an important and complementary role to play in the Development Management process.

5.9 Members recently resolved to grant planning permission for two private SANGs at Haresfoot Farm and Castle Hill, which were the first applications for developer-led SANG solutions in the Borough. This application is predicated on similar grounds – i.e. it would complement the Council-led SANG and enable new housing to be approved. The fact that one developer-led SANG has been approved does not render the capacity that would be created by this site surplus to requirement; rather, for the foreseeable future there will be a need for both new Council-led and developer-led SANG solutions if the Council is to provide the number of homes identified as necessary in the Borough.

5.10 The proposal would secure 47.07 hectares of SANG land that would mitigate up to 2,452 new dwellings within 5km of the site (on the basis of 52 dwellings per hectare). The SANG has been developed in consultation with Natural England and meets its SANG criteria as noted in the section on 'Suitability of Site for SANG' (below).

5.11 The allocation of SANG credits would remain within the control of the applicants. Irrespective of whether the credits are used by the applicant themselves or sold to third parties, they would reduce pressure on Council-led SANG and assist in facilitating a continual and predictable supply of new housing across the Borough.

6. PLANNING HISTORY

Planning Applications: None

Appeals: None

7. CONSTRAINTS

Advert Control: Advert Special Control

Ancient Woodland: Ancient & Semi-Natural Woodland

Area of Outstanding Natural Beauty: CAONB outside Dacorum

Article 4 Directions: Land at the South Side of Nettleden Road, Potten End

CIL Zone: CIL1

CIL Zone: CIL2

Conservation Area: WATER END

Former Land Use (Risk Zone)

Green Belt: Policy: CS5

Parish: Great Gaddesden CP

Parish: Nettleden with Potten End CP

Path Name: NETTLEDEN WITH POTTEN END 031

Path Name: NETTLEDEN WITH POTTEN END 007

Path Name: GREAT GADDESSEN 063

Path Name: GREAT GADDESSEN 064

Path Name: GREAT GADDESSEN 062

Path Name: GREAT GADDESSEN 067

Rural Area: Policy: CS7

Parking Standards: New Zone 3

EA Source Protection Zone: 2

EA Source Protection Zone: 3
Wildlife Sites: Heizdins Wood

8. 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.

9. PLANNING POLICIES

Main Documents:

National Planning Policy Framework (December 2023)
Dacorum Borough Core Strategy 2006-2031 (adopted September 2013)
Dacorum Borough Local Plan 1999-2011 (adopted April 2004)

Relevant Policies:

Core Strategy

NP1 - Supporting Development
CS1 - Distribution of Development
CS5 – The Green Belt
CS7 – The Rural Area
CS8 – Sustainable Transport
CS10 - Quality of Settlement Design
CS11 - Quality of Neighbourhood Design
CS12 - Quality of Site Design
CS24 – The Chilterns Area of Outstanding Natural Beauty
CS25 – Landscape Character
CS26 – Green Infrastructure
CS27 – Quality of the Historic Environment
CS29 - Sustainable Design and Construction
CS31 – Water Management
CS32 – Air, Soil and Water Quality

Local Plan

Policy 51 – Development and Transport Impacts
Policy 54 – Highway Design
Policy 55 – Traffic Management
Policy 79 – Footpath Network
Policy 80 – Bridleway Network
Policy 97 – Chilterns Area of Outstanding Natural Beauty
Policy 99 – Preservation of Trees, Hedgerows and Woodlands
Policy 101 – Tree and Woodland Management
Policy 108 – High Quality Agricultural Land

Supplementary Planning Guidance/Documents

Chiltern Beechwoods Mitigation Strategy
Accessibility Zones for the Application of Car Parking Standards (2020)

Chilterns Area of Outstanding Natural Beauty Management Plan 2019 – 2024
Planning Obligations (2011)
Roads in Hertfordshire, Highway Design Guide 3rd Edition (2011)
Landscape Character Assessment for Dacorum (2004)

10. CONSIDERATIONS

Main Issues

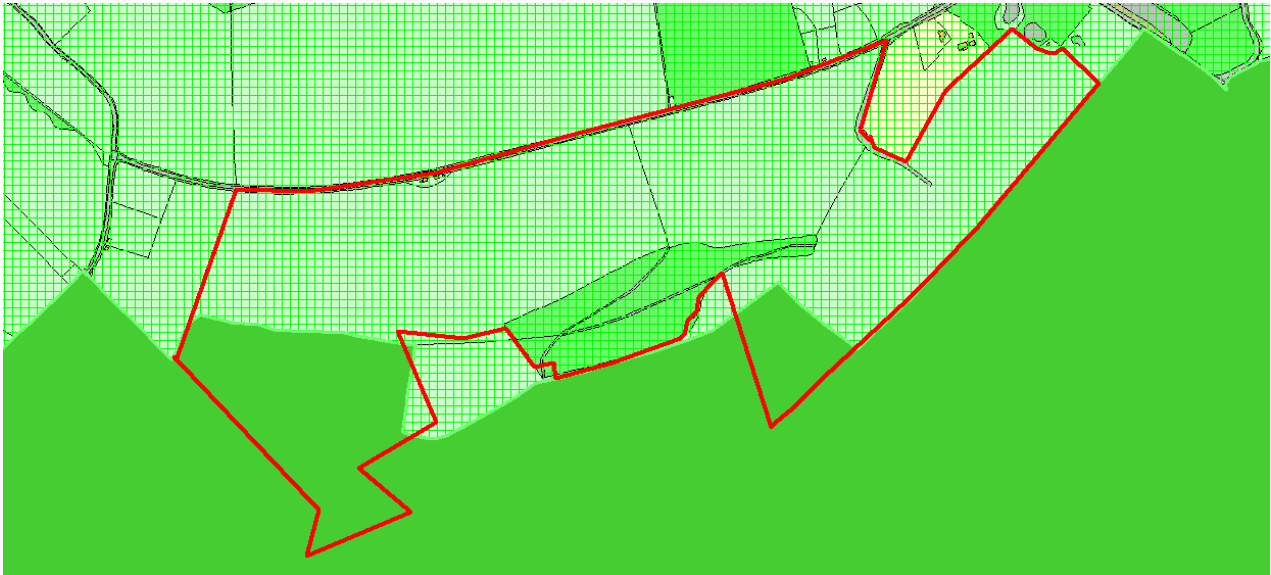
10.1 The main issues to consider are:

- Principle of Development
- Suitability of the Site as a SANG
- Impact on the Chilterns National Landscape
- Impact on Landscape Character
- Impact on the Significance of Heritage Assets
- Impact on Residential Amenity
- Impact on Highway Safety and Car Parking
- Impact on Ecology.

Principle of Development

Rural Area

10.2 The majority of the application site lies within the Rural Area, wherein Core Strategy Policy CS7 states that countryside recreation uses are acceptable. Small-scale development will be permitted, e.g. for the above use, provided that it has no significant impact on the character and appearance of the countryside. See image below showing the application site outlined in red and location of Rural Area and Green Belt:



 Rural Area  Green Belt

10.3 The proposed access and car park would be located in the eastern area of the site, within the Rural Area. The submitted drawings show that the car park would be situated at the lowest point of the site, in close proximity to other man-made development - i.e. access roads and the group of dwellings that make up this part of Potten End Hill and Willows Lane – and surfaced in type 1

gravel with woodland planting around its perimeter. The new access would necessitate a section of existing roadside hedge to be removed, replanted and set further back to allow for the required visibility splays. Notwithstanding the proposed woodland planting and new hedge, the proposed car park and access would likely be visible from the surrounding countryside and from public footpath no. 64, particularly during the first few years whilst the newly planted vegetation and trees are growing and maturing.

10.4 The new vehicle crossover would be finished in tarmac and would measure 4.8m wide at the narrowest point. This element of the proposal is the most engineered, man-made feature, however it would only extend over the access itself, and not into the access road or car parking area. The car parking area would be finished in a gravel surface, which it is felt would have a more naturalistic appearance.

10.5 Overall, it is considered that the principle of an access and car park in this location is acceptable, subject to appropriate materials and screening. There would be no above-ground built structures and it is thus considered that spatially, the access and car park would have a limited impact on the character and appearance of the countryside. Visually, it is acknowledged that the presence of vehicles in the car park and increase in vehicle movements would have a localised impact. However, it is considered that the location of the new access and car park is logical well-sited in terms of the existing surrounding built environment and highway network. Furthermore, appropriate screening as outlined above would help the car park to assimilate into the surrounding countryside.

Green Belt

10.6 Part of the site resides within the Green Belt, wherein Core Strategy Policy CS5 applies. It states that small-scale development will be permitted and that the Council will apply national Green Belt policy to protect the openness and character of the Green Belt. The relevant national Green Belt policies are contained within paragraphs 154 and 155 of the NPPF.

10.7 Paragraph 154 states that a local planning authority should regard the construction of new buildings as inappropriate in the Green Belt, however one of the exceptions is 154 b), 'the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation....' etc. Paragraph 155 states that certain other forms of development are not inappropriate in the Green Belt, including 155 e), 'material changes in the use of land (such as changes of use for outdoor sport or recreation...)' etc. The proviso for both of the above-listed exceptions is that the development preserves Green Belt openness and does not conflict with the purposes of including land within it.

10.8 The elements of the proposal that would be within the Green Belt are the new areas of tree planting / hedgerows, stock-proof fencing, kissing gates, the walking routes, benches, information boards and walking route signposts. The walking routes themselves would be mown grass, rather than hard surfacing. There would not be any new built form or engineering works within the Green Belt areas, thus it is considered that the main consideration with respect to the Green Belt is the change of use of the land.

10.9 The change of use from agricultural to informal outdoor recreation would likely result in an intensification of use of the site in terms of vehicular movements to and from the car park and walkers accessing the SANG. There are several existing public rights of way transecting the site and it is considered that any increase in activity from walkers would be absorbed into the existing use of the site by ramblers, dog-walkers etc. In terms of visual and spatial openness, there would not be any built structures or development within the Green Belt itself, other than the minor artefacts listed above. The land would retain its open character and appearance as a result of the change of use to outdoor recreation. Furthermore, all of the works proposed within the Green Belt are reversible and could be easily removed.

10.10 It is therefore considered that, in the context of the NPPF, the change of use of the land would have a negligible impact on Green Belt openness as the site would remain in a natural state, being generally free from development or built form and rural in character. Overall, the proposal would be appropriate development, would preserve openness and would not conflict with the purposes of including land within the Green Belt, to accord with paragraph 143 of the NPPF.

Conclusion on Principle of Development

10.11 The proposed SANG is acceptable in principle, both in relation to the Rural Area designation and the Green Belt.

Suitability of Site for SANG

10.12 The Chiltern Beechwoods Special Area of Conservation Mitigation Strategy was approved by cabinet at a meeting held on 15th November 2022. The Mitigation Strategy sets out the SANG criteria likely to be accepted by the Council (as Competent Authority) and Natural England.

10.13 The criteria have been set out below along with the case officer's view as to whether this has been complied with or not (green indicates compliance and red indicates non-compliance):

SANG Feature	Criteria	Expected / Desirable	Comment
Paths	A minimum circular walk of 2.3-2.5 kilometres to be provided.	Expected	A circular walk of 2.3km is being provided.
	Paths easily used and well maintained but mostly unsurfaced.	Expected	The paths would comprise of mown grass, thereby providing an appropriate naturalistic aesthetic.
	Where parking is provided, circular path should start and finish at that location.	Expected	The circular path starts and finishes at the car park.
	Paths should be safe, easily identifiable and kept clear of obstructions, such as scrub cover for example.	Expected	The proposed paths will be kept clear of scrub cover as part of the ongoing management and maintenance, which are to be secured by way of condition and legal agreement. The proposed 2.3km route is out in the open for its entirety, with any tree and scrub located away to the boundaries.
	Information boards and/or signage at access points outlining the layout of the site and routes available to visitors.	Desirable	It has been indicated that information boards are to be provided.
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	A car park with capacity for 50 cars, as well as bicycle parking, is to be provided adjacent to Potten End Hill.
	Parking areas are to be easily and safely accessible by car and to be clearly sign posted.	Expected	The car park will be accessed from the existing highway network. No details of sign-posting are shown on the plans; however, this matter can be reserved by condition.

	Visitor to be able to take dogs from the parking area to the site safely off the lead.	Desirable	The provision of dog-proof fencing around the edge of the site provides confidence that visitors can let their dog off the lead.
Access	Access points to be provided based on the intended visitors of the SANG.	Expected	The SANG will be accessible from the car park and surrounding public rights of way.
	Safe access route on foot from nearest car park and/or footpath	Expected	The entrance from the car park leads safely and directly into the SANG.
	Access should be unrestricted within the site, with plenty of space for dogs to exercise freely and safely off the lead.	Expected	The site will be fully enclosed thus allowing free access for dogs to be exercised off the lead.
Character of Space	Needs to be semi-natural, or perceived as such where close to existing development.	Expected	The site is predominantly undulating farmland (that would become grassland). The ancient woodland at Heizdin's Wood and the existing tree planting to the site boundaries provides interest. Supplementary planting would provide additional screening.
	If the site is larger than 12 hectares, a range of habitats should be present.	Expected	The site comprises Ancient Semi Natural Woodland. Additional planting includes the restoration of grassland meadows and historic hedgerows.
	No unnatural intrusions (e.g. odour from sewage treatment works, noise from busy roads).	Expected	The surrounding highway network is considered to be a very minor intrusion. The site already feels natural, and this would be enhanced by further planting.
	There should be little intrusion of built structures such as dwellings, buildings, fencing (not constructed using natural materials), etc.	Expected	There is some limited surrounding built form, however further planting would provide additional screening.
	Naturalistic space with areas of open countryside with dense and scattered trees and shrubs.	Desirable	The site is predominantly open countryside with Heizdin's Wood in the centre and trees along the boundaries. Additional woodland and parkland tree planting along with hedges and thickets would provide a variety of distinct naturalistic areas.
	Gentle undulating topography. Steep slopes are likely to deter visitors.	Desirable	The site features a gently undulating topography. The slopes are not unduly steep.
	Focal point such as a viewpoint or monument within the site and accessible via walking routes.	Desirable	The topography of the site provides high points with opportunities for views across Gaddesden Place house and park. Seating can be provided on higher ground to take advantage of views across the

			valley towards the Ashridge Estate, Gaddesden Place and nearby conservation areas.
	Provision of open water, however large areas of open water cannot count towards SANG capacity.	Desirable	Small wildlife ponds to be established in low-lying areas to the east.

10.14 Natural England were consulted and consider the site to be a good candidate for a large SANG, with its long views to the north and good location close to Hemel Hempstead, also confirming that due to its size the catchment area of the SANG would be 5km. It also noted that the location of the site means it has the potential to intercept visitors travelling north from Hemel Hempstead to the Chilterns Beechwoods SAC with easy access by car along Leighton Buzzard Road and Potten End.

10.15 The SANG is proposed to come forward in two phases with the eastern phase 1 comprising all of Natural England's essential criteria for a SANG (2.3km circular walk and car park). Natural England supports the phase delivery approach, including the provision of the full car parking capacity for the whole SANG as part of the delivery of phase 1.

10.16 The proposed SANG has a rural feel and the existing use by the public along the Public Rights of Way footpaths within the site suggests that the proposed SANG is in a location that the public will use. The applicant has followed advice given by Natural England at pre-application stage, which included the introduction of grassland meadows, restored historic hedgerows and parkland in the southeast corner of the proposed SANG, acknowledging the historic views across the valley from Gaddesden Place. Natural England is content that the landscape elements shown on the SANG Landscape Strategy Plan will provide a semi-natural habitat.

10.17 In their consultation response, Natural England confirmed that the proposed Potten End SANG does meet the Natural England SANG Quality Guidelines and, in principle, have no issue with it being designated a SANG, subject to the following points:

1. The SANG is to be created as set out in the 'SANG Delivery Framework Document for Land at Potten End Hill, Hemel Hempstead' (CSA, May 2024), which should be made a condition of the planning consent, to ensure that the SANG is created and managed according to the NE SANG Guidelines (2021).
2. A management company, trust/charity or the Local Planning Authority (LPA) is to be named as managers of the SANG prior to approving the SANG for mitigation, and a legal agreement secured between the applicant / their client and the management company/body, to secure the funding of the SANG management via a commuted sum/endowment.
3. A legal agreement between the applicant / their client and the LPA regarding step-in rights and management of the SANG in perpetuity has been signed by both parties if required.

10.18 Natural England's order of preference for transferring long-term management of the SANG to a management body is: 1) the LPA; 2) the Land Trust or similar body; or 3) a new management company set up by the applicant. If the SANG is to be managed by a third-party management company, step-in rights would be agreed in writing with the LPA. Step-in rights would not be required if a charity is the managing body as, in the unlikely event that the charity were to be dissolved, the site and the ring-fenced endowment would, by virtue of Article 17 of its articles and as a matter of charity law, pass to another organisation with similar charitable purposes.

10.19 The Land Trust has confirmed in writing (letter dated 14th October 2024) that they are willing to take formal ownership of the proposed SANG, subject to Board approval, contract and payment of an agreed endowment, and would thereafter remain responsible for its provision and maintenance in perpetuity (no less than 80 years).

10.20 In summary, the site is considered to be both suitable and capable of becoming a SANG. Whether or not the site actually serves as SANG for housing developments within the Borough will be a subsequent matter for the relevant planning officer or, as the case may be, the Development Management Committee.

Impact on the Chilterns National Landscape

10.21 In relation to the Chilterns National Landscape (formerly known as the Chilterns Area of Outstanding Natural Beauty, the AONB), Policy CS24 of the Core Strategy, Saved Policy 97 of the Local Plan and Paragraph 182 of the NPPF seek to ensure that the scenic beauty of this area is conserved and that new development is sensitively located and designed to avoid or minimise adverse impacts on this designated area. Saved Policy 97 states that, in the AONB, the prime consideration is the conservation of the beauty of the area, that any development must be satisfactory assimilated into the landscape. Open air recreation is specifically addressed in Policy 97, where it states that:

'Informal outdoor recreation allowing the quiet enjoyment of the countryside is encouraged, but careful attention will be paid to the provision of associated ancillary facilities such as car parks and toilets in order to minimise their impact on the local scene.'

10.22 The Chilterns AONB Management Plan states that the Chilterns is a living and working landscape, shaped, worked and enjoyed by people living in and around the National Landscape. Policy DP12 of the Management Plan is supportive of sympathetic proposals that enhance the Chilterns as a place to visit, live, explore and enjoy, for example sensitively designed new visitor facilities.

10.23 A holding objection / comments have been received from the Chilterns Conservation Board (CCB) suggesting that further detail on the relationship between the anticipated housing site(s) for this SANG and the anticipated emerging Local Plan's preferred options consultation is required, however there is no planning justification to link the proposed SANG to specific future sites. Whilst the SANG would be in the National Landscape, it does not mean that the housing developments it would support would also be in the National Landscape. The SANG would have a catchment area of 5km, which would cover Berkhamsted, the western side of Hemel Hempstead, as well as smaller villages and settlements in the vicinity. Furthermore, Council-led SANG solutions will not have the capacity for the expected housing numbers within the Borough, therefore new housing development will be expected to pursue their own SANG solutions.

10.24 The CCB also suggested that further detail should be provided relating to the accessibility of the site (modal split between car-based visitors and non-car-based visitors), the assessment of mitigation to prevent harm to the Ancient Woodland and the long-term delivery of the submitted SANGs management plan objectives. In terms of the accessibility of the site, the data is not available to show and the modal split between car-based visitors and non-car-based visitors, however the Transport Assessment indicates that the SANG could generate around 5% additional traffic on busier days. It should also be noted however that the SANG is well-connected to the existing public right of way network, therefore access to the site by foot would also be expected. The mitigation to prevent harm to the Ancient Woodland and the long-term delivery of the submitted SANGs management plan objectives would be secured by legal agreement. The CCB also commented that proposed SANGs should be accessible for all users including ambulant visitors, people with buggies and wheelchair users. Provision for disabled car parking spaces would be included, however the paths would be mown grass and the site would be accessed via

kissing gates. As such, the site may not be suitable for all users, however this is weighed against the requirement for a SANG to remain as naturalistic as possible. In this instance, any interventions to upgrade the footpaths, for example to a hard surface that is suitable for a wider range of users, would unlikely be acceptable in terms of its visual impact on the landscape.

10.25 In terms of the proposed access and car park, these areas of development would be relatively limited in scale and located at the lowest point of the site. As outlined in Policy CS24, regard is to be had to the policies and actions set out within the Chiltern Conservation Board's Management Plan. Of relevance in this regard is Policy EP3, the full wording of which is set out below for ease of reference:

'The Chilterns has benefited from widespread stile-removals, new 'access for all' trails and other initiatives to improve physical accessibility which makes it one of the leading accessible landscapes. Accessibility should be further improved to provide more and better opportunities for everyone to enjoy the countryside. Priorities include improved access for those with limited mobility, new or improved access links between the AONB and urban areas, more multi-user routes, better bridleway connectivity and provision of facilities on appropriate sites (e.g. waymarked trails, information boards, cycle and car parking).'
(Officer emphasis).

10.26 The site currently comprises agricultural fields and an area of woodland. It is important to note that most of the site is to remain undeveloped and enhanced with areas of additional woodland. Stock-proof fencing would be installed alongside newly planted native hedgerows, which would reintroduce historic field boundaries and would be appropriate within the context. The proposed stock-proof fencing itself would be visually permeable and would not be highly prominent or incongruous within this countryside setting. The proposed access and car park would be the only areas of operational development. These elements would have a localised urbanising effect on this part of the National Landscape, however this effect would be mitigated by the proposed woodland screening. The car park may be visible from long distance views, for example from footpath no. 064 and from the eastern side of the valley, however the above-mentioned woodland planting, in addition to the wider parkland tree planting within the valley floor, would soften the impact. Whilst there would be an increase in activity by virtue of the change of use to informal outdoor recreation, from visitors and associated additional vehicle movements, the site already benefits from a number of public rights of way, such that there is already public access to the site.

10.27 It is considered that the proposal would reduce the cumulative impacts of new development and would reduce visitor pressure on a sensitive site, i.e. on the Chilterns Beechwoods SAC. It would provide new facilities within the designated landscape to encourage access to nature and the countryside and facilitate the enjoyment and understanding of the special qualities of the National Landscape. This is compatible with the aims of the AONB Management Plan, which seeks to encourage the enjoyment of the AONB. Whilst it is acknowledged that the car park would have a visual impact on the National Landscape in terms of introducing hard-surfacing and a formalised man-made access, this impact is considered to be limited, given that it would be restricted to the lower part of the site, adjacent to the highway and mitigated by the proposed woodland screening and additional parkland tree planting that would surround the car park. On balance, it is felt that any minimal residual harm would be outweighed by the significant benefits of the scheme, including offsetting harm to the SAC (a European-protected site) and enabling the Council to deliver the required housing numbers within the Borough.

Landscape Character

10.28 Policy CS25 states that all development will help conserve and enhance Dacorum's natural and historic landscape and should take full account of the Dacorum Landscape Character Assessment. The site lies within the Landscape Character Area of Nettleden Ridges and Valleys (Area 122), which is defined by:

'strongly undulating topography and the cover of extensive arable fields and relict parkland features. The ridge and valley complex extends westwards beyond the character boundary and into the Ashridge Estate (Area 121), where the designed estate landscape becomes dominant. The settlement of Nettleden provides a visual and cultural focus to the area. It is a small hamlet of traditional built styles including some newly converted residential properties hidden away in the folds of the arable landscape. The area is strongly linked with Ashridge and evidence of its former inclusion within the historic estate is widely apparent. The planned 'gatepost' woodlands that frame the dry valley at Water End, the woodland roundels and scattered veteran trees and the sunken road at Nettleden were all part of the historic approach to the manor.'

10.29 The Strategy and Guidelines for Managing Change seek, inter alia, to:

- Promote awareness and consideration of the setting of the AONB, and views to and from it, when considering development and land use change proposals on sites adjacent to the AONB
- Promote the creation of a network of new medium to large woodlands in the open arable landscape, particularly with a view to visually integrating the area into the adjacent Ashridge landscape character area
- Utilise ancient hedge and field boundaries for the most appropriate location for woodland restoration and expansion
- Promote the multiple uses of ancient woodland through education and access
- Encourage the reversal of habitat fragmentation and the creation and improvement of habitat links to create ecocorridors
- Ensure new planting is encouraged to maintain age diversity. Ensure landscape improvements respect the historic context of existing features and the form and character of parkland and gardens
- Encourage reversion from arable uses to pasture and chalk grassland
- Promote the establishment of open and wooded common land restore a mix of habitat types and a balance between agriculture and wildlife and public access
- Promote the restoration and creation of hedgerows and ditches as characteristic field boundary patterns.

10.30 The rationale for new hedges and fences as part of the proposed SANG includes reintroducing historic field boundaries, which is consistent with the objectives of the Landscape Character Area. The proposals have been informed by the heritage and historic mapping of the area and the location of the hedgerows is consistent with historic field patterns. New hedgerows would also assist in the creation of habitats and ecocorridors.

10.31 The proposal includes areas of parkland, to be created in the east of the site, as well as additional woodland created to the south of Heizdins Wood. This woodland planting is consistent with the above guidelines, which seek to promote the creation of woodlands. In addition, the reversion from arable farmland to grassland is supported by the landscape strategy for Nettleden Ridges and Valleys. Where fencing is required at the perimeter of the site it will be stock proof fencing and consistent with the agricultural character of the landscape.

10.32 New built development in the form of the car park would be introduced into the landscape and have an urbanising influence. That said, it is to be built at ground level and in close proximity to the adjoining highway and surrounding development along Potten End Hill and Willows Lane. Furthermore, it would be located at the lowest point within the site, which complies with Policy CS24 in terms of protecting the scarp slope from development that would have a negative impact upon its skyline. Moreover, once fully established, the planting scheme would help to limit views of the car park.

10.33 On the basis of the above, it is not considered that there would be any harm to the landscape character of the area; rather, if anything, the proposal is likely to result in an improvement by way of additional woodland, hedgerows, habitat creation and ongoing maintenance and care. The development is therefore considered to accord with Policy CS25 of the Core Strategy.

Impact on Heritage Assets

10.34 Policy CS27 of the Core Strategy is an overarching policy which seeks to ensure that the quality of the historic environment is maintained. It states that the integrity, setting and distinctiveness of designated and undesignated heritage assets will be protected conserved and, if appropriate, enhanced.

10.35 Paragraph 205 of the NPPF advised that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation, irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance. Where a development proposal will lead to less than substantial harm to the significance of a heritage asset, paragraph 208 of the NPPF requires the harm to be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

10.36 The small settlement at Water End, which is a Conservation Area, lies immediately east of the site, and the eastern end of the site lies within the boundary of the Conservation Area. There are listed buildings to the south side of Nettleden Road, including Moor Cottage (grade II* listed) which is located 32m from the southeast corner of the site. Grade II* listed Gaddesden Place is visible from the site, positioned on the opposite side of the valley.

10.37 The Council's Conservation & Design Officer has been consulted and has provided the following representation:

"The introduction of a car park including a formalised entrance (with associated gate / height barrier and signage) will detract from the setting of the Conservation Area. However, it is acknowledged the additional screening and hedgerows proposed in the vicinity will limit this impact. Any harm is thought to be at the lower end of 'less than substantial'.

The Heritage Setting Assessment ascribes a similar level of harm to the setting of Moor Cottage (grade II), like with the car park a lot will depend on how sympathetically the planting / screening is established.*

The site forms part of the wider setting to Gaddesden Place house (and its surrounding parkland) which lies in an elevated position to the east of Water End, with views to the west and across the SANG site. The change from arable fields to grassland / meadow with additional hedgerows will preserve the wider setting of Gaddesden Place but there are concerns the car park may be visible - potentially harming its wider setting. Any harm will likely be at the lower end of 'less than substantial'."

10.38 The Conservation & Design Officer also commented that the wider setting of the Grade II* Ashridge Estate registered park and garden, Frithsden Conservation Area, Nettleden Conservation Area and Bingham's Park Grade II listed building would be preserved.

10.40 Overall, it is considered that the proposed car park would result in harm to the setting of Water End Conservation Area, the setting of Moor Cottage and the wider setting of Gaddesden Place House. With respect to each of these designated heritage assets, the level of harm is quantified at the lower end of less than substantial. Nonetheless, the less than substantial harm identified to their significance (through development within their setting) will need to be weighed against any public benefits of the proposal, as per paragraph 208 of the NPPF. Public benefits are essentially anything that delivers the economic, social or environmental objectives described in the NPPF, but there is an expectation that they will be of a nature or scale to be of benefit to the public at large, as opposed purely private benefit.

Social Benefits

10.41 The proposed change of use would permit public access to the entirety of the site, with the new vehicular access and car park extending these benefits to a wider group of people; that is to say, those not living within easy walking distance of the site. This would appear to be in the spirit of paragraphs 96 and 124 of the NPPF, which state that planning policies and decisions should aim to achieve healthy, inclusive and safe places and beautiful buildings which '*enable and support healthy lifestyles....for example through the provision of safe and accessible green infrastructure....*' as well as encouraging '*multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains – such as developments that would enable new habitat creation or improve public access to the countryside*'. This benefit is afforded moderate weight.

10.42 In addition, the proposed SANG would mitigate the impact of visitor pressure on the Chiltern Beechwoods SAC. The SANG has capacity for approximately 2,452 dwellings, which would help to unlock a number of housing sites, ensuring that credits can be purchased from nearby sites. This benefit is afforded significant weight.

Economic Benefits

10.43 Short term direct economic benefits include expenditure during the construction process and the creation of employment opportunities during construction / implementation of the scheme. In addition, there would be employment opportunities associated with the long-term management and maintenance of the SANG. Collectively the economic benefits are afforded limited weight.

Environmental Benefits

10.44 The proposal would achieve a Biodiversity Net Gain of +187.62% in habitat units and +48.56% in hedgerow units, which significantly exceeds the requirements of the Environment Act. This benefit is afforded significant weight.

10.45 The proposed SANG has been designed with reference to the historic context of the area, and includes the reintroduction of parkland in the eastern area of the site, new woodland to the south of Heizdin's Wood and elsewhere for the reinstatement of historic boundaries and hedgerows. This benefit is afforded moderate weight.

Conclusion

10.46 Overall, it is considered that the less than substantial harm identified (at the lower end of the scale) is outweighed by the collective public benefits of the proposal.

Impact on Residential Amenity

10.47 Policy CS12 of the Core Strategy states that new development should avoid visual intrusion, loss of sunlight and daylight, loss of privacy and disturbance to properties in the surrounding area. Furthermore, paragraph 135 f) of the NPPF seeks to ensure that planning decisions create places with a high standard of amenity for existing and future users.

10.48 The surrounding area consists of sparse residential development, predominantly comprising detached properties on Potten End Hill, Nettleden Road and Willows Lane. The SANG Landscape Proposals indicate that the SANG footpaths would not be in close proximity to any of the surrounding properties, with separation distances in excess of 60m. Furthermore, new woodland and thicket planting would provide additional screening along the boundaries of the SANG. It is thus considered that there would be limited potential for overlooking, such that the change of use of the site would not result in an unacceptable loss of privacy.

10.49 In terms of noise and disturbance, it is not considered that there would be any significant adverse impacts arising from the change of use. It is acknowledged that the character and nature of the use will change, but there is nothing inherently noisy in informal outdoor recreation. The impact of the intensification of the use of the site will also, to a degree, be tempered by the fact that SANG footpaths are located a reasonable distance away from sensitive residential receptors and it is felt that the existing public rights of way would absorb the increased use.

