

## NORTH HERTFORDSHIRE DISTRICT COUNCIL

Council Offices, Gernon Road, Letchworth Garden City, Hertfordshire, SG6 3JF

Telephone: (01462) 474000

Text Phone: (01462) 474800

DX 31317, Letchworth



Sue Holden  
Chief Officer  
Chilterns Conservation Board  
The Lodge  
90 Station Road  
Chinnor  
OX39 4HA

Our Ref: LettAONB/HL/SH  
Contact Officer: Helen Leitch  
Direct Line: 01642 474513  
Email [helen.leitch@north-herts.gov.uk](mailto:helen.leitch@north-herts.gov.uk)  
Date: 21 December 2018

Dear Sue,

### **Re: Chilterns AONB draft Management Plan 2019-2024**

Thank you for the opportunity for North Hertfordshire District Council to comment on the draft Management Plan. Our detailed comments for each section have been submitted, as requested, on-line (see copy attached) but we would like to make some general comments regarding the overall structure and content of the Management Plan.

While we realise that you need to focus the comments received, it would have been beneficial to be able to comment on the Policies in each section as well as the Strategic Objectives. Of the four questions for each section only two allow free text – one for the Objectives and one for the Actions. Therefore we have included our comments on the policies within the two free text areas.

Sections 5 to 10 (the six themes of Nature; Historic Environment; Land, Woodland and Water; Enjoyment and Understanding; Social and Economic Wellbeing; and Development) lack consistency as some sections have supporting text for the policies and others do not. Some policies are very specific and others cover a number of issues. Also, we consider that the order of some policies could be reviewed to put overarching policies first followed by policies relating to specific issues.

We realise that the scope of the different sections varies but there is a range in the number of objectives in each section between 3 & 8, and in the number of policies in each section between 12 & 21. This gives a total of 30 Objectives and 89 policies, plus the four general policies. Also there is overlap between some sections in their Objectives and Policies creating repetition or in some cases leading to potential conflict. For example, policy NP12 (p29) *Help visitors to discover and enjoy wildlife in the Chilterns sensitively while not harming or disturbing it* is similar to, and could be included in, policy EP8 (p45) *Promote greater understanding of the Chilterns*

*landscape and respect for other users, through communication and education.*  
Policy SP7 (p49) *Encourage greater use of the AONB landscape to improve levels of physical and mental health and wellbeing* also refers to helping visitors enjoying the AONB and could also be included. We would suggest that further consideration could be given to the number of policies and whether some could be combined to reduce the overall number as well as seek to address the potential conflict between the various sections.

If it is not appropriate to have a definition for 'the setting' of the AONB then this needs to be stated in the document with a reason. Similarly, if the definition of 'major development' is different within the AONB then this also needs to be clarified.

We are concerned about conflict between encouraging more visitors into the AONB without having the supporting sustainable infrastructure to cope with this potential increase, which may put pressure on other issues such as the rural economy, social well-being and the landscape that you are trying to conserve and enhance. There appears to be little supporting evidence to justify how the Conservation Board proposes to address sustainable transport measures through the Management Plan.

It is noted that collaborative/partnership working is promoted throughout the Plan. Further clarity is required with regard to how the Conservation Board anticipates the 'Key actions', as set out at the end of each section, will be delivered and who will be responsible for undertaking the actions. This will require careful consideration in terms of placing any additional burden on local authorities with decreasing resources.

The 2019-2024 Management Plan is a collaboration between the authors of the different sections and various other people with an interest in the AONB. The difficulty is to ensure that the objectives and policies fit together coherently to achieve a consistent document across all the themes. The Conservation Board might want to satisfy themselves that the Management Plan is an effective, workable document for the range of people who will use the Plan.

While the Council is generally supportive of the Management Plan and its intentions, the comments outlined in this letter and in our on-line response have highlighted certain aspects where we consider further clarification and suggested amendments could be made to the Plan. If you wish to discuss our comment in more detail then please contact Helen Leitch, Principal Urban Design & Landscape Officer.

Yours sincerely

A handwritten signature in black ink, appearing to read 'D Levett', with a long horizontal flourish extending to the right.

