



# Chilterns Beechwoods Special Area of Conservation Officer training

Darran Eggleton – Head of Service, Development Management, Building Control & Enforcement

Mark Aughterlony – Development Manager (Core)

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# Agenda

## Part 1

1. What is the Chilterns Beechwoods Special Area Conservation
2. Where is it located
3. Why does it matter ecologically
4. Requirements under the Habitats Regulations
5. How does it affect development

## Part 2

1. Chilterns Beechwood Mitigation Strategy
2. Development Management Process
3. Frequently asked questions
4. Q&A



# Part 1: Chilterns Beechwoods Special Area of Conservation

What is it?



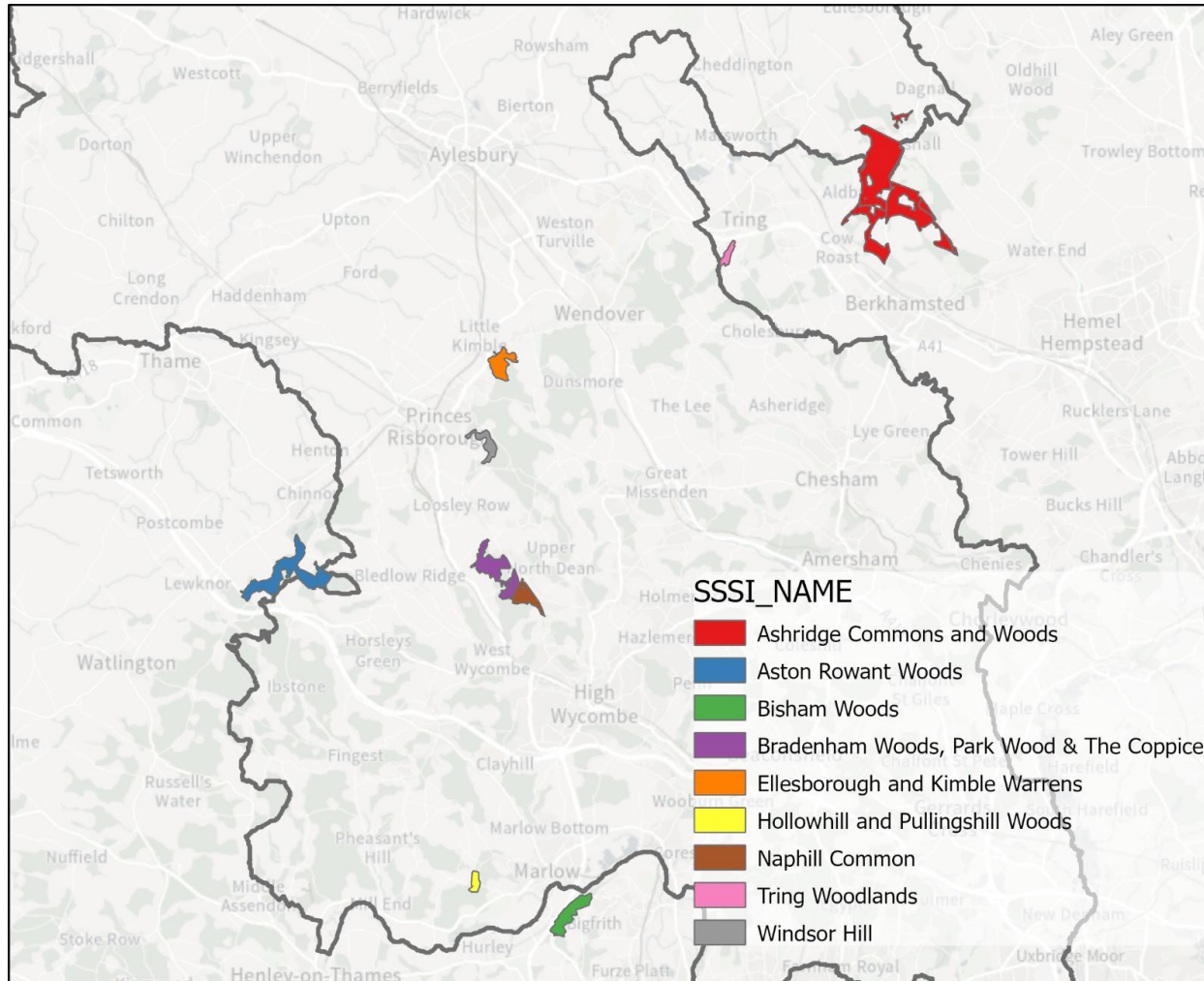
# 1. What is the Chilterns Beechwoods Special Area of Conservation

