

Date: 9<sup>th</sup> March 2023  
Your Ref: -  
Our Ref: SANG\_Bunkers\_NMPC  
Contact: Rebecca Williams  
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Directline: 01442 228 000 (ask for named officer)



Via email only to:

Nash Mills Parish Council: [clerk@nashmillsparishcouncil.gov.uk](mailto:clerk@nashmillsparishcouncil.gov.uk)

Cllr Maddern: [Jan.Maddern@dacorum.gov.uk](mailto:Jan.Maddern@dacorum.gov.uk)

Luke Johnston: [Luke.Johnson@dacorum.gov.uk](mailto:Luke.Johnson@dacorum.gov.uk)

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Dear Nikki and Cllr Maddern,

### **SANGS (Suitable Alternative Natural Greenspace)**

Thank you for your letter dated 20<sup>th</sup> February 2023, I apologise for the delay in responding.

We acknowledge your letter raises concern over a lack of consultation with Nash Mills Parish Council in the development of the Bunkers Park SANG Management Plan and the process/approach taken (compared to the engagement undertaken by Clean, Safe and Green when preparing previous Green Flag Management Plans).

### **Habitats Regulations and the importance of mitigation for the Chilterns Beechwoods SAC**

When the Council became aware of the recreational pressure at Chilterns Beechwoods SAC, it was legally required to take action and as a result a 'planning moratorium' was introduced. On the advice of Natural England, this restriction on approving planning applications could not be lifted until an acceptable Mitigation Strategy was put in place.

The Council worked at pace with Natural England, the National Trust and the affected adjoining local authorities, Buckinghamshire Council, Central Bedfordshire Council and St Albans City and District Council, "the Partner Authorities", to prepare the Chilterns Beechwoods SAC Mitigation Strategy.

The Council's Mitigation Strategy is a material consideration in the determination of planning applications and offers important guidance to applicants as to how their applications will be dealt with in accordance with the Habitats Regulations. The Strategy will help to assist both applicants and the Council and ensure fair and consistent decision making.



Its purpose is principally to protect the Special Area of Conservation. The Mitigation Strategy does this by securing over £18m of contributions to deliver a wide range of interventions detailed in the *Strategic Access Management and Monitoring Strategy (SAMMS)*. These SAMMS contributions for the National Trust will enable a package of protection and management measures to be delivered at Ashridge Commons and Woods SSSI over the next 80 years.

The second limb of the Mitigation Strategy involves the identification of Suitable Alternative Natural Greenspace (SANG). 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 sites such as the Chilterns Beechwoods SAC. The SANG sites will receive a significant level of new funding to help deliver a range of improvements to the sites. Not only will these improve the visitor experience but they will also help to protect them in the long term.

During the development of the Mitigation Strategy and background technical studies, the Council worked closely with Natural England to ensure both of these new forms of SAC Mitigation (SAMM and SANG) would not result in any sustained objections to new development proposals i.e. to planning applications which result in one or more net new homes or other development which would likely result in increased recreational pressure on the Chilterns Beechwoods SAC. The methodologies used were in accordance with best practice and follow established systems used by other local authorities with designated National Sites within their boundaries.

The SAMMS and SANG payments are in line with similar schemes in operation elsewhere and we do not expect these contributions to impact on deliverability within the borough.

#### Identifying SANG at Bunkers Park and Chipperfield Common

In order to identify and deliver SANG in a timely manner, the Council sought to bring forward some of its own land holdings for improvement, with Chipperfield Common and Bunkers Park forming the first phase of the Council's strategy towards SANG provision.

These SANG proposals were expedited in order to enable a speedy release of the planning moratorium (recognising that between 150 and 200 applications were pending a decision as a result of the 8 month planning moratorium). Without this the housing moratorium would last indefinitely with significant implications for providing new homes for Dacorum's residents.

To bring Chipperfield Common and Bunkers Park up to SANG standard the Council prepared new management plans drawing on the knowledge and experience of our Clean, Safe and Green section who are responsible for the day-to-day management of the sites. We believe the Bunkers Park SANG Management Plan draws on known issues and the aspirations of the Parish Council and local groups, such as improvements to footpaths, benches and bins, which we have garnered over a long period of working together. The Management Plan will also help secure a new SANG Delivery Officer that will provide a dedicated resource to detailed matters of implementation and delivery. We hope a substantial amount of what is proposed in the Plan will be supported by the local community and visitors to Bunkers Park.

There has been a need to ensure that the further use of Bunkers Park respects its current function and does not compromise the wider ecological objectives of the site. To that end the management plan includes many interventions to improve the site's ecology, such as new rewilding areas and waymarked footpaths to deter visitors from straying into more ecologically sensitive areas. The inclusion of additional waste/dog waste bins across the site will also encourage more people to dispose of their waste responsibly.

The SANG classification allows us to direct new funding towards a wide range of improvements. Across these two initial SANGs a total of £16.2m of measures will be implemented and the use of the sites as SANG secured for a period of no less than 80 years.

Some SANG payments have now been received and funds will be made available to be drawn down by Clean, Safe and Green to implement the interventions. We hope this investment in Bunkers Park and its management will make it much easier for the site to retain its Green Flag status in the future.

### Engagement on SANG Management Plan

We accept that only very focused and limited engagement took place on these initial SANG Management Plans, which were delivered via a more truncated process than we would normally choose. We apologise that communication with the Parish Council lapsed in this instance, which was due to the short timescales and turnaround times needed, as well as the limited capacity and resources available. This prevented us from engaging as we would have liked to, but we felt it important to find a quick solution to the planning moratorium. We also understand that Clean, Safe and Green have similarly accepted that they have not consulted the Parish when preparing recent Green Flag Management Plans.