10.50 The proposed new access would be located close to the junction of Willows Lane and Potten End Hill. There would be an increase in vehicular activity at the new junction, however it would be located within the established highway network. The Transport Statement suggests that the nature and scale of development proposed is likely to generate an increase of around 5% of additional traffic on busier days (e.g. Bank Holidays). This level of increase in activity is not considered to be significantly noisy or disruptive, particularly given that the majority of trips are likely to be on leisure days, in the middle of the day, or at least outside of rush hour times.

10.51 Concerns have been raised that the change of use of the site could result in an increase in anti-social behaviour. The basis of these concerns is not entirely clear and it is considered that, subject to the imposition of reasonable controls such as a condition restricting use in non-daylight hours, the site would not be at greater risk of anti-social behaviour than public open space elsewhere in the Borough. In the event that instances of anti-social behaviour were to be witnessed, this would be a police matter that could be dealt with under criminal law, where appropriate.

10.52 In summary, notwithstanding the objections received from members of the public, it is considered that the development would not have a significant adverse impact upon the amenity of nearby properties, complying with Policy CS12 of the Core Strategy.

Impact on Highway Safety and Parking

10.53 Policy CS12 of the Dacorum Core Strategy states that on each site development should provide a safe and satisfactory means of access for all users and paragraph 115 of the NPPF advises that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe. Policy 51 of the Dacorum Local Plan states that the acceptability of all development proposals will be assessed specifically in highway and traffic terms and should have no significant impact upon, inter alia:

- the nature, capacity and use of the highway network and its ability to accommodate the traffic generated by the development; and

- the environmental and safety implications of the traffic generated by the development.

Highway Safety

10.54 Potten End Hill is designated as a classified C local distributor road, subject to a derestricted speed limit of 60mph. The proposals include a new access point from the highway in the form of a simple priority junction / bellmouth access, providing vehicular access to a car park. The design includes a carriage opening width of 4.8m leading to a carriage width of 5.5m, which would enable two vehicles to pass one another. Vehicle to vehicle visibility splays of 2.4m by 160m are illustrated to either side of the proposed access point. Having regard to the speed surveys carried out for the submitted Transport Statement, the Highway Authority considers that the above visibility splays are considered acceptable and sufficient to ensure visibility levels in accordance with the relevant standards.

10.55 The existing hedge would need to be removed and replaced by a new hedge to facilitate the visibility splays. The Highway Authority has confirmed that a S278 Agreement would need to be entered into with regards to the off-site works on highway land, including:

- New bellmouth access and any associated works (e.g. new hedge behind visibility splay)
- Any temporary construction access arrangements.

10.56 The dimensions and layout of the parking areas, including the maintenance vehicle bay, are considered to be acceptable by the Highway Authority and vehicles would be able to turn around and egress to the highway in forward gear. In terms of trip generation, the approach is based on traffic surveys conducted at Ashridge, which is considered reasonable. The Transport Statement estimated around 5% additional traffic on busier days, which would not represent a significant impact.

10.57 The Highway Authority recommended a condition (referred to as condition 2 in their consultation response) requiring the submission of details to the LPA for the above off-site works. However, the S278 Agreement is a separate process that is required prior to the commencement of the development. The S278 Agreement will be between the developer and the Highway Authority and will require the construction of the off-site highway works to be undertaken to the specification of the Highway Authority. As these details would be secured by a separate process, the recommended condition is not necessary. In addition, as it relates to off-site land, this condition would not be enforceable by the LPA. The condition does not meet 6 tests set out in paragraph 55 of the NPPF and is thus not recommended.

10.58 Subject to entering into a S278 Agreement and recommended conditions, the Highway Authority considers that the proposal would not have an unreasonable or severe impact on the safety and operation of the surrounding highway and has no objections on highway grounds to the proposals.

Parking

10.59 Policies CS8 and CS12 of the Core Strategy seek to ensure that safe and sufficient parking based on parking standards is included as part of all new development. The Dacorum Parking Standards SPD does not include guidance in terms of parking requirements for open space. However, the Council's *Mitigation Strategy for Ashridge Commons and Woods Site of Special Scientific Interest* provides guidance on the suggested level of parking for SANG purposes. This is set out in paragraph 3.5.25:

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.

10.60 The proposed SANG would have an area of 48.81 hectares; therefore, based upon the mitigation strategy, a total of 73 parking spaces would be expected. However, this is at variance with Natural England's guidance which requires 1 space per hectare of SANG land. It is also important to note that the mitigation strategy refers to parking provision being 'in the region of', suggesting that a relaxation of the standards can be justified in certain scenarios.

10.61 Having regard to the sensitivities of the site, being located within the Chilterns National Landscape, the designated Rural Area (partially within the Green Belt) and in close proximity to designated heritage assets, it is felt that the proposed level of 50 spaces would be an appropriate level of provision in this instance, which is closer to Natural England's guidance of 1 space per hectare. The layout and dimensions of the parking spaces is acceptable, further details with regards to the level and location of disabled parking and cycle parking provision would be secured by condition.

10.62 Taking all of the above into account, it is considered that the development would provide safe and sufficient parking and is in accordance with Policies CS8 and CS12 of the Dacorum Core Strategy.

Impact on Ecology

10.63 Policies CS26 and CS29 of the Dacorum seek to ensure that, amongst other things, development management action contributes towards the conservation and restoration of habitats and species, the strengthening of biodiversity corridors, the creation of better public access and links through green space and minimises impacts on biodiversity and incorporating positive measures to support wildlife.

10.64 Baseline ecological surveys were conducted at the site in January and March 2024, to determine any constraints to the proposed change of use. The findings and conclusions of these investigations are presented in the Preliminary Ecological Appraisal (PEA) prepared by CSA Environmental.

10.65 The site is dominated by arable land that is cultivated for cereals and other crops. Heizdins Wood, an ancient semi-natural woodland and Local Wildlife Site (LWS), is located in the centre of the site, covering an area of 4.98ha. There are two smaller areas of woodland within the site, all of which qualify as priority woodland. There are badger setts within the site and hedgerows on site qualify as priority habitat and provide corridors for local wildlife.

10.66 The proposed change of use of the site to outdoor recreation is unlikely to result in significant adverse ecological effects subject to the following safeguards:

- Installation and maintenance of dog waste bins
- Protection of woodland, important trees and hedgerows
- Clear signage and guidance for ecological interests of the site and responsible use of the SANG, including for woodland and mature trees.

10.67 In addition to the above a series of habitat interventions are proposed to mitigate for any minimal impacts expected from recreational use, and to deliver ecological enhancement, including a net gain. These are reversion to grassland, restoration of former parkland, woodland restoration and long-term management, reinstatement of historic hedgerows with close adherence to importance views from surrounding landscapes and creation of permanent and ephemeral ponds in the low-lying areas to the east making use of existing depressions and topography.

10.68 Using the Biodiversity Metric 4.0 (i.e. the most up-to-date version of the statutory metric), the PEA demonstrates that a biodiversity net gain (BNG) in excess of the mandatory 10% would be achieved as follows:

Habitat Units BNG

Baseline: 100.16 units

Post-development: 288.08 units

Net change in units: +187.92 units or **+187.62%**

Hedgerow Units BNG

Baseline: 23.88 units

Post-development: 35.48 units

Net change in units: +11.60 units or **+48.56%**

10.69 There have been a number of objections from local residents regarding the impact on ecology, including to habitats and species. The PEA states that the reversion of arable to grassland may displace some farmland specialists, however overall biodiversity would be increased. Furthermore, the above-mentioned interventions and safeguards would ensure that any increase in activity would be mitigated.

10.70 Herts Ecology has been consulted and commented that a general BNG condition is required and that the BNG should be secured by conditions and/or legal agreement. Additionally, uncertainty surrounding the future management of the woodland on the site will require the submission and approval of a revised SANG Delivery Framework, which would be secured by a pre-commencement planning condition. Furthermore, an ongoing woodland monitoring clause would be included within the S106 legal agreement.

10.71 It is acknowledged that the change of use would result in more human activity across the site; however, given the relatively sizable site area, the level (and type) of activity that is likely to occur, the duration of an average visit and the proposed habitat creation, it is not considered that there would be any adverse impacts on ecology, subject to appropriate planning conditions and the above-mentioned legal agreement. Accordingly, the development is in accordance with Policies CS26 and CS29 of the Core Strategy.

Other Material Planning Considerations

Loss of Agricultural Land

10.72 Paragraph 180 of the NPPF seeks to ensure that planning policies and decisions contribute to and enhance the natural and local environment by, inter alia, recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland.

10.73 Saved Policy 108 of the Dacorum Borough Local Plan seeks to protect the 'best and most versatile' (BMV) agricultural land. The Agricultural Land Classification (East Region) map illustrates that the site is 'Good to Moderate' Grade 3 agricultural land, meaning that the land is not classified as Grade 2 'Very Good' or Grade 1 'Excellent' in terms of its agricultural quality, according to Natural England's Agricultural Land Classification map.

10.74 With the exception of the car park, the built form of which is considered de-minimus from an agricultural land perspective, the application site will remain undeveloped. It follows that despite the change of use of the land and the requirement that the land be maintained and managed as SANG for a minimum of 80 years, in reality there would be no permanent loss. It is also clear from

the proposed landscaping plans that no changes to the contours of the landscape are proposed, ensuring that the topsoil is retained, making restoration to an agricultural use at a later stage a realistic possibility. No objections have been raised by Natural England in that regard.

Flood Risk

10.75 Core Strategy Policy CS31 states that developments will be required to avoid Flood Zones 2 and 3, unless it is for a compatible use. Paragraph 165 of the NPPF is clear that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk of flooding. Additionally, Paragraph 165 explains that when determining planning applications, Local Planning Authorities should ensure that flood risk is not increased elsewhere.

10.76 The LLFA has been consulted and has objected on the grounds that the application has not provided calculations to support the proposed surface water drainage strategy or sufficient evidence of increased flood risk to off-site areas and highway.

10.77 A Flood Risk Assessment (FRA) by Charles & Associates Consulting Engineers has been submitted in support of the application. This confirms that the site is fully within Flood Zone 1, wherein advice from the Government is clear that the sequential test is not applicable unless there are flooding issues in the area of the development. There are no known issues and therefore a sequential test is not required.

10.78 The majority of the site will remain undeveloped other than the access and car park, which would be surfaced using permeable materials. The car park would be laid to the existing contours and the access road would be laid to camber, allowing surface water runoff to discharge to edge filter drains, which would also intercept any runoff from both land upstream of the parking area and the car park itself which may not infiltrate directly to ground. This would provide a fully SuDS (Sustainable Drainage System)-compliant surface water drainage scheme.

10.79 Taking all of the above into account, it is considered that the drainage strategy proposed comprises of a sustainable drainage system (infiltration – top of the SuDS hierarchy), meeting the requirements of paragraph 175 of the NPPF; that is to say, '*major developments should incorporate sustainable drainage systems unless there is clear evidence that it would be inappropriate.*' As such, it is felt that any outstanding calculations to support the proposed surface water drainage strategy and further evidence of increased flood risk to off-site areas and highway, as required by the LLFA, could be dealt with by condition.

Source Protection Zone 1 (SPZ1)

10.80 The application site is located in Source Protection Zone 1 (SPZ1). Core Strategy Policy CS31 states that water will be retained in the natural environment as far as possible and that development will be required to avoid damage to Groundwater Source Protection Zones. Furthermore, Policy CS32 states that any development proposals which would cause harm from a significant increase in pollution (into the soil or any water body) by virtue of particles, effluent or noxious substances, will not be permitted. Paragraph 180 e) of the NPPF also seeks to ensure that planning decisions should contribute to and enhance the natural and local environment by preventing new development from contributing to unacceptable levels of, inter alia, soil and water pollution.

10.81 The LLFA has raised concerns that the proposed car park would discharge via infiltration in SPZ1 and that the Environment Agency (EA)'s Approach to Groundwater Protection policies set out that the applicant is required to undertake a hydrogeological risk assessment for proposed surface water runoff discharges into SPZ1 areas that are not clean roof water.

10.82 The FRA states that the filter drains within the parking area and access road will help reduce pollutant levels in the runoff by filtering out fine sediments, hydrocarbons and other pollutants. Groundwater flooding is considered low risk at this site and the FRA states that the implementation of infiltration drainage will not pose any risk to the underlying aquifer.

10.83 The EA has been consulted and stated that, despite being in SPZ1, the proposed works are non-contaminative, and so are likely to have low risk. Nonetheless, given that the infiltration method within the FRA relies on drains to filter out fine sediments, hydrocarbons and other pollutants, it is deemed reasonable and necessary that a condition be added that requires an assessment and, if necessary, mitigation for infiltration of surface water runoff from the car park.

Archaeology

10.84 Core Strategy Policy CS27 seeks to ensure that features of known or potential archaeological interest will be surveyed, recorded and wherever possible retained. The site does not reside within an Area of Archaeological Significance, although Grim's Ditch is located 1.5km west of the site and Roman pottery has been recorded nearby, as well as evidence of a Roman road and cropmarks in the locality. The applicant has provided an Archaeological Desk-Based Assessment, which states that there is no current evidence to indicate focused prehistoric or Roman activity within the site itself. Nonetheless, paragraph 200 of the NPPF states that where a site on which development is proposed has the potential to include heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

10.85 The County Archaeologist has been consulted and commented that an archaeological field evaluation has not been carried out and that provision should be made for the car parking/access/planting to be moved to accommodate the preservation of archaeological remains, should this be felt appropriate. However, it is considered that unless any archaeological remains found on the site of the car park are of national significance, then archaeological recording of the remains should suffice. Furthermore, given that the proposed development would require minimal excavation, it is considered that the ground would remain relatively undisturbed and localised within the car park and access road areas only.

10.86 As such, it is considered that a field evaluation and any subsequent preservation, recording, analysis, publication etc. could be secured by appropriately worded conditions, should permission be granted. An informative note will also be added to ensure that, if it is the case that archaeological remains of national significance are found (that require preservation rather than recording), the applicant would need to submit a fresh planning application.

Impact on Public Rights of Way

10.87 Saved Policies 79 and 80 Local Plan state that the public footpath and bridleway networks will be protected, improved and promoted, with particular attention in Policy 79 given to the creation and signing of circular walks.

10.88 Kissing gates are proposed at the public right of way entrances to the SANG site. The proposed SANG footpaths would provide increased connectivity to the existing footpaths within the site and, in turn, the wider public right of way network. New hedges are proposed around the perimeter of the SANG. Where these intersect with existing public footpaths, kissing gates would be installed. A new hedgerow would be planted alongside footpath 62 and some minor artefacts such as benches would be positioned close to the existing footpaths at viewpoint locations.

10.89 Overall, the proposed development would not have a detrimental effect on the use of the existing footpaths or the site and does not, therefore, give rise to any concerns. It is considered

that the public footpath network would be protected, improved and promoted, to accord with the above policies.

Impact on Trees and Landscaping

10.90 Saved Policy 99 of the Dacorum Local Plan encourages the preservation of trees, hedgerows and woodlands throughout the Borough, with a high priority being given to their retention and protection during development.

10.91 An Arboricultural Impact Assessment by Barton Hyett Associates has been submitted in support of the application. In terms of impact on existing trees and hedges, the vehicle visibility splays require a 100m section of hedge along Potten End Hill to be removed and relocated behind the splay. A 17.5m gap within the replanted hedge would remain for the new access. Otherwise, there are no trees or hedges proposed to be removed within the site.

10.92 In terms of tree protection, the proposal only requires construction works with heavy plant and machinery in the far east of the site to complete construction of the proposed access track and car park. The remainder of the proposal, across the majority of the site, requires only light / minor works outside retained tree Root Protection Areas (RPAs). Tree protection fencing is proposed around trees near the proposed access track and car park; most notably the lone sycamore, which is just to the northwest of the proposed new access road.

10.93 In terms of Heizdins Wood, which is an ancient semi-natural woodland, the proposal does not require any significant works or activity within the ancient woodland buffer. The proposal has the potential to enhance the ancient woodland habitat both through the cessation of agricultural cultivation within the buffer and also by increasing species diversity, canopy cover and connectivity across the site via proposed landscape planting. No new footpaths are proposed within the ancient woodland, however it is anticipated that increased visitor numbers could impact upon the tree roots. Therefore, the S106 legal agreement will include a woodland monitoring clause, whereby the woodland will be monitored periodically for any damage and, if necessary, appropriate remediation measures taken.

10.94 Overall, it is considered arboricultural impacts of the development proposal on trees at the site are minimal and that the loss of hedging to allow for the access would be compensated for by planting proposals, which would comprise native species to ensure biosecurity. Tree protection measures and subsequent native tree and hedge planting would be secured by condition and the condition of the ancient woodland would be monitored by legal agreement. Subject to the above measures, the proposal complies with Saved Policy 99.

Contaminated Land

10.95 Policy CS32 of the Core Strategy states that development will maintain soil quality standards and remediate contaminated land in line with Environment Agency, Defra and Natural England guidance. Parts of the site reside within an area of potentially contaminative former land use. The Council's Contaminated Land Officer has been consulted and raised no objection to the proposal, subject to the inclusion of contaminated land conditions and informative notes. Subject to the recommended conditions, the proposal complies with Policy CS32.

Air Quality

10.96 The Environmental Health Officer has suggested that an informative note be included for the development to incorporate facilities for electric vehicle recharging. However, the site does not reside within an Air Quality Management Area. Furthermore, whilst there will be a power supply for the gate to allow opening and closing, there will not be a power supply in the car park as street lighting is not proposed. It is therefore not necessary to include the suggested informative note.

Planning Obligations

10.97 A legal agreement is in the process of being drafted which would require the site to be managed as a SANG for a period of at least 80 years. At this stage, the applicant's preferred management partner is the Land Trust (<https://thelandtrust.org.uk/>) who are a charitable organisation with a track record of managing areas of public open spaces for community benefit. The Land Trust has confirmed in writing (letter dated 14th October 2024) that they would be able to take formal ownership of the proposed SANG and would thereafter remain responsible for its provision and maintenance in perpetuity.

11. CONCLUSION

11.1 Given the above assessment, it is considered that the change of use of the land to outdoor recreation would have a negligible impact on Green Belt openness as it would remain in a natural state, being generally free from development or built form and rural in character. The change of use is therefore appropriate development both in terms of the Green Belt and Rural Area designations. The proposed new access and car park would be located within the Rural Area and would spatially have a limited impact on the character and appearance of the countryside. Visually, the presence of vehicles in the car park and increase in vehicle movements would have a localised impact, however this would be mitigated with appropriate screening. Overall, the proposal would preserve Green Belt openness and would not conflict with the purposes of including land within the Green Belt, to accord with paragraph 143 of the NPPF. The new access and car park would have a limited impact on the character and appearance of the countryside, which would be mitigated with screen planting.

11.2 The proposed SANG is compatible with the aims of the AONB Management Plan and would encourage the enjoyment of the AONB. Whilst the car park would have a visual impact on the National Landscape, the Chilterns Conservation Board's Management Plan supports proposals to provide more and better opportunities for everyone to enjoy the countryside, including provision of facilities on appropriate sites (e.g. waymarked trails, information boards, cycle and car parking).

11.3 A low level of less than substantial harm to the setting of designated heritage assets has been identified in relation to the new access and car park. However, this low-level harm would be outweighed by a number of public benefits, including social benefits in terms of increasing public access to the site, mitigating the impact of visitor pressure on the Chiltern Beechwoods SAC and unlocking housing for approximately 2,452 dwellings. It would also deliver economic benefits such as short-term provision of jobs during the implementation period, and longer-term jobs during the management and maintenance of the SANG. Environmentally, there would be a significant delivery of Biodiversity Net Gain, including reintroduction of parkland and new woodland and hedges. The less than substantial harm identified is outweighed by the collective public benefits of the proposal.

11.4 It is considered that the proposal would reduce the cumulative impacts of new development and reduce visitor pressure on a sensitive site, i.e. on the Chilterns Beechwoods SAC. On balance, it is felt that the low level of harm identified to the character and appearance of the countryside, the setting of nearby heritage assets and the Chilterns National Landscape would be outweighed by the benefits of the scheme, including offsetting harm to the SAC and enabling the Council to deliver the required housing numbers within the Borough.

11.5 Given the government drive for increased housing provision, and in light of the situation the Council finds itself in in terms of the Chiltern Beechwoods and the effect this is having on housing delivery within the Borough, due weight should be afforded to the provision of a SANG in this location. The SANG will unlock development within an area of the Borough not currently served by a Council-led Strategic SANG solution. In addition, new standalone public open space that is

genuinely available for members of the public (not simply an intrinsic part of an existing development) is a considered to be a considerable benefit.

12. RECOMMENDATION

12.1 That the application be **delegated with a view to APPROVAL** subject to the completion of an agreement under Section 106 of the Town and Country Planning Act 1990 which secures, inter alia, the management and maintenance of the land as SANG for a minimum period of 80 years, and subject to the conditions set out below.

Conditions and Reasons:

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

**CSA/6878/101 (Rev. D) Red Line Site Location Plan
CSA/6878/116 (Rev. B) SANG Landscape Strategy
SANG Delivery Framework Document by CSA Environmental (Report No: CSA/6878/06)
Transport Statement by Charles Associates (ref. 16-021-040 Rev A)
Arboricultural Impact Assessment by Barton Hyett Associates
Design & Access Statement by CSA Environmental
Preliminary Ecological Appraisal by CSA Environmental (Report No: CSA/6878/04)
Flood Risk Assessment by Charles Associates (ref. 16-021-041 Rev B)
Heritage Setting Assessment by CSA Environmental (Report No: CSA/6878/03)**

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

3. Notwithstanding the SANG Delivery Framework Document, an updated document shall be submitted to and approved in writing by the Local Planning Authority prior to the commencement of development. It shall clearly explain any relationship with management associated with the delivery of a biodiversity net gain, confirmation of the future management of woodland on the site and also ensure it contains all the suggested avoidance, mitigation and enhancement measures suggested in the Preliminary Ecological Appraisal, for habitats and species. Development shall be carried out in accordance with the approved particulars and fully provided prior to first use of the site.

Reason: To ensure the protection of important habitats and species and those protected by legislation that could be adversely affected by the development, having regard to Policy CS26 of the Dacorum Borough Core Strategy and Section 15 of the National Planning Policy Framework (December 2023).

4. No development of the car park shall commence until a Construction Management Plan / Statement has been submitted to and approved in writing by the Local Planning Authority. Thereafter the construction of the development shall only be carried out in accordance with the approved Plan: The Construction Management Plan / Statement shall include details of:

- a. Construction vehicle numbers, type, routing;**
- b. Access arrangements to the site;**

- c. Traffic management requirements;**
- d. Construction and storage compounds (including areas designated for car parking, loading / unloading and turning areas);**
- e. Siting and details of wheel washing facilities;**
- f. Cleaning of site entrances, site tracks and the adjacent public highway;**
- g. Timing of construction activities (including delivery times and removal of waste) and to avoid school pick up/drop off times.**

Reason: In order to protect highway safety and the amenity of other users of the public highway and rights of way in accordance with Policies CS8 and CS12 of the Dacorum Core Strategy (2013) and Policies 51 and 54 of the Dacorum Borough Local Plan (2004).

5. No development shall commence until an Archaeological Written Scheme of Investigation has been submitted to and approved by the Local Planning Authority in writing. The scheme shall include an assessment of significance and research questions; and:

- (a) The programme and methodology of site investigation and recording.**
- (b) The programme for post investigation assessment.**
- (c) Provision to be made for analysis of the site investigation and recording.**
- (d) Provision to be made for publication and dissemination of the analysis and records of the site investigation.**
- (e) Provision to be made for archive deposition of the analysis and records of the site investigation.**
- (f) Nomination of a competent person or persons/organisation to undertake the works set out within the Written Scheme of Investigation.**

Reason: To ensure that reasonable facilities are made available to record archaeological evidence in accordance with saved Policy 118 of the Dacorum Borough Local Plan (2004), Policy CS27 of the Dacorum Borough Core Strategy (2013) and Paragraph 200 of the National Planning Policy Framework (December 2023).

6. i) Development shall take place in accordance with the Written Scheme of Investigation approved under Condition 5.

ii) The development shall not be brought into first use until the site investigation and post investigation assessment has been completed in accordance with the programme set out in the Written Scheme of Investigation approved under condition 5 and the provision made for analysis, publication and dissemination of results and archive deposition has been secured.

Reason: To ensure that reasonable facilities are made available to record archaeological evidence in accordance with saved Policy 118 of the Dacorum Borough Local Plan (2004), Policy CS27 of the Dacorum Borough Core Strategy (2013) and Paragraph 200 of the National Planning Policy Framework (December 2023).

7. (a) No development approved by this permission shall be commenced prior to the submission to, and agreement of the Local Planning Authority of a written preliminary environmental risk assessment (Phase I) report containing a Conceptual Site Model that indicates sources, pathways and receptors. It should identify the current and past land uses of this site (and adjacent sites) with view to determining the presence of contamination likely to be harmful to human health and the built and natural environment.

(b) If the Local Planning Authority is of the opinion that the report which discharges condition (a), above, indicates a reasonable likelihood of harmful contamination then no

development approved by this permission shall be commenced until a Site Investigation (Phase II environmental risk assessment) report has been submitted to and approved by the Local Planning Authority which includes:

- (i) A full identification of the location and concentration of all pollutants on this site and the presence of relevant receptors, and;
- (ii) The results from the application of an appropriate risk assessment methodology.

(c) No development approved by this permission (other than that necessary for the discharge of this condition) shall be commenced until a Remediation Method Statement report; if required as a result of (b), above; has been submitted to and approved by the Local Planning Authority.

(d) This site shall not be occupied, or brought into use, until:

- (i) All works which form part of the Remediation Method Statement report pursuant to the discharge of condition (c) above have been fully completed and if required a formal agreement is submitted that commits to ongoing monitoring and/or maintenance of the remediation scheme.
- (ii) A Remediation Verification Report confirming that the site is suitable for use has been submitted to, and agreed by, the Local Planning Authority.

Reason: To ensure that the issue of contamination is adequately addressed to protect human health and the surrounding environment and to ensure a satisfactory development, in accordance with Core Strategy (2013) Policy CS32.

8. Any contamination, other than that reported by virtue of Condition 7 encountered during the development of this site shall be brought to the attention of the Local Planning Authority as soon as practically possible; a scheme to render this contamination harmless shall be submitted to and agreed by the Local Planning Authority and subsequently fully implemented prior to the occupation of this site. Works shall be temporarily suspended, unless otherwise agreed in writing during this process because the safe development and secure occupancy of the site lies with the developer.

Reason: To ensure that the issue of contamination is adequately addressed to protect human health and the surrounding environment and to ensure a satisfactory development, in accordance with Dacorum Borough Core Strategy (2013) Policy CS32.

9. No development shall commence until details have been submitted to and approved in writing by the Local Planning Authority to illustrate the quantum and location of the following:

- Standard vehicle parking spaces;
- Disabled / accessible vehicle parking spaces;
- On-site cycle parking.

The development shall be carried out in accordance with the approved details prior to the first use of the development hereby approved, thereafter retained for those purposes and maintained in a good condition for the lifetime of the development.

Reason: To ensure suitable, safe and satisfactory planning and development of the site and to ensure a satisfactory level of parking in accordance with Policies CS8 and CS12 of the Dacorum Borough Core Strategy (2013) and the Dacorum Parking Standards SPD (2020).

10. Prior to the commencement of development hereby approved, an Arboricultural Method Statement and Tree Protection Plan prepared in accordance with BS5837:2012 (Trees in relation to design, demolition and construction) setting out how the tree shown for retention on plan no. CSA/6878/116 Rev B shall be protected during the construction process, shall be submitted to and approved by the Local Planning Authority. No equipment, machinery or materials for the development shall be taken onto the site until these details have been approved. The tree protection measures must be implemented prior to the commencement of the development, the works must then be carried out according to the approved details and thereafter retained until completion of the development.

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 180 of the National Planning Policy Framework (December 2023).

11. No development (other than groundworks) shall take place until full details of both hard and soft landscape works have 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;
- Means of enclosure;
- Soft landscape works including a planting scheme with the number, size, species and position of trees, plants and shrubs;
- Minor artefacts and structures (e.g. benches, way marking signs, information boards, bins etc.).

The development shall be carried out in accordance with the approved details and thereafter maintained for the lifetime of the development.

The 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 Policy CS12 (e) of the Dacorum Borough Council Core Strategy (2013).

12. No development shall take place until further details of the drainage scheme have been submitted to and approved in writing by the Local Planning Authority. These further details shall include:

- 1. Infiltration tests to BRE Digest 365 Standards which confirm that the site is suitable for the disposal of surface water via infiltration.**
- 2. Clarification on whether the proposed access road will be lined.**
- 3. Further information on the filter drains, including contributing area and confirmation of suitable infiltration rates within the filter drain reach receiving the flow to manage this appropriately.**
- 4. Provision of a comprehensive drainage layout drawing which demonstrates confirmation of the points above.**

5. **An assessment of water quality, including the provision of mitigation elements as required, which addresses the presence of the Source Protection Zone and meets the requirements of the Environment Agency.**
6. **If infiltration tests indicate that infiltration is not a viable means of surface water disposal, full details of a suitable alternative discharge mechanism (watercourse / sewer) shall be provided for review and approval by the Local Planning Authority.**

Development shall be carried out in accordance with the approved details.

Reason: To ensure that the site is adequately drained and to avoid the mobilisation of contaminants which could find their way into the aquifer, in accordance with Policies CS31 and CS32 of the Dacorum Core Strategy (2013).

13. No development shall take place until details of the implementation, adoption, maintenance and management of the sustainable drainage system have been submitted to and approved in writing by the Local Planning Authority. Those details shall include:

- a) **a timetable for its implementation; and,**
- b) **a management and maintenance plan for the lifetime of the development which shall include the arrangements for adoption by any public body or statutory undertaker, or any other arrangements to secure the effective operation of the sustainable drainage system throughout its lifetime.**

The sustainable drainage system shall be implemented and thereafter managed and maintained in accordance with the approved details.

Reason: To ensure that the site is subject to an acceptable drainage system serving the development and to prevent flooding by ensuring the satisfactory storage of and disposal of surface water from the site in accordance with Policy CS31 of the Dacorum Borough Core Strategy (2013) and Paragraph 175 of the National Planning Policy Framework (December 2023).

14. Prior to the first use of the development hereby permitted, the proposed access and any other necessary highway works, on-site hardstanding and turning areas shall be laid out, demarcated, levelled, surfaced and drained in accordance with the approved plans and retained thereafter available for that specific use.

Reason: To ensure construction of a satisfactory development and in the interests of highway safety in accordance with Policies CS8 and CS12 of the Dacorum Borough Core Strategy (2013) and Policies 51 and 54 of the Dacorum Borough Local Plan (2004).

15. Prior to the first use of the development hereby approved, brash/deadwood borders to the footpaths within the ancient woodland known as Heizdin's Wood shall be laid out, to encourage users to stay on paths, particularly where close to notable ground flora areas and close to badger setts. Prior to the first use of the development hereby approved, signage shall be erected at the three footpath access routes through the ancient woodland known as Heizdin's Wood, informing the SANG users and wider public of the ecological interests and sensitivities of the woodland, including guidance on staying on paths to protect woodland flora and fauna.

Reason: To ensure the protection of important habitats and species and those protected by legislation that could be adversely affected by the development, having regard to Policy CS26 of the Dacorum Borough Core Strategy and Section 15 of the National Planning Policy Framework (December 2023).

17. There shall be no use of the SANG car park between sunset and sunrise (as set out by the Met Office). During these hours the gate / barrier(s) to the site shall be permanently locked, and details of its operation are to be submitted to and approved in writing by the local planning authority prior to the car park being first brought into use.