Protected for:

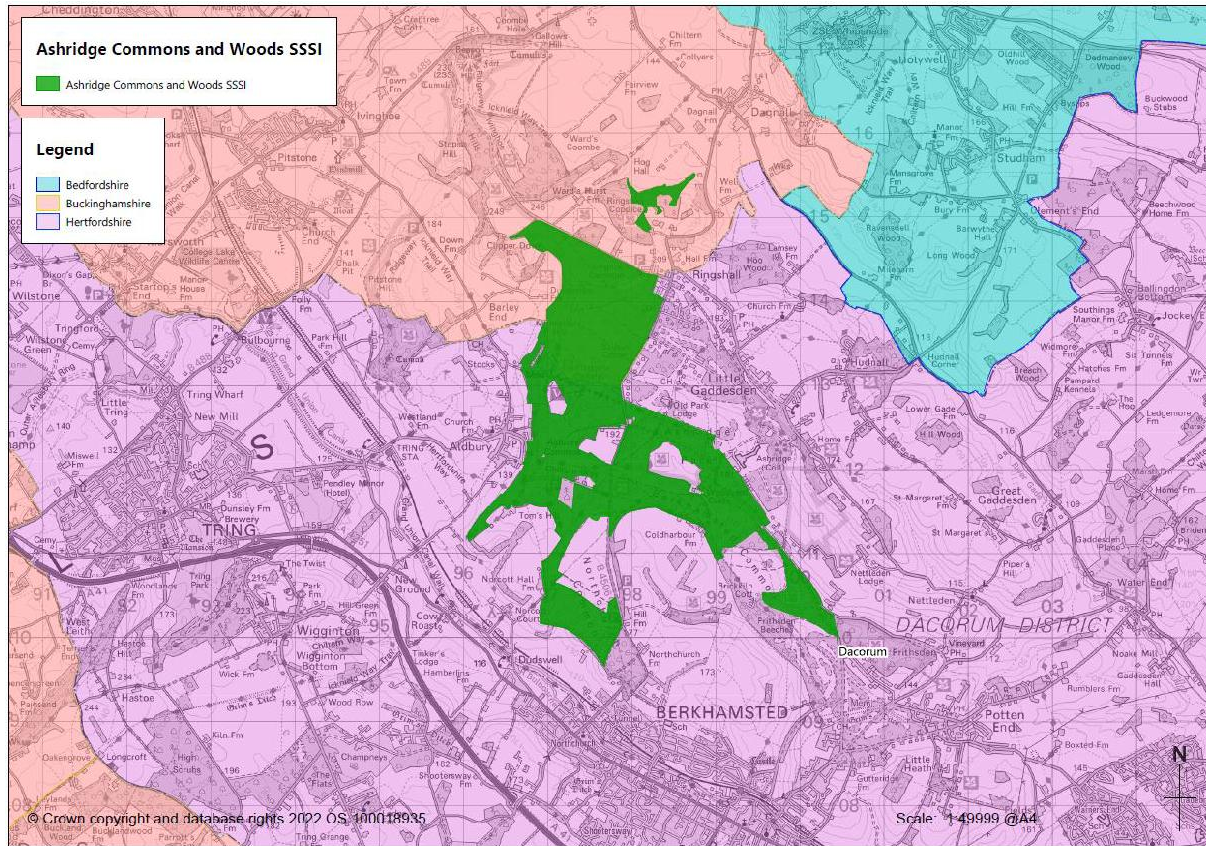
- Beech forests on neutral to rich soils
- Dry grasslands and scrublands on chalk or limestone
- Rare stag beetle



## 2. Chilterns Beechwoods SAC Location



# CBSAC – Ashridge Common and Woods SSSI



### 3. Why does it matter ecologically?

- Part of a network of Internationally Significant Sites protected by the Habitats Regulations
- Under threat from recreational pressure



# Recreational impacts- Dacorum evidence

- Contamination (e.g. dog fouling, litter, spread of plant pathogens);
- Increased fire risk;
- Trampling/wear (e.g. loss of vegetation, soil compaction, erosion, damage to trees from climbing);
- Harvesting (e.g. fungi, wood);
- Difficulties in managing the site (e.g. maintaining the grazing regime);
- Disturbance (e.g. affecting the distribution of livestock and deer).