Cllr David Levett  
Executive Member for Strategic Planning, Enterprise and Transport



## CHILTERN AONB MANAGEMENT PLAN 2019-2024 CONSULTATION DRAFT FEEDBACK FORM

<b>Your Name:</b>	Helen Leitch
<b>Email:</b>	Helen.leitch@north-herts.gov.uk
<b>Organisation:</b>	North Hertfordshire District Council

We welcome your interest and feedback on the draft Chiltern AONB Management Plan.

The plan has undergone a complete restructure over the past 10 months based on internal and external review and feedback. The new plan includes the **key issues, objectives, policies and key actions** that we have identified for the area for the next five years and beyond.

We particularly welcome your comments on our Vision and General Policies (pages 15-18 of the draft Plan). Any feedback you're able to provide is welcome. Unfortunately, we are unable to reply to consultation responses individually.

The Management Plan is available for consultation from 23 October – 31 December 2018. Please complete, save and submit your response via our online submission form here: <https://www.chilternsaonb.org/management-plan-review>

### YOUR COMMENTS

#### INTRODUCTORY SECTIONS (pages 2 – 18)

<p>Do you agree with the general policies (GP1-GP4) set out on pages 15-18 of the Management Plan?</p> <p>GP1 YES</p> <p>GP2 YES</p> <p>GP3 YES</p> <p>GP4 YES</p>
<p>Do you agree with the Vision for the AONB?</p> <p>YES</p>
<p>Do you have any other feedback on the Introductory Sections?</p> <p>Within the Vision on p14, bullet point 8 states 'Only the most essential development should take place within the AONB.... How is 'most essential development' defined in respect of the AONB? It would also be useful to have an AONB definition of 'major development' if this is different from the recognised planning definition. How will the AONB manage the conflict between GP4 (contributing sustainable ecosystem services) (P18) and EO5 encouraging MUCH greater use of the Chilterns by people surrounding the Chilterns? (p43)</p>
<p>Please tell us what you would be willing to do to care for the Chilterns in the future</p>

## CHILTERNNS AONB MANAGEMENT PLAN 2019-2024 CONSULTATION DRAFT FEEDBACK FORM

### NATURE

Do you support the Strategic Objectives set out in the Nature section?

**YES**

Do you have any comments about the Strategic Objectives set out in the Nature Section?

**Policy NP12 Help visitors to discover and enjoy wildlife in the Chilterns sensitively while not harming or disturbing it. Needs to be rewritten as 'sensitively' either needs to be omitted or relocated after 'Help visitors to'.**

Do the Policies deliver the Strategic Objectives in the Nature section?

**YES**

Please tell us any Actions you feel are needed to achieve the strategic objectives.

**It is not clear who will be responsible for the Key Actions.**

### HISTORIC ENVIRONMENT

Do you support the Strategic Objectives set out in the Historic Environment section?

**YES**

Do you have any comments about the Strategic Objectives set out in the Historic Environment Section?

**Policy HP6 refers to Neighbourhood Plan but there is no mention of Neighbourhood Plans elsewhere or guidance on how Parish Councils or Neighbourhood Forums working with the local communities could get involved in locally listed heritage assets.**

**No supporting text has been provided for the policies in this section.**

Do the Policies deliver the Strategic Objectives in the Historic Environment section?

**YES**

Please tell us any Actions you feel are needed to achieve the strategic objectives.

**It is not clear who will be responsible for the Key Actions.**

### LAND, WOODLAND & WATER

Do you support the Strategic Objectives set out in the Land Woodland & Water section?

**YES**

Do you have any comments about the Strategic Objectives set out in the Land Woodland & Water Section?

**Objective LO2 ensuring the chilterns remains a functional, working landscape conflicts with desire to increase visitor numbers. There needs to be a careful balance between accessibility for visitors and the economy of the AONB. The words 'functional' and 'working' have similar meanings and one of them could be removed.**

**Policy LP4 deals with grazing on all areas of Chilterns chalk grassland. Further clarification is required in the supporting text regarding what can be done about the current uneconomic status of grazing as management.**

**Not all policies in this section have supporting text.**



## CHILTERN'S AONB MANAGEMENT PLAN 2019-2024 CONSULTATION DRAFT FEEDBACK FORM

Do the Policies deliver the Strategic Objectives in the Land Woodland & Water section?