Reason: In the interests of the amenity of neighbouring properties and in order to reduce / limit the potential / fear of crime, in accordance with Policy CS12 of the Dacorum Core Strategy (2013) and Paragraph 96 (b) of the National Planning Policy Framework (December 2023).

18. Prior to the first use of the development hereby approved, full details of the 'height restriction barrier with low level steel gate' shown on drawing no. CSA/6878/116 Rev B shall be submitted to and approved in writing by the local planning authority.

The development shall be carried out in accordance with the approved details prior to the first use of the development and thereafter retained for the lifetime of the development.

Reason: To ensure satisfactory appearance to the development and to safeguard the visual character of the area, in accordance with Policies CS11, CS12 and CS24 of the Dacorum Borough Core Strategy (2013).

19. The SANG shall be permanently open to members of the public 7 days per week, 365 days a year for no charge.

Reason: To ensure that the site offers a credible alternative to Ashridge Woods and Common for the purposes of outdoor recreation, and for the avoidance of doubt.

20. Notwithstanding the details submitted, prior to first use of the development hereby approved, full details of the stock proof fencing shown on drawing no. CSA/6878/116 Rev. B shall be submitted to and approved in writing by the Local Planning Authority. Development shall subsequently be carried out in accordance with the approved particulars, be in place prior to first use of the development hereby approved and permanently retained and maintained thereafter.

Reason: To ensure that fencing is sympathetic to the character and appearance of the area and the Chilterns AONB, in accordance with Policies CS11, CS12 and CS24 of the Dacorum Borough Core Strategy (2013).

21. The development granted by this notice must not begin unless a Biodiversity Gain Plan has been submitted to and approved in writing by the planning authority. The development shall thereafter be carried out in accordance with the approved Plan.

Advice about how to prepare a Biodiversity Gain Plan and a template can be found at <https://www.gov.uk/guidance/submit-a-biodiversity-gain-plan>.

Reason: To ensure that the development provides biodiversity net gain in accordance with Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021) (or as subsequently amended), Policies CS26 and CS29 of the Dacorum Borough Core Strategy (2013) and the National Planning Policy Framework (2023). These details are required prior to commencement to ensure that the ecological and biodiversity enhancements can be achieved before construction works begin and to ensure statutory requirements are fulfilled.

Informatives:

1. Agreement with Highway Authority: The applicant is advised that in order to comply with this permission it will be necessary for the developer of the site to enter into an agreement with Hertfordshire County Council as Highway Authority under Section 278 of the Highways Act 1980 to ensure the satisfactory completion of the access and associated road improvements. The construction of such works must be undertaken to the satisfaction and specification of the Highway Authority, and by a contractor who is authorised to work in the public highway. Before works commence the applicant will need to apply to the Highway Authority to obtain their permission and requirements. Further information is available via the website

<https://www.hertfordshire.gov.uk/services/highways-roads-and-pavements/business-and-developer-information/development-management/highways-development-management.aspx>

2. Road Deposits: It is an offence under section 148 of the Highways Act 1980 to deposit mud or other debris on the public highway, and section 149 of the same Act gives the Highway Authority powers to remove such material at the expense of the party responsible. Therefore, best practical means shall be taken at all times to ensure that all vehicles leaving the site during construction of the development are in a condition such as not to emit dust or deposit mud, slurry or other debris on the highway.

3. Storage of materials: The applicant is advised that the storage of materials associated with the construction of this development should be provided within the site on land which is not public highway, and the use of such areas must not interfere with the public highway. If this is not possible, authorisation should be sought from the Highway Authority before construction works commence. Further information is available via the website

<https://www.hertfordshire.gov.uk/services/highways-roads-and-pavements/business-and-developer-information/business-licences/business-licences.aspx> or by telephoning 0300 1234047

4. Working Hours: Contractors and sub-contractors must have regard to BS 5228-2:2009 "Code of Practice for Noise Control on Construction and Open Sites" and the Control of Pollution Act 1974.

As a guideline, the following hours for noisy works and/or deliveries should be observed: Monday to Friday, 7.30am to 5:30pm, Saturday, 8am to 1pm, Sunday and bank holidays - no noisy work allowed.

Where permission is sought for works to be carried out outside the hours stated, applications in writing must be made with at least seven days' notice to Environmental and Community Protection Team ecp@dacorum.gov.uk or The Forum, Marlowes, Hemel Hempstead, HP1 1DN. Local residents that may be affected by the work shall also be notified in writing, after approval is received from the LPA or Environmental Health.

Works audible at the site boundary outside these hours may result in the service of a Notice restricting the hours as above. Breach of the notice may result in prosecution and an unlimited fine and/or six months imprisonment.

5. Construction Dust: Dust from operations on the site should be minimised by spraying with water or by carrying out of other such works that may be necessary to suppress dust. Visual monitoring of dust is to be carried out continuously and Best Practical Means (BPM) should be used at all times. The applicant is advised to consider the control of dust and emissions from construction and demolition Best Practice Guidance, produced in partnership by the Greater London Authority and London Councils.

6. Waste Management: Under no circumstances should waste produced from construction work be incinerated on site. This includes but is not limited to pallet stretch wrap, used bulk bags,

building materials, product of demolition and so on. Suitable waste management should be in place to reduce, reuse, recover or recycle waste product on site, or dispose of appropriately.

7. Invasive and Injurious Weeds: Weeds such as Japanese Knotweed, Giant Hogweed and Ragwort are having a detrimental impact on our environment and may injure livestock. Land owners must not plant or otherwise cause to grow in the wild any plant listed on schedule 9 of the Wildlife and Countryside Act 1981. Developers and land owners should therefore undertake an invasive weeds survey before development commences and take the steps necessary to avoid weed spread. Further advice can be obtained from the Environment Agency website at <https://www.gov.uk/japanese-knotweed-giant-hogweed-and-other-invasive-plants>

8. Contaminated Land: The above contaminated land conditions are considered to be in line with paragraphs 180 (e) & (f) and 189 and 190 of the NPPF 2023. Guidance on how to assess and manage the risks from land contamination can be found here:

<https://www.gov.uk/government/publications/land-contamination-risk-management-lcrm>

https://www.dacorum.gov.uk/docs/default-source/environment-health/development-on-potentially-contaminated-land.pdf?sfvrsn=c00f109f_8

9. Source Protection Zone: The LLFA are concerned that the proposed car park is discharging via infiltration in SPZ1. The Environment Agency's Approach to Groundwater Protection policies stated that only clean rainwater can be infiltrated into SPZ1 (G12 - Discharge of clean roof water to ground and G13 - Sustainable drainage systems). The Environmental Agency's Approach to Groundwater Protection policies set out that the applicant is required to undertake a hydrogeological risk assessment for proposed surface water runoff discharges into SPZ1 areas that are not clean roof water. The applicant should assess and provide mitigation for infiltration of surface water runoff from the car park within a SPZ1 location and obtain Environment Agency consent for the proposals. If the applicant cannot get a consent from the Environmental Agency the current location of the car park will not have a viable drainage strategy and a new location and/or drainage strategy will be required. or further advice on what we expect to be contained within the FRA to support a planning application, please refer to our Developers Guide and Checklist on our surface water drainage webpage:

<https://www.hertfordshire.gov.uk/services/recycling-waste-andenvironment/water/surface-water-drainage/surface-water-drainage.aspx>

this link also includes HCC's policies on SuDS in Hertfordshire.

APPENDIX A: CONSULTEE RESPONSES

Consultee	Comments
Chilterns Conservation Board	<p>Change of use from agricultural land to Suitable Accessible Natural Green Space (SANG), together with a vehicular access, car park, paths, fencing and landscaping and Nettleden Road Potten End Berkhamsted Hertfordshire. DBC reference 24/01239/MFA.</p> <p>CNL(CCB) Holding objection/comments, based upon the need for further details and assurances as to which housing site(s) relate to this proposal and its relationship to anticipated draft Local Plan allocations, potentially north of Hemel Hempstead. The CCB's Planning Committee meeting on 25th July 2024 considered this application and supported this recommendation. We submit an appendix drawing</p>

showing the relationship of this site to the SAC and the potential north of Hemel Hempstead option in the DBC Local Plan 2024-2040 Revised Strategy for Growth, Oct-Dec 2023. We acknowledge the point that this application is comprehensively presented. As a SANG within a nationally protected landscape, 'great weight' must be given to the conservation and enhancement of the AONB. To assist the decision-maker, the new 'further the purpose' duty (LURA 2023) must be discharged (please see our comments at 1.5, below). The key focus here must address the concern that sporadic and incremental SANGs can inhibit a strategic and planned SANGs approach. The Dacorum 2023 Revised Strategy for Growth is relevant; as the LPA progresses, we strongly promote a 'joined-up approach' to housing growth and its implications for appropriately mitigating recreational impacts upon the Chilterns Beechwoods SAC.

1.0. Duties and Responsibilities

1.1. The Chilterns National Landscape (Chilterns Conservation Board, CCB) has been consulted on this application. It is the duty of a conservation board, established by the Countryside and Rights of Way Act 2000 as amended, to (a) seek to further the purpose of conserving and enhancing the natural beauty of the AONB, and (b) to further the purpose of increasing the understanding and enjoyment by the public of the special qualities of that AONB. If it appears to the conservation board that there is a conflict between those purposes, they are to attach greater weight to the purpose mentioned in paragraph (a). The delivery of an effective SANGS strategy is essential to the mitigation of recreational pressures on the Chilterns Beechwoods SAC, a very significant special quality identified in the Chilterns AONB Management Plan.

1.2. We are submitting a holding objection contingent upon the resolution of two principal matters -

1.2.1. To establish the planning principle, which requires, in this case, further detail on the relationship between the anticipated housing site(s) for this SANG and the anticipated Local Plan's preferred options consultation, and

1.2.2. Further details pertinent to design (car park layout and location), accessibility (modal split between car-based visitors and non-car-based visitors), the assessment of mitigation to prevent harm to the Ancient Woodland and the long-term delivery of the submitted SANGS management plan objectives.

1.3. Potential harm to the AONB follows where the delivery of a SANG is uncoordinated and could be more effectively delivered within the forthcoming Local Plan process. Therefore, we need greater information on the housing site(s) mitigated by this proposal.

1.4. The NPPF duty at 182 deals with 'conserving and enhancing landscape', of which the SAC is a highly valued constituent part and the NPPF at 183, when applying the major development test, is material under criterion (c) whereby moderation (or mitigation) is a matter to be assessed.

1.5. The LPA should now apply the 'duty to further' in the revised section 85 of CROW 2000. In this case, that requires scrutiny of the effectiveness of capturing visitors to the SAC. We do not have that information. We need to know which potential sites are earmarked for this new housing and their relationship to, for example, SANGs within planned housing allocations and anticipated future housing allocations.

2.0. Background Issues.

2.1. The purpose of a SANG is to accommodate recreational access to nature and the countryside and, in doing so, deflect visitor pressures away from vulnerable, protected areas, such as the Chilterns Beechwoods Special Area of Conservation (SAC) and two associated Sites of Special Scientific Interest (SSSI) at Ashridge Commons and Woods (Ringshall Coppice) and Tring Woodlands. In this case, the principal qualifying habitat is Asperulo-Fagetum Beech forests on neutral to rich soils, dry grasslands and scrublands on chalk or limestone and the Stag Beetle. It covers around 1,300 hectares and is a key part of the special qualities of the Chilterns AONB. Anticipated housing growth in the immediate hinterland raised concerns around 2022, that this would exacerbate existing problems for these highly protected habitats, with 'over-recreational' pressures already including the trampling of habitat, litter, dog fouling (eutrophication enrichment of soil) and fire, for example.

2.2. Natural England (NE) has comprehensively promoted the mitigation of recreational pressures on the Chilterns Beechwoods Special Area of Conservation (SAC) since it called for a moratorium of all new housing within a threshold distance around this habitat, widely adopted as 12.6 km (the zone of influence). The subsequently agreed mitigation comprises:

2.2.1. Physical provision of SANGs to absorb recreational pressures without recourse to visiting the SAC.

2.2.2. Payments in lieu of creating a SANG (around £4k per dwelling), and

2.2.3. SAMMs (Strategic Access Management and Monitoring) financial payments to control impacts through site management (e.g. new 'honeypot' visitor facilities away from the SAC and around £913 per dwelling).

2.3. While the SAC is contained within the Chilterns National Landscape, the 12.6 km zone of influence is both within and outside the AONB designated area and extends into several local authorities. The zone of influence captures housing proposals for mitigation (i.e. physical SANGs or financial payments) but does not stipulate that the new SANGs countryside must be within that zone. It could be outside of it, but not by much as NE guidance recommends that the newly created SANGs countryside is no further than 5km from the new housing it will serve.

2.4. Other Recent CNL Cases:

These applications comprise land at,

Castle Hill Berkhamsted (20 ha of SANGs - reference DBC 23/02972/MFA), which we understand is to be reported to DBC's Planning Committee on 11th July 2024, with a recommendation to approve.

Haresfoot Farm near Berkhamsted (24ha of SANGs - reference DBC 23/02508/MFA) and directly linked to a residential scheme at Grange Farm Bovington (245 dwellings, reference 23/02034/MFA), awaiting a final decision.

Halfway House Farm, Chesham (23 ha and reference BC-Chiltern PL/24/0459/FA). Castle Hill and Halfway House are freestanding SANGs, i.e., not linked to a specific residential scheme.

All three fall within the 12.6km zone of influence. Castle Hill and Halfway House are within the National Landscape/AONB. Haresfoot Farm is outside, and the scheme it directly links to (Grange Farm, Bovington) sits within the National Landscape's setting (about 5 km away), awaiting a final decision. Two DBC-led SANGs are being developed at Bunkers Hill and Chipperfield Common.

3.0. Impact upon the National Landscape, its special qualities and an assessment of its impact.

3.1. Legal and Policy Areas, for determination

The following apply,

- o Section 85 of the Countryside and Rights of Way Act (CROW), also amended by the s245 of the Levelling Up and Regeneration Act 2023 ('the duty to further)

- o Section 40 of the Natural Environment and Rural Communities Act 2006.

- o The Development (Local) Plan 1991-2011 Policies 97 (AONB) and 102/103 (Sites of Importance to Nature Conservation) and Core Strategy 2006-2031, section 16 (Enhancing the Natural Environment).

- o The National Planning Policy Framework, 182 (AONBs) 185 (biodiversity) and 186 (mitigation) and 187 (SAC's habitat status).

- o Chilterns AONB Management Plan 2019-2024.

- o Dacorum BC, (2022) 'The Chilterns Beechwoods Special Area of Conservation Mitigation Strategy' (Nov 2022).

- o Natural England's (2021) Guidelines for Creation of Suitable Alternative Natural Greenspace (SANG), appendix one criteria.

- o Footprint Ecology (2022) Visitor Survey Recreational Impact (Chris Panter et al).

3.2. This development management policy area has gathered pace since 2022. The Chilterns AONB Management Plan pre-dates it (published 2019) and does not include a specific reference to SANGs. However, the principles that lie behind SANGs are embedded throughout the AONB Management Plan, including reducing the (cumulative) impacts of new development, reducing visitor pressure on sensitive sites, and providing new facilities within the designated landscape to encourage access to nature and the countryside and facilitating the enjoyment and understanding of the special qualities of the National Landscape. Planning weight can, therefore, be attributed to the Management Plan, consistent with Planning Practice Guidance ('They may contain information which is relevant when preparing plan policies, or which is a material consideration when assessing planning applications'. Paragraph: 040 Reference ID: 8-040-20190721, Revision date: 21 07 2019).

4.0. Detailed Chilterns National Landscape (CCB) Comments on the planning principle.

4.1. For this application, we propose to submit the following detailed comments:

4.2. The starting point is the special qualities of the AONB, as detailed in both the AONB Management Plan and, in this case, as detailed in the Hertfordshire Landscape Character Assessment (LCA) 122 Nettleden Ridges and Valleys. The predominant landscape character is, 'defined by the strongly undulating topography and the cover of extensive arable fields and relict parkland features'. Rolling topography, arable fields, relict and designed parklands, and woodland define this character. Guidelines to conserve and restore the landscape character in this LCA include a reversion from arable land to pasture and chalk grassland, ensuring a balance between visitor needs, conserving the landscape and promoting the use of ancient woodland through education and access. The AONB Management Plan sets out the principal special qualities at its pages 10 and 11 and in chapter 5 (nature) and chapter 7 (land, woodland and water).

4.3. The key tests for a SANG located within the AONB include:

4.3.1. It is part of or adjacent to the development that is the nominal source of the visitor pressure,

4.3.2. If not, will it be significantly easier to get to from the source development (i.e. by noncar means), and

4.3.3. It will it be designed in such a way as to conserve and enhance the special qualities of the AONB, before any consideration is given as to whether it will increase the understanding and enjoyment of the AONB, which it must also deliver.

4.4. Under 4.3.1, the location is some 2.8 km at the closest point from the SAC and accessible to visitors from Berkhamsted and Hemel Hempstead. 4.3.2 cannot be determined because we do not know the source development. 4.3.3 requires that the highly valued host AONB

landscape is enhanced. The creation/reinforcement of various habitats within the site are prerequisites for creating a semi-natural perceptual landscape that will attract visitors and draw them away from otherwise recreating within the nearby SAC. This element of 'capture' is critical. The application site is farmed for arable production, neighboured by a Grade II* historic landscape (registered park and garden) and contains an ancient woodland at Heizdin's Wood. The topography is instinctively attractive, with near and far views of Chilterns woodland and chalk downland. Several public rights of way have already been crisscrossed on the site, including the Chiltern Way, promoting the understanding and enjoyment of the AONB. The topography creates some steep gradients in places.

4.5. The principal of a SANG's location must be determined. In this case, more information is needed. Once this is established, detailed consideration must be given to the DBC, Natural England (NE), and Footprint Ecology guidance. NE has produced a comprehensive set of criteria in their 2021 SANGs guidance appendix. In the papers, the applicant's landscape agent does examine that document.

4.6. No housing sites are explicitly identified. We accept that the Dacorum Guidance does not explicitly require that, but in this case, the material merits render such information vital and necessary. The applicant's estimation, in the papers, is that this SANG supports the future allocation of 5,884 new residents or 2,452 dwellings (assuming 2.4 people per dwelling). This point reinforces our earlier concern that a lack of information on the linked housing is important. Without that information, assessing or gauging the impacts within the context of the potential preferred options to be promoted by the future Local Plan is impossible. In other words, should a north Hemel allocation be pursued that offers a better allocation for a comprehensive SANG and one that potentially assists in conserving the setting of the Chilterns AONB's southern boundary, it should be preferred.

4.7. In summary, we are concerned that a lack of strategic planning, in this case, could result in a sporadic rollout without proper regard to the core objectives of the approved mitigation strategy, i.e. to capture visitors and deflect them away from the Chilterns Beechwoods SAC. The Dacorum Mitigation Strategy (2022) states at its 3.5.4. The identification of new (bespoke) SANG will need to be agreed with the Competent Authority and/or Natural England'. We can see that some pre-application advice has been sought from Natural England but not from the LPA, as far as we could ascertain.

4.8. We acknowledge that this application is comprehensively detailed and well-presented. Taking a holistic view and being aware of this location, just to the north of Gadebridge, we would want to be reassured that its location is not better served by the broad location of a SANG to the immediate north of any Hemel preferred option, should that be pursued. We need to know the applicant's likely intended housing sites, which must be within a 5km radius. This is a material consideration of some note.

4.9. The relevant SANG's policy framework covers the Footprint Ecology Study, Natural England (2021), and the Dacorum (2022)

guidance. The combined effect of these policies assumes that the new SANGs will be footloose within the zone of influence and/or within 5km of the proposed housing sites. No specific locations are proposed. However, the housing location, to be mitigated by the SANG scheme, is material. It makes sense for the mitigation to be 'logical' and, therefore, rationally placed near the growth allocation in any forthcoming Local Plan.

5.0. Detailed points, subject to the Planning Principle being established.

5.1. A relevant checklist is in the published Natural England (2021) Guidelines for Creation of SANGs, annexe one. This guidance points to detailed matters with respect to the car parking layout, the anticipated split of the intended modal split between cars and other modes of arrival/departure and the recreational impact upon the Ancient Woodland and details within the Management Plan.

5.2. Relevant material planning considerations include the resulting landscape character and its perception, as well as improvements to conserve and enhance the AONB, consistent with the s85 duty and the new 'duty to further' the conservation and enhancement of the AONB, Local Plan Policy 97, the NPPF 183 and the AONB Management Plan (as detailed above). The applicants seek to enhance some historic field patterns, introduce new meadows and woodland planting, reintroduce some woodland planting in the southeastern corner and create a circular walking route with interpretation, signage and viewpoints/vistas, with benches and interpretation to highlight those benefits. Other detailed aspects, following the detailed guidance, include a circular or suitable walking route of 2.3 km, signage/interpretation, a designed landscape that is perceived to be safe, the avoidance of nuisance (visual intrusions, noise, pollution), maintenance of paths and the delivery of a management regime.

5.3. The applicants produce a useful tabulation in Table One and Paragraph 3.5 of their submitted SANG Framework Management Plan. In assessing these individual elements within an AONB location, we would promote a 'holistic' assessment of the AONB's landscape character and the perceptual landscape experienced. That perceptual landscape combines sensory and cognitive emotions, following the guidance published by the Landscape Institute (the knowledge gained from sources and experiences). In that assessment, the resulting AONB landscape would have to conserve and enhance the existing site, be naturalistic and deliver a long-term sustainable landscape improvement. The key test (combining the s85 duty with the Local Plan 97 and NPPF 183) is the delivery of an improved AONB landscape instead of just 'nil harm'. The LPA must now exercise a decision-making duty to further the conservation and enhancement of the AONB, as set out in the new 'duty to further' (s245 of the LURA 2023 as updating s85 of CROW). The planning applicant must, therefore, demonstrate how that is achieved. The proposed biodiversity and ecological improvements, partial landscape restoration (southeast corner) and tree planting and meadow grassland habitat creation all contribute towards this key test. The

applicants say that the land is a 'ready-made SANG'; however, that requires the delivery of a robust SANGs Delivery Framework Document as a critical prerequisite, and we have commented on that as above. The car park location does not satisfy this test, resulting in landscape harm in this proposed location.

5.4. Car Parking design - This location is visible within the wider AONB landscape and must be seen as a clear negative when planning weight is attributed to landscape harm. The NPPF requires that 'great weight' be given to the AONB's conservation and enhancement. We accept the need for some car parking, and its design needs to be modest and informal. Access gates from the car park to the landscape must be suitable for wheelchair users and visitors with buggies.

5.5. Access to the Ancient Woodland is problematic. Its presence within the SANG adds considerably to the landscape quality and fits with the surrounding wooded landscape. Following Natural England's standing advice on Ancient Woodlands, a separation of 15 metres is ordinarily required. That relationship is not possible here with the PROW network crisscrossing the wood. With the SANG established, then further recreational access must be anticipated. To assist all parties, the applicant may want to set out examples of how the deployment of signage/interpretation/brush and deadwood borders has or has not worked in other case studies. In reference to woodland restoration works, long-term management (see page 22 of the SANG Framework Management Plan) requires a specific stipulation to monitor any transgression from the paths, with damage or disturbance to the Heizdin's Wood Ancient Woodlands.

5.6. The SANG Framework Management Plan and the BNG provision of 76 habitat units must be framed within a legal agreement. Again, regarding the oft-mentioned 'targeted safeguards and long-term woodland management', whilst it may be premature to expect considerable details at this stage, we recommend a mechanism is built into the Management Plan to set out and monitor and even remediate any miscreant visitor's behaviour. The Framework Management Plan must refer to a monitoring and remediation strategy where damage or disturbance is recorded, and remedial actions identified.

5.7. Any legal agreement covering the Management Plan must be secured at the planning application stage. In past examples, Natural England has asked for the inclusion of SANG costings and tariff for in-perpetuity (minimum 80 years) management of the site within the SANG Management Plan and confirmation of who will manage the SANG in perpetuity.

5.8. We would ask that suitable external consultations be conducted with access user groups. This SANG must be accessible to all users, including ambulant visitors, people with buggies and wheelchair users. The surface treatment of some, if not all the circular walk appears to be 'mown grass'. We think it is possible to surface some of the tracks with a suitable, low-impact, low-maintenance surface that allows all users access throughout the year. A Breedon gravel surface or similar

	<p>may readily suffice. The NE (2021) guidance case study at Edenbrook Country Park offers an example of well-surfaced paths and provisions for wildlife.</p> <p>5.9. Access gates must be readily accessible to all visitors, including buggy and wheelchair users. Some of this could be controlled by condition and discharged later; however, user groups must be consulted on this application. This proposed SANG's circular walk configuration and the topography's gently rolling contours make this a suitable location for many users. Promoting more comprehensive access to the countryside is essential, an initiative that the CNL/CCB has been working to promote.</p> <p>The key focus here must address the concern that sporadic and incremental SANGs can inhibit a strategic and planned SANGs approach. The Dacorum 2023 Revised Strategy for Growth is relevant; as the LPA progresses, we strongly promote a 'joined-up approach' to housing growth and its implications for appropriately mitigating recreational impacts upon the Chilterns Beechwoods SAC.</p>
BCA Townscape Group	The BCA Townscape Group has commented: N/A
The Chiltern Society	<p>The Chiltern Society strongly objects to this application for the following reasons. The Society understands the need to protect Ashridge SAC to which end suitable alternative green space (SANG) is required to divert visitors who would otherwise visit Ashridge. However, the proposed SANG on land between Potten End Hill and Nettleden Road is totally unsuitable and is contrary to the Guidelines to SANGs adopted by Natural England and Dacorum Borough Council.</p> <p>Appendix 4:Guidelines for the creation of Suitable Accessible Natural Green Space (rev 3: April 2008) which followed the guidelines issued by Natural England (with minor changes) states: '...SANGS should seek to avoid sites of high nature conservation value which are likely to be damaged by increased visitor numbers.'</p> <p>The SANG Guidelines accept that 'The effectiveness of SANG as mitigation will depend upon the location and design. These must be such that the SANG is more attractive than the SPA to users of the kind that currently visit the SPA.'</p> <p>The National Planning Policy Guidelines (revised December 2023) states in Para. 182: Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight.</p> <p>Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality. The availability of agricultural land used for</p>

food production should be considered, alongside the other policies in this Framework, when deciding what sites are most appropriate for development. The scale and extent of development within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.

Policy CS24 of the Dacorum Core Strategy, Chilterns Area of Outstanding Natural Beauty, states: The special qualities of the Chilterns Area of Outstanding natural Beauty will be conserved. Whilst Policy 97 of the Adopted Local Plan states:

In the Chilterns Area of Outstanding Natural Beauty the prime planning consideration will be the conservation of the beauty of the area; the economic and social well-being of the area and its communities will also be taken into account. 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. Every effort will be made to discourage development and operations that would adversely affect the beauty of the area and goes on to state;

- Development must not be intrusive in terms of noise, disturbance, light pollution, traffic generation and parking.
- Extensive recreational facilities such ... country parks must be carefully integrated with the landscape, natural vegetation and natural ground contours.
- Intrusive fencing and illumination are not acceptable.
- Informal outdoor recreation allowing the quiet enjoyment of the countryside is encouraged, but careful attention will be paid to the provision of associated ancillary facilities such as car parks and toilets in order to minimise their impact on the local scene.

The site is within the Chilterns National Landscape (Chilterns Area of Outstanding Natural Beauty) and is in the 'High Gade Valley', Area 123 of the Dacorum Landscape Character Assessment. The steep valley sides offer long views along the open valley, with mixed farmland, woodland blocks and the meandering River Gade and adjacent water meadows. A prominent feature is Gaddesden Place and its parkland. It is a fine Grade II Palladian villa which dominates views. Given the topography, there are fine views from numerous public vantage points. Heizdin's Wood, along the summit of the steep slopes, is an ancient woodland and an habitat for some protected species of flora and fauna, specially ground nesting birds and protected mammals.

At present there are public rights of way across the site, namely GG62,63,64 which is effectively one continuous footpath leading from the northern end of Potten End Hill (near Bingham's Park Farm), around Heizdin's Wood, and towards Nettleden Road. Pedestrians rarely stray from these designated paths. If the SANG is popular, there will be increase in footfall. The introduction of the SANG, with its associated car park together with ad hoc planting will totally alter the character and appearance, not only of the site itself, but the wider vistas of the river corridor. It will do little to increase biodiversity given the requirement for unencumbered access for people, dogs, and cyclists. Additional footfall will lead to a damaging effect on the ancient

woodland which is the focal point of the site. Large numbers of people together with dogs will have a severely detrimental affect on the current quiet enjoyment of the area. This site will become popular with commercial dog walkers, which has resulted in problems elsewhere on public open spaces (where possible, some have been banned). The increase in popularity of specifically designated sites purely for dog walkers negates the need to provide the loss of this area which will cater predominantly for people walking dogs as the Guidelines for SANGs acknowledges as the main users.

At a recent public meeting, the developers of LA3 in Hemel Hempstead, stated that this SANG is required to mitigate their development of 1100 dwellings on the south western side of Hemel Hempstead. This development is some four miles from the proposed SANG. The Ashridge Visitor Centre, whilst slightly further, provides a vast wooded environment, cafe, shop, toilets, the Bridgewater Monument and numerous parking areas. The National Trust is also intending to divert some visitors away from the main visitor area by providing other attractions on the Estate at Hill Farm, Northchurch, Pitstone Quarry and Wards Hurst Farm in Beacon Road, Little Gaddesden. The proposed SANG will offer no such 'attractions', merely a car park and open fields. Any new planting will take years to mature. Therefore, it will completely fail to divert, intercept or provide a credible alternative for recreational visits to Ashridge.

As there are few residents living within the 5 - 20 minute walk from the site, the majority of visitors to the proposed SANG will travel by car, hence the extensive car park. This will further add to the noise and disturbance of the quiet countryside and given that illumination will be unacceptable in the dark countryside, it could result in anti social activities. Advice from the police must be sought. Access to the site by pedestrians is extremely dangerous as there are no footpaths along Nettleden Road, Potten End Hill or this part of Leighton Buzzard Road. All these roads carry fast moving traffic including heavy vehicles and the proposed access off the lower part of Potten End Hill is dangerous with fast moving traffic coming from Potten End and vehicles turning off Leighton Buzzard Road. To achieve adequate site lines a long section of mature hedgerow will be removed, further damaging the wildlife and the appearance of the area. There is already severe traffic congestion at certain times of the day leading to Water End Bridge North (a Listed structure) and further traffic will increase the pollution of the area. There is no bus service through Potten End and only 2 buses a day (Red Eagle) along the Leighton Buzzard Road. The Council's aim is to reduce carbon emissions by reducing reliance on cars but this site is impossible to get to by public transport, further polluting the area.