# Dacorum evidence



Visitor survey, recreation impact assessment and mitigation requirements for the Chilterns Beechwoods SAC and the Dacorum Local Plan

Chris Panter, Durwyn Liley, Sophie Lake, Phil Saunders & Zoe Caals

- Footprint Ecology report for Dacorum's local plan evidence identified adverse effects due to recreational pressure in 2021
- Natural England issued a letter on 14 March 2022 - effectively placed a Moratorium on development caught by the HRA issue

## 4. Habitats Regulations

- The requirement for compliance with the Habitats Regs is a point of **law** – we cannot simply take a planning view.
- It exists to protect the SAC sites' **integrity i.e. the ability for them to achieve their conservation objectives (=maintain the features for which they were designated).**
- The Habitats Regs impart a duty on Local Planning Authorities (competent authorities) to carefully consider the **likely significant effects** of any proposal on a European site, either alone or in combination with other plans or projects.

# Habitats Regulations continued

- Where the potential for likely significant effects (LSE) cannot be excluded, a competent authority must make an **appropriate assessment** of the implications of the plan or project for that site.
- Where an adverse effect on the site's integrity cannot be ruled out or **mitigated**, and where there are no alternative solutions, the plan or project can only proceed if there are **imperative reasons of over-riding public interest (IROPI)** and if the necessary **compensatory measures** can be secured.
- By law, Natural England – the statutory conservation body – must be consulted.

# Habitats Regulations Assessment (HRA) vs Appropriate Assessment (AA)

- HRA = the entire process of ensuring that a project complies with the Regulations regarding designated sites
- AA = a specific stage of HRA if adverse effects on integrity of the site cannot be dismissed
- An appropriate assessment is not a technical or legal term. It is about making an assessment that is
  - **appropriate to establish certainty** over whether there would be adverse effects due to the plan or project, alone or in combination with other plans or projects,
  - and if an adverse effect is identified, that sets out - with enough **certainty** - the **mitigation measures** that need to be secured to mitigate those effects.

[Habitats regulations assessments: protecting a European site - GOV.UK](#)

# How does it affect development?

- In response, a Mitigation Strategy was developed in collaboration with other affected LPAs: Dacorum BC, Central Bedfordshire BC, St Albans BC, in consultation with Natural England
- Development types affected:

Development Type (Use Class)	Affected by the restrictions
Student accommodation (C2)	Yes
Residential care homes and institutions (C2)	Yes
Dwelling houses (C3)	Yes
Houses in Multiple Occupations (HMOs) (C4)	Yes
Residential caravan sites	Yes
Permanent residential boat moorings	Yes
Gypsies, Travellers and travelling show people plots	Yes
Ancillary accommodation (e.g., granny annex)	No *
Replacement dwelling houses	No
Extensions to dwelling houses	No
Hotels**	Potentially
Other (e.g., cafes, shops and yurts)	Case by case basis if within 500m avoidance zone. No if outside 500m avoidance zone but within the 12.6 Zone of Influence.