**YES**

Please tell us any Actions you feel are needed to achieve the strategic objectives.

**It is not clear who will be responsible for the Key Actions.**

### ENJOYMENT & UNDERSTANDING

Do you support the Strategic Objectives set out in the Enjoyment & Understanding section?

**NO**

Do you have any comments about the Strategic Objectives set out in the Enjoyment & Understanding Section?

**Not all policies in this section have supporting text.**

**The first paragraph in the section talks about Londoners taking the train straight into the countryside. Presumably this is mainly people living north of the Thames as there are other recreation options more accessible for people living south of the Thames. How will people arriving at a tube or railway station on foot get access into the AONB countryside? Can there be links with public bus networks?**

**An objective should be to address the uneven spread of visitor pressure and protect the most vulnerable sites.**

**Objective EO5 seeks to Encourage MUCH greater use of the Chilterns countryside.... Surely encouraging greater use is sufficient?**

Do the Policies deliver the Strategic Objectives in the Enjoyment & Understanding section?

**NO**

Please tell us any Actions you feel are needed to achieve the strategic objectives.

**Policy EP3 is unclear. Is it about accessibility within the AONB or getting to the AONB?**

**Initiatives to improve accessibility to the AONB should be using sustainable transport.**

**Improving accessibility within the AONB should also include bus stops, tube and railway stations. It is unclear why the AONB should be the most accessible landscape in the country.**

**Policy EP4 is similar to policy NP11 in seeking engagement of volunteers.**

**Policy EP7 reference could also be made on how bike hire can be encouraged eg. at railway stations or car parks.**

**Policy EP8 promotes greater understanding of the Chilterns landscape and respect for other users through communication and education but there is no mention of potential effects on people who live and work in the AONB.**

**EP9 is similar to EP3 and EP10 in raising awareness and promoting the Chilterns. They could be combined.**

## CHILTERNNS AONB MANAGEMENT PLAN 2019-2024 CONSULTATION DRAFT FEEDBACK FORM

**Suggest that EP10 (including EP3 and EP9) should be the first policy in the section as it is about a Chilterns-wide visitor management initiative to ensure visitor use is sustainable. It is also not clear who will be responsible for the Key Actions.**

### SOCIAL & ECONOMIC WELLBEING

Do you support the Strategic Objectives set out in the Social & Economic Wellbeing section?  
**YES**

Do you have any comments about the Strategic Objectives set out in the Social & Economic Wellbeing Section?

**There is no mention of Local Enterprise Partnerships (LEPs) and the possibility to work in partnership with such organisations to promote economic opportunities in the AONB.**

**Policy SP12 Promote the Chilterns at key visitor entry points is similar to policies EP3 and EP9 resulting in duplication.**

Do the Policies deliver the Strategic Objectives in the Social & Economic Wellbeing section?  
**YES**

Please tell us any Actions you feel are needed to achieve the strategic objectives.

**It is not clear who will be responsible for the Key Actions.**

### DEVELOPMENT

Do you support the Strategic Objectives set out in the Development section?  
**YES**

Do you have any comments about the Strategic Objectives set out in the Development Section?

**None of the policies have supporting text.**

**DP2 and DP3 should be framed in a more positive way rather than refusing development except where it meets the criteria.**

**DP4 highlights development which generates traffic in or travelling across the AONB but what about the effect of encouraging increased visitor numbers and the need to diversify and encourage business in the AONB?**

**DP7 reads as if all permitted development within the AONB or its setting, regardless of scale or type, delivers on-site improvements for AONB visitor facilities.**

Do the Policies deliver the Strategic Objectives in the Development section?  
**NO**

Please tell us any Actions you feel are needed to achieve the strategic objectives.

**This form does not allow comments on any Policies within any of the sections., nor is it clear who will be responsible for the Key Actions.**



## CHILTERN AONB MANAGEMENT PLAN 2019-2024 CONSULTATION DRAFT FEEDBACK FORM

### **IMPLEMENTATION & MONITORING**

Do you have any comments about the Implementation & Monitoring Section?

**It would be useful to include the source of the data sets for each of the eight Core Monitoring Indicators. These Indicators are a good secondary level of monitoring presumably on an annual basis and more could be added if information becomes available.**