The SANG is required retrospectively for LA3, (although the developers already have the Castle Hill land earmarked as a SANG). Regrettably, the previous government's aim of providing 'access to green space within a 15 minute walk from their home' is not incorporated into housing sites, nor is the lament of the Children's Play Advisory Services for the provision of 'spaces to play close to their homes' taken on board. The provision of large SANGs far from the dwellings they aim to serve is just the easy and cheap option favoured

	<p>by developers but in this instance, severely damaging to the character and appearance of the Chilterns AONB, which, to reiterate, has the highest status of protection in relation to conserving and enhancing the landscape and scenic beauty. A bland dog walking park totally fails to do this.</p> <p>When considering this proposal, the bigger picture needs to be considered. The proposal will lead to the permanent loss of over 47ha (116acres) of prime agricultural land which is currently under crops. As well as changing the character of the area it would make the land unavailable for the growing of food. In times of changing farming subsidies, supply chain difficulties (as highlighted in the pandemic), the desire to reduce food miles and uncertainties with grain supply from Ukraine (which is ongoing), this loss of this land (together with losses elsewhere under the creation of SANGs in the Borough) is significantly harmful. Taking an average of 9 tonnes per ha. the land for this SANG can provide some 423 tonnes - a not insubstantial amount! In these uncertain times, agricultural land, especially good quality land, should be safeguarded to maintain and enhance Britain's food security and supply as clearly acknowledged in government guidelines.</p> <p>The provision of large SANGs far from the dwellings they aim to serve is just the easy and cheap option favoured by developers but in this instance, severely damaging to the character and appearance of the Chilterns AONB, the loss of good quality agricultural land, the increase in pollution by vehicles, noise and disturbance to wildlife and dangerous traffic conditions, all clearly contrary to both National and Local policy.</p> <p>Therefore, the Chiltern Society strongly objects and respectfully requests that the application is refused.</p>
The Countryside Charity	<p>I write with regard to the above application for the provision of Suitable Accessible Natural Greenspace (SANG) in respect of the mitigation of the impacts of public use on the Chiltern Beechwoods Special Area of Conservation (SAC). CPRE Hertfordshire is aware of the Mitigation Strategy agreed by Dacorum Borough Council and supports the provision of appropriate and significant SANG in the right locations while wishing to raise the following concerns about this application.</p> <ol style="list-style-type: none"> 1. CPRE Hertfordshire is concerned that the Mitigation Strategy achieves the objectives of reducing the detrimental impacts of over-use at the Ashridge Estate, and is not seen simply as a means of developers discharging planning obligations for proposed developments without considering the full range of impacts on the locations selected. This is particularly important given the protection afforded by Green Belt, Rural Area and National Landscape (AONB) designations at this location. 2. The impacts on wildlife on the subject site could be severe and a major concern is the impacts on the four ground-nesting bird species known to be present on the SANG; corn bunting, (now a rare and rapidly-declining species with a national decline of 83% between 1967

	<p>and 2020) grey partridge, yellow wagtail and skylarks. These are Section 41 species and thus protected by paragraph 185b of the National Planning Policy Framework (December 2023) and they are likely to be displaced and disturbed by dogs roaming freely.</p> <p>3. Increasing visitor numbers to the SANG area with dogs are likely to lead to increased access to the banks of the River Gade at Water End via the Public Right of Way which crosses the SANG site and crosses Nettleden Road to reach the riverside. This is a Local Wildlife site and an area of wet meadow, very liable to wear and tear through over-use which could increasingly pollute the river, an internationally recognised chalk stream.</p> <p>4. It is inappropriate in our view that measures designed to protect the SAC could damage another important habitat, and one which is less robust than the SAC itself. The wet meadow area is increasingly being used by commercial dog walkers and there is a local concern that the SANG could become similarly affected.</p> <p>5. The planning application includes very limited indications of how and for how long the SANG is to be managed for the benefit of local communities and visitors. In the event that the Council grants permission, it should satisfy itself that the mechanism for continual maintenance is robust and long-lasting.</p> <p>6. It will be necessary to include strong legal obligations on any institutional arrangements which are made with the developers and their agents. Any successor organisation should have clearly drawn responsibilities to maintain the high quality of this protected rural landscape and possess the resources to undertake necessary maintenance and management in perpetuity.</p>
<p>Conservation & Design (DBC)</p>	<p>Proposed SANG Site, Land adj Nettleden Rd, Potten End</p> <p>Change of use from agricultural land to Suitable Alternative Natural Green Space (SANG), together with a vehicular access, car park, paths, fencing and landscaping</p> <p>The application is for the change of use of arable / grassland fields to an area of Suitable Alternative Natural Green Space (SANG) to mitigate the potential recreational impacts of residential development upon the Chilterns Beechwoods Special Area of Conservation ('SAC')</p> <p>The site lies within the Chilterns National Landscape and the southern part of the site lies within the Green Belt. The proposed site occupies the sides of a valley which rises above Nettleden Road to the north and the River Gade to the east. The small settlement at Water End, which is a Conservation Area, lies immediately east of the Site, and the eastern end of the site lies within the boundary of the Conservation Area. There are listed buildings to the south side of Nettleden Road, including Moor Cottage (grade II* listed) which is the closest listed building to the site. A Heritage Setting Assessment has been submitted in support of the application.</p>

	<p>The introduction of a car park including a formalised entrance (with associated gate / height barrier and signage) will detract from the setting of the Conservation Area. However, it is acknowledged the additional screening and hedgerows proposed in the vicinity will limit this impact. Any harm is thought to be at the lower end of 'less than substantial'.</p> <p>The Heritage Setting Assessment ascribes a similar level of harm to the setting of Moor Cottage (grade II*), like with the car park a lot will depend on how sympathetically the planting / screening is established.</p> <p>The site forms part of the wider setting to Gaddesden Place house (and its surrounding parkland) which lies in an elevated position to the east of Water End, with views to the west and across the SANG site. The change from arable fields to grassland / meadow with additional hedgerows will preserve the wider setting of Gaddesden Place but there are concerns the car park may be visible - potentially harming its wider setting. Any harm will likely be at the lower end of 'less than substantial'.</p> <p>In terms of the designated heritage assets, the less than substantial harm identified to their significance (through development within their setting) will need to be weighed against any public benefits the proposal may possess, as per NPPF para. 208.</p> <p>The wider setting of the Grade II* Ashridge Estate registered park and garden, Frithsden Conservation Area, Nettleden Conservation Area and Bingham's Park Grade II listed building will be preserved.</p> <p>As a general point, encouraging people to get in their cars to drive to an area of SANG does not seem sustainable and there is a concern that the increase in visitor numbers could put pressure upon the water meadows within Water End.</p> <p>The inclusion of interpretation boards within the SANG site is welcomed but these need to be co-ordinated and well researched by a specialist to ensure they tie into the site and its wider surroundings - they should be agreed via a condition of consent.</p> <p>A detailed long-term Management Plan should be required as a condition of any consent.</p>
Environment Agency	Despite being in SPZ1 the proposed works are non-contaminative, and so are likely to have low risk.
Environmental And Community Protection (DBC)	<p>Environmental Health Pollution Team:</p> <p>With reference to the above planning application, please be advised the Environmental Health Pollution Team have no objections or concerns re noise, odour or air quality. However I would recommend the application is subject to informatives for waste management, construction working hours with Best Practical Means for dust, Air Quality and Invasive and Injurious Weeds which we respectfully</p>

request to be included in the decision notice.

Working Hours Informative

Contractors and sub-contractors must have regard to BS 5228-2:2009 "Code of Practice for Noise Control on Construction and Open Sites" and the Control of Pollution Act 1974.

As a guideline, the following hours for noisy works and/or deliveries should be observed: Monday to Friday, 7.30am to 5:30pm, Saturday, 8am to 1pm, Sunday and bank holidays - no noisy work allowed.

Where permission is sought for works to be carried out outside the hours stated, applications in writing must be made with at least seven days' notice to Environmental and Community Protection Team ecp@dacorum.gov.uk or The Forum, Marlowes, Hemel Hempstead, HP1 1DN. Local residents that may be affected by the work shall also be notified in writing, after approval is received from the LPA or Environmental Health.

Works audible at the site boundary outside these hours may result in the service of a Notice restricting the hours as above. Breach of the notice may result in prosecution and an unlimited fine and/or six months imprisonment.

Construction Dust Informative

Dust from operations on the site should be minimised by spraying with water or by carrying out of other such works that may be necessary to suppress dust. Visual monitoring of dust is to be carried out continuously and Best Practical Means (BPM) should be used at all times. The applicant is advised to consider the control of dust and emissions from construction and demolition Best Practice Guidance, produced in partnership by the Greater London Authority and London Councils.

Waste Management Informative

Under no circumstances should waste produced from construction work be incinerated on site. This includes but is not limited to pallet stretch wrap, used bulk bags, building materials, product of demolition and so on. Suitable waste management should be in place to reduce, reuse, recover or recycle waste product on site, or dispose of appropriately.

Air Quality Informative

As an authority we are looking for all development to support sustainable travel and air quality improvements as required by the NPPF. We are looking to minimise the cumulative impact on local air quality that ongoing development has, rather than looking at significance. This is also being encouraged by DEFRA.

As a result as part of the planning application I would recommend that the applicant be asked to propose what measures they can take as part of this new development, to support sustainable travel and air quality improvements. These measures may be conditioned through the planning consent if the proposals are acceptable.

A key theme of the NPPF is that developments should enable future occupiers to make "green" vehicle choices and (paragraph 35) "incorporates facilities for charging plug-in and other ultra-low emission vehicles". Therefore an electric vehicle recharging provision rate of 1 vehicle charging point per 10 spaces (unallocated parking) is expected. To prepare for increased demand in future years, appropriate cable provision should be included in the scheme design and development, in agreement with the local authority.

Please note that with regard to EV charging for residential units with dedicated parking, we are not talking about physical charging points in all units but the capacity to install one. The cost of installing appropriate trunking/ducting and a dedicated fuse at the point of build is miniscule, compared to the cost of retrofitting an EV charging unit after the fact, without the relevant base work in place.

In addition, mitigation in regards to NOx emissions should be addressed in that all gas fired boilers to meet a minimum standard of 40 mg NOx/Kwh or consideration of alternative heat sources.

Invasive and Injurious Weeds - Informative

Weeds such as Japanese Knotweed, Giant Hogweed and Ragwort are having a detrimental impact on our environment and may injure livestock. Land owners must not plant or otherwise cause to grow in the wild any plant listed on schedule 9 of the Wildlife and Countryside Act 1981. Developers and land owners should therefore undertake an invasive weeds survey before development commences and take the steps necessary to avoid weed spread. Further advice can be obtained from the Environment Agency website at <https://www.gov.uk/japanese-knotweed-giant-hogweed-and-other-invasive-plants>

Environmental Health Land Contamination Team:

Having reviewed the planning application I am able to confirm that there is no objection to the proposed development. However, it will be necessary for the developer to demonstrate that the potential for land contamination to affect the proposed development has been considered and where present that it will be remediated.

This reflects the historical presence of three landfill sites within the application site boundary and the formalisation of public access to the application site.

Contaminated Land Conditions:

Condition 1:

(a) No development approved by this permission shall be commenced prior to the submission to, and agreement of the Local Planning Authority of a written preliminary environmental risk assessment (Phase I) report containing a Conceptual Site Model that indicates sources, pathways and receptors. It should identify the current and past land uses of this site (and adjacent sites) with view to determining the presence of contamination likely to be harmful to human health and the built and natural environment.

(b) If the Local Planning Authority is of the opinion that the report which discharges condition (a), above, indicates a reasonable likelihood of harmful contamination then no development approved by this permission shall be commenced until a Site Investigation (Phase II environmental risk assessment) report has been submitted to and approved by the Local Planning Authority which includes:

- (i) A full identification of the location and concentration of all pollutants on this site and the presence of relevant receptors, and;
- (ii) The results from the application of an appropriate risk assessment methodology.

(c) No development approved by this permission (other than that necessary for the discharge of this condition) shall be commenced until a Remediation Method Statement report; if required as a result of (b), above; has been submitted to and approved by the Local Planning Authority.

(d) This site shall not be occupied, or brought into use, until:

(i) All works which form part of the Remediation Method Statement report pursuant to the discharge of condition (c) above have been fully completed and if required a formal agreement is submitted that commits to ongoing monitoring and/or maintenance of the remediation scheme.

(ii) A Remediation Verification Report confirming that the site is suitable for use has been submitted to, and agreed by, the Local Planning Authority.

Reason: To ensure that the issue of contamination is adequately addressed to protect human health and the surrounding environment and to ensure a satisfactory development, in accordance with Core Strategy (2013) Policy CS32.

Condition 2:

Any contamination, other than that reported by virtue of Condition 1 encountered during the development of this site shall be brought to the attention of the Local Planning Authority as soon as practically possible; a scheme to render this contamination harmless shall be submitted to and agreed by the Local Planning Authority and subsequently fully implemented prior to the occupation of this site. Works shall be temporarily suspended, unless otherwise agreed in writing during this process because the safe development and secure occupancy of the site lies with the developer.

Reason: To ensure that the issue of contamination is adequately addressed to protect human health and the surrounding environment and to ensure a satisfactory development, in accordance with Core Strategy (2013) Policy CS32.

Informative:

The above conditions are considered to be in line with paragraphs 180 (e) & (f) and 189 and 190 of the NPPF 2023.

	<p>Guidance on how to assess and manage the risks from land contamination can be found here:</p> <p>https://www.gov.uk/government/publications/land-contamination-risk-management-lcrm</p> <p>and here:</p> <p>https://www.dacorum.gov.uk/docs/default-source/environment-health/development-on-potentially-contaminated-land.pdf?sfvrsn=c00f109f_8</p>
Historic England	<p>Historic England provides advice when our engagement can add most value. In this case we are not offering advice. This should not be interpreted as comment on the merits of the application.</p> <p>We suggest that you seek the views of your specialist conservation and archaeological advisers. You may also find it helpful to refer to our published advice at https://historicengland.org.uk/advice/find/</p> <p>It is not necessary to consult us on this application again, unless there are material changes to the proposals. However, if you would like advice from us, please contact us to explain your request.</p>
EDF Energy	<p>Please be advised that my Company has no objections to the proposed work. (UK Power Networks)</p>
Forestry Commission	<p>The Commission is a non-statutory consultee on developments in or within 500m of ancient woodland. As a Government department we neither support nor object to planning applications, but endeavour to supply the necessary information to help inform your decision on the application.</p> <p>Within the site area is Heizdins Wood, an Ancient Semi Natural Woodland.</p> <p>Ancient woodlands are an irreplaceable habitat. They have great value because they have a long history of woodland cover, being continuously wooded since at least 1600AD with many features remaining undisturbed. Decisions should be made in line with paragraph 186 (c) of the National Planning Policy Framework, which states: "Development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists"</p> <p>As Ancient woodland, ancient trees and veteran trees are irreplaceable, you should not consider proposed compensation measures as part of your assessment of the merits of the development proposal.</p> <p>We also particularly refer you to further technical information set out in Natural England and Forestry Commission's Standing Advice on Ancient Woodland - plus supporting Assessment Guide and "Keepers</p>

	<p>of Time" - Ancient and Native Woodland and Trees Policy in England.</p> <p>The importance of Ancient Woodland, is not just in the age of the individual trees. The Arboricultural Report focusses on the impact on individual trees within the site and states that the impact of the development on trees is minimal. It is therefore unclear if any assessment has been undertaken in relation to the impacts of the proposal on the ancient woodland habitat as a whole.</p> <p>The Joint NE/FC Standing Advice states that both the direct and indirect effects of development should be considered for both the construction and operational phases of the proposed development.</p> <p>Not just including the potential for actual construction to impact on soils, trees and tree roots. But also the potential for effects when the development is in use and has a likely increase in visitor numbers. Other impacts to the ancient woodland, for example can include trampling of plants and erosion of soil from additional people with accompanying domestic pets, therefore also reducing the resilience of the woodland and increasing disturbance to wildlife.</p> <p>We note plans for supplementary woodland planting on the south eastern corner of the Ancient Woodland, however it is unclear how this will help alleviate visitor pressure on the Ancient Woodland.</p> <p>Although mention is made of employing a 15m buffer for the Ancient Woodland and utilising construction exclusion zones, there is no details of how the stock proof fence and kissing gates will be apparently installed within the Ancient Woodland as detailed in the landscape strategy plan.</p> <p>Ancient Woodlands should have a buffer zone of at least 15m from the boundary of the woodland. Buffer zones should consist of semi-natural habitats including woodland or a mix of scrub, grassland and heathland.</p> <p>The Local Authority may wish to request that an ecological survey of the woodland is undertaken and that a tree protection plan is secured by condition.</p> <p>The biosecurity of all planting stock also needs to be considered. Woodlands need to be climate, pest and disease resilient. Planting should contribute to a resilient treescape by maximising connectivity across the landscape. Plans should also be in place to ensure the long term management and maintenance of any new and existing woodland, with access also needing to be considered for future management.</p> <p>We hope these comments have been useful to you. If you require any further information, please do not hesitate to contact me.</p>
<p>Hertfordshire Highways (HCC)</p>	<p>AMENDED PROPOSAL</p> <p>Change of use from agricultural land to Suitable Accessible Natural</p>

	<p>Green Space (SANG), together with a vehicular access, car park, paths, fencing and landscaping</p> <p>Recommendation</p> <p>Notice is given under article 22 of the Town and Country Planning (Development Management Procedure) (England) Order 2015 that Hertfordshire County Council as Highway Authority does not wish to restrict the grant of permission subject to conditions.</p> <p>Comments</p> <p>A Biodiversity Gain Plan has subsequently been submitted as part of the application. HCC as Highway Authority would have no additional comments to its response dated 17/06/2024.</p>
<p>Hertfordshire Highways (HCC)</p>	<p>With reference to the above Town & Country (T&C) planning application, please be aware that there is a process within Hertfordshire that was agreed with all districts some years ago. The following procedure was agreed:</p> <p>All T&C planning applications should be sent directly from the local district planning department to Hertfordshire Highways, who will then review the application for Hertfordshire Fire & Rescue Service (HFRS) against our 'Access & facilities for the fire service' requirements. If Highways then feel there may be an issue, or require further clarification, they will forward the application to HFRS highlighting their specific concerns. HFRS will review the application before replying to the relevant district planning dept with our comments.</p> <p>We trust this explanation of the process makes sense. Should you require any further clarification about this process, please contact administration.cfs@hertfordshire.gov.uk who will pass your query to the relevant officer. Please forward all future planning applications to Hertfordshire Highways.</p> <p><u>Recommendation</u></p> <p>Notice is given under article 22 of the Town and Country Planning (Development Management Procedure) (England) Order 2015 that Hertfordshire County Council as Highway Authority does not wish to restrict the grant of permission subject to the following conditions:</p> <p>1. No development shall commence until details have been submitted and approved in writing by the Local Planning Authority to illustrate the following: An appropriate level of disabled / accessible vehicle parking; Confirmation as to the level of on-site cycle parking; Comments or recommendations from the rights of way officer as to any comments or recommendations in respect to the rights of way surrounding and through the site and/or any improvements that may be secured.</p> <p><u>Reason:</u> To ensure suitable, safe and satisfactory planning and development of the site in accordance with Policy 5 of Hertfordshire's</p>

Local Transport Plan (adopted 2018)

THE ABOVE MAY BE MORE APPROPRIATE TO BE SECURED DURING THE CONSULTATION PERIOD RATHER THAN A FORMAL CONDITION

2. A: Highway Improvements - Offsite (Design Approval)

Notwithstanding the details indicated on the submitted drawings no on-site works above slab level shall commence until a detailed scheme for the necessary offsite highway improvement works as indicated on drawing number 16-021-257 J have been submitted to and approved in writing by the Local Planning Authority. These works shall include:

- New bellmouth access and any associated works
- Temporary construction access arrangements

B: Highway Improvements - Offsite (Implementation / Construction)

Prior to the first use of the development hereby permitted the offsite highway improvement works referred to in Part A of this condition shall be completed in accordance with the approved details.

Reason: To ensure construction of a satisfactory development and that the highway improvement works are designed to an appropriate standard in the interest of highway safety and amenity and in accordance with Policy 5, 13 and 21 of Hertfordshire's Local Transport Plan (adopted 2018).

3. Provision of Access and Parking

Prior to the first use of the development hereby permitted, the proposed access and any other necessary highway works, on-site hardstanding and turning areas shall be laid out, demarcated, levelled, surfaced and drained in accordance with the approved plans and retained thereafter available for that specific use.

Reason: To ensure construction of a satisfactory development and in the interests of highway safety in accordance with Policy 5 of Hertfordshire's Local Transport Plan (adopted 2018).

4. Construction Management Plan / Statement

No development shall commence until a Construction Management Plan / Statement has been submitted to and approved in writing by the Local Planning Authority. Thereafter the construction of the development shall only be carried out in accordance with the approved Plan: The Construction Management Plan / Statement shall include details of:

- a. Construction vehicle numbers, type, routing;
- b. Access arrangements to the site;
- c. Traffic management requirements;
- d. Construction and storage compounds (including areas designated for car parking, loading / unloading and turning areas);
- e. Siting and details of wheel washing facilities;
- f. Cleaning of site entrances, site tracks and the adjacent public highway;
- g. Timing of construction activities (including delivery times and removal of waste) and to avoid school pick up/drop off times.

Reason: In order to protect highway safety and the amenity of other

users of the public highway and rights of way in accordance with Policies 5, 12, 17 and 22 of Hertfordshire's Local Transport Plan (adopted 2018).

Highway Informatives

HCC as Highway Authority recommends inclusion of the following Advisory Note (AN) to ensure that any works within the highway are carried out in accordance with the provisions of the Highway Act 1980:

AN) Agreement with Highway Authority: The applicant is advised that in order to comply with this permission it will be necessary for the developer of the site to enter into an agreement with Hertfordshire County Council as Highway Authority under Section 278 of the Highways Act 1980 to ensure the satisfactory completion of the access and associated road improvements. The construction of such works must be undertaken to the satisfaction and specification of the Highway Authority, and by a contractor who is authorised to work in the public highway. Before works commence the applicant will need to apply to the Highway Authority to obtain their permission and requirements. Further information is available via the website <https://www.hertfordshire.gov.uk/services/highways-roads-and-pavements/business-and-developer-information/development-management/highways-development-management.aspx>

AN) Road Deposits: It is an offence under section 148 of the Highways Act 1980 to deposit mud or other debris on the public highway, and section 149 of the same Act gives the Highway Authority powers to remove such material at the expense of the party responsible. Therefore, best practical means shall be taken at all times to ensure that all vehicles leaving the site during construction of the development are in a condition such as not to emit dust or deposit mud, slurry or other debris on the highway.

AN) Storage of materials: The applicant is advised that the storage of materials associated with the construction of this development should be provided within the site on land which is not public highway, and the use of such areas must not interfere with the public highway. If this is not possible, authorisation should be sought from the Highway Authority before construction works commence. Further information is available via the website

<https://www.hertfordshire.gov.uk/services/highways-roads-and-pavements/business-and-developer-information/business-licences/business-licences.aspx> or by telephoning 0300 1234047

Comments / Analysis

The application comprises of the change of use of agricultural land to a SANG on land at Potten End Hill. Potten End Hill is designated as a classified C local distributor road, subject to a derestricted speed limit of 60mph and classed as P1/M2 (inter-urban road) on HCC's Place and Movement Network.

Parts of Public footpaths Great Gaddesden Bridleway Berkhamsted 062, 063 and 064 run through the site.

A Transport Statement (TS) has been submitted as part of the application.

Access

The proposals include a new access point from the highway in the form of a simple priority junction / bellmouth access, providing vehicular access to a car park. The design is shown on submitted drawing number 16-021-247 J and includes a carriage opening width of 4.8m leading to a carriage width of 5.5m, which would enable 2 vehicles to pass one another. Vehicle to vehicle visibility splays of 2.4m by 160m are illustrated to either side of the proposed access point. The applicant carried out speed surveys (the records of which are in appendix D of the submitted TS). The recorded average daily 85th percentile speed for vehicles travelling northbound was 47.3mph and travelling east was 42.9 mph and therefore the above visibility levels are considered acceptable and sufficient to ensure visibility levels in accordance with DMRB CD109 standards.

The existing hedgeline would need to be removed and replaced by a new hedgeline at the back edge of the necessary visibility splays. The submitted proposed site plan (drawing number 16-021-257 J) states that the "existing hedgerow to be translocated behind visibility splays". Following the granting of any planning permission, the applicant would need to enter into a Section 278 Agreement with the HA in relation to the works that would be needed on highway land including:

- New bellmouth access and any associated works including new hedgeline at the back edge of visibility splay.
- Any temporary construction access arrangements.

An extent of highway plan to clarify the works which would be within the existing highway (which it is acknowledged has been provided as part of this planning application) in addition to the submission of a Stage One Road Safety Audit and Designers Response for any of the proposed highway works would be required to be submitted as part of the 278 application.

Public Rights of Way

It would be recommended that Clayton Rae (the Dacorum Rights of Way Officer) be consulted in respect to the proposals and any objections, recommendations or comments that he may have in respect to the impact on the rights of way surrounding and running through the site.

Parking Level and Layout

The proposal includes the provision of 50 car parking spaces. HCC as the Highway Authority would not have any specific objections to the overall level of car parking, which have been based on Natural England guidelines. Nevertheless DBC as the parking and planning authority for the district would ultimately need to be satisfied with the overall level and type of parking. It would also be recommended that the level of car parking is reviewed in future if there are any

	<p>detrimental impacts from vehicles parking on, or potentially causing an obstruction to, the surrounding highways. The dimensions and layout of the parking areas are considered to be acceptable by HCC as Highway Authority and vehicles would be able to turn around and egress to the highway in forward gear. There does not appear to be any disabled / accessible car parking spaces shown and therefore an appropriate number would need to be provided in this respect.</p> <p>The proposals also include a vehicle bay for a maintenance vehicle which would be supported to enable such a vehicle to park and also turn around on site and egress to Potten Hill End in forward gear. A swept path analysis /tracking plan for a large vehicle and trailer has been submitted to illustrate that such a vehicle would be able to access the site, vehicle bay and turn around.</p> <p>The proposals also include cycle parking stands (although the exact level of provision is not clear from the submitted plans). It would be recommended that the level of cycle parking is increased as and if demand arises for it.</p> <p><i>Trip Generation & Distribution</i></p> <p>A trip generation assessment for the proposed use has been included as part of the TS, the approach of which is considered reasonable when taking into account the nature of the use (and lack of comparable sites on the TRICS database). Following assessment of these details, the impact on the operation of the surrounding highway network from a trip generation perspective would not be a reason to recommend refusal from a highways perspective.</p> <p><u>Conclusion</u></p> <p>HCC as Highway Authority has considered that the proposal would not have an unreasonable or severe impact on the safety and operation of the surrounding highway. The applicant would need to enter into a Section 278 Agreement with HCC to cover the technical approval of the design, construction and implementation of the highway works at the access to the site. Therefore, HCC has no objections on highway grounds to the proposals, subject to the reference to, and inclusion of, the above planning conditions and informatives.</p>
Hertfordshire Ecology	<p>ECOLOGICAL IMPLICATIONS</p> <p>Overall Recommendation</p> <p>Further information and/or amendments required before the application can be determined.</p> <p>Summary of Advice</p> <ul style="list-style-type: none"> - A General Biodiversity Gain Condition is required - Further conditions and/or legal agreements will be required to secure the net gain - Uncertainty surrounding the future management of woodland on the

site will require the submission and approval of a revised SANG Delivery Framework

- Whilst the site meets the SANG Quality Guidelines, post-determination, until legal and other arrangements relating to the management body and step-in rights are resolved, we will advise the Council to not consent any applications for housing that seek to rely on the this SANG as mitigation for adverse impacts on the Chilterns Beechwoods SAC.

Supporting documents

I have made particular use of the following documents in providing this advice:

- o Design & Access Statement, Land at Potten End Hill, CSA Environmental, May 2024 (DAS)
- o Planning Statement, Land at Potten End Hill, Savills, May 2024
- o Preliminary Ecological Appraisal, CSA Environmental, May 2024 (PEA)
- o SANG Delivery Framework Document, CSA Environmental, May 2024)

Comments

Thank you for your letter of 25 June 2024 which refers, and for consulting Herts LEADS (Ecology); I apologise for the delay with this reply.

In my response I will lean heavily on comments made by Natural England in its letter of 1 July 2024 which I find are clearly set out and compelling.

Ecological assessment

Importantly, the Hertfordshire Environmental Record Centre (HERC) identifies the presence of the ancient woodland of 'Heizdin's Wood' Local Wildlife Site (LWS) in the centre of the site and 'Brown's Spring & Hollybush Wood' LWS adjacent to the south-western site boundary. Protected in policy and guidance, both represent potential considerable constraints on (and opportunities for) the proposed development.

Other than this, HERC has few records of notable habitats or species either within the proposed development site or on land nearby, reflecting the predominantly intensive arable land use in the area.

This opinion is reflected in the PEA which adds that all the woodland and hedgerows on site represent priority habitats and is considered to be of county and local importance, respectively. Further, it notes the local importance of the field margin grassland. In addition, whilst acknowledging that various features enjoyed varying degrees of protection in policy and law, and although not stated as such, appears to conclude that there will be no existing impacts on existing biodiversity that cannot be mitigated, Heizdin's Wood LWS will be safeguarded and the SANG will deliver a substantial net gain for biodiversity.

Importantly, regarding the latter, as will be seen later in this letter, the PEA states:

These woodlands will be subject to targeted safeguards and long-term woodland management to ensure no adverse effects from recreational use of the wider SANG.

Later, these measures are briefly described signage, brash/deadwood borders to footpaths and 'Initial woodland interventions and long-term management ...' with little further explanation here or elsewhere. Ancient woodland, in particular, are afforded special protection in Government standing advice.

Apart from these matters, I consider that overall, the PEA is fit for purpose, and, in principle, I have no reason to disagree with this outcome. However, I will return to points made above later on.

Avoidance/mitigation/compensation/enhancement

This positive outcome was dependent on the adoption of a series of avoidance, mitigation, compensation and enhancement measures for habitats and/or protected species, described at various points in section 5 of the PEA including, but not limited to the management of Heizdin's Wood (and other woodlands and hedgerows), the delineation of (woodland) paths, signage, restoration of parkland, careful siting of newly-created habitats, avoidance measures for protected species, the installation of waste bins, the protection of important trees and hedgerows and tree protection measures.

Although only brief details are provided in the PEA, I consider they represent reasonable and pragmatic proposals that bring with them a degree of confidence they will effectively reduce the impact of the proposals and safeguard future management of the site.

These would normally merit a condition to secure their implementation but as many are incorporated within the SANG Delivery Framework Document, I return to this point in the SANG section below.

Biodiversity net gain

The submitted metric (as summarised in the PEA) predicts a biodiversity net gain of 187.92 habitat units (187.62%) and 11.60 hedgerow units (48.56%) of which 110.18 units habitat units apply solely to the SANG leaves a surplus of 76 units which, it is intended, will be transferred to future residential applications within a 5km radius should they gain consent. However, s5.14 of the PEA states:

'The calculation undertaken has taken into account any planting or habitat creation which is essential for the delivery of the SANG, ensuring that any BNG demonstrated is additional to the SANG requirements. Measures required for SANG and those additional are clearly identified within the comments sections of the Biodiversity Metric spreadsheets ...'.

Unfortunately, I could see no compelling evidence in the 'comments' section and so I have relied on the summary provided by the PEA which appears reasonable. However, my calculations identified a surplus of approximately seventy-eight habitat units. Other than noting the Planning Statement suggests a greater gain in habitat units of 207.10%, I have no reason to doubt this though perhaps this explains this discrepancy which should be ironed out prior to determination but does not affect the relative merits or otherwise of the scheme at this stage.

Importantly, it is assumed that the applicant wishes that considerable weight will be attached to the delivery of a net gain in excess of the mandatory minimum. Therefore, the predictions made must be consistent, justified and subsequently delivered.

In saying this, I note the trading rules are satisfied and that the ('irreplaceable') ancient woodland of Heizdin's Wood LWS will remain unaffected and not only will there be no habitat loss but that no measures to achieve a net gain will be carried out in the woodland. Again, I will return to this point later.

Ultimately, only long-term monitoring would demonstrate how these communities develop and whether the considerable net gain claimed is being achieved. In time, this may require changes in management if not. However, I remain satisfied that a BNG in excess of the mandatory, minimum requirement of 10% could be delivered for both the SANG and 'non-SANG' components of the proposed development.

Consequently, I have no reason to disagree with the outcomes shown, and, therefore, I am of the opinion that the delivery of a biodiversity net gain should not represent a fundamental constraint on the proposed development or reason for objection.