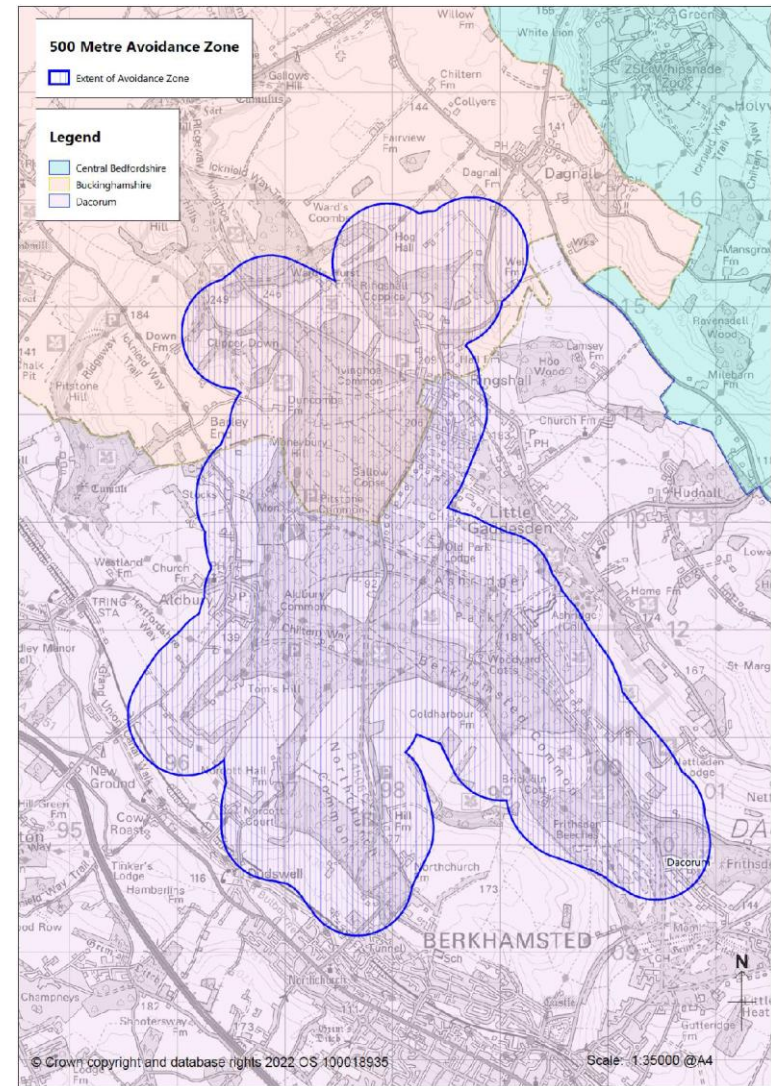
*\* Provided that the occupation of the ancillary accommodation is tied to that of the main dwelling*

*\*\* Some applications depending on their scale and location could lead to a significant impact on the Special Area of Conservation. Each case will need to be considered on its own merits.*

# Mitigation Strategy – 500 m Exclusion Zone



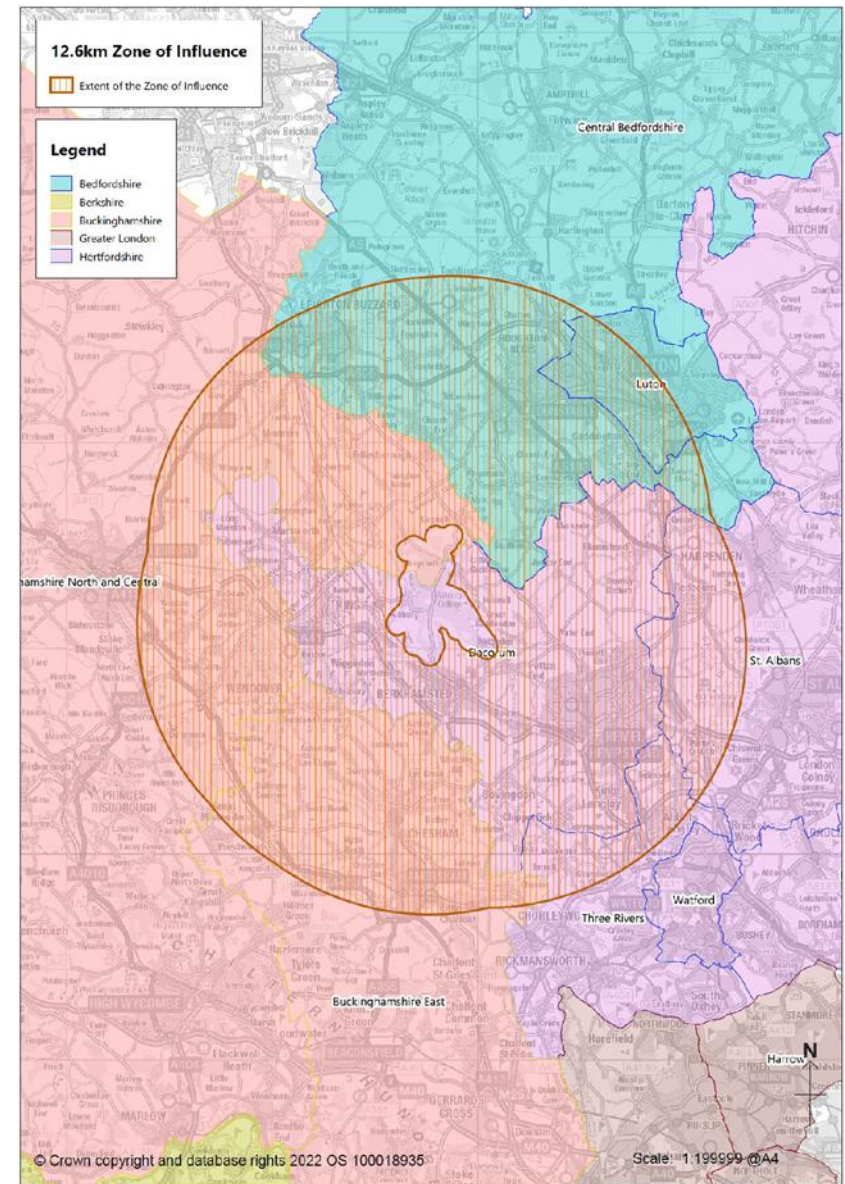
- New housing located directly adjacent to the SAC will pose public access and disturbance risks.
- Survey data shows that visitors living within 500m are much more likely to visit the SAC.
- Recommended that there should be a presumption against residential development within 500m of the SAC boundary.
- Net new homes must be refused permission as the impact cannot be mitigated.