Please do not see this as a lack of willingness or desire for thorough engagement with you, it reflects the Council's limited funds, the complexity of the HRA process and the need to deliver in the most streamlined fashion on this occasion.

### Overview and Scrutiny and Cabinet meetings

In your letter, you referred to an email from the Strategic Planning Team dated 18 November 2022. The email was sent in response to a query from Kings Langley and District Residents Association about the purpose of SANGs and how any such proposal has any potential to result in 'betterment' at Ashridge Estate. The Council was copied into a response made by Hertfordshire County Council's Ecology team. On receipt, the Residents Association secretary asked if the response could be forwarded to all their members, to which we agreed. I understand Hertfordshire County Council then also forwarded this to Gruff Edwards as Chair of Dacorum Environmental Forum which was then circulated onto their members, which we assume included Nash Mills Parish Council.

We understand that the meeting reports and minutes in question are:

- Agenda item 9: [Agenda for Strategic Planning & Environment Overview & Scrutiny on Wednesday, 12th October, 2022, 7.30 pm \(dacorum.gov.uk\) Minutes](#)
- Agenda item CA/100/21: [Agenda for Cabinet on Tuesday, 15th November, 2022, 7.30 pm \(dacorum.gov.uk\)/ Minutes](#)

We have been responding to queries on the Chilterns Beechwoods SAC and Mitigation Strategy as and when these are received. In particular, we received numerous written responses from interested parties prior to November's Cabinet meeting which were responded to in writing and also verbally at the start of the Cabinet meeting by Councillor Anderson.

We have read through the reports and minutes for both of these committee meetings and have not found an explicit reference to Nash Mills Parish Council. Reference was made to partnership working with other Councils (this related to the development of the Mitigation Strategy with other local authorities affected by the planning moratorium), input of other Council departments and Natural England into the SANG management plans, and also that the Council would continue to

work closely with (Chipperfield) Parish Council on the Chipperfield Common Management Plan. This was due to Chipperfield Parish Council having contacted the Council prior to Cabinet about the proposals.

The meeting minutes are not intended to be read that we have engaged with all parties i.e. Parish Councils or ward councillors, but that we have historically worked closely with relevant stakeholders when implementing upgrades at the sites and that we would expect the implementation of the SANG measures to follow a similar process. In the minutes, where Alex Robinson speaks about a number of the interventions being supported, we have been assured by Clean, Safe and Green representatives through this work that a number of the principles and interventions proposed align well with feedback and expressed shortfalls in management/site habitat or furniture to date. We apologise that the minutes are ambiguous enough to give the impression that Nash Mills Parish Council was directly consulted on the SANG proposals. If we have missed the specific reference which concerns you, please do highlight this directly to us.

### Member meeting minutes

The minutes from October's Scrutiny and November's Cabinet meetings have been published for comment/scrutiny and agreed/signed off at the next sitting of Scrutiny/Cabinet. The minutes seek to reflect the discussion that took place at the meeting. The request to add a note that Parish Councils were not consulted would be an additional point which was not voiced during the meetings.

If such a request were formally received by Democratic Services they would need to consult on the proposed changes with both the Monitoring Officer and the meeting chairs to receive a view on whether such an addition could be made.

If you wish to explore this option, please email: [member.support@dacorum.gov.uk](mailto:member.support@dacorum.gov.uk) mailbox.

### Suggested way forward

The Council wishes to assure the Parish Council that we will maintain engagement with your organisation more widely through our Local Plan making process (where Chilterns Beechwoods SAC matters will be addressed in terms of future growth).

In terms of the Bunkers Park SANG Management Plans, there are very specific legal requirements which must be met to enable SANG delivery. This results in a very narrow/specific remit of delivery. It may be that a number of the Parish Council's aspirations would be better suited to be addressed and delivered through the Green Flag Management Plan (although this will be very dependent on specifics). These matters would need to be worked through in detail before we could be sure which plan they would best sit within.

Again we accept that our decision to limit consultation during the SANG Management Plans development has led to communication between our organisations lapsing to a less than ideal situation. We will seek to improve this, and are hopeful that the SANG Delivery Officer will be able to work with the Parish Council and local interest groups on important matters at Bunkers Park.

In terms of normal ongoing maintenance Clean, Safe and Green commit to:

- Talking to the Parish Council more than they have been able to recently which has principally be down to resourcing pressures. This will result in focused discussion around normal/Green Flag Management Plans matters via Luke Johnson. Luke has had to progress the Green Flag Management Plan (without consultation) prior to the

end of this financial year, but plans to pick up consultation with yourselves for the next version of the Green Flag Management Plan early next year.

- An annual conversation/meeting about what is planned to be done on-site, where interested parties can input ideas on anything new or different approaches, etc.
- Clean, Safe and Green would then consider if these suggestions are a workable approach, and feed them into the next version of the Green Flag Management Plans.

We are aware that the Friends Group also play an important supporting role in Bunkers Park's management and maintenance:

- Meetings with this group take place around monthly for 10 months of a year (generally not meeting in July and August), with meetings often focussing on a maintenance task or addressing a specific management issue on site.

The Parish Council may wish to become more active in this group to influence some of the day to day management aspects.

In terms of SANG Management Plan's approach going forwards, the Council commits to:

- On-going conversations on the delivery of the SANG management plan, i.e. an opportunity to discuss aesthetics, specifications, or the most appropriate location of interventions to those presented on the current map.
- Engagement on the review process.

The Council hopes the SANG Management Plan represents a solid basis for future engagement with you and local interest groups.

I hope this provides you with some comfort on the approach to the SANG Management Plans.

Yours sincerely,

A handwritten signature in dark ink, appearing to read 'Ronan Leydon', with a stylized, flowing script.

Ronan Leydon  
Team Leader - Strategic Planning