In England, BNG is mandatory under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021). Under the statutory framework for biodiversity net gain, which came into effect on 12th February 2024, every grant of planning permission, subject to some exceptions, is expected to deliver at least a 10% increase in biodiversity value relative to the pre-development biodiversity value of the onsite habitat.

The application is automatically subject to a General Biodiversity Gain Condition, which requires the delivery of a Biodiversity Gain Plan. It is recommended that the plan provided is in line with the DEFRA Biodiversity Gain Plan template. This condition should be kept separate to the list of conditions imposed in the written notice if the Council is minded to grant consent. The Biodiversity Gain Plan must be submitted to, and approved by, the Council before any development can begin.

Given that the claims for BNG for this site comprise a substantial increase in biodiversity value relative to the value before development (due, primarily, to the conversion of arable farmland to other neutral grassland) it is recommended that in this instance, the Council also secures the plan via a legal agreement, either by a s106 agreement or conservation covenant.

Further, given the need for a legal agreement and by reason of its scale, the predicted net gain can be considered to be 'significant'. Therefore, it is recommended the production and implementation of a Habitat Management and Monitoring Plan (HMMP) should also be secured by condition (ie one to be imposed on the written notice with any permission granted).

This will demonstrate how the habitat enhancement and creation, and subsequent target habitat conditions will be created, enhanced and monitored over the 30-year period following the completion of the capital works required to create them. It is therefore, recommended that the HMMP should follow the HMMP template produced by DEFRA.

Consideration should also be given within any legal agreement to secure resources to allow adequate monitoring over the 30-year period.

SANG

In its response, Natural England has confirmed that the site meets the SANG Quality Guidelines and given clear reasons why. From the description provided in various submitted documents, I have no reason to disagree with this and, given Natural England's response there is no reason for me to reiterate this here.

It is proposed the management of the SANG should be secured via implementation of the SANG Delivery Framework Document, itself to be secured via a condition or s106 agreement. I consider the document and the approach to implementation to be reasonable, proportionate and largely fit for purpose for this stage of the planning process, although the following caveats apply.

The same intention to deliver woodland management across the site, including Heizdin's Wood is repeated in s3.6-3.9 of the Framework as in the PEA (and as referenced in the DAS and Planning Statement). Given that it is assumed the SANG Delivery Framework Document will be the main delivery document the absence of any (even high-level) prescriptions (other than broad intentions) in section 3 or section 5 or Appendix F means the proposals are inadequately described to the extent it casts doubt on the overall outcome.

I acknowledge that much of the detail concerning land and habitat management will be delivered in future biodiversity net gain documents and need not be repeated here at present though this may be required in the future. However, this point is made more important as, the BNG metric makes clear, there is to be no management or enhancement of the ancient woodland.

Further, the PEA states:

'... is anticipated to be an intrinsic draw to potential users of the SANG and was part of the reasoning for selecting the Site ... The presence of the woodland is intended to provide a genuine alternative experience to the Chilterns Beechwoods SAC.'

The DAS (and similar text in the Planning Statement) adds:

'Existing access through the woodland will remain and will form part of the wider walking routes that connect to the SANG.'

Given this, the pressures anticipated and the inherent fragility of ancient woodland in particular, it becomes imperative that the

mitigation measures suggested are more fully described to allow scrutiny. Otherwise, the need to avoid the deterioration or direct harm may lead to conflicts with the Natural England/Forestry Commission standing advice. This only allows harm to arise for '... wholly exceptional reasons and where there's a suitable compensation strategy in place ...'. I doubt the provision of a SANG would meet the 'wholly exceptional reasons' test.

Natural England highlighted similar concerns on page 3 of its letter and recommends these be incorporated within a revised 'management plan'. I agree. It should also clearly explain any relationship with management associated with the delivery of a biodiversity net gain and also ensure it contains all the suggested avoidance, mitigation and enhancement measures suggested in the PEA, for habitats and species. This would make for a more coherent set of requirements should the proposed development be consented.

Therefore, the SANG Delivery Framework Document should be amended prior to determination. Once amended to the Council's satisfaction, I recommend the SANG Delivery Framework Document should be secured by condition or within a s106; at this later stage, full details relating to the long-term management of the SANG must be provided.

Furthermore, on pages 4 & 5 of its letter, Natural England also describes at length its concerns with the identification of a management company and step-in rights. I endorse these views and there is no need for me to state anything further other than to emphasise the importance of Natural England's advice as the statutory adviser on these matters.

Accordingly, post-determination, until legal and other arrangements relating to the management body and step-in rights are resolved, we will advise the Council to not consent any applications for housing that seek to rely on the Potten End SANG as mitigation for adverse impacts on the Chilterns Beechwoods SAC. Otherwise, the strict tests demanded by the Habitats Regulations 2017 (as amended) that the Council must be able to ascertain the absence of an adverse effect on the integrity of the Chilterns Beechwoods SAC prior to determination may not be satisfied.

Conclusion

Overall, we do not object in principle to the proposed development but until such time as the management of woodland on site is clarified and agreed, then permission should not be granted as harm to the ancient woodland in particular, cannot be ruled out.

Putting these matters to one side, it is clear the site displays the physical characteristics to be considered a SANG. Whilst the absence of a known management body and the lack of step-in rights need not be a reason for refusal at this stage, it is imperative that no housing proposals are consented that seek to rely on this site as a SANG. This can only take place when the management body and step-in rights are resolved.

<p>Lead Local Flood Authority (HCC)</p>	<p>Thank you for your consultation on the above site, received on 11 June 2024. We have reviewed the application as submitted and wish to make the following comments.</p> <p>Change of use from agricultural land to Suitable Alternative Natural Green Space (SANG), together with a vehicular access, car park, paths, fencing and landscaping.</p> <p>The submitted application has not provided BRE365 infiltration testing to evidence the proposed surface water drainage strategy, has not included calculations to support the proposed surface water drainage strategy or sufficient evidence of increased flood risk to off-site areas and highway.</p> <p>We object to this planning application in the absence of an acceptable Flood Risk Assessment (FRA), Drainage Strategy and supporting information relating to:</p> <ul style="list-style-type: none"> o Impacts from the development adversely effects flood risk to off-site property and the highway. o The development not complying with NPPF, PPG or local policies due to lack of design information to sufficiently address increase of flood risk elsewhere. o Flood risk objective 1: Achieve flood risk reduction through spatial planning and site design o Flood risk objective 3: Reduce surface water runoff from new developments o Policy CS29 -Sustainable Design and Construction o Policy CS31- Water Management o Policy CS32- Air Soil and Water Quality <p>Reason</p> <p>To prevent flooding in accordance with National Planning Policy Framework paragraphs 173, 175 and 180 by ensuring the satisfactory management of local flood risk, surface water flow paths, storage and disposal of surface water from the site in a range of rainfall events and ensuring the SuDS proposed operates as designed for the lifetime of the development. We will consider reviewing this objection if the issues highlighted on the accompanying Planning Application Technical Response document are adequately addressed. The applicant has not provided calculations to support the proposed surface water drainage strategy or sufficient evidence of increased flood risk to off-site areas and highway.</p> <p>Informative</p> <p>The LLFA are concerned that the proposed car park is discharging via infiltration in SPZ1. The Environment Agency's Approach to Groundwater Protection policies stated that only clean rainwater can be infiltrated into SPZ1 (G12 - Discharge of clean roof water to ground and G13 - Sustainable drainage systems). The Environmental Agency's Approach to Groundwater Protection policies set out that the</p>

	<p>applicant is required to undertake a hydrogeological risk assessment for proposed surface water runoff discharges into SPZ1 areas that are not clean roof water. The applicant should assess and provide mitigation for infiltration of surface water runoff from the car park within a SPZ1 location and obtain Environment Agency consent for the proposals. If the applicant cannot get a consent from the Environmental Agency the current location of the car park will not have a viable drainage strategy and a new location and/or drainage strategy will be required. or further advice on what we expect to be contained within the FRA to support a planning application, please refer to our Developers Guide and Checklist on our surface water drainage webpage https://www.hertfordshire.gov.uk/services/recycling-waste-andenvironment/water/surface-water-drainage/surface-water-drainage.aspx this link also includes HCC's policies on SuDS in Hertfordshire.</p> <p>Please note if, you the Local Planning Authority review the application and decide to grant planning permission, notify the us (the Lead Local Flood Authority), by email at FRMConsultations@hertfordshire.gov.uk.</p> <p>Annex The following documents have been reviewed, which have been submitted to support the application:</p> <p>-Flood Risk Assessment, Charlies and Associates, May 2024, Revision B</p>
<p>Natural England</p>	<p>SUMMARY OF NATURAL ENGLAND'S ADVICE</p> <p>NO OBJECTION - TECHNICAL SANG COMMENTS</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 or landscapes.</p> <p>HOWEVER</p> <p>The planning application documents do not include a legal agreement between the LPA and the applicant regarding step-in rights and future SANG management. Without these safeguards, there is risk that default could be made upon the SANG; it then ceases to displace people away from the SAC. NE is of the opinion, as it stands, that there is insufficient information to satisfy us that the site could function as mitigation for adverse impacts on the Chilterns Beechwoods SAC for in perpetuity. Thus, NE will object to any proposed housing developments that rely on the Potten End SANG as mitigation for adverse impacts on the Chilterns Beechwoods SAC, until such time that a legal agreement between the applicant and the LPA regarding step-in rights has been signed and more information has been provided regarding the in-perpetuity management of the SANG. Please notify NE once progress on the above has been made, and we can then reconsider our position.</p>

The application is for a change of use from agricultural land to a Suitable Alternative Natural Greenspace (SANG), together with provision of a new car park, and has been the subject of a pre-application Discretionary Advice Service contract between the developer and Natural England. NE advice on SANG design as part of DAS contract CSA Environmental asked Natural England to provide advice on Suitable Alternative Natural Greenspace (SANG) at Potten End, Hemel Hempstead, which included one site visit, conducted on 14 February 2023.

The proposed site, approximately 47.23ha in area, occupies the sides of a valley which rises above Nettleden Road to the north and the River Gade to the east. The landform rises within the proposed site to a localised ridge in the vicinity of Bingham's Park. The small settlement at Water End lies immediately east of the Site, with the settlements at Potten End and Nettleden a short distance to the west. The site, which is currently arable, sits in a quiet location within a mixed arable and grassland landscape, with parkland to the northeast associated with Gaddesden Place to the northeast. Overall, the site was deemed by Natural England to be a good candidate for a large SANG, with its long views to the north and good location close to Hemel Hempstead. Due to its size, the catchment area of the SANG will be 5km.

The location of the site means it has the potential to intercept visitors travelling north from Hemel Hempstead to the Chilterns Beechwoods Special Area of Conservation (SAC), with easy access by car along Leighton Buzzard Road and Potten End. The proposed SANG has a rural feel, with little need for screening other than in the vicinity of the new SANG car park. Existing use by the public along the Public Rights of Way footpaths within the site suggests that the proposed SANG is in a location that the public will use, which is welcomed. Natural England advised that, given that existing use was limited to the Public Rights of Way footpath, the site is not under significant existing use and a visitor survey is not required as part of the SANG proposal. At the time of the site visit, Natural England recommended reversing the current arable land to a 'parkland' character open space. More recent advice in relation to historic views across the valley from Gaddesden Place has resulted in a proposal comprising grassland with restored historic hedgerows and parkland in the southeast corner of the proposed SANG. Natural England is content that the landscape elements shown on the SANG Landscape Strategy plan (CSA Environmental, May 2024) will meet NE's SANG Guidelines in terms of providing semi-natural habitat.

The SANG is proposed to come forward in two phases, with the eastern phase 1 comprising all of NE's essential criteria for SANG, including a defined 2.3km circular walk and a car park. The applicant has opted to provide the full car parking capacity for the whole SANG as part of the delivery of phase 1, which NE supports as an approach.

In terms of the visitor experience to the SANG, Natural England advised that the proposals for the SANG should consider the inclusion of one or more benches at strategic viewpoint locations throughout the site, for those wishing to make the most of walking the whole site, so

we are pleased to see these included within the SANG Landscape Strategy plan. Natural England also suggested the provision of a dog splash; we note the inclusion of ephemeral ponds in the northeast corner of the site close to the car park, which will no doubt prove attractive to visitors with dogs. Similarly, the provision of dog-proof fencing around the edge of the site provides confidence that visitors can let their dog off the lead, which is one of the essential criteria for SANG. We also advised considering the inclusion of a natural play area to enhance the draw of the site for visitors; placement of a natural play area close to the entrance and car park would generally be appropriate to maximise use. Provision of a natural play area may be more appropriate once both phases of the SANG are open to the public.

Heizdins Ancient Semi Natural Woodland

Natural England is pleased to note the proposals for woodland restoration works and long-term woodland management of the woodlands, including Heizdins Wood, which are detailed in the SANG Delivery Framework Document for Land at Potten End Hill, Hemel Hempstead (CSA Environmental, May 2024).

Although no material changes are proposed to the existing baseline within the woodland, increased visitor traffic to the site and parking provision etc could result in increased foot traffic along the ancient woodland PRowS. This needs to be considered carefully and addressed within the management plan. Natural England notes that there are currently no specific references to visitor management within Heizdins Wood - this could include defining the PRow footpaths with log edging to encourage visitors to keep to the footpaths and avoid trampling of the bluebells *Hyacinthoides non-scripta*, and signage explaining the sensitivity of the woodland to recreational pressure. Regular monitoring of the woodland should also be included within the SANG management plan, with some planned interventions if early signs of recreational damage begin to appear.

Chilterns National Landscape

The proposed SANG site is located within the Chilterns National Landscape. The statutory purpose of the National Landscape is to conserve and enhance the area's natural beauty. Natural England support the approach that has been taken to the landscape design of the masterplan for the SANG site, which has been informed by the relevant local Landscape Character Assessments and a technical note outlining the landscape baseline and character of the site.

The proposed masterplan has sought to strengthen the landscape character of the site by proposing to re-create elements of the historical landscape through re-introducing a parkland character to the site and re-instating lost hedgerows. From desktop review, the overall approach taken appears to be commensurate with the Chilterns National Landscapes' statutory purpose to conserve and enhance the natural beauty of the landscape and with the purpose of increasing the understanding and enjoyment of the public of the special qualities of the area of outstanding natural beauty. Therefore, we have concluded

that impacts on the nationally designated landscape and the delivery of its statutory purpose to conserve and enhance the area's natural beauty can be determined locally by the local planning authority, with advice from its landscape or planning officers, and from the Chilterns Conservation Board.

We advise 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 182 and 183 of the National Planning Policy Framework, which requires great weight to be given to conserving and enhancing landscape and scenic beauty within National Landscapes, National Parks, and the Broads and states that the scale and extent of development within all these areas should be limited. Paragraph 183 requires exceptional circumstances to be demonstrated to justify major development within a designated landscape and sets out criteria which should be applied in considering this proposal.

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

We advise that you consult the Chilterns Conservation Board. Their knowledge of the site and its wider landscape setting, together with the aims and objectives of the area's statutory management plan, will be a valuable contribution to the planning decision. Section 245 (Protected Landscapes) of the Levelling Up and Regeneration Act 2023 places a duty on relevant authorities (which includes local authorities) in exercising or performing any functions in relation to, or so as to affect, land in a National Park, the Broads or an Area of Outstanding Natural Beauty in England, to seek to further the statutory purposes of the area. This duty also applies to proposals outside the designated area but impacting on its natural beauty. The Chilterns Conservation Board may be able to offer advice in relation to the duty, including on how the proposed development aligns with and contributes to delivering the aims and objectives of the area's statutory management plan.

Natural England confirms that the proposed Potten End SANG does meet the NE SANG Quality Guidelines and, in principle, we have no issue with it being designated a SANG, pending the following points.

1. The SANG is to be created as set out in the 'SANG Delivery Framework Document for Land at Potten End Hill, Hemel Hempstead (CSA, May 2024), which should be made a condition of the planning consent, to ensure that the SANG is created and managed according to the NE SANG Guidelines (2021).

2. A management company, trust/charity or the LPA is to be named as managers of the SANG prior to approving the SANG for mitigation, and a legal agreement secured between the applicant / their client and the management company/body, to secure the funding of the SANG management via a commuted sum/endowment (see additional advice below).

3. A legal agreement between the applicant / their client and the LPA regarding step-in rights and management of the SANG in perpetuity has been signed by both parties if required (see additional advice below).

Additional Advice - Relating to the use of this proposed SANG as mitigation in future The Potten End SANG is to be relied upon to mitigate adverse recreational pressure impacts on the integrity of the Chilterns Beechwoods Special Area of Conservation (SAC) of developments within the 5km catchment area of the SANG. As such, the SANG must be approved by Natural England and is expected to follow Natural England's published SANG Guidelines. This is in order that an appropriate assessment undertaken by the Responsible Authority (in this case Dacorum Borough Council) can conclude that there is sufficient certainty that the Potten End SANG mitigation measure will make an effective contribution to avoiding harm, guaranteeing beyond all reasonable doubt that a planning application which relies on the SANG mitigation will not adversely affect the integrity of the Chilterns Beechwoods SAC.

Lack of clarity regarding management company for the SANG The 'SANG Delivery Framework Document for Potten End Hill, Hemel Hempstead (CSA, May 2024) includes a section on capital works to create the SANG and information on the ongoing aftercare and maintenance of the landscape planting of the proposed Potten End SANG. Natural England welcomes the information provided in Chapters 4 and 5 of the 'SANG Delivery Framework Document for Potten End Hill, Hemel Hempstead (CSA, May 2024). However, paragraph 4.3 on pages 22-23 of the 'SANG Delivery Framework Document for Potten End Hill, Hemel Hempstead (CSA, May 2024) states the following:

Following this period [the first 12 months following establishment of the SANG planting], a suitable future managing agent will need to be put in place to secure the future maintenance of the newly created SANG in perpetuity. It is anticipated that this will be a suitably qualified Management Partner, as appointed by the applicant, who can demonstrate a track record in the management of SANG land. The Management Partner will take on the management responsibility for the SANG in perpetuity.

Paragraph 4.5 states that 'Full details of the future management and maintenance of the SANG is anticipated to be secured via planning condition and/or the s106 agreement'. Natural England requires a management company, trust/charity or LPA to be named as managers of the SANG prior to approving the SANG for mitigation, and a legal agreement secured between the applicant / their client and the management company/body, to secure the funding of the SANG management via a commuted sum/endowment. This requirement ensures that SANG management is secured and funded in perpetuity (taken to be a minimum of 80 years).

Natural England's order of preference for transferring long-term management of the SANG to a management body is as follows:

	<p>1) the Local Planning Authority, who may wish to make use of any spare capacity as they see fit in return for agreeing to manage the SANG in perpetuity;</p> <p>2) The Land Trust or similar body;</p> <p>3) A new management company set up by the applicant / their client.</p> <p>If the SANG is to be managed by a third-party management company, step-in rights will need to be agreed in writing with the Local Planning Authority. The LPA should provide confirmation that they will provide step-in-rights for the proposed SANG management company. Step-in rights may not be required if charities such as the Land Trust are the managing body. If step-in rights are needed, NE would require written confirmation of the LPA's agreement to take on the site and appropriate wording to be incorporated in the legal agreement. This is to ensure that the SANG would be managed by the LPA in perpetuity should the management company cease trading. Without a legal agreement between the applicant / their client and the LPA regarding step-in rights and subsequent securing of the SANG management, NE is of the opinion that the SANG may not be adequately managed in perpetuity to fulfil its function as mitigation for adverse impacts on the Chilterns Beechwoods SAC.</p> <p>As it currently stands, NE will object to any housing developments that rely on the Potten End SANG as mitigation for adverse impacts on the Chilterns Beechwoods SAC.</p>
Great Gaddesden Parish Council	<p>The following is a summary of the full response submitted separately.</p> <p>1.1. Great Gaddesden Parish Council objects to this application.</p> <p>1.2. The only way to meet Dacorum's corporate priority to reduce emissions and reach net-zero as soon as possible and reduce pressure on the Ashridge Commons and Woods SSSI is to locate SANGs within walking distance of new housing developments. Other than Hemel Garden Communities which isn't expected imminently, the emerging Local Plan lists no new housing developments within walking distance of the Potten End Hill SANG.</p> <p>1.3. If the recommendation is to ignore the Borough's corporate priorities then the Parish Council's critical objections to the proposed change of use are as follows:</p> <p>1.3.1 The proposal doesn't specify how it will meet Dacorum and National England's objective of deflecting visitors from the Ashridge Commons and Woods SSSI. It is inappropriate for a site in the National Landscape to be the subject of speculative development which involves harm to ecological and heritage assets with no clear benefit.</p> <p>1.3.2. The proposed car park is in the setting of several heritage assets, a globally rare and environmentally fragile chalk stream, and very close to existing traffic congestion caused by the Water End Bridge. It is an inappropriate location, particularly when alternative sites are available at the top of Potten End Hill.</p>

1.3.3. The proposal will fundamentally change the landscape character of the valley slope to the south of Nettleden Road from what is currently an unbroken vista into four separate compartments segmented by new hedgerows and fences which will have a significant and detrimental impact on long distance views from several heritage assets, footpaths and on the National Landscape contrary to the NPPF.

1.3.4. The site hosts six ground-nesting or ground-using bird species which are s41 species and are protected under the NPPF; Natural England guidelines are explicit that sites where free roaming dogs may cause a nuisance should not be considered as SANGs.

1.3.5. The footpath along the Gade water meadows is the flattest and arguably most attractive walking route from the SANG car park leading to a café at the garden centre at Great Gaddesden, but the impact of greater footfall along the water meadows is not considered. It would be a disastrous failure of policy if a strategy aimed at reducing harm to the Ashridge Commons and Woods SSSI just migrated that harm to a globally rare and ecologically sensitive chalk stream. The impact of the SANG on the Gade needs to be assessed and at the very least a mitigation strategy implemented.

1.4. If despite the arguments advanced above it is decided to proceed with the SANG the Council has the following operational concerns:

1.4.1. Active travel access to the SANG from north Hemel needs to be improved to meet Dacorum's Corporate priorities.

1.4.2. Any proposal which results in increased traffic along the Leighton Buzzard Road must incorporate a mitigation strategy to improve the junction of the B440 and Potten End Hill and traffic flows across the Water End bridge.

1.4.3. It is unclear how the security of the site will be controlled once it is opened-up through the car park. The application deals with the safety of the intended users but not the risk of antisocial behaviour. Regrettably the Council's experience is that rural areas receive less support from enforcement bodies than urban areas.

1.4.4. It is unclear what happens if the SANG management organisation fails to meet its obligations.

1.4.5. Given the planned scale of development in the emerging Local Plan in Berkhamsted and Hemel, and the criteria that SANGs should divert visitors from the SSSI, the Council would like to see an analysis of the overall impact of SANGs which may have a significant urbanising effect on the parish.

1.5. The Council is grateful to the developers and their agent for making time to brief the local community prior to submitting the application.

<p>Nettleden with Potten End Parish Council</p>	<p>I appreciate that the consultation on this application has been closed but should be most grateful if you would consider the attached objection from the Parish Council.</p> <p>The arguments are not dissimilar to those advanced by Great Gaddesden, but are much shorter and reflect more of a difference of opinion between councillors on some aspects of the application.</p> <p>V1.0</p> <p>Response to 24/01239/MFA Land at Nettleden Road, Potten End - change of use from agricultural land to Suitable Alternative Natural Green Space (SANG), together with a vehicular access, car park, paths, fencing and landscaping. The council OBJECTS to the application.</p> <ol style="list-style-type: none">1. Only a relatively small part of the western end of the proposed SANG falls in the parish of Nettleden with Potten End, however the long-distance view from the Nettleden conservation area which is in the parish would be impacted, footpaths in the site of the SANG are already used extensively by parish residents and the whole SANG falls within the general setting of the parish. Accordingly it is considered appropriate for the Parish Council to express an opinion on the proposal.2. Locating the car park in the valley of the Gade, a globally rare chalk stream, in the setting of the Water End Conservation Area and a number of other heritage assets, and close to the single lane bridge at Water End which is the subject of daily traffic congestion is incomprehensible and contrary to paragraphs 205, 207 and 208 of the NPPF. Locating the car park at the top of Potten End Hill near the existing light industrial estate of Bingham's Park is more logical (although the Council acknowledges that it would most likely then fall outside the land currently allocated for the SANG).3. Although the Gade doesn't run through the SANG it is very close to it, and there is a risk that the SANG and its car park will drive an increase in visitor numbers and in particular dogs to the river and its associated water meadows. The Gade is one of only 220 chalk streams globally and has been designated a priority habitat within the qualifying criteria of the UK Biodiversity Action Plan Priority Description for Rivers. Work currently being undertaken by Affinity Water to improve the Gade has identified the presence of Water Voles which are protected under the Wildlife and Countryside Act 1981, are on the Red List for Mammals in Great Britain and would be at risk from dog incursion.4. The site hosts six ground-nesting or ground-using bird species which are Section 41 species and so protected by paragraph 185.b of the NPPF. That protection is incompatible with the requirement of the SANG to allow dogs to roam freely. Natural England guidance is that sites where roaming dogs will cause a nuisance should not be considered for SANG.5. The Council acknowledges that the ecology of the site and the
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	<p>Gade may benefit from less intensive cultivation and a reduction in the use of pesticides and herbicides but no information has been provided to indicate whether this would be sufficient to offset the impact on wildlife.</p> <p>6. If the SANG is to proceed the Council would like to see a risk assessment and mitigation measures agreed to protect the ground-breeding birds, the Gade and its water meadows. It would represent a complete failure of policy if an approach designed to protect Ashridge simply exported the same problem to the Gade.</p> <p>7. The Parish Council notes that it is proposed to develop the SANG in two stages, the first being the eastern section which is the more ecologically sensitive and closest to heritage assets. It seems to the Council that moving the car park to the top of Potten End Hill has the added benefit of allowing the western end to open first which, subject to clarification of the situation regarding ground-breeding birds, might have less ecological impact.</p> <p>8. The Parish Council strongly disagrees with the suggestion that residents of Potten End might be deflected from visiting Ashridge because of the SANG as stated in the logic for reducing the size of the car park. A change of use and on-site car park will have no impact on whether Potten End residents continue to use the existing footpaths on the site or travel to Ashridge. This otherwise trivial observation seems to the Parish Council to go to the heart of the objective of the SANG which is to divert visitors to Ashridge; it is not at all clear how this SANG will achieve this aim.</p>
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APPENDIX B: NEIGHBOUR RESPONSES

Number of Neighbour Comments

Neighbour Consultations	Contributors	Neutral	Objections	Support
269	64	0	57	7

Neighbour Responses

Address	Comments
The Bungalow Nettleden Hemel Hempstead HP1 3DB	<p>Having lived in the area longer than the current Potten End/ Nettleden and Great Gaddesden parish council committee members and the majority of the village residents, I would like to give a balanced and better informed view for the proposal.</p> <p>Historically, the land has been used for agriculture, however it was not until the early 80's with the advent of modern farming practice that the landscape you see today was formed. Previously the area was made up of several small grass fields bordered by hedgerows.</p>

	<p>The proposal states that it will be managed by several wildlife and conservation groups and funded for the duration by the applicant. This will not be an urban park but more an extension of the Ashridge estate in keeping with the area. Current Government policy 'The green transition'. is aimed at taking land out of food production and creating better habitat to help protect our wildlife. A SANG goes some way to meeting that criteria.</p> <p>The notion that the current agricultural use on the site is beneficial to ground nesting birds, is at best naive. The introduction of wild flower meadows, grass meadows, hedge and tree planting will be vastly more beneficial to insects, all nesting birds, bees and all wildlife as many case studies have proved.</p> <p>The current Dacorum planning proposals brings Hemel Hempstead ever closer to our villages and although the SANG will not prevent this, it will at least mean that an area is protected from any development for at least the next 80 years.</p> <p>The benefits to the River Gade should be considerable. The reduction of pesticides and artificial fertiliser will lead to better water quality and improved flora and fauna. As far as the plans show the proposed boundary is far enough away to prevent public access to the chalk stream banks, unlike the water meadows on the other side of the Nettleden Road. The greatest threat to our chalk stream is Piccotts End pumping station as water demand increases.</p> <p>Unfortunately, commercial dog walking already happens on this site even though it is farmed land and policing it is extremely hard given that the handlers seem to think they have the right to walk wherever they like. This is also the case on the water meadows next door. This practice will continue SANG or no SANG. Commercial dog walking exists due to the schedules of our working lives, many of the local village people commute to work and use their services. The SANG will not prevent this but it may help protect the verges and lay-bys along the Nettleden Road and ease the pressure on the water meadows.</p> <p>A big bone of contention is the creation of a car park. Is a 50 car car park really going to impact the Leighton Buzzard Road that much? It will not be the case of 50 cars going in and out all day long. The car park should be closed at night. The plans show it will be well landscaped and will not be made from concrete/tarmac, but with the use of more sympathetic materials.</p> <p>The site was home to a large Pick Your Own, farm shop and children's farm enterprise, with a far greater throughput of traffic than is being proposed with this planning application.</p>
<p>Iona Vicarage Road Potten End Berkhamsted</p> <p>Hertfordshire HP4 2QZ</p>	<p>The proposed area for this SANG lies within the Chiltern Hills Natural Landscape, part of the Green Belt, and afforded the highest protection in National Policy.</p> <p>I believe this SANG has been proposed to encourage residents of the new development off Pouchen End Lane to exercise themselves and their dogs in the area rather than travelling to Ashridge. Footfall and dogs roaming on the site will destroy the natural wildlife habitats</p>

	<p>Residents will have to travel by car to reach this site, which is not eco friendly and should be discouraged. The intended car park at the SANG, accessed from the narrow road of Potten End Hill, will increase traffic on this road and on the busy Leighton Buzzard Road.</p> <p>The obvious area for residents to exercise from the new Pouchen End development ideally should be within walking distance of their estate, preferably on land within the development.</p> <p>The Castle Hill SANG, ref:23/02972/MFA has now been approved by Dacorum Planning Committee, an area of 25.6 hectares, so this site will act as an alternative to Ashridge, but unfortunately use of the car will again be needed.</p>
<p>3 Church Meadow Great Gaddesden Hemel Hempstead Hertfordshire HP1 3BS</p>	<p>There seems to be a total lack of care for or understanding of the local area for this proposed development.</p> <p>Firstly, the extremely rare ecosystem which exists through this area, in the form of the Chalk Stream, will be seriously harmed, by not only the destructive works that will take place on the car park and the large amount of articulated lorries required to transport the materials, which will lead to increased noise, not to mention the damage to the roads. Its also the increased noise and traffic pollution and increased footfall from visitors, all of which will disturb birds and other animals living in the environment and no doubt lead to the degradation of the environment. This area is not able to cope with large amounts of visitors whilst maintaining it's natural beauty, and is certainly not suitable as an alternative to Ashridge, with it's large estate, golf course, cafes and car parks.</p> <p>Questions that are not answered in the plan:</p> <ul style="list-style-type: none"> - What assessment on environmental impacts has been done? - Will the carpark be secured overnight in order to stop antisocial behaviour such as fly tipping and drug use? - Why is a smaller housing development with green space onsite, not suitable, given the area around the development is in existing green space? - What are the expected number of visitors to this area given the 1,100 homes proposed on the existing site? -What will be done to protect the water meadow and natural chalk stream on the opposite side of Nettleden Road, given it's sensitivity and importance? - How will the area be maintained and protected, and who will pay for this? <p>I am also concerned about increased traffic to an already overused area, the traffic at water end bridge often goes all the way back to Hillier's garden centre, and beyond, why would it be suitable to suggest more people use this route?</p> <p>This application should be rejected, the natural environment and it's inhabitants along with the local villages and the residents, shouldn't be made to suffer, just to satisfy Taylor Wimpey's need to provide green space on their plan. They would rather build more houses and</p>

	<p>make more profit, whilst ruining another natural environment, than reduce the number of houses on their development and provide green space onsite, which would be a much more beneficial way of doing things for everyone else other than Taylor Wimpey. The key word in SANG is SUITABLE, the plan is not suitable in any way.</p>
<p>Holly House 8 Kilfillan Gardens Berkhamsted Hertfordshire HP4 3LU</p>	<p>OBJECT on grounds below.</p> <p>The Chilterns AONB is the closest area to London with protected natural views - we should be scrupulous in touching these.</p> <p>The proposal will not only damage the fragile ecology and unique chalk streams but it will ruin the postcard view from the woods on the hill to the north - literally the most natural, untouched view in the area.</p>
<p>The Moor 3 Water End Moor Water End Hemel Hempstead HP1 3BL</p>	<p>-increased traffic and pollution -effect on Chalk stream -conserve environment</p> <p>Please go to the documents tab on the following page for the full letter: Dacorum Public Access (Application ref. 24/01239/MFA)</p>
<p>Lark Rise Hollybush Close Potten End Berkhamsted Hertfordshire HP4 2SN</p>	<p>Lacks necessary consideration of important matters. Scale not justified. Unsustainable development. Sensitive features at site.</p> <p>Please go to the documents tab on the following page for the full letter: Dacorum Public Access (Application ref. 24/01239/MFA)</p>
<p>Hedgerows Potten End Hill Water End Hemel Hempstead Hertfordshire HP1 3BN</p>	<p>My husband and I are against the proposal.</p> <p>The proposal will increase traffic to an area outstanding natural beauty and there is a high likelihood of antisocial behaviour associated with the proposed car park. The steps taken to mitigate anti social behaviour are vague to say the least.</p> <p>We noticed that the car park has been moved from the North West side as per Transport statement 3 to be next to Potten End Hill and closer to a greater number of houses than in than original proposed location, this makes no sense at all.</p> <p>The area around Willows Lane and Potten End Hill has suffered from a high number of burglaries in the last 18 months, so much so that the police have agreed to come immediately if there is a sign of a break in. The SANG would only increase the volume of traffic which can only increase the possibility of more burglaries.</p> <p>There must surely be other more suitable locations for this proposal.</p>
<p>Ashbarton Potten End Hill Water End Hemel Hempstead</p>	<p>We object to this development for the following reasons:</p> <p>1. Noise and disturbance resulting from use and overlooking / loss of privacy</p>

Hertfordshire
HP1 3BN

We moved from an urban area 18 years ago for peace and tranquility to an AONB, adjacent to this unnecessary proposed development. This development will detrimentally impact that AONB. We walk around the Ashridge estate weekly and will continue to do so because of its beauty, whether this SANG project goes ahead or not. We doubt many people will visit the proposed SANG (mainly as it is in the middle of nowhere), and continue to Ashridge as they will have to drive to the proposed SANG anyway. One purpose of this development, to protect Ashridge from overuse will simply backfire by no one visiting this development, but also harm the beauty of this AONB.