# Mitigation Strategy

## 12.6 km Zone of Influence

- Zone of influence from 500 to 12.6 km from the CBSAC - Ashridge site.
- Represents the core area around the SAC where increases in the number of people (Use Classes C2, C3 and some others) will require mitigation measures to avoid adverse effects on the integrity of the SAC.



# Buckinghamshire's Chilterns Beechwoods Special Area of Conservation Recreational Pressure Mitigation Strategy adopted August 2024

Part A - Strategic Access Management and Monitoring Strategy (SAMM)

Part B - Suitable Alternative Natural Greenspace (SANG)

Developers need to provide both SANG *and* SAMMS to mitigate the impact of qualifying development

[Read the Mitigation Strategy document](#)

# Part A- Mitigation strategy – Strategic Access Management and Monitoring Strategy

- A payment made by developers which gets transferred to the Natural Trust to provide mitigation at the Ashridge Common site (the SAC).
- The total costs for SAMMS is **£18,275,510**.
- For Buckinghamshire this will result in a **per-dwelling tariff of £566.23 in the north and central planning areas** and **£87.03 in the east planning area**.

## Part B Mitigation Strategy – Suitable Alternative Natural Green Spaces

- A SANG seeks to provide opportunity for recreation outside the SAC.
- Capacity required is calculated as 8ha per 1000 people (2.5 people per household) – Natural England standard.
- Catchment of SANG and capacity depending on size.
  - SANG between 2 and 12ha – 2 km catchment
  - SANG between 12 and 20ha – 4 km catchment
  - SANG over 20ha – 5 km catchment

# Mitigation Strategy – Suitable Alternative Natural Green Spaces

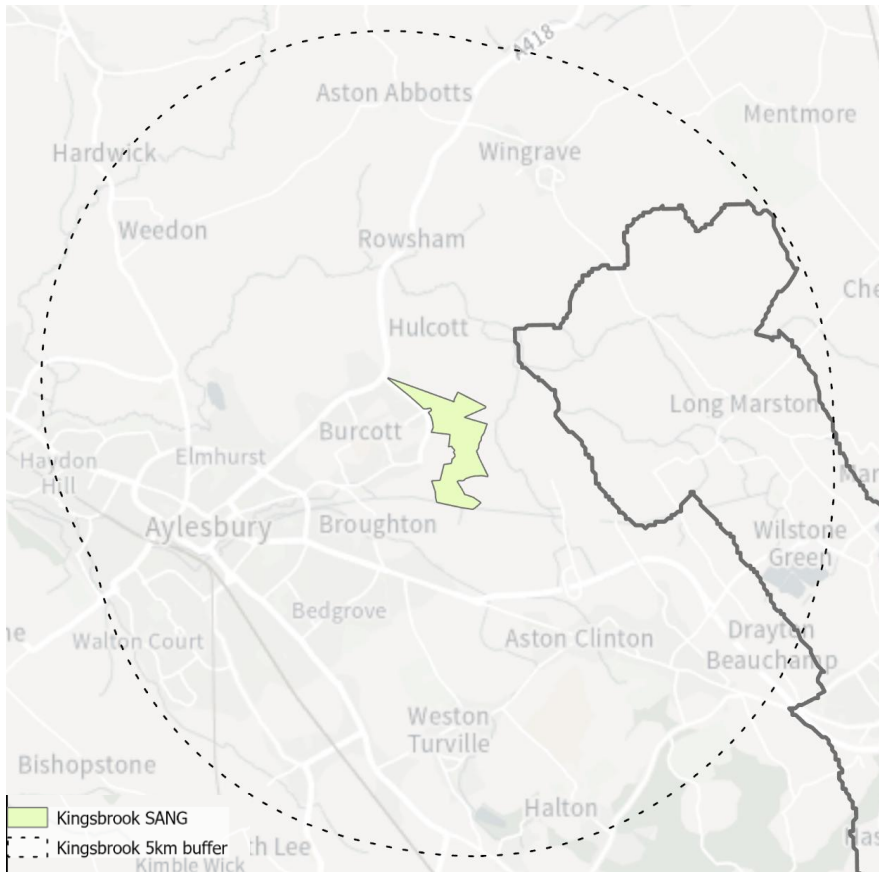
Definitions:

