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Standing up for Hertfordshire's countryside

CPRE Hertfordshire Position on Suitable Alternative Natural Greenspaces (SANGs) as mitigation for damage to the Chilterns Beechwoods Special Area of Conservation (SAC)

At CPRE Hertfordshire we are concerned that landowners and developers are putting forward proposals to create Suitable Alternative Natural Greenspaces (SANGs) in what we believe are inappropriate locations. In response, we are publishing our position on SANGs.

Introduction

The Chilterns Beechwoods Special Area of Conservation (SAC) is under damaging pressure from increasing visitor numbers. The SAC is an area of around 1285 hectares stretching across the Chilterns. Here in Hertfordshire it includes a large part of the Ashridge Estate and also Tring Woodlands.

UK law places SACs in the top tier of nature conservation sites nationally. This means that Dacorum Borough Council, the lead local authority, is required by law to implement a mitigation strategy to protect the SAC and its special wildlife habitats from further damage. The mitigations must be in place in order for the Council to grant planning permission for development, or to finalise a Local Plan.

For further background and context, see our published article from March 2022 [‘More protection for the Chilterns Beechwoods Special Area of Conservation’](#).

The Mitigation Strategy

The Chilterns Beechwoods Special Area of Conservation Mitigation Strategy was agreed with Natural England and published in November 2022. The strategy is applicable throughout the Zone of Influence, an area within a 12.6 kilometre radius from Ashridge. This area extends across all of Dacorum Borough and into the edges of the four adjacent local authorities: St Albans City and District and Three Rivers District in Hertfordshire, and Buckinghamshire and Central Bedfordshire Councils.

The mitigation places new, mandatory requirements on development. Each new development that increases the number of residents within the Zone of Influence, even if only one dwelling unit, must:

- pay a fee that goes to the National Trust, who administer most of the Ashridge Estate, to help implement a variety of on-site measures to alleviate visitor pressures; *and*
- contribute to an existing Suitable Alternative Natural Greenspace (SANG) elsewhere in the borough or create a new SANG, so as to deflect visitors away from Ashridge, and to the SANG.

The requirements for SANGs are spelled out in detail in the Mitigation Strategy ¹, including their size, types of landscape, public access and accessibility, length of footpaths, perimeter fencing to allow dogs to roam off-lead, and many other criteria.

The mitigation strategy also describes an ambition for new 'gateway sites'. The purpose of a gateway site is similar to that of a SANG, to create an attractive alternative to Ashridge that deflects users away, reducing recreational pressures. But a key difference between a SANG and a gateway site is that the latter needs to be well related to the existing Ashridge Estate and importantly on land outside of the SAC. A gateway site also should provide equivalent attractions and facilities sufficient to draw people away from more sensitive areas within Ashridge. ²

Read [the Mitigation Strategy](#) to find out more including full details of all of these measures.

CPRE Hertfordshire's Position

1. We support the overarching objective of **mitigating the damage** already done to the special habitats of the SAC and **preventing future damage** due to high numbers of human and canine visitors.
2. In principle, we support SANGs as a means of opening up more of the countryside for public access and recreational enjoyment.

However, SANGs must be located in the right place. Criteria for well-located SANGs must take into account all of the following considerations...

3. We support Dacorum Borough Council's strategy³ of reducing car dependency and reducing car journeys throughout the Borough. **It is therefore crucially important that SANGs are located onsite with or immediately adjacent to residential development, to ensure that local people can easily and conveniently walk to the SANG.** If they have to get in their car to reach a SANG, they may just as well drive to Ashridge and this defeats the purpose of deflecting visitors away from the SAC, as well as being contrary to DBC's strategy to reduce car travel.

¹ Pages 26-33, Chilterns Beechwoods Special Area of Conservation Mitigation Strategy

² Page 33, Chilterns Beechwoods Special Area of Conservation Mitigation Strategy

³ Page 29, Dacorum Borough Council, [Climate and Ecological Emergency Strategy](#)

4. We are therefore deeply concerned by pending SANG proposals that are not onsite with or immediately adjacent to residential development, e.g. the Taylor Wimpey / Barrett Homes proposed SANG at Potten End Hill.
5. We are also concerned by pending SANG proposals in sites that are unlikely to be able to replicate the tranquil, natural woodlands and landscapes of Ashridge due to some other negative feature of their location, e.g. the already-consented SANG at Haresfoot Farm south of Berkhamsted, which is immediately adjacent to the busy and noisy A41 highway.
6. We want to **ensure that SANGs do not cause harm to existing public recreational amenity**. For example, SANG landscaping must not cause harm to existing landscape character, planting must not impede viewpoints from existing Public Rights of Way (PRoWs), and SANG landscape design should enhance not detract from access to and enjoyment of existing PRoWs in keeping with the requirements of paragraph 104 of the National Planning Policy Framework. Well-located SANGs should improve linkages between existing PRoWs.
7. We also want to **ensure that SANGs do not cause harm to existing biodiversity and special habitats on SANG sites**. It would be tragic if, in seeking to protect the habitats of the SAC, SANGs instead cause harm to other habitats. This is a particular concern on proposed SANG sites where endangered ground-nesting bird species are present, such as skylarks, corn bunting, grey partridge and yellow wagtail. These are Section 41 species and thus protected by paragraph 185b of the National Planning Policy Framework, and they are likely to be displaced and disturbed by dogs roaming freely.
8. To fully understand existing biodiversity and special habitats on potential SANG sites, the Council must ensure the site is fully and independently ecologically-assessed, and that the applicant's assertions are not taken as a given.
9. To fulfil their purpose of deflecting visitors away from Ashridge and the SAC, each SANG must have an 'air of relative wildness'⁴ similar to that at Ashridge, must not introduce artificial features or materials, unnecessary fencing or other built structures.
10. We also have concerns about the National Trust's proposed 'gateway' Visitor Hubs in multiple locations around Ashridge as these are specifically intended to attract visitors arriving by car. Each of the three proposed Visitor Hubs are intended to have similar facilities to those currently at Monument Drive within the SAC e.g. café, shop, children's play area, toilets, and extensive car parking. They would also have many features of a SANG, including woodland and grassland habitats, footpaths, and some built structures such as picnic benches and dog poo bins. Two of the three proposed Visitor Hubs are within 500 metres of the SAC, and thus we believe they are likely to attract more visitors to the SAC and cause even more damage to the SAC's special habitats.

⁴ Pages 30-31, Chilterns Beechwoods Special Area of Conservation Mitigation Strategy

11. Finally, we believe robust measures of success are needed for all SANGs. These measures must include: statistically significant reduction in visitor numbers at the SAC, measurable reduction in damage at the SAC (e.g. soil compaction and root exposure, trampling of rare plants, littering, fires from barbeques, vandalism, and dog fouling), and positive site-specific measures for each SANG such as improved numbers of protected species.

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