The proposed SANG car park is positioned in the AONB opposite our family home, as well as opposite a number of other residential properties along Potten End Hill. This will cause noise and disturbance to us as well as a lack of privacy and we will be overlooked. As the location of the car park has been moved already to avoid detrimentally impacting one local resident for the same reason, why has the new location been chosen that now detrimentally affects several other local residents in the same way. This is illogical. A precedent has been set as we understand the developers were forced to move the position of the car park away from one local resident; therefore, it must be moved away from all. Because of the repositioning, there is evidently no reason for a specific location for the proposed car park inside the SANG. Why is the proposed car park not situated in the more appropriate location next to the built-up area of Bingham's Park industrial area and day nursery? Adjacent to the Bingham's Park site would provide extra security to prevent antisocial and illicit behaviour. Having the car park in the proposed location would encourage that behaviour. There is already a large car park at Bingham's Park. The adjacent field to Bingham's Park is used for football events weekly, where cars are parked on the fields and verges detrimentally impacting that area. Surely the best option to minimise the environmental impact is to build the proposed car park at that location to meet the needs of those visitors as well as dog walkers. The proposed location of the car park in the middle of the AONB land is illogical.

The only seeming benefit of the car park in the proposed location is financial to the developer as the land is flatter at the proposed site, nearer the bottom of the valley and chalk stream. This should not be the determining factor.

We are aware of a rural car park in Hampshire, close to our friends in Alresford that has been closed by the local council as the police do not have the time or resources to control the illicit behaviour brought to that car park because of its out of the way location. That car park remains abandoned with the eyesore of huge concrete blocks at the entrance to close it. A similar problem will occur in the proposed car park because of its proposed out of the way location and with stretched police resources - drug dealing, motorbike and car racing, dogging etc will be a problem, as happened in Hampshire. Police have already given warnings for antisocial behaviour such as cars drifting and racing at Gadebridge car park. The proposed location of

	<p>this car park will encourage the same antisocial behaviour where we live, and it will be unchecked as it's out of the way. The 50-place large car park is unnecessarily extremely large and would encourage racing and drifting in that car park.</p> <p>Our house has a large garden, that will be strangled by development, with houses on three sides of our boundary, as one is now being constructed behind our property. With this proposed car park in front, our garden will have development on all sides and therefore will not be green belt, by its very definition. With this new development, we will have no option but to consider applying to build new houses on our land to pay for a move to the countryside again, which was the reason why we live here in the first place.</p> <p>2. Potten End Hill - Traffic and Safety</p> <p>The lower part of Potten End Hill is a very straight relatively narrow long hill climb main road that attracts motor bikes and cars to race. Having an entrance to a car park in the middle of that part of the hill is illogical for a safety point of view. Further up the hill is more built up and traffic is slower, more appropriate for a car park entrance. The traffic is already a problem and will get worse with this development.</p> <p>3. Ecology and Biodiversity</p> <p>Why is the location of the proposed car park so close to the Gade chalk stream and not at the higher end of the SANG near the existing development of Bingham's Park? We understand that Government guidance is to protect such streams and their habitat from pollution. The proposed car park location is therefore illogical. There is no thought about this in the applicant's proposal.</p> <p>The development with its off-lead dog walking, probable illicit behaviour and the pollution will have a detrimental impact on the water voles that live in our area, as well as the bird species that live in our garden and the local fields such as corn buntings, yellow hammers and blackcaps, which nest on or near the ground.</p>
<p>Little Oaks Potten End Hill Water End Hemel Hempstead Hertfordshire HP1 3BN</p>	<p>We strongly object to this planning application.</p> <p>Not enough thought has gone into the impact this would have on the local traffic and the hazards we already have with the volume of traffic on Leighton Buzzard road and Potten End Hill. At a busy time the traffic stretches from the bridge at Water End all the way back to Gadebridge Roundabout. You propose an entrance to a car park at the lower end of Potten End Hill. Traffic that comes along Leighton Buzzard Road and turn left to go up Potten End Hill are now in an national speed limit road (60mph). At this point because it is a hill the drivers are accelerating very hard to climb the hill. They will have only gone a few metres when they will be confronted by vehicles turning right into the new access road. There are bound to be accidents at this point and there are still big holes in the hedge from previous accidents at that area.</p> <p>The amount of animals, small birds etc that will suffer if this goes</p>

	<p>ahead. No matter the precautions you take to help them there will be an massive effect on their survival with the introduction of the new car park and road, the amount of people in general, the amount of dogs that are being walked on or off leads, one of the biggest problems being the cars/motorbikes and cycles.</p> <p>When we attended the first meeting the car park was on the Nettleden Road side. You have had a complaint from the local resident as it would have been right outside his property. Rightly so he should complain as this project should not be going ahead anyway.</p> <p>However you have now changed the position of the car park and put it straight outside mine and my neighbours property.</p> <p>I strongly object to this. What gives you the right to move it from one location (because you have had a local complaint) to outside two other property's.</p> <p>The problems we are going to get with the car park outside our property's is unthinkable.</p> <p>The car park will get the wrong type of people in it. There will be groups that gather in cars at night, the same as the problems you get with Gadebridge Park car park. They are then screeching around the car park and causing disruption to all. I take my dog to Gadebridge Park car park for her walks and have experienced this unruly behaviour on many occasions. You also get motorbikes causing disruption and also using the footpaths that you would be putting in. I would suggest that there would also be drug dealing and other illicit activities going on.</p> <p>Also with wrong type of people in this car park they will be looking over the road and looking straight at our property and thinking of a future property to break into. Our security would be compromised.</p> <p>If this did go ahead why can you not use the access and car park that is already in further up the hill. This is at the entrance to Blnghams Park Farm where there is already a entrance and an area where cars park. This is also on a slower part of the road and not on a straight fast section.</p>
<p>Queenswood Frithsden Lane Berkhamsted Hertfordshire HP4 1NW</p>	<p>We object to this proposal on the grounds of the unnecessary increase in traffic and also the impact on this lovely rural valley.</p> <p>The proposed site is not within "easy walking distance" of more than a handful of homes so that everyone who might use it will have to drive there. The Leighton Buzzard Road is already very busy, frequently congested and the turning into it from Potten End Hill is a potentially dangerous one with poor view of the oncoming traffic, especially from the Piccott's End direction.</p> <p>Surely in today's world, where there is an opportunity to reduce reliance on cars, this must be a priority. Accordingly, the SANG should be easily accessible on foot by the residents of the new housing developments.</p>

	<p>The valley either side of the Nettleden Road is truly beautiful and one of the few places where I have seen hares bouncing around the fields. To introduce what is essentially a huge dog exercise park will destroy this environment.</p>
<p>Lark Rise Hollybush Close Potten End Berkhamsted</p> <p>Hertfordshire HP4 2SN</p>	<p>As a resident whose garden abuts the proposed land for the sang I am objecting to the proposal for a number of reasons:</p> <ul style="list-style-type: none"> * The wanton destruction of an area of natural beauty with uninterrupted views across to the Great Gaddesden Water Meadows and Highpark wood and all of the varied wildlife within it from hares, deer, stoats and foxes to ground nesting birds. *The proposed land is criss-crossed with walking paths that are fully used already by both walkers and dog walkers without the need to tear the land up and fence it in. *There will be increased traffic on an already dangerous road through the village of Potten End and a congested junction at the bottom of the Potten End Hill. *The idea of a sang is to offer green space to a development of houses nearby. The original proposal contained links to LA3 but this was removed. The continuation of this sang is disingenuous and not in the best interests of the residents of Dacorum for builders to 'bank' a sang for future use no matter how far from any future development it may be. It seems to me that developers want to cram as many houses on a development as possible and call up a green space miles away to offset this! The green space should be next to or within the development. *Ashridge estate is trying to guide people away from Ashridge due to numbers - this will encourage more. *The idea of a sang that you have to drive miles to from any linked development goes against the ethos of the sang itself and also the need to reduce/minimise car use in general in the Dacorum area.
<p>Four Winds Nettleden Road Water End Hemel Hempstead Hertfordshire HP1 3DF</p>	<p>The proposal in its current guise is unacceptable as it lacks the necessary consideration of important matters including design, amenity and disturbance, community benefit, and highways impact. In particular, the scale of the proposal is not sufficiently justified given the existing site constraints and local rural character.</p> <p>Any harm amounting to the Green Belt or AONB should be apportioned substantial weight and whilst there are recognised benefits associated with this scheme, they are not sufficient to justify the level of development proposed.</p> <p>The location of the car park needs to be examined due to its proximity to the existing residential premises and heritage assets, and the fact that these could potentially be avoided if another location were to be chosen further along Potten End Hill.</p>

	<p>The location and mapping of the walking routes should consider what is currently in place and be mitigated in order not to create issue for the current locals, I myself being one of them, as this scheme could be so beneficial for the local community but it cannot in its current form.</p> <p>The creation of a SANG will attract visitors meaning that there are opportunities to be gained within the local economy along with the provision of facilities for those dual uses (i.e. the car park) that can be facilitated through amendments to the design.</p> <p>Most importantly the main objective of a SANG to relieve pressure on the Chilterns Beechwoods SAC and therefore the design should be tailored to encourage the use of the site by existing residents so to further reduce the pressure on the SAC and encourage more sustainable practices.</p> <p>For full letter please see: Dacorum Public Access (Application ref. 24/01239/MFA)</p>
<p>Jacaranda Nettleden Road Water End Hemel Hempstead HP1 3DF</p>	<p>-Objection on SANG grounds - Congestion Full letter can be viewed under the 'Neighbour Letter' with description of 'Jacaranda Neighbour Response'</p>
<p>Lark Rise Hollybush Close Potten End Berkhamsted HP4 2SN</p>	<p>As a resident whose garden adjoins this proposed development, I am objecting on several bases.</p> <p>This SANG is not within walking or public transport access of any new housing development currently planned in the wider area.</p> <p>It will increase traffic both through (1) Potten end and (2) along the Leighton Buzzard Road:</p> <p>(1) Potten End. There is no footpath from the car park to Potten End. The first portion of footpath is dangerous and narrow, I already have had personal frights of traffic speeding past me with a young child in tow. This is a disaster waiting to happen. Furthermore there have been several serious accidents in Potten End due to the fast speeding and increased car presence in the village. this will make that worse.</p> <p>(2) traffic already queues for 15 minutes to cross an ancient bridge over the adjacent chalk stream - any addition of a car park along the Potten End Hill will add to this increased traffic, causing further congestion and build up the pollutants in the area and again creating danger.</p> <p>There are rare ground nesting birds on the site, multiple deer trails, badger runs, bats, partridge, pheasant, owls, hares, rabbits - the list goes on. Any addition of somewhere dogs can run freely will disastrously affect this ecosystem and kill wildlife - how is that helping a green agenda? This is a peaceful area currently, multiple species of birds can be heard and seen throughout the day and evening.</p> <p>The views across the valley are currently unspoilt with PROW across</p>

	<p>the fields that are used by locals on foot from nearby villages. There is no need to add further footpaths.</p> <p>The SANG will add multiple hedgerows and fences, cutting across the English countryside and it's historic views. The field adjoins a roman road and spectacular roman ruins have been found in nearby fields.</p> <p>NO PLANTING OF HIGH HEDGEROWS OR TREES SHOULD BE PERMITTED. The plans included are insufficient in detail of what how the boundaries will be created, how works traffic will be managed, how wildlife will be protected.</p> <p>No consideration has been given to increased noise, looting, fly tipping and general public disturbance - no plans to address these points are included in the proposals.</p> <p>This SANG will encourage more professional dog walkers to the area. Multiple dogs off leads will affect the use of this by those not wanting to walk dogs - currently there are many walkers (without dogs or with dogs on leads) using these PROW.</p> <p>IF this were to go ahead, I think that it is important that dogs are restricted to smaller areas to run freely, that locals (particularly those adjacent to the SANG) have a say in planting and footpath layouts and that the carpark is restricted to daytime hours only with an automated locking system that prevents the use of the carpark after dark or by caravans/lorries/vans etc during the day; finally, the SANG should be vastly reduced in size and scope.</p> <p>Locals need to be consulted!</p>
<p>16 Vicarage Road Potten End Berkhamsted Hertfordshire HP4 2RA</p>	<p>The proposal will exacerbate an already congested part of the Leighton buzzard road (particularly Water End bridge) . The driver for this proposal is for the development of 1100 homes which isn't mentioned . There are numerous listed buildings and a chalk stream within 100 metres of the proposed site.</p>
<p>8 Cromer Close Little Gaddesden Berkhamsted Hertfordshire HP4 1PR</p>	<p>A SANG area, with the support of conservationists would only be beneficial. There wouldn't be fertiliser or pesticides being sprayed which impact wildlife. People in the area will remember this was once a pick your own farm which had a far greater number of cars driving to and from, and a car park - this never caused a traffic problem but was a great addition to the community. Ashridge Estate is vastly overcrowded, you cannot access it other than by car and there's often no parking. The 'food festival' mentioned in another comment is at Ashridge House, not the estate. I would much rather see a SANG which guarantees the area is protected, than another use/development. I understand that people will oppose/want it to stay as it is if they are a neighbouring property as it is the unknown - and 'not in my back yard'. The land could be used for any number of things - including events/storage or possible future development. I'd rather a well-thought out and protected SANG. I think it would be a great addition if it is in-keeping with the area/natural beauty. People park along the lane and walk there already, through the fields not realising they have been sprayed.</p>

<p>Four Oaks Vicarage Gardens Potten End Berkhamsted</p> <p>Hertfordshire HP4 2RL</p>	<p>I fully support the initiative to transform this land into a suitable alternative natural green space and protect it from residential development for the next 80 years. Preserving our green belt is crucial for maintaining the environmental integrity, biodiversity, and natural beauty of our community. This green space will offer a serene haven for residents, providing essential opportunities for outdoor activities and relaxation. By safeguarding this area from housing development, we are ensuring that future generations can continue to enjoy and benefit from this precious natural resource. Let's commit to preserving our green spaces and prioritising sustainable, community-centered growth.</p>
<p>4 Church Cottages Church Meadow Great Gaddesden Hemel Hempstead Hertfordshire HP1 3BU</p>	<p>I object to this development because it appears to contravene ss.40, 41 of the Natural Environment and Rural Communities Act 2006, and the National Planning Policy Framework (NPPF) of 2012.</p> <p>One should be aware that Savills Estate Agents, Taylor Wimpey, and Barratt Homes' motivation in filing this application is not in the interests of environmental conservation or public amenity - only the terminally naive and simple minded would be taken in by such a deception. These companies have only done so to fulfil an amendment to the Conservation of Habitats and Species Regulations 2017 which requires housing developers to offset the impact of unrestrained building development in the Green Belt and AONB. Perhaps it might be better if productive agricultural land was conserved, but then again, every farmer has his price.</p> <p>From the housebuilders' perspective, creating an urban park, which can then be concreted over after 80-years' use as a canine toilet by commercial dog-walking enterprises, is an obviously worthwhile investment if it allows them to construct and sell thousands of houses nearby. If this SANG is to serve the needs of the local residents in these new housing estates, why is a car park required? Surely, they can walk, cycle, or take the bus?</p> <p>Perhaps Dacorum Borough Councillors should also consider what is in this deal for them? After all, the Council now has a Liberal Democrat administration which is unlikely to benefit financially through donations by housebuilders; Taylor Wimpey, Savills, and Barratt have only donated cash to the Conservative Party in the past, and the Conservative Party will now have little influence in planning decisions in this area, except through 'unofficial' channels, of course.</p>
<p>Nettleden And Frithsden Society</p>	<p>I am writing to you as chairman of the Nettleden and Frithsden Society and attach our response to the above planning application plus an Annex containing a series of photos of views of the proposed site from various public footpaths and roads.</p> <p>I should be grateful if you would consider these comments and also upload these for me to the public site for this application so they are available for members and the public to read. Unfortunately, because of the photos and pictures, the usual way of uploading comments does not work.</p>

	<p>To view these online please go to the documents tab on the following page: Dacorum Public Access (Application ref. 24/01239/MFA)</p>
<p>3A Chestnut House Farm Close Shenley Herts WD7 9AD</p>	<p>I have just read a copy of the objection letter to the above planning application sent from the Nettleden, Frithsden and District Society. I am the co-owner of The Alford Arms in Frithsden. I wholeheartedly agree with their objections and I would like to add my weight in opposition to the proposed SANG. There is no doubt that placing this amenity so far from the actual development at Pouchen End makes no sense and it is more likely to attract new residents from the proposed massive development to the north of Hemel Hempstead. This would cause no end of traffic chaos at the bottom of Potten End Hill and in effect turn the land alongside the Lady's Mile into a municipal park, which is wholly inappropriate for the area. The area around Ashridge, the untouched villages and hamlets, the AONB and the wonderful Grade 2* landscape must be protected at all costs. To appreciate the special nature of this valley, you may want to take a walk on the hidden footpaths along the Lady's Mile and experience the wealth of wildlife that will be disrupted by the SANG. Some invisible, but you can't help but notice the song of the many skylarks that nest in the fields.</p> <p>I think it is important that developers consider amenity land when building these large developments and Hemel Hempstead is a great example of how successful this can be, BUT it is successful because the open spaces are mixed up among the houses and as a result create convenient space on everybody's doorstep. Not at such a distance that, without owning a car, would be out of reach of a large chunk of residents. The developers must be forced to consider part of the land destined for housing stock for the purposes of the SANG or to acquire more land adjacent to the development.</p>
<p>The Bungalow Nettleden Hemel Hempstead Herts HP1 3db</p>	<p>I fully support this.</p> <p>It is needed to help reduce recreational pressures on Ashridge Woods, alternative green spaces need to be identified. With the benefit of it being maintained for 80 years. Or would people rather have it as a housing estate in a decade or so? Nettleden Road (The Ladies Mile, as some will know it as) is littered with cars throughout the day, hikers and dog walkers, park on the grass verges causing a nuisance. The walkers do not stick to the footpaths and can often be seen trespassing on the fields.</p> <p>As some have mentioned, there used to be a very busy Pick Your Own Site, with 100's of cars daily, The Farm shop and Children's farm, had bus loads of children visiting from afar. There is a farm shop now on Water End Road which is popular and has many visitors. None of which has had an impact on the traffic in the village. a 50 car car park is not large and does not mean it will have that amount of cars parked at any one time.</p> <p>This application has my full support.</p>

<p>Cllr Alan Anderson</p>	<p>I am aware that my role as the Council Opposition's spokesperson on Planning matters is purely an unofficial quasi role, and that I am not a ward member for where this application is located.</p> <p>However, I still have to object formally to this planning application, on the grounds that it is an inappropriate location to designate suitable alternative natural greenspace.</p> <p>The site is located in an AONB, or to use the new term in a National Landscape, and the chalk valley sides on each side of Nettleden Road are stunningly attractive.</p> <p>I am aware that SANG applications do not involve physical development in the traditional sense, and I do not share the knee-jerk objections made when SANGs are considered.</p> <p>However, in this particular case, I feel that even additional footpaths, and the natural 'developments' which would be required to bring the land up to SANG standard, along with any BNG requirements, would harm the location and wreck the chalk valley characteristics which make the location stand out so much as an attractive stretch of countryside.</p> <p>I therefore would be grateful if my objection could be taken into account, and if you're minded to recommend granting permission, if my planning views could be reported to the DMC. (I understand that one of the local ward members is objecting, so that would get round any issues under the scheme of delegation with me trying to refer the application to the DMC.)</p>
<p>Bede Cottage Frithsden Hemel Hempstead HP1 3DD</p>	<p>To view letter of objection please go to the documents tab on the following page: Dacorum Public Access (Application ref. 24/01239/MFA)</p>
<p>The White House Potten End Hill Water End Hemel Hempstead Hertfordshire HP1 3BN</p>	<p>Whilst generally I am in support of the principal of a SANG, this proposal seems to be an ill thought through box-ticking exercise, to allow the building of hundreds of houses nowhere near the actual site. Who actually is going to use this SANG and how are they going to get there without driving? Who benefits apart from the developers?</p> <p>I object on the following grounds:</p> <ol style="list-style-type: none"> 1. The car park is too big and in the wrong location. Firstly shouldn't we be encouraging people to walk and cycle rather than use cars? But since there are no footpaths up Potten End Hill or Nettleden Road, and no cycle lanes, or any public transport options then there is no choice but to drive. Having the car park entrance virtually opposite Willows Lane is a disaster waiting to happen, since the visibility is very restricted and the speed limit on the road is 60mph. You will have cars pulling out into fast moving traffic from both sides of the road. If there must be a car park then it should be sited at the top end of the SANG by Bingham Park, where there is already access in place for the industrial units. Additionally, locating a car park next to the Gade, a rare chalk stream, is ecologically unsound. 2. The site will likely be used by commercial dog-walkers. They have already caused a nuisance in the local area by scaring cattle. Having dogs run wild will have a negative impact on the ground-breeding

	<p>birds and will likely cause their total destruction. This site should be restricted to dogs on leads only and no commercial activity.</p> <p>3. Finally, how will the site/car park be secured at night to stop fly-tipping, xxxxx, drug-dealing and other undesirable activity?</p>
<p>Bede Cottage Frithsden Lane Frithsden Hemel Hempstead Hertfordshire HP1 3DD</p>	<p>Part 1</p> <p>24/01239/MFA</p> <p> </p> <p>Change of use from agricultural land to Suitable Alternative Natural Green Space (SANG), together with a vehicular access, car park, paths, fencing and landscaping</p> <p> </p> <p>Land Nettleden Road Potten End Berkhamsted Hertfordshire</p> <p>We would like to register our objection to this planning application for a SANG in the strongest possible terms.</p> <p>This proposal will significantly change this piece of land in terms of its visual impact within a highly sensitive area, and damage its already existing biodiversity. We do not believe it will serve the originally stated purpose of providing a publicly accessible green space for the residents of new housing developments around Hemel Hempstead to use as it is nowhere near them. We do not believe it will divert people from visiting the Ashridge Estate and the Chilterns Beechwoods Special Area of Conservation which this policy was designed to protect. We believe that on the contrary it will actually attract more people to visit them and the area of AONB / Chiltern National Landscape and the historic villages which are immediately adjacent and surrounding them. This wider area too is suffering from too many visitors, increased traffic and many associated problems in recent years.</p> <p>Visual impact of the site & harm to the beauty of AONB / National Landscape & setting of heritage assets: Firstly this is not just any old piece of farmland of no intrinsic value. The views both up and down the valley along the "Ladies Mile" area of Nettleden Road are of unspoilt open countryside on both sides. As you pass through all you see is open farmland with minimal encroachment of modern buildings or features. You see the occasional walker and can often spot hares in the fields and birds soaring. The view of the large open fields with no hedges or fences sweeping to both sides is a much appreciated, indeed iconic local view.</p> <p>In the broadest terms this view makes a significant contribution to the beauty of this part of the AONB / Chiltern National Landscape - with extensive vistas from many of the local footpaths including the Roman Road above Frithsden, paths from Great Gaddesden as well as from the eastern side of Potten End depending on the time of year.</p> <p>We believe that the changes proposed will cause significant harm to these views and in specific planning terms will damage the setting of important heritage assets.</p>

The Heritage Statement acknowledges that there are a significant number of heritage assets which will be affected by this proposal

"The Site forms part of the setting of a number of heritage assets including the Grade II* Listed Moor Cottage, Water End Conservation Area, the Grade II* listed Gaddesden Place house, the non-designated Gaddesden Place park, the Grade II* Ashridge Estate registered park and garden, Frithsden Conservation Area, Nettleden Conservation Area and Bingham's Park Grade II listed building."

There cannot be any justification for even considering the siting of a SANG in such a sensitive place. There must be any number of other possible sites where there is no risk of harm to heritage assets

Quoting from the Transport Statement submitted with this application

"Paragraph 205 of the NPPF states that great weight should be given to the conservation of heritage assets when considering the impact of a proposed development and Core Strategy Policy CS27 requires development to protect, conserve and where appropriate enhance the integrity, setting and distinctiveness of heritage assets."

The views down the valley form an important part of the setting of the Grade II* listed Ashridge Park and Gardens which runs to the north side of Nettleden Road adjacent to the northern end of the proposed site. This area should have strong planning protection and any detrimental effect on it which we believe these plans would have should have significant weight in terms of whether this application should be granted. These views likewise form part of the setting of the Nettleden Conservation Area and its approaches. Nettleden is nestled in a setting of unspoilt open fields in all directions with extensive views as you leave Nettleden heading towards the junction with the Ladies Mile. There is currently little encroachment on these views existing footpaths being discrete and largely hidden.

The Transport Statement itself admits "there may be some level of harm to the setting of Water End Conservation Area and nearby listed buildings." The car park falls within the setting of this area and will have a detrimental impact even despite measures to shield it from view.

The view down the valley of unspoilt landscape to Gaddesden Place House and its park again forms part of the charm and interest of this vista as you go away from Nettleden. Likewise it is important that the currently unspoilt pastoral landscape view stretching into the distance from Grade II* listed Gaddesden Place house is not ruined either.

In accordance with paragraphs 207 and 208 of the NPPF, "where a development proposal will lead to harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal."

We believe that the harm to these assets will be significant and will not be outweighed by any public benefit as we will demonstrate later.

The applicants are trying to suggest that their proposals simply involve swapping one type of open green space for another and that therefore there will be no significant impact on the character of the AONB or the setting of these heritage assets. This is disingenuous in the extreme.

The openness of the view will be changed by the introduction of two new hedges and the man-made feature of a long fence along the southern side of the valley. This divides the land into four sections. This will significantly change the appearance of this side of the valley in contrast to the other side of the Ladies Mile and destroy the current sweeping vista. We do not accept that the argument that this reflects the 19th century field structure is sufficient to justify changing the beautiful view as it is now. Likewise the ecological argument that the new hedges will be a valuable habitat is not sufficient to outweigh the harm done. In this area we already have an abundance of ancient hedgerows with their extensive biodiversity. We understand that there is an Article 4 direction removing permitted development rights for fencing on this land because Dacorum Borough Council were keen to retain the openness of the landscape without any man made features amid concern at the time about 20 years ago that the land might become subdivided.

We understand that a requirement of a SANG is that dogs must be allowed off their leads to roam freely. There is clearly potential here for a lot of problems if this site is used by a large number of dog walkers as we believe it will be. It is likely that a significant amount of dog-proof fencing will ultimately be required not all of which is detailed in the current supporting documents.

We feel that the land will take on the look of parkland rather than open agricultural land. In addition to the fencing, the proposed extensive network of mown pathways will be visible as you look down the valley and this is likely to be more noticeable in winter as the paths become churned up and boggy. All the footpaths in this area become very muddy in winter and people then walk on the edges to avoid the mud effectively widening the paths. (This has been a big problem on the Ashridge estate). (It is also extremely unlikely, from the evidence of other similar paths nearby, that the site will in fact "provide access all year round without areas becoming waterlogged or inaccessible due to wet or muddy terrain" as the DAS maintains. This problem is also likely to be exacerbated if the tracks on the site become extensively used by cyclists, as many tracks through Ashridge are, because this erodes and compacts the ground into muddy ruts. The woods near Frithsden are currently being plagued by youths on BMX bikes who keep digging ramps and constructing what is effectively a BMX racetrack there. The sloping nature of this site will likely be very attractive to them and it is hard to see how this type of antisocial behaviour can be avoided. (Incidentally the steep nature of much of the site makes it less suitable as a walking amenity area for a diverse range of visitors including the elderly or those less physically able).

The park like appearance will be emphasised by the proposed bench viewing points and extensive signage.

The main difference from the landscape as it currently is, will be that people will be able to wander all over the site and put it to whatever use they choose for picnics, ball games, family gatherings, general recreational activities so that at busy times it will have many people on it and so will resemble a busy urban park rather than natural countryside with the occasional walker passing through. The DAS itself admits this on p38, stating

"A large amenity park in the southern part of the Site will help form a new community focus. This area will provide residents a place to relax, exercise and have social interaction with neighbours, friends and family." (NB please see comments further down for what actually constitutes a "local resident").

It is likely that it will get very busy at some times. Based on our experience as residents of the area we feel it is likely that the numbers of visitors on busy days, once the site becomes well known, could considerably exceed those quoted in the transport statement thus also leading to issues with the available parking and leading to overspill on to the verges of the local roads. Our experience has been of a steady increase in visitor numbers. Any new attraction, such as the opening of a cafe at Ashridge House, leads to a sustained increase in visitors, particularly in cars.

P38 of the DAS in fact goes on to say that "Quality landscaping will create an attractive destination for the wider community, as well as the new residents." acknowledging that it will become a destination in its own right attracting people from further afield than the catchment area it intends and effectively attracting more people into the area who may not otherwise have come.