**Project level/ bespoke SANG** – to mitigate a specific application eg Hampden Fields and Burton Lane, Lt Chalfont

**Strategic SANGS** – to mitigate multiple applications. Any development of 10 and above must be in a SANG catchment area.

All dwellings of 9 and under within the ZOI can be mitigated at a strategic SANG.

# Strategic SANG – Kingsbrook Meadows SANG



- Kingsbrook Meadows Strategic SANG would have capacity to mitigate 3395 new homes.
- Developers will be required to purchase SANG credits to mitigate against their development.

- 5km catchment

Delivery in phases-

- Phase 1 within 12months
- Phase 2- 24 months
- Phase 3- 40 months- includes visitor centre

# Kingsbrook Meadows- aerial view



# View –Phase 3 visitor centre

USE

The proposals are for a Visitor Centre within Kingsbrook Meadows which will be managed by RSPB. The building provides foyer, café, soft play, kitchen, toilets, retail and staff facilities.



**PROPOSALS:** CGI view of the approach to the entrance courtyard

# Who maintains the SANG?

- SANG must be managed in perpetuity (80 years minimum)
- This includes all the features of the SANG eg footpaths, car park fencing, dog bins (and emptying) and habitats.
- Applicants should demonstrate that the SANG will be viable over that period with sufficient funding available for the 80-year period.
- The management of the SANG must be by an 'enduring body' and the land transferred to that body through freehold or long lease arrangements.
- Natural England preference: local authorities, parish councils or trusts such as the Land Trust or English Estates with a dedicated land management function or similar bodies.
- The enduring body for Kingsbrook Meadows is RSPB.
- Management, enduring body and funding is secured through S106 agreement

# Strategic SANG – Kingsbrook Meadows SANG

The SANG credit will cost £5,314.57 per dwelling

This will cover

- in perpetuity maintenance and monitoring costs (at least 80 years)
- Habitat enhancement during its lifetime (Stage 2)
- Costs for administering and allocating credits and regular monitoring to be retained by the council

"Council led" in that the council will be responsible for allocations of credits, collect sums and pass to RSPB.



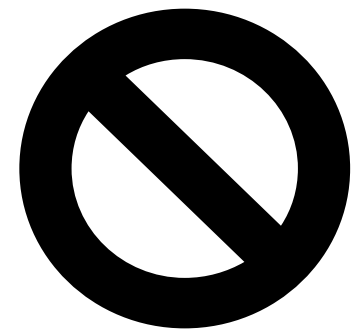
# Who qualifies?



