

CHAPTER 15 - BOVINGDON AIRFIELD

15.1. BOVINGDON AIRFIELD: GENERAL

Supports

<i>Rep No</i>	<i>Name</i>	<i>Rep No</i>	<i>Name</i>
1647	Flaunden Parish Council	4994L	English Nature
1899	Chiltern District Council		

15.2. BOVINGDON AIRFIELD: POLICY

Objections

<i>Rep No</i>	<i>Name</i>	<i>Rep No</i>	<i>Name</i>
634*	HCC Environment Department	4202	Mrs E M Nyboer
3224	Mr C Beney	4799*	HM Prison Service
3815	Mr & Mrs P H Gee	5188	Messrs A R & Executors of C Glenister

Counter Objection

To pre-inquiry change 213
5308PC HCC Environment Department

Supports for pre-inquiry changes

To pre-inquiry change 213
5277PC English Nature 5527PC CPRE - The Hertfordshire Society

Key Issues

- (a) Are the uses proposed in Policy 5 appropriate. (3815)
- (b) Should a Regional Helicentre be added to the list of potential uses for the airfield. (3224)
- (c) Does the previous use of land at Middle Lane affect its Green Belt designation. Should development be permitted to enable it to be restored. (3815)
- (d) Should the area bounded by Ley Hill Road, Shantock Hall Lane, Long Lane and Bovington Green Lane be designated for commercial and residential development. (5188)
- (e) Would it be appropriate for the nature conservation interest of the Brickworks area to be identified. (634)
- (f) Is it appropriate for the statement to refer to restoration of the clay extraction area and mineral workings. (5308PC)
- (g) Should the ancillary sites at Long Lane and Middle Lane be proposed as community nature reserves. (634, 3815, 4202)
- (h) Should the Plan indicate the need to take into account security and amenity considerations in respect of the proposed bypass. (4799)

Inspector’s Conclusions

General

- 15.2.1. I have previously indicated in Chapters 1 and 14 of my report that this section of the Plan would be better deleted and used instead as supplementary planning guidance. I have, nevertheless commented briefly on the detailed objections to this section of the Plan for the sake of completeness.

(a) Appropriate uses

- 15.2.2. The objector questions whether the uses identified under section 5 are appropriate and criticises the policies of the Airfield section of the Plan for failing to realise the brownfield nature of the airfield sites. The Council argues that in view of the area’s Green Belt location the uses proposed are appropriate.
- 15.2.3. Although some of the land covered by the airfield study might reasonably be classified as “brownfield” this does not mean that it should automatically be developed. The area clearly falls within the Green Belt. As such only those uses which are listed in paragraphs 3.4 and 3.12 of PPG2 could be considered appropriate. I consider that the uses listed in section 5 would fall within this list. To extend the uses to include residential development or other inappropriate uses would conflict with the advice in paragraph 3.3 of PPG2, which makes clear that local plans should not include policies which permit inappropriate development in the Green Belt. In the circumstances, I consider that the list of uses identified in section 5 is reasonable and I see no need for it to be modified.

(b) A Regional Helicentre

- 15.2.4. The objector has provided no evidence of need for such a facility in this location. Moreover the lack of existing buildings, combined with the site’s Green Belt status and its proximity to HM Prison The Mount, would be likely to render the airfield unsuitable for such a use. I therefore recommend that no modification should be made in response to objection 3224.

(c) Development of land at Middle Lane (Site 11)

- 15.2.5. I have already dealt with the Green Belt status of this land in paragraphs 4.27.11 to 4.27.22 of my report. I find no exceptional circumstances to warrant its exclusion from the Green Belt. Paragraph 1.7 of PPG2 makes clear that the objective of improving damaged or derelict land is not a material factor in its continued protection.
- 15.2.6. Turning to the issue of enabling development, I appreciate that there may be benefits from such an approach if it enabled the majority of the land to be designated and managed as a nature reserve. However, specifically encouraging such development within the Plan would, in my view, run directly contrary to the advice in paragraph 3.3 of PPG2. Consequently, I recommend no modification should be made to the Plan in this respect.
- 15.2.7. Whether or not the benefits of such development would amount to the very special circumstances necessary to warrant allowing inappropriate development in the Green Belt could only be properly assessed when all the evidence, including the full details of the enabling development, was available. This would clearly be a matter for the Council to determine at the planning application stage. I do not propose therefore to comment further on the merits of such a scheme.

(d) Land between Ley Hill Road, Shantock Hall Lane, Long Lane and Bovingdon Green Lane

- 15.2.8. I have already addressed the suitability of this site for commercial/residential development in Chapters 4, 7 and 8 of my report (*see sections 4.8, 4.27, 7.52 and 8.20*). I have concluded that in the light of the land’s inclusion in the Green Belt and its significant distance from the village this would not be a sustainable location for either housing or employment. Consequently, I recommend that no modification should be made in answer to objection 5188.

(e) Nature conservation interest of the Brickworks area

- 15.2.9. The objector points out that the clay extraction area has nature conservation interest and suggests this should be referred to given the impact restoration would have. The Council accepts this and proposes under PIC213 to insert a reference in section 9 to the enhancement of the site’s nature conservation interest. Since I understand this area has now been taken over by the Boxmoor Trust specifically for the purpose of managing it for its nature conservation interest I consider that this change is appropriate. I therefore recommend that it should be included in the amended policy.