Overall, for all of the above reasons, we do not agree that the proposals provide "enhancements to landscape and visual amenity" of the site as the Green Belt Technical Note states.

There are a number of other important reasons to object to this proposal.

Ecological impact

There will be an adverse ecological impact as a large number of ground nesting birds will be disturbed on the site as well as the brown hares and other wildlife and plants already known to be established in the area particularly in Hedzin's Wood and especially if dogs are allowed to roam free. There seems to be little point in destroying one area of land which has significant established ecological value in favour of the hypothetical future ecological benefit of a couple of hedges and some wildflower meadow. This benefit may well not arise in fact depending on how well the site is managed in reality and the extent of the depredations to any measures taken to encourage wildlife and plants that would occur with extensive use of the site by large numbers of walkers, uncontrolled dogs, runners and cyclists and that is before increased littering and any anti social activity is taken into account. We do not agree with the DAS statement that there will

be a "substantial net gain for biodiversity". Moreover the risk to the globally ecologically important Gade chalk stream and the delicate ecology of the surrounding water meadows only 100 metres from the southern end of this site does not seem to have been considered at all. This site already suffers from too many visitors as others have explained and it is likely that many people may decide to walk the paths alongside the chalk stream rather than go uphill towards Potten End potentially with free-roaming dogs.

Over-use of the site and higher visitor numbers than expected:

We have many concerns, in addition to those already mentioned, that the site may be over-used leading to excessive numbers of vehicles arriving. Since a big part of the aim of these spaces is to allow dogs to run free it is likely that it will attract large numbers of private and professional dog walkers. We are already seeing less than professional-looking dog walkers turning up down our lane from as far away as Watford. It is easy to see how this use might be incompatible with people wanting to use the space for other activities such as a quiet, safe walk with small children. In the same way it might attract large groups of runners or cyclists. The roads in this area are already over-run with large running and cycling groups using them for training.

The site may well become used as a general car park for people taking longer hikes in the Chilterns as it becomes known. There are, for example, always many mini buses belonging to hiking/ school/ D of E groups parked in the area. The site links via existing public footpaths back unto the Ashridge Estate and the SAC and wider AONB area. The supporting documentation points to these links as an advantage of the site and implies an intention to encourage the use of / publicise these links. The Transport Statement does not appear to have taken account of this when talking about the number of user journeys in & out & parking spaces required. If the car park becomes full there will be overspill onto surrounding verges and potentially pressure in the future to expand the size of the car park. What guarantees will there be that this cannot happen? Also will the car park be free or paying? The DAS quotes The Footprint Ecology report (2022), stating that SANG "should provide parking that is free or significantly cheaper than parking at the European sites" but the DAS does not go on to clarify what the policy will be.

Overall the car parking policy seems to be ill-thought out & flawed in the extreme. The Footprint Ecology report goes on to say "A guide to parking provision should be in the region of 1.5 spaces per ha of SANG." We understand that, quite rightly, given its intrusive nature in the landscape & neighbour concerns about antisocial behaviour, the size of the planned car park has been reduced. The justification for this stated in the DAS is that the existing community in the area (in Potten End) will walk to the site, implying that these residents will make up a significant part of the visitors. As we explain in a later section we do not believe that Potten End residents need this site or will use it in large numbers. Indeed, one minute the DAS is talking about the users being the new residents of new developments in a 5km radius, the next, current residents of Hemel & in the next breath residents of Potten End (in different parts of the DAS and depending on what they are trying to justify). There is no clear logic to any of this.

If the car park is too big it will severely harm the landscape, if it is too small to cope with likely an underestimate of car visitors (or too expensive) this will cause overspill parking issues in the area. This is irreconcilable and is a major reason why the application should be rejected.

Potential other unforeseen uses of the site

Given the publicly accessible nature of the SANG, will there be any management control over what other activities can take place there? Is there a risk of organised events being held on the site as many are in Gadebridge Park such as fun runs or other events. This would lead to much noise and disturbance to residents as well as big parking and traffic issues. If the SANG is to be managed under option 3 of a private management company which we understand is the plan, what is the risk / possibility of the site being hired out for financial gain for such events.

Management of the site day to day and what happens after the 80 years

In general if the site is managed by a third party company for the next 80 years what guarantees are there that the site will be properly managed in terms of litter, ecological management and general site maintenance and that this will be adequately funded. How would the local authority ensure that it is managed for the benefit of the local community and not ultimately for commercial gain or in the long term interest of the developers. What happens to the site in year 81? There is clearly a risk that the site could become so degraded by over-use that it then becomes classed as "grey belt" or land of "no particular value" in the new terminology and under threat of development. The car park would clearly be a "brownfield" site at this point. Clearly the owners, presumably Taylor Wimpey and Barratt David Wilson Homes at the point it reverts after 80 years, would have a strong interest in seeking development on the site. Given this, the argument that designating the land as a SANG for 80 years protects it is also irrelevant (especially as the area being in the AONB and green belt should give it a very high level of protection in any case).

Antisocial behaviour

There is a significant and very concerning risk of antisocial behaviour on the site. It could easily attract trail and motor bikers at night as well as car racing. It is not clear how the site could be effectively secured to prevent this happening or whether local police have the resources to deal with this. These activities are already a problem in this area. Even in Frithsden we can hear motorbikes being raced late at night probably along the Leighton Buzzard Road. Noise travels long distances in these valleys and it is likely that any activity of the like would disturb residents over a wide area of Frithsden, Nettleden, Potten End, Water End and the Gaddesdens. Other people engaged in illicit activities may be attracted there due to the remote nature of the site and its proximity to the main road. People hanging around on the site at night may lead to a general reduction in security and risk to local properties. There is also the possibility of local teenagers gathering and fires being lit which already happens on the Ashridge Estate as well as fly tipping particularly if the car park and site are not

properly maintained and are a mess with overflowing litter bins. There could be issues with people trying to camp overnight. Other anti social behaviour such as people holding parties & gatherings & playing music will be difficult to control if the land is public access. Neighbouring properties may well experience noise disturbance and general racket from lots of people especially near the car park. This will all potentially disturb the rural peace and tranquility of the AONB and Conservation Areas. Other comments have eloquently described the problems at similar sites. The Transport Statement admits

"There is the potential for an increase in noise and disturbance as a result of anti-social behaviour due to the provision of a car park and increase in public access. This could be dealt with by the installation of a height-restriction barrier at the entrance to the car park. Another recommendation is to close the car park between the hours of sunset and sunrise."

It is not clear at all that these problems of would be "dealt with" as the Transport Statement dismissively says by installing a height barrier or closing the car park at night. This would require diligent daily management of the site for 80 years which cannot be guaranteed and indeed any barriers would be circumvented by troublemakers on bikes or on foot.

to continue - part 2

Part 2

Inaccessibility by public transport or on foot from the areas it is meant to serve. This site is not realistically reachable by public transport or on foot. There is a very infrequent bus service along the Leighton Buzzard Road only. There are poor or no footways along the road to the main entrance to the site making this a dangerous route. The DAS implies that the fact that the SANG is crossed by or adjacent to various public footpaths means that people will walk to the site and access it via these footpaths from Hemel Hempstead and the new developments. DAS p 20 These rights of way provide connections to the wider area, including southwards to the centre of Hemel Hempstead and its existing services and facilities which are concentrated along High Street, around 3km from the proposed Site access. This is not really credible. It is very unlikely that many people are going to walk 3km from Hemel Hempstead High Street via a complicated route of public footpaths to go for a walk on this site or to let their dogs off the lead as the DAS implies. Cyclists are unlikely to cycle to the site to go for a walk. It is improbable that cycling will be a principal means of accessing the site therefore. The fact that the car park plans as per the DAS p44 only includes four cycle parking spaces implies that they know this perfectly well. The DAS statement on p40 that the proposals promote active modes of transport is clearly rubbish therefore. We believe that the distances from Hemel Hempstead may in fact have been understated anyway. Almost all visitors will come by car / van. Siting the SANG here clearly, therefore, goes against Hertfordshire's own Local Transport Plan for 2018 where the stated objective is to reduce the need to travel and dependence on the car. As previously stated the site is clearly intended to attract dog walkers - these would clearly not come by bike (unless with their dogs in a doggy sidecar presumably) Indeed the very existence (and

publicising) of this site amongst the dog-walking community may encourage them to come from much further away than they otherwise would have, probably much further away than the 5km catchment described by the DAS

Traffic

Significant concerns have been raised by others in relation to traffic issues with which we agree. There is already major traffic congestion along the Leighton Buzzard Road at different times of the day, sometimes stretching back almost to roundabout at the entrance to Hemel. The fact that most visitors to the site will arrive by vehicle will add to these problems and this is clearly foolish. The turning out of both Potten End Hill and Nettleden Road are notoriously difficult and there have been many accidents and near misses well known to locals even though these are not always recorded in official counts. The Transport Statement states

A new access would be created off Potten End Hill. In terms of highway safety, you have indicated that informally the Highway Authority has not raised any significant concerns at pre-application stage. There is however the potential that the increase in vehicle movements associated with the SANG could have an impact on the junction between Potten End Hill and Leighton Buzzard Road. We would recommend that an analysis of the potential impacts on this junction is carried out

It is well known that unless accidents are formally recorded by the police the Highways Authority does not or cannot take them into account when deciding if there is likely to be an issue in an area. It is vital, however, that the very real & well informed concerns of the many local residents who have commented on this are not ignored as part of this analysis.

Lack of justification for choosing this site, failure to meet objective to divert visitors from the SAC. Given the harm that will clearly accrue to this special site from the proposal as well as the numerous other grounds for objection to it, there must a close scrutiny of the justification for this plan. It is not enough that Taylor Wimpy and Barratt David Wilson Homes have managed to acquire this site. There must be a clear and genuine overriding public interest in this site being used for this purpose, clarity that this SANG will achieve the objective of keeping people away from the Ashridge Estate and the SAC and that the objectives could not be achieved by utilising another less sensitive site. It should not be pushed through for convenience to enable a planned development to go ahead nor to facilitate the maximum number of houses being crammed onto a development site. We do not believe these criteria will be fulfilled and it should not simply be taken as a fait accompli that this plan should go ahead. We understand that the raison d'etre of these SANGS was to prevent any new housing developments in Dacorum from adding to the already severe damage which excessive visitor numbers have caused to the Chilterns Beechwoods Special Area of Conservation Chilterns SAC which forms part of the Ashridge Estate. (We have seen this with our own eyes in the woodland immediately adjacent to our house which has suffered significant depredations in recent years). As a result any new development must provide more publicly accessible green space. As we understood this, when first mooted, the idea was that this green space would be incorporated into the developments themselves or be immediately adjacent. (Another comment has pointed out that this is

in fact what happened with other developments in Hemel in earlier years). This obviously makes perfect sense to anyone that this would enable the new residents to walk their dogs easily, go for a walk without getting in their cars or engage in other outdoors leisure pursuits close to their homes. Incorporating the green space into the developments would also make for a much more pleasant environment to live in and would clearly be more sustainable and ecologically beneficial if wildlife friendly areas were included. We understand that this SANG is being funded by developers who want to build 1100 houses to the west of Hemel at the bottom of Pouchen End Lane. This link was made explicit in early conversations but is now apparently missing from the planning application. It is clearly ridiculous that a SANG which is at a considerable distance from this development and reached by no obvious or easy route is not in anyway going to attract residents of this development to use it. It is clearly not walkable and as has been said people are unlikely to cycle a long distance to go for a walk. To get there by car, residents would have to drive up Pouchen End Lane (a narrow & difficult road) and go through Potten End to reach it thus increasing traffic & causing issues in Potten End. They may very well once in Potten End head off in any case towards Ashridge House and the many other parking or walking spots they would pass en route as this would just as easy and probably a more attractive end destination. They could go round via the north western end of Hemel & in along the Leighton Buzzard Road - another long and circuitous route with its own problems already described. If they headed down to the London Road to Berkhamsted these residents would again pass many other walking spots and access points to the SAC area before they got there. It therefore really beggars belief that anyone can seriously imagine that this would divert people coming from this development from coming to the Ashridge Estate and if this is the case the justification for this SANG completely fails.

Clearly the solution to this problem is for the density of houses on this site to be reduced to somewhere around 900 as was originally proposed and the remainder of the site to be turned into a SANG.

As others have termed it, developer greed to maximise their profits by cramming houses in cannot be a reason to cause irreparable damage to an irreplaceable part of the AONB. Indeed while we appreciate that more houses need to be built, these should be built in a reasonable and sustainable way which respects the surrounding environment. Of course there also remains the major question of why, given the threat to the Ashridge Estate, the SAC and indeed the rest of the AONB locally, the major house building planned for this area is to the north and west of Hemel which brings it extremely close to the boundaries of the AONB.

Probably having realised between the initial consultations and the actual application that the argument justifying this SANG as being for use by the residents of the Pouchen End development to divert them from Ashridge demonstrably fails, the supporting documentation now also tries to widen the scope of the supposed benefits and justification for it in a deeply alarming and highly spurious way. The DAS now talks about a non specific linear catchment radius of 5km which includes nearly all of Berkhamsted, the western side of Hemel Hempstead, as well as smaller villages and settlements in the vicinity and claims that this will divert residents from Ashridge. We have

already demonstrated that it is unlikely to be used by residents of the Pouchen End Chaulden area of Hemel. It is extremely unlikely to be used by residents of Berkhamsted as they would either go out of Berkhamsted to the north heading to the Monument area or if heading up past the castle would go to the Ashridge House area, or any of the well-known walking areas in between (or even the Berkhamsted SANG).

The DAS states that The location of the Site is well related to Hemel Hempstead. As such, the Site is in a location that would intercept visitors travelling north to visit the nearby SAC, Ashridge Commons and Woods.

It is true that the site is on the way for visitors heading from north Hemel Hempstead to Ashridge. However we do not agree that it would effectively prevent these visitors from heading onwards to Ashridge. Existing residents of Hemel who visit the area are likely to know it well and will have their preferred spots in the Ashridge area already. They are also unlikely to be diverted from the ancient Ashridge woodlands to a less attractive, less genuinely natural landscape. Promoting the site to the new residents of the hypothetical developments may well have the unintended consequence of making them more aware of the Ashridge Estate and actually attracting more people there. Once as far as the SANG it is likely that people may be attracted to explore further into the area towards Ashridge House, the woodlands and the facilities of the National Trust visitor centres current and proposed. The extensive network of public footpaths linked to the SANG, which the DAS makes such a virtue of, may simply encourage people to walk on into Ashridge Forest increasing the footfall on paths through Nettleden, Frithsden and the Gaddesdens and the footfall in the closest areas of woodland such as Frithsden Beeches which are already much damaged. Hikers may simply use the car park as a base to hike from overloading its predicted capacity as previously stated.

The lack of facilities on site will, as many commentators have said, encourage people to venture further in search of toilets and refreshments increasing visitor numbers in the wider area. This is not a good thing. Villages such as Frithsden are already at capacity with visitors and cars parking everywhere. The DAS itself points out that there is not a safe footpath up Potten End Hill if people head up to Potten End village. Nor do the residents of Water End want lots of people heading along the Water Meadows to the Garden Centre. (Perversely, however, were visitor facilities to be provided at the site it would likely become a major magnet for visitors with significant issues such as those currently experienced at the Monument. The statements in the DAS are also controversial for number of other reasons

The DAS keeps referring to the SANG at Hemel Hempstead. It is absolutely disgraceful & misleading to say the site is situated at the northern edge of Hemel Hempstead as the DAS does. It is separated by a wide area of open, unspoilt countryside from the edge of HH 1.3km according to the DAS. It is a completely different & distinct area with its own character and special features. The area around the SANG is made up of a few small rural villages and hamlets. Potten End, Water End, Nettleden, Frithsden & the Gaddesdens. Nobody in this area considers themselves to live in the conurbation of Hemel Hempstead.

It is extremely alarming that the DAS talks about this site as if it is already part of Hemel Hempstead or will soon be swallowed up into it. (The planning policy for many years was that this separation between small market towns in this area should be strictly maintained and towns such as Berkhamsted and Bovingdon should not be subsumed into Hemel Hempstead. It is essential for the protection of the AONB and the character of these charming towns that this is not permitted).

When discussing the SANG and the need for it or otherwise it should be remembered the true local community in this area are the residents of these villages of Potten End, Water End, Nettleden, Frithsden & the Gaddesdens. The Transport Statement admits that these are the only areas from which the SANG can be reached by a reasonable 5-20 minute walk.

The DAS states on page 7.

The SANG will provide attractive natural green space and walking opportunities..... offering an alternative destination for informal recreation in the countryside for new residents and the local community.

The residents of these villages have no need of the SANG. They are already well versed in the local area and its footpaths. They have no need of further green space and are unlikely to use the SANG. The extensive network of public footpaths is already available to locals and the visiting walkers and hikers who seek out and appreciate the beauty of the Chilterns Landscape rather than merely those seeking a bit of open land to run their dogs. It is not acceptable to foist this development on the actual genuine local community therefore.

The DAS has now become, it seems, deliberately vague about the originally stated link to the Pouchen End development. It states that the SANG aims

to provide an alternative destination for informal recreation both for new residents of proposed residential developments in the local area, but also for the existing community in Hemel Hempstead. The proposed SANG will unlock potential development opportunities within a 5km distance of the Site DAS p 1

Page 33 of the DAS further states:

At present, the capacity of the Potten End Hill SANG is not designed to suit any particular development, but it is intended to be used as general capacity for future development within the local area, to be allocated accordingly by the proposed applicant. This capacity will be retained for use in mitigating future developments within the 5km SANG catchment

It is clear reading the DAS statement closely that the real intention behind this site is not a properly quantified, thoroughly researched plan to meet a clearly identified public need to provide an area of public greenspace for the Pouchen End development. This justification in any case fails as discussed) It is in fact a purely speculative attempt to secure a SANG to facilitate other non-specified proposed residential developments in the

local area or to unlock other potential development opportunities. With such vague aims, it cannot be said that an overriding public interest need has been demonstrated which would outweigh all the great

	<p>damage using this site would do. Indeed the proposed or potential future developments within 5km mentioned presumably form part of the proposed local plan which is highly contentious and is still at the consultation stage. The SANG is therefore premised on the basis of a purely speculative uncertain future need.</p> <p>It is clear also that the entire SANG policy as it seems to be operating in Dacorum needs to be reviewed. There seems to be a very worrying policy of developers grabbing any bit of land around the SAC that becomes available and and trying to say it is suitable for a SANG. The worst thing about this is that the pieces of land currently identified are all right on the edges of the Ashridge Estate and the SAC which they are trying to protect. This will simply as we have explained attract more people to the area who will then move on into it. The only way to protect this special area is to ensure that the greenspace is incorporated into the developments so that it is genuine resource for the everyday recreation needs of the residents without their needing to get in their cars. People will then still want to visit the SAC area sometimes but this is really a separate problem from their everyday recreation needs. If they have somewhere nearby to use regularly they will perhaps choose to make a trip to a destination within the SAC less often. Of course the only real way to prevent any further pressure on the SAC is to avoid large scale house building in the adjacent area. We say this not as Nimbys but because once this special area is destroyed it is gone forever and it is essential that it is protected for future generations.</p> <p>Overall we feel that this proposal for a SANG at Potten End Hill will cause substantial detriment to the views in this part of the AONB/ National Landscape, that it will cause substantial harm to the setting of the many heritage assets around it, that it will not in all likelihood lead to an increase in biodiversity. It will add to traffic issues and a general increase in car journeys and car use. Rather than keeping people away from Ashridge and the SAC it may actually encourage more visitors to come. It may well lead to antisocial behaviour which will cause serious issues for both immediate neighbours and those further away, preventing their quiet enjoyment of their properties. It is clear that the initially stated objective of diverting residents of the Pouchen End development from Ashridge will not be achieved; the idea of approving this development to facilitate unspecified hypothetical housing developments in other parts of Hemel and Dacorum in the future is outrageous. For all of these reasons this proposal must be rejected.</p> <p>P.S. We have just been alerted to the development consultation by Taylor Wimpey for the large tract of land at Chesham Road in south Berkhamsted. Just to be absolutely clear, the SANG which is the subject of this application will not serve to divert anyone living at this new development from the SAC either and cannot be claimed as suitable mitigation for this. To reach it residents will have to negotiate the already congested roads through Berkhamsted via Hilltop Road and Gravel Path or via Kings Road and New Road passing numerous other better walking areas and entry points to Ashridge on the way.</p>
2 Bradden Meadow	My husband and I strongly object to this proposed SANG and fully

<p>Gaddesden Row Hemel Hempstead Hertfordshire HP2 6BN</p>	<p>endorse the numerous eloquent & informative comments made by other objectors. It is a travesty that this application is even being considered by Dacorum Borough Council. Besides the glaring ecological reasons why this development should not go ahead, the extremely dangerous situation with traffic congestion, should not be ignored. Through no fault of my own, I was involved in a traffic accident in this area. It makes no sense that a recreational space (SANG) would be created for a housing development over a mile away, requiring residents' to travel by car to utilize it. There is ZERO safe pedestrian access. It should be COMPULSORY for builders & developers like Taylor Wimpey to create recreational spaces WITHIN their developments, where children & families could meet & socialize. However, developers are allowed to squash the maximum allowed number of houses onto their land for maximum financial gain. Pure greed! The idea of creating a SANG in this Area of Outstanding Natural Beauty is so ludicrous that one has to wonder what the long term plan might be. Undoubtedly it's the first step in destroying our precious green belt and covering the countryside with wall to wall houses. Once the green belt is gone, it's GONE. Do not allow this to happen!!</p>
<p>Gadd row Gaddesden Row Great Gaddesden Hemel Hempstead Hertfordshire HP2 6HJ</p>	<p>This potential plan is totally unnecessary encouraging walkers to take the easier option through the fragile ecology of the water meadows and precious chalk stream. Most people will ignore the steep pathway to Potten end. The water meadows are important breeding grounds for the ground breeding birds nesting including corn bunting and yellow hammer, which will be impacted by the extra people and their dogs if this is allowed. It can not be allowed, traffic already too heavy on Leighton buzzard road and Water end bridge , never mind the impact on the beautiful historic dry valley! A car park opens up other uses in the future ie buildings etc etc.</p>
<p>1 Gade Valley Cottages Dagnall Road Great Gaddesden Hemel Hempstead Hertfordshire HP1 3BW</p>	<p>My wife and I strongly object to the proposed positioning of the Potten End Hill /Nettleden Road SANG for the following reasons: RELEVANCE OF THE PROPOSED AREA: 1. It is inconceivable that people visiting Ashridge would divert to a relatively smaller area just because it is designated as a SANG. We have lived in Gade Valley Cottages along the Leighton Buzzard Road (Dagnall Road) for 24 years and consider ourselves fortunate to live in such a beautiful area. (The busy road was the compromise) The whole area attracts visitors now but not as an alternative to the vastness of Ashridge with its winding pathways through wooded areas & open spaces; history & educational activities; cafes & golf course; pond-life & deer - an area large enough to cater for all abilities, disabilities & age groups - as opposed to the proposed steep dry valley peppered with hedgerows. 2. Likewise, those living on the new development are unlikely to drive the distance to the Potten End SANG in preference to a recreational</p>

area that could easily be incorporated into the new development build to better suit the diverse needs of the new community. Or in preference to the vastness of Gadebridge that already caters for all ages and abilities.

3. We do not think the proposed Potten End Hill /Nettleden Road site is a suitably relevant area as a SANG

EFFECT ON THE EXISTING AREA:

Assuming there is a successful concerted effort to draw people away from Ashridge and their own new development area, we would compare it to the many hundreds of people who drove to and walked through this area during lockdown as an example of what happens when a relatively small area experiences extra footfall:

1. There was a constant stream of people walking in both directions across the river, passing the parish hall & up to the woods. Sometimes there were more than 10 groups at any one time, as far as you could see in both directions, each trying to socially distance as they passed each other- now we have a manageable average of approximately 10 groups a day.

2. We had to put a sign on our gate asking people not to scrape their boots on there & tried putting a bucket of water out for them to use (they scraped on the hall gate instead!) - we moved the no parking sign to the driveway itself so they didn't park and block us in behind the houses, put a no dog fouling sign with an 'emergency' poo bag under a stone by it (those that used it, left it by the sign! - many others just let their dogs foul everywhere) & we downloaded a notice from the council website about keeping their dogs away from cows, etc.

3. Different times obviously and we certainly didn't object to people using the area for the benefit of their own mental health, but wish they had respected the area too.

Q. What long term provisions are going to be included in this proposal that prevents a recurrence of the relatively short term damage and disruption experienced during the lockdown influx?

KEEPING PEOPLE & DOGS TO THE DESIGNATED AREA:

1. It seems pretty obvious that people parking at the Potten End Hill SANG will automatically choose the prettier, flatter walk along the stream, especially with the draw of the garden centre cafe en route.

2. A nice tempting circular walk would be along the stream, (possibly a stop at the garden centre, the swings, or for a paddle for people or dogs in the chalk stream), across the fields, crossing the Dagnall Road (name-changed now from the Leighton Buzzard Road at Gade Valley Cottages) and up into the woods, down again to crossing back at either the Hemel Garden Centre crossroads or further along by the houses just before the s-bend bridge - a footpath that just comes straight out onto the winding road without a footpath or verge for protection! There's also no footpath beyond Gade Valley Cottages to encourage walkers to head in the direction of Dagnall.

Q. What long term provisions are going to be included in this proposal to ensure the existing eco-habitat is protected, people criss-crossing a busy road are safe and residents are not adversely affected?

MAINTAINING THE AREA:

Council finances naturally concentrate on where the population is highest.

1. The only regular assistance the neighbourhood receives is the hedgerow opposite the cottages that is cut by a tractor once a year, a very occasional visit from a road sweeper and our bins are collected weekly.

2. Being on the outskirts, currently as neighbours we manage to litter-pick generally and keep the grass verges & into the footpaths mowed and the hedgerows trimmed. The Parish Hall includes the adjoining verges in its gardening programme.

3. Litter consists mainly of plastic bottles & drinks cans, bits of cars, sweet wrappers, tissues and waste from takeaways (mainly McDonalds)

4. On one occasion we had a lady park in the residents parking area behind the cottages to allow 9 dogs to roam free. Another let her dog off the lead in the driveway & it immediately relieved itself over my toolbox. On both occasions neither apologised and acted as if their dogs' needs took precedence.

5. We asked the Dacorum dog warden for help as we poo-pick the 100 yards up the driveway & into the field behind. We were grateful for the 'no dog fouling' signs sent but apparently don't qualify for a dog waste bin. This is another issue that would definitely need to change with an increased footfall. Possibly to the extent of having dog wardens to ensure people have poo bags and their dogs are being properly controlled.

6. There was a planning application for a doggie daycare centre that was declined as not suitable for the area; what has changed?

7. Children walk to school through the fields and it's not at all pleasant now, that's without actively encouraging more use.

8. We have lorries and cars that stop in the 'unregistered' lay-by opposite Gade Valley Cottages to relieve themselves either by the side of their vehicle or by popping through the gate into the field.

Q. What long term provisions are going to be included in this proposal to ensure increased litter and/or fly-tipping is controlled?

Q. What long term provisions are going to be included in this proposal to ensure dogs are being properly controlled by less considerate owners, and dog faeces are not affecting the health of children or walkers?

Q. What long term provisions are going to be included in this proposal for toileting facilities for people?

HIGH TRAFFIC AREA:

1. The amount of traffic that uses the Leighton Buzzard/Dagnall Road is now an all-day problem, both weekdays & weekends and to actively encourage people into their cars for recreation would only increase traffic on an already overused road network.

2. Downgrading to a B-road has helped to keep most lorries off the road but there are still plenty of trucks that think it doesn't apply to them.

3. From about 6am to 9-ish, and again 3.30pm-7-ish, is a major daily problem as there's a constant flow of cars & it's very difficult to exit the driveway in a car and crossing the road with the children for school on

weekdays and recreation at weekends is a nightmare. The same applies if there's an accident or hold-up on any of the motorway or major routes.

4. The speed indicator sign is largely ignored during quieter times and at night

5. Youths taking part in organised walking activities are always met by the organisers to cross the road as it is considered a danger spot.

6. A neighbour put a mirror up on the speed indicator sign to aid drivers and walkers exiting the hall driveway/footpath, but this would need replacing with a permanent fixture if traffic increased as it was only purchased from the internet and tends to blow out of alignment in the wind or as lorries pass.

7. We have white rocks on the verge opposite the cottages to prevent cars undertaking into the pathway of people trying to exit the field to cross the road. We've all experienced times when we're indicating right to turn into the hall driveway and someone has tried to under, and one even over took on the right.

8. Motorcyclists love the bends in the road and the constant noise from the hundreds that pass on a nice sunny day is disturbing when trying to enjoy a day in the garden. They usually ride in groups of 10 or 20 so just as one group has whizzed by, so the next take over - and then they all come back again!

9. Increased traffic would also need to compete with overtaking motorbikes, and possibly lead to more accidents. That's without pedestrians trying to cross or even walk along the road.

10. Pedal cyclists tend to avoid the road, or cycle early in the morning or late evening. We don't use our bikes at all from home.

11. There's always accidents at the junction of Potten End Hill where cars cross the Leighton Buzzard /Dagnall Road without realising that there's a T-junction at the bottom of the steep hill.

12. Not all accidents involve the police so therefore many go unrecorded.

13. We've had a car pull straight out into our path from Nettleden Road and ran us off the road towards the river bank.

14. Cars driving in the direction of Dagnall, fail to negotiate the bend at the garden centre cross roads and end up on the grass verge outside the garden centre (one recently was upside down & another previously took down the telegraph pole), or into the tree by the bus stop if going in the other direction.

15. The public footpath from Gade Valley Cottages to the garden centre is too close to the road for safety and too narrow & close further on towards the s-bend bridge, where it then doesn't exist at all.

16. A mobility scooter was needed prior to having surgery recently, and the only route that could be negotiated was up as far as the garden centre, round the houses in the village and back again. Although even then the pathway opposite the parish hall was a bit hairy.

17. With no footpath along Potten End Hill, Nettleden Road and on the Leighton Buzzard Road from the bridge to between both roads, it would be extremely dangerous if people decided to walk to the SANG.