- **Allocations Priority Protocol**

Section 6 of the Bucks Mitigation Strategy (August 2024) sets out the priority for allocations

- *a) Existing sites with planning permission;*
- *b) Developments of up to 9 dwellings or equivalent within the 12.6km zone (outside the 500 avoidance zone);*
- *c) Allocations from the Development Plan where these are located within the catchment of a Strategic SANG that has sufficient capacity;*
- *d) Allocations from emerging neighbourhood plans where these have been through the examination process and are at referendum stage;*
- *e) 100% Affordable Housing sites;*
- *f) Rural Exception Sites;*
- *g) Windfall sites/any other site in excess of 9 dwellings or equivalent, provided they are located within the catchment of a Strategic SANG that has sufficient capacity; and*
- *h) Permitted developments considered through the prior approval process where a regulation 77 application is being made.*



## Who may not qualify?

- *Strategic SANG for un-allocated sites or those that do not currently have planning permission, will only be allocated to developments once sites are confirmed to be Policy Compliant at the point the Section 106 is completed*

### What not allocated?

- *Strategic SANG capacity will not be allocated to affected proposals in the following circumstances:*
- *6.9.1. **Permission is refused:** Development that is refused permission will not be allocated any Strategic SANG capacity. This may include inappropriate Development in the Greenbelt or Chilterns NL.*
- *6.9.2. **Appeals** it should not be assumed that the Council will reserve any Strategic SANG capacity for proposals that are appealed and any exception to this will be on a case-by-case basis.*
- *6.10. In such instances, the applicant will be expected to seek an alternative form of SANG capacity or deliver its own bespoke local/project SANG solution.*

# When will Kingsbrook Meadows SANG be ready to use?

- Phase 1 - 26.1 ha will be delivered and open within 12 months - capacity for 1,305 dwellings.
- Phase 2- 17.69 ha- will be delivered and open within 24 months – capacity for a further 884 dwellings
- Phase 3- will be delivered and open within 40 months- capacity for further 1,205 dwellings
- Condition on residential developments restricting occupancy until SANG open to public.

## Other SANG



### Other potential sources of SANG mitigation

- Resolution to grant on Bell Lane, Lt Chalfont (PL/24/3925/FA) subject to amended Management Plan and S106 agreement
- Halfway Farm House application near Chesham/ Great Missenden area.
- Both of these are willing to enter into a legal agreement and appoint English Estates as the enduring body.
- S106 must be completed and permission granted before can accept as mitigation .
- Proof of credits to be purchased from private run SANG
- Grampian condition restricting occupancy until SANG open to public.

## Mitigation Strategy – next steps



- Applicants must confirm if they wish to purchase credits from Kingsbrook (or other)
- Officer will draft an Appropriate Assessment under the Habitat Regulations and consult Natural England
- Both the SAMMS and SANG payments will be secured through S106 agreements- UUs or bi lateral
- Payment by developers on commencement of development, but
- Can opt to pay on completion of agreement
- Grampian condition to restrict occupancy until SANG open

# Legal Agreements and Decision Making

- Secure Special Area of Conservation Mitigation  
*(Strategic Access Management and Monitoring Strategy (SAMMS) and Strategic Accessible Natural Green Space (SANG))*
- Types of Legal Agreements
- Prior to determination of affected planning applications



# Progress and next steps- summary

- Kingsbrook SANG now determined and credits can be allocated
- Progress other strategic SANGs in south of Zone of Influence
- Legal Agreements
- Officers proceed to determine applications



# Development outside Bucks

- For Kingsbrook Meadows – council responsible for allocations
- Privately operated SANG developer responsible for allocations developments

# Frequently asked questions

- How do we deal with developments incrementally seeking developments of 9 and under?
- Will a development only partly in catchment be regarded as within catchment?
- How quickly will other SANG be granted/ delivered?
- Who is responsible for emptying dog/waste bins in SANG?
- Can we refuse a SANG when it is not linked to development or there is no/limited growth in an area?

# Useful links and templates



- Main website pages: [Development in the Chiltern Beechwoods Special Area of Conservation | Buckinghamshire Council](#)
- Most recent FAQ's (Oct 2025) [Microsoft Word - FAQs-Chiltern-Beechwoods-SAC SEPT 2025](#)
- What do you need to submit for a S106 agreement: [What you need to provide for an S106 agreement](#)
- SANG and SAMM Action Plan checklist: [SANG and SAMM Action Plan-final.docx](#)
- Appropriate Assessment revised template July 2025: [Appropriate Assessment template revised July 2025 clean copy.docx](#)
- Suggested text for report drafting and post S106 agreement reports: [Wording for Officer Reports](#)

# Questions



## Further resources

- Buckinghamshire's Chilterns Beechwoods Special Area of Conservation Recreational Pressure Mitigation Strategy adopted August 2024: [Read the Mitigation Strategy document](#)
- [FAQs](#) by Buckinghamshire Council