18. That's without negotiating the tailbacks that the single-track s-bend bridge experiences. Quite often at its busiest times, tail-backing as far as Hilliers Garden centre and occasionally to Gadebridge, and

	<p>the Hemel Garden centre in the other direction and occasionally as far as Gade Valley Cottages, the resulting cars trying to find an alternative route through, which we guess would impact a car park repositioned to the top of the SANG?</p> <p>19. That said, although not ideal, a car park at the top of the SANG would offer a slightly safer alternative to that at the bottom of the hill where exiting motorists would have poorer visibility and faster downhill traffic to contend with.</p> <p>20. The damaged walls alongside the bridge and houses are testament to the number of vehicles that mount the kerbs and hit them.</p> <p>21. The road is littered with wing mirrors and wheel trims from cars and trucks failing to pass each other safely. Our own wing mirror was hit and broken by a van straddling our side of the road where the footpath exits on the winding road just before the bridge (2 - Keeping people & dogs to the designated area)</p> <p>22. Most of the lockdown traffic came from the direction of Hemel so all the above will only be exacerbated by the new development.</p> <p>23. The road would need a serious traffic / pedestrian / cycle survey to determine whether it's safe to have another car park along its length. There are already 4 car parks exiting from the Red Lion pub, the parish hall and both garden centres; two garage & a carpet business, as well as footpaths criss-crossing the busy road, and of course road junctions and private driveways.</p> <p>Q. What long term provisions are going to be included in this proposal to ensure ALL road users are safe and the carbon footprint isn't increased by actively encouraging people to drive to a recreation area?</p> <p>All in all, it seems the location chosen to reduce visitor numbers to Ashridge and provide suitable recreation space for the new housing development has too many things that just don't make logical sense:</p> <ul style="list-style-type: none"> - In relation to Ashridge, ruining one special environmental area for another - And in relation to the new development, an easier and more logical option would be to design it into the new development itself, thereby catering for the diverse needs of the new community and avoiding the need to use a vehicle <p>We would ask that this proposal is rejected and the existing wider area around the proposed Potten End Hill site offered the environmental protection and recognition that it deserves. Thank you.</p>
<p>Pipers Forge Nettleden Road Nettleden Hertfordshire HP1 3DQ</p>	<p>I would like to object to this application on the grounds of serious negative impact on the local ecology, increase in traffic and associated noise and air pollution, and its overall lack of imagination in terms of sustainable transport and active travel infrastructure;</p> <p>As well as permanently changing the local landscape, allowing dogs to roam free would be detrimental to the various ground-nesting birds and other established wildlife in the area. In addition to this devastating impact within the proposed SANG, footfall and dog-walking would inevitably increase on the adjacent footpaths along the Gade water meadows, a globally rare chalk stream. Indeed, an</p>

	<p>example worth noting is that the previous open access across the field from the Nettleden Road to Great Gaddesden had to be removed by the landowner after lockdown, apparently due to overuse by dog walkers and the negative impact on wildlife and cattle therein. If this proposal proceeds, Dacorum or the landowner should consider introducing a commercial dog walker licensing scheme or a ban as implemented by the Boxmoor Trust.</p> <p>In addition, The Design and Access statement has no statement about how dog fouling will be controlled within the SANG causing a potentially serious public health issue. Although all public space in Dacorum is subject to a PSPO controlling dog fouling, there is little evidence that enforcement takes place locally and it is not clear if a privately owned SANG would even be considered a public space. Anti-social behaviour in general is also of concern, as action in respect of other local reporting of issues is often slow, or not progressed.</p> <p>The proposal does not satisfactorily address active travel access to the SANG and as such would increase traffic and associated air and noise pollution along the Leighton Buzzard Road and alternative routes via Berkhamsted, Potten End and Nettleden. Speeding on many of the surrounding minor roads, and the failure of Highways to enforce a 40mph limit on those roads considered appropriate would persist, creating additional hazard for local residents who know the roads well and drive according to the conditions.</p> <p>Dacorum's corporate priority is to reduce emissions and reach net-zero as soon as possible and as such, the only likely way to achieve this would be to create an on-site SANG, adjacent to the new housing development, and thereby allowing pedestrian access to local residents without the need to travel further afield, most likely by car. It is also unclear from the proposal how the proposed location of this SANG would meet National England's objective of deflecting visitors from the Ashridge Commons and Woods SSSI.</p>
<p>The Moor 3 Water End Moor Water End Hemel Hempstead Hertfordshire HP1 3BL</p>	<p>I strongly object to the proposal. 24/01239/MFA. I feel it will bring more traffic and pollution to an area that is already under pressure. If such areas are required, they must be located close to the development so car use is minimised.</p> <p>The extra footfall will also be detrimental to plant, wildlife and the river Gade chalk stream. Also, the increase in litter, and commercial dog-walkers will bring no positive benefits to the area.</p>
<p>Wayside Nettleden Road Little Gaddesden Berkhamsted Hertfordshire HP4 1PP</p>	<p>This large field view is a stunning part of our local landscape; many times as I drive towards Water End from Nettleden I am arrested by the beauty of the vista.</p> <p>Also it is productive farmland with large numbers of skylarks. To reduce it to a dog walking area is a crime.</p> <p>It will be mostly accessed by car causing further congestion and pollution in the Water End area which is already a bottleneck with dangers when emerging onto the Leighton Buzzard road from Nettleden and from Potten End. Work is presently being done to improve the course of the River Gade through this part of the valley</p>

	<p>and this will compromise that with additional run off.</p> <p>There should be room on the huge area being developed between Piccotts End and Water End for onsite pockets and drifts of land to break up the housing providing landscaping and outdoor amenities for residents without crossing the boundaries. This feels like greed on the part of the developers to cram in as many houses by putting the amenity land elsewhere.</p>
<p>Nettleden Farm Roman Road Nettleden Hemel Hempstead Hertfordshire HP1 3DQ</p>	<p>I am writing to register my concerns regarding a planning application made by Taylor Wimpey for a SANG extending across the entirety of the land between the west side of the Ladies Mile going all the way from the Leighton Buzzard Road to the junction with the Nettleden Road ("the Site").</p> <p>I live at Nettleden Farm, and have done so for more than 30 years . During this time I have done my bit to maintain the beauty of this valley and its fauna and flora. Changing the use of the Site from agricultural farmland to a recreational park may on the face of it seem to be harmless, but the reality will be very different and the impact on the valley will be very detrimental.</p> <p>This application is being made to support a major residential development on the western edge of Hemel Hempstead at Pouchen End Lane. There is no reason why Taylor Wimpey could not create a recreational area within their development by building a few less houses. I would mention that Taylor Wimpey's residential development site is a considerable distance from the Site; there are green space areas much closer such as Bunkers Park Open space and Gadebridge park which I think are underused. There is also Berkhamsted Common and walks along the canal.</p> <p>An objective of Hertfordshire's local transport plan is to reduce the need to travel and reduce car dependency. Proposing a Sang so far away from Taylor Wimpey's residential development and creating a car park seems to be totally contrary to the objectives of the transport plan by encouraging the use of cars to get to the Site.</p> <p>It is one of the quirks of life that people visit places of interest when they are on holiday but rarely do so in the area in which they live. The proposed SANG will be used mostly by visitors from North London and other large urban conurbations rather than local residents. Visitors from urban areas do not have any knowledge of the country code. Also in the last 20 years there has been a very marked decline in the respect shown by people to others or property. My wife and I have experienced people climbing over our fences and strolling on the our land, vandalizing structures, picnicking, and building campfires on our property as well as fly tipping . Visitors coming to the area seem to think they can do what they like. The Site, being such a large area, will encourage biking which will soon churn up any grass pathways. The Site, being relatively remote particularly at night, will also give rise to anti social/illegal activities such as camping, drug taking and fly tipping .</p> <p>With all the additional hedgerows, fencing, benches, signage and bins proposed, the Site will look more like an urban space rather than natural open countryside as currently exists. The published SANG guidelines by some Councils recommend signage is limited to the car park and a semi natural looking landscape with plenty of variation. Woodland or a semi wooded landscape is considered to be a key</p>

	<p>feature . Taylor Wimpey's application does not appear to follow these guidelines.</p> <p>I note that one of the requirements of a SANG is that dogs can be left off the lead . Taylor Wimpey acknowledge that there are hares and ground nesting birds on the Site . How will these be protected?</p> <p>Further, the Site will attract the commercial dog walkers . They arrive with a van full of dogs which are then left to roam. With so many dogs to handle my experience is that they have little or no control over them. I am aware that the Ashridge Estate have had problems with commercial dog walkers and have had to ban them from certain areas . We have sheep on our land on a regular basis. Only a few months ago a neighbour had a serious problem of sheep worrying by dogs. Unless the proposed fencing is completely dog proof and kept properly maintained then we and any neighbour who has stock on their land is potentially at risk.</p> <p>Once Taylor Wimpey have set up the SANG they will walk away. Who will ensure that the Site is properly regulated and maintained, litter is picked up, and bins cleared on a regular basis? With the current economic climate the Council is short of money and certainly has more important priorities than paying for the maintenance of the Site .</p> <p>If the Sang is approved then it should be a condition that Taylor Wimpey provide/ organize the provision of funding in perpetuity for the maintenance of the Site.</p> <p>I would ask that this application is rejected.</p>
<p>Meadow Cottage Pipers Hill Nettleden Hemel Hempstead Hertfordshire HP1 3DQ</p>	<p>My friend, who does not have internet access, wrote an objection letter to S. Robbins dated 23rd June 2024 and hand delivered it to the Civic Centre internal postbox within that building, together with a carbon copy addressed to James Doe - neither published.</p> <p>I agree with almost everything he said and herewith present my version:</p> <p>I wish to object in the strongest terms to the SANG application 24/11239/MFA REF. SANGS.</p> <p>Whilst in principle I am not opposed to SANGS in the right place for the right reason, I am vehemently opposed to this one. It does not meet the correct criteria for a SANG in any way. I should not have to waste my time telling you what that is, your department have all the rules at your disposal, and in any case many other objectors have clearly demonstrated what they are.</p> <p>To be specific:</p> <p>Location area: _____</p> <p>In an AOONB highly visible from Gaddesden Place one of several precious and listed buildings in the area.</p> <p>Why does it have to cover an area so large (40+ hectares)? I suspect to comply with the catchment area criteria for future massive house building which is totally unacceptable in this particular AOONB and spectacular landscape, - the major interest being vested in</p>

developers, estate agents et al.

Precious little to do there that is not already available, and more, at Gadebridge and other parks which have good public transport routes available to most residents of the borough.

Currently a beautiful agricultural vista which takes my breath away when approached from Nettleden village each day, which makes an area of outstanding natural beauty exactly as described. The population of this country desperately need to retain farmed agricultural land despite current DEFRA et al policies.

I do not believe that this proposal will have any impact whatsoever on relieving the perceived problems at Ashridge. I understand that this proposal relates to the housing development at Pouchen End where there is already open green space much closer to the development which should be made available for the proposed SANG - this should be the priority, not imposing it on our beautiful rural community.

Any subsequent negative impact on the River Gade and water meadows has to be an consideration in this proposal - I do not see it mentioned anywhere in the published planning documents.

Proposed Use:

The application seems to be concentrating on dog walking as the most frequent usage proposed. Who wants to put their dog in a vehicle and drive miles to walk it when there are so many other convenient places to walk? - I thought the council was trying to discourage vehicle usage. I suspect that professional dog walkers will be the most frequent users and around here we have witnessed how much nuisance they can cause. Despite this, I understand that there are protected and endangered bird species in the proposed location which could be decimated by dogs marauding about the land. Also, other established wild life driven away from their habitat by invading human and animal species. I can see that more knowledgeable protesters have provided plenty of detail with which I fully agree. I would also question the seasonal timing of the ecological surveys regarding the dangers to wildlife .

Car Park:

The second proposed location of the now 50 space car park is no more acceptable to local residents than the original, makes no sense at all and is open to gross misuse (as mentioned in other objections, with which I totally agree) if not managed in perpetuity. Bingham's Park has the space, security and infrastructure to accommodate it if this disastrous plan goes ahead - why not put it there?

Traffic considerations & local roads:

Potten End Hill which joins the Leighton Buzzard Road is a nightmare

	<p>to turn out of at the best of times, sometimes the main road is backed up from Galley Hill to Water End and the sight lines are rubbish at the bottom of Potten End Hill. Increased traffic will obviously make matters worse and increase pollution.</p> <p>I fully support the excellent content of objections already published, please publish mine which are submitted today - the deadline date.</p>
<p>Glacis Browns Spring Potten End Berkhamsted Hertfordshire HP4 2SQ</p>	<p>This proposal seems to be to allow the building of hundreds of houses nowhere near the actual site and it will not reduce use of Ashridge Forest. Who is going to use the SANG and how are they going to get there without driving? This will put even more traffic onto a 1 way listed bridge, that it can currently take at least 20 minutes to cross. Who benefits apart from the developers?</p> <p>I object on the following grounds:</p> <ol style="list-style-type: none"> 1. The car park is too big and in the wrong location. First shouldn't people walk and/or cycle rather than use cars? But since there are no footpaths up Potten End Hill or Nettleden Road, and no cycle lanes, or any public transport options then there is no choice but to drive. Having the car park entrance virtually opposite Willows Lane is dangerous, since the visibility is very restricted and the speed limit on the road is 60mph. Therefore, cars will pull out into fast moving traffic from both sides of the road. Additionally, locating a car park next to the river Gade, a rare chalk stream, is ecologically unsound. 2. The site will likely be used by commercial dog-walkers. They already cause a nuisance in the local area by scaring cattle. Having dogs run wild will have a negative impact on the ground-breeding birds and will cause their total destruction. 3. Finally, how will the site/car park be secured at night to stop fly-tipping, drug-dealing and other undesirable activity? Especially as other car parks around Whipsnade have been shut already due to undesirable night-time in-car activity?
<p>Pipers Cottage Nettleden Road Nettleden Hemel Hempstead Hertfordshire HP1 3DQ</p>	<p>We have lived in Nettleden for 25 years and are concerned about the use of local farmland in a green belt to satisfy the need for recreation facilities relating to a major housing development elsewhere. Fundamentally residents need and want recreation facilities as part of the their own neighbourhood which they can access on foot not by car or public transport.</p> <p>I support the position adopted by Nettleden & Potten End Parish Council in their consultation response to the planning application.</p> <p>Otherwise I would mention the flooding that the part of Nettleden Road adjacent to the site experiences as soon as there is any rainfall. At these times it is unsafe to travel along the road to access Nettleden village. It is important that no development is undertaken to make this position worse particularly as the Nettleden Road is increasingly used to bypass the increasingly busy Leighton Buzzard Road in order to avoid the Water End Bridge.</p>

Cedar Heights
Browns Spring
Potten End
Berkhamsted
Hertfordshire
HP4 2SQ

12 July 2024

Dear Sirs

Re: Letter of Objection to Planning Application Reference 24/01239/MFA Proposed by Taylor Wimpey - "Change of use from agricultural land to Suitable Alternative Natural Green Space (SANG), together with a vehicular access, car park, paths, fencing and landscaping"

This letter is to voice my objection to the above referenced application on numerous grounds.

It is wholly inappropriate for Taylor Wimpey (T.W.) to make this application on the proposed land for the following reasons -

Location

The proposed site, in part, is already used and enjoyed by walkers.

To make the changes proposed will dramatically alter the existing appearance, increase the number of hedgerows and an enormous amount of fencing to enclose the area as stated in their Design & Access Statement May 2024 section 5.2.

This location is not served by any means of public transport nor, as openly stated in the Design Access Statement, is not sited close to housing. The car park entrance is proposed via Potten End Hill road which is a non-paved road with minimal street lighting, therefore visitors will only be able to easily access the site by use of car or bicycle.

The statement further mentions that the SANG lies in "very close proximity to Potten End" and links with "existing rights of way" thereby providing direct access to the existing community.

T.W. are correct, as a resident of Potten End I already enjoy these access rights, why therefore do I need more ?

Section 1.5 titled "The Vision" further states "provide attractive natural green space and walking opportunities" - these already exist, "offering an alternative destination for informal recreation in the countryside for new residents" - the new residents in question are a 6.5 km drive away (measured using Goggle Maps UK).

Road Safety

T.W. statement describes Potten End Hill road as "a two-way single carriageway rural road and it is flanked by trees and green verges to either side of it, with very narrow to no footway provision along its extent".

The access to the car park will be from Potten End Hill road. This is only 300m distance to the junction with Leighton Buzzard Road which in turn is only 350m distance to the narrow single vehicle access bridge over the River Gade.

These 2 junctions already have severe congestion at certain times of the day and by permitting a car park entrance so close will exacerbate traffic congestion considerably.

T.W. state that 50 car parking spaces will be provided. If this number proves to be insufficient drivers will be forced to park on Potten End Hill road which, as already described by T.W, is a two-way single carriageway rural road. Should this be permitted then very dangerous situations will be created.

	<p>"The car park and access track will be surfaced with DoT Type 1, with granite dust", T.W make no statement as to how this surface will be managed and what provisions are made to stop this loose material travelling onto the existing road surface. Vehicle tyres will cause this material to move which in turn will create hazards on the existing road surface such as slippery surfaces when wet, stones on the road etc.</p> <p>The consistency of Type 1 is a loose material. Vehicle tyres will churn this material quickly causing potholes that will inevitably fill with water. This will result in a lesser number of usable parking positions and will force drivers to seek alternative parking slots such as Potten End Hill road.</p> <p>Safety T.W. make no mention as to how the area will be managed to prevent the paths being used as a cycle race track. This could lead to considerable safety risks to walkers.</p> <p>T.W. state that dogs can roam freely and safely. The provision of a car park will encourage commercial dog walkers to park vans full of dogs and be allowed to run freely. Ashridge Estate already recognise this as a problem and have taken steps to mitigate these risks, T.W. make no reference to this.</p> <p>The statement says that perimeter areas will be enclosed with a mixture of fences and hedgerows. The planting of hedgerows will take a number of years to establish and form a close impenetrable screen, what will prevent dogs accessing protected areas such as the water meadows, farmland, livestock, existing wildlife such as hares and ground nesting birds. Additionally, there appear to be minimal preventative measures to stop dogs accessing the surrounding roads.</p> <p>Objection Summary Location - This is an inappropriate site for change of use from current agricultural to SANG. Its location and distance from the housing development will not directly and easily benefit the new residents. There are numerous existing areas more easily accessible to the new housing development that are already recreational and wildlife areas.</p> <p>Safety & Road Safety - Increased traffic using Potten End Hill road will result in much greater congestion and traffic delays. Insufficient / unusable parking places will result in drivers seeking alternative parking options, this will cause greater risk and hazards.</p> <p>The above are my objections to this application, I would therefore ask that this application is rejected. xxxxx</p>
<p>The White House Potten End Hill Water End Hemel Hempstead</p>	<p>My main objection to the application is linked to the proposed Car Park, and specifically the location. I'd suggest there is a much better option for the car park. This would be at the "top" end of the SANG site, in the area of Bingham's Park, specifically the area used by a</p>

<p>Hertfordshire HP1 3BN</p>	<p>local youth football team. At this location there is already access from Potten End Hill. There is a small area of land used as a youth football pitch, with enough land to also support car parking. There is already car's parked on this site for matches, often with cars also parked on the verge of Potten End Hill during games.</p> <p>Any new car park created here would serve the proposed SANG, better support local sport and recreation and also perhaps provide a dual use for the car park, hence further mitigating the environmental impact of the car park development.</p>
<p>Fairview House Potten End Hill Water End Hemel Hempstead Hertfordshire HP1 3BN</p>	<p>Key concerns are as follows :</p> <p>Fundamentally oversized and will likely be used to satisfy further developments Sang requirements</p> <p>2 Increased traffic through village in construction and permanent phases</p> <p>3 location of new boundaries provides increased security concerns for adjacent properties- I would suggest this affects everyone in Holybush Close</p> <p>4 Application fundamentally lacks detail to understand the potential further impact to views , boundary treatments , biodiversity and archeological interests</p>
<p>Church Side Nettleden Road Nettleden Hemel Hempstead Hertfordshire HP1 3DQ</p>	<p>We are vehemently opposed to this proposed development and blot on the landscape. This is an area of outstanding natural beauty, already enjoyed by walkers on both sides of the Ladies Mile or Nettleden Road. A proposed car park will increase traffic and noise in this already congested area and spoil the natural beauty of unspoilt fields in both directions. We cannot see why this is necessary or thought of as a good idea by anyone appreciating the beauty of this area. Nettleden Road is already somewhat of a racetrack and this will only get worse. Please reconsider this absurd proposal, not supported by anyone in this area.</p>
<p>Dunromin Browns Spring Potten End Berkhamsted Hertfordshire HP4 2SQ</p>	<p>I have strong concerns over this proposed application. The proposed car park is on a busy narrow road without a footpath, consideration should be given to safe access for pedestrians and traffic.</p> <p>The site is close to a chalk stream and the fields currently support wildlife such a ground-nesting birds, eg skylarks which are protected in the UK under the Wildlife & Countryside Act 1981. The site is home to water voles, deer and badgers where there are established setts. The proposal is actively encouraging off-lead, free-running dogs. The two don't mix.</p> <p>There is scant mention management of the site. For example of a "managed site" Dunstable Downs is a staffed, managed site. It has free-roaming dogs, active sports, family gatherings/picnics etc. Even they have had to close one car park due to inappropriate behaviour and their main car park is locked at night. Litter on this is left strewn widely across the landscape. Dog waste is left on the grass, dog waste bins are overflowing and increasingly common their waste is hung in plastic bags on trees and bushes. How will this proposed site be protected if it is designed to attract large numbers of people and</p>

	<p>their dogs? Clearly even with a "managed site" there are problems.</p> <p>The proposed site can be changed after 80 years. What is to stop it becoming a housing development, concreted over. It is being planned at the moment to mitigate new housing development. Where will they go next?</p>
<p>Withies Leighton Buzzard Road</p> <p>Water End Hemel Hempstead Hertfordshire HP1 3BD</p>	<p>I object to this application on the following grounds:</p> <p>1 The parking location is inappropriate. The parking is the most environmentally damaging part of the proposed development, and it has been located next to the most environmentally sensitive part of the landscape. The likelihood of environmental damage to the Gade River valley is high. The parking MUST be moved as far from the river as possible.</p> <p>2 The application attempts to justify the location of the parking on the grounds of locating it in "least visually sensitive part of the site". No evidence is provided to support this assertion. The application also references the views from Gaddesden Place - again with no evidence to support this. Photos taken from Gaddesden Place (see the submission by the Parish Council) clearly show that this is incorrect. Moving the parking up adjacent to Bingham's Park would be more logical and it would be shielded from the long views by Heizen's Wood.</p> <p>3 A local bird expert has identified a number of protected ground-nesting bird species that nest on the proposed area. These species are protected by an Act of Parliament. They would be wiped out by free-ranging dogs, meaning the developers would be criminally complicit.</p> <p>4 The River Gade is one of 220 rare chalk streams anywhere on the globe. It is astonishing that it is not referenced at all in the application, with no assessment of the impact of the proposed SANG on this rare and environmentally sensitive asset. This application cannot be considered without an assessment of impact on the river, the river valley, and the fauna and the flora associated with the river.</p> <p>5 This proposed SANG is proposed in order to reduce pressure on Ashridge Commons and Woods SSSI. Yet the analysis in the application itself concludes the proposed SANG would have a neutral impact on Ashridge. In other words it would not meet its primary objective. Surely this renders the whole application pointless and without substance.</p> <p>6 There is no new proposed development which logically links to this proposed SANG. All visitors from new developments would have to drive to get there. This increase in traffic is contrary to Dacorum's corporate priority to reduce emissions and reach net zero as soon as possible.</p>
<p>The Moor 3 Water End Moor Water End</p>	<p>Having lived in Water End for just over 50 years I feel I am in a position to raise and an objection to the proposal of Potten End Hill SANG.</p>

<p>Hemel Hempstead Hertfordshire HP1 3BL</p>	<p>This proposal will be extremely detrimental to an already over developed area. More traffic will bring increased pollution and accidents. On occasions it can take several minutes to join Potten End Hill now due to traffic buildup trying to access Leighton Buzzard Road.</p> <p>Extra footfall will be damaging to flora and fauna. An AONB will be permently destroyed, not only the land but also the River Gade. The River Gade is a chalk stream, such streams are globally rare and provide valuable habitat. 85% of the worlds chalk streams are in England and 30% (68) are in the south east. The River Gade must also be protected from this proposal.</p> <p>The SANG proposal is extremely damaging to the local area and must not be approved.</p>
<p>2 Roman Farm Roman Road Nettleden Hemel Hempstead Hertfordshire HP1 3DA</p>	<p>I strongly object to the change of use to SANG. I support and agree with all the comments made by those objecting and would like to add the following.</p> <p>There are many footpaths and bridle ways throughout the area and they are already well used by walkers, cyclists, dog walkers, horse riders and others, all are available to those who wish to use them. I see no need to add anymore infrastructure to this already well used area.</p> <p>I fail to see the logic to adding a SANG to an area that is only a few hundred yards from woodlands, streams and Ashridge forest, all are available for public use, surely it would make more sense to add these SANG facilities to an area that has none?</p> <p>As I said, I agree with all the objections made by others, so have just added some additional comments for your consideration.</p>
<p>Four Oaks Vicarage Gardens Potten End Berkhamsted Hertfordshire HP4 2RL</p>	<p>I support this application, I believe safeguarding the land for a sustain period can only be of benefit to the local area. Arguments relating to the traffic and parking seem weak given the road has been used as a diversion for one reason or another for a long time and it has easily coped, so a few extra cars shouldn't be noticeable or cause for concern.</p>
<p>Woodlands Noake Mill Lane Water End Hemel Hempstead Hertfordshire HP1 3BB</p>	<p>who manages the antisocial behaviour, drugs, drinking, racing cars and motorbikes, travellers accessing the site, rubbish and the rise in crime. There is already an issue in this area with commercial dog walkers who are happy to pick the dog mess up tie it in a bag and then leave the bags for local residents to dispose of. As this is an alternative to the Ashridge Estate and as people will still need to drive (impact on climate) why would they choose this space over an already well established site at Ashridge which offers a cafe, National trust shop and an around bigger, more interesting attractive space and what about the impact this will have on the local wildlife and vegetation along with the chalk stream.</p>

<p>Stable Barn Pipers Hill Great Gaddesden Hemel Hempstead Hertfordshire HP1 3BY</p>	<p>Inappropriate development for housing some distance away that can only be accessed by car. It won't be used by residents of the Pouchen End development as once in their car they will drive to Ashridge. The ground breeding birds will be destroyed by dogs allowed to run free. It will be mainly used by professional dog walkers. It will lead to further erosion of the adjoining Gade River chalk stream.</p> <p>Proposed siting of car park is simply dangerous. Only accessible by car no adjoining footpaths from Potten End or Nettleden. Destroys the current character of the valley.</p>
<p>Hurnreed House Leighton Buzzard Road</p> <p>Water End Hemel Hempstead Hertfordshire HP1 3BH</p>	<p>I am concerned to see that on the application 'no environmental assessment' is stated. This development poses high risk to local ecology; the area is a breeding ground for ground breeding birds. Also dog poo and plastic poo bags will be left; who will clear this? I believe people will cross the Nettleden Road into the Water meadows running towards Great Gaddesden. This area has been dominated by professional dog walkers , often with 6 dogs all off-lead and running rampant in the fields and in and out of the chalk stream. Why does DBC large display signs when driving into Hemel 'walk or cycle' don't drive - surely this proposal is nonsense; dog WALKERS to DRIVE their animals to Potten End? The area has few footpaths in and road verges are rough, will people drive, park and then explore further afield, and danger to themselves and others. The area has many rabbits and hares, dogs love to chase them, this could result in a dog 'bolting' and deviating from the designated area, this happened to a friend on mine, her dog bolted and was killed on the Water End Road, the driver was unhurt but very shaken. Please reconsider this inappropriate development.</p>
<p>Farm Cottage St Margarets Great Gaddesden Hemel Hempstead Hertfordshire HP1 3BZ</p>	<p>Protecting ecological sites A SANG has been defined as "recreational sites, created to attract residents of new developments away from designated sites that are protected for their valuable ecology and are sensitive to recreational activities such as dog walking." (Ref Planning Policy - Royal Borough of Windsor and Maidenhead. Available at https://www.rbwm.gov.uk/home/planning/planning-policy/non-development-plan/biodiversity-and-thames-basin-heath-spa/what-sang#:~:text=A%20Suitable%20Alternative%20Natural%20Greenspace,activities%20such%20as%20dog%20walking.)</p> <p>Whilst the area surrounding the proposed Potten End SANG is not protected, it is home to valuable ecology, notably rare ground breeding birds including Corn buntings an sky larks and the river Gade. The Gade is a chalk stream, these types of rivers are globally rare, with less than 200 in existence, over 85% of which exist in England. (Reference: https://www.wildtrout.org/content/chalkstreams)</p> <p>There is a legitimate concern that increased public access to the SANG will drive dogwalkers towards the Upper Gade which is right next to the proposed site. Recent river water quality testing carried at Great Gaddesden during the Great Uk Water Biltz in June 2024 noted high levels of water pollution in this location. (Reference: https://freshwaterwatch.org/pages/great-uk-waterblitz-results)</p>

	<p>Presence of dog walkers near the river may lead to additional pollution, for example via the pesticides many dogs are frequently treated with to avoid fleas.</p> <p>Protecting ground breeding birds: The concept of SANG was developed in 2009 to protect ground breeding birds in the Thames Basin Heath Special Protection Area. (Reference: https://csaenvironmental.co.uk/2024/03/27/sang-a-success-story/) It followed research which identified a link between dog walking and reduced breeding success of rare bird species. The introduction of SANGs in the Thames Basin Heath have successfully alleviated pressure on the targeted rare birds in the special protected area leading to increased populations. Subsequently the SANG concept has been rolled out across numerous areas lowland heathland protected areas in southern England. (Reference: https://csaenvironmental.co.uk/2024/03/27/sang-a-success-story/)</p> <p>The proposed Potten End SANG site is home to several species of ground breeding birds, notably corn buntings and sky larks. These birds are also found in adjacent habitats. Given that a key criteria of a SANG is to allow dogs off leads it seems likely that the proposed SANG will negatively impact ground breeding birds in the area, ironically driving the same type of biodiversity damage it was designed to protect.</p> <p>Currently little is known about the ecological diversity of the Upper Gade and its surrounding areas. Although it is hoped that the location of the SANG could be moved to a more suitable site, at a minimum, significant measures are needed to help avoid detrimental impacts on the ecologically sensitive area of the Upper Gade.</p> <p>These include:</p> <ul style="list-style-type: none"> -Regular monitoring of biodiversity in and around the Upper Gade -Mitigation measures to deter dog walkers from using the footpaths around the Upper Gade, for example signage explaining the importance of keeping dogs on leads. <p>A core criteria of any SANG is convenient and accessible car parking. If there are accessibility issues, this will decrease the use of the site thus undermining the need to encourage the public away from Ashridge. The proposed location of the carpark is at odds with this. It lies directly along the Leighton Buzzard road, and just a few hundred meters from Water End Bridge which is a single lane bridge. This stretch of road has increasingly severe traffic problems, due to the volume of traffic along the Leighton Buzzard road. Locating a car park here will subject SANG users to high levels of traffic. This will increase the time it takes them to access the site and significantly reduce the chance it will be used. A better approach would be to locate the car park up Potten End Hill, closer to Potten End as this will offer users an alternative route should there be traffic on the Leighton Buzzard road</p>
<p>4 Park View Gadebridge Lane Hemel Hempstead Hertfordshire</p>	<p>We are fully in support of this application for a 'Suitable Alternative Natural Green Space' on the land near to Nettleden Road in Potten End. Taking land away from industrialised modern farming with all of its dangerous pesticides and fertilisers and converting it to an area of</p>

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wildlife and conservation seems a very sensible idea and should be supported by everyone with an environmentally Green eye to the future. Even more so since Brexit and the dropping of the EU protections and regulations here in the UK.

I appreciate that there will be some NIMBY complainants but we believe this is by far a 'win win' situation for the environment, the local community and wildlife. With the new Government stating it will build millions of new homes over the next 5 years on all categories of land means we do need such schemes to protect areas within our countryside. I understand that there will be new tree planting projects and the introduction of wild flower meadows which will greatly enrich the health and wellbeing of us all and the whole area. It will ensure this area is properly managed and protected from any further development within all of our life times. What is there not to support?

The current sad state of the River Gade, or trickle as we call it, with its dirty polluted water and eroded banks will no doubt also benefit from this and proper management. This is long overdue both here and in all of our waterways which seem to have been neglected and polluted by the water companies and industrial farming for years without protection.

We do think a small car park for visitors to the site is sensible and is also a benefit. Our understanding is that it will only be for a maximum of 50 vehicles, far fewer than the National Trust property at Ashridge. I am sure fewer vehicles than that will ever use it regularly and I assume that it will be closed in the evenings and nights. I remember going regularly to the Strawberry Farm there a few years ago with my family and during the summer there were far more vehicles entering and leaving their car park than is anticipated with this proposal. I don't recall that having any impact whatsoever on the flow of traffic along the Leighton Buzzard Road. A very sensible and environmentally sound proposal for the whole area which we 100% support.