(f) Restoration of the clay extraction area

- 15.2.10. The County Council question the inclusion of the references to the restoration of mineral workings as this is a matter for the Mineral Planning Authority and will need to be considered against the relevant policies of the Minerals Local Plan. The Borough Council considers it is valid to provide information on likely after uses.
- 15.2.11. I accept that it would normally be inappropriate to refer to minerals issues in a local plan. However, in this case the Plan merely indicates that restoration will be pursued with the Minerals Planning Authority. The suggested after uses would not appear to be inconsistent with the Minerals Local Plan. Consequently, I do not consider that their inclusion would cause any significant harm. However, the deletion of this section from the Plan and its reissue as supplementary guidance would ensure that any potential conflict within the Development Plan was avoided. This reinforces my view that this section of the Plan should be deleted.

(g) Community nature reserves at Long Lane and Middle Lane (Sites 4 and 11)

Long Lane (Site 4)

- 15.2.12. Mrs Nyboer argues that the reference to the site being designated as a community nature reserve is contrary to the advice in PPG9. She also points out that the ecological survey (CD112) that was undertaken as part of the Airfield Study did not identify the site as being of significant nature conservation interest. This view is supported by the County Council (634).
- 15.2.13. The Borough Council argues that the policy does not seek to designate the site as a nature reserve. Instead it merely states that support will be given to any community initiative which seek to achieve this objective. While the site may not be of substantial ecological interest this does not mean it would have no merit as a community nature reserve. There is proven interest from within the local community for such a use.

- 15.2.14. I have already dealt with this site’s Green Belt status and its proposed use for housing in sections 4.27 and 7.52 of my report respectively. I, therefore, propose to deal solely here with the issue of whether it is appropriate for the Plan to support community initiatives to acquire and manage the land as a community nature reserve.
- 15.2.15. Paragraph 18 of PPG9 makes clear that local planning authorities should only apply local designations to sites of substantive nature conservation value, and take care to avoid unnecessary constraints on development. This advice is clearly intended to discourage local planning authorities from designating sites as being of nature conservation interest merely as a means to prevent unacceptable development.
- 15.2.16. In this case there is no evidence in this case that the site is of substantive nature conservation value. I appreciate that the Herts and Middlesex Wildlife Trust letter of April 1992 refers to the presence of Muntjac Deer, Badgers and Foxes. However, it goes on to say that it is unlikely that the site will be found to have major conservation interest. The subsequent ecological survey (CD112), which was undertaken in 1994, identifies the site as being of low interest and this designation appears to be substantiated by the representation from the Hertfordshire Biological Records Centre.
- 15.2.17. I note the Council’s argument that the advice in paragraph 18 of PPG9 does not apply in this case as the Plan merely seeks to support the site’s informal designation as a community nature reserve. However, while the relevant policy may not directly contravene this advice I consider that it comes very close to doing so. In my view what is effectively being encouraged in the Plan is the creation of a non-statutory nature reserve, which PPG9 clearly lists as a local designation. I appreciate that the Plan does not actually designate the land for this purpose. Nevertheless, in the absence of any clear evidence that the site is of substantive nature conservation value I find the aim of objective 10 of the Bovingdon Airfield policy runs contrary to the spirit of PPG9, insofar as it relates to the Long Lane site.
- 15.2.18. I appreciate that just because the site is not currently of significant conservation interest would not prevent it being acquired and managed as a community nature reserve. However, while support for such a use might be justified where there were no other sites of nature conservation interest within the area, it is clear from the ecological survey (CD112) that there are a large number of sites within the immediate vicinity that are of high or moderate local interest. In my view this brings into question the value of developing this site as a nature reserve.
- 15.2.19. Although I do not accept the objector’s arguments that it would be too costly to acquire and manage the site for this purpose, I consider that there is little realistic prospect of this actually being achieved. Not only does the owner appear unwilling to sell the land for this purpose but it is clear from Mr Elkins letter¹ that the Bovingdon and Flaunden Green Belt Protection Group, who originally appeared to have put forward the suggestion for a nature reserve, is currently dormant. More significantly despite this idea having been originally raised in 1992 there has been no effective progress towards achieving this goal over the intervening ten-year period.
- 15.2.20. I acknowledge that the Inspector who considered the alterations to the Plan in 1997 recommended no modification should be made in respect of this part of the Bovingdon

¹ See Appendix 3 to LPA Doc. No. 721 – DBC/1A

Airfield Policy. However, this recommendation appears to have been influenced more by the importance he attributed to the site’s contribution to the Green Belt than to its nature conservation value. I have already indicated in paragraphs 4.27.32 to 4.27.40 of my report that the site continues to make an important contribution to the Green Belt. However, I do not consider this is sufficient reason to encourage its use as a community nature reserve. On balance, I would recommend that the reference to support for any local community initiative to acquire and manage land at Long Lane (Site 4) as a community nature reserve would be better deleted.

Middle Lane (Site 11)

- 15.2.21. The situation with regards the land at Middle Lane is in my view rather different. The ecological survey indicates that this site has a high local interest owing to its diversity of habitats. I consider therefore that its designation as a community nature reserve would be beneficial and would not conflict with the advice in PPG9.
- 15.2.22. However, while I do not believe that it would be necessary to go to the expense of removing all the foundations, roadways and other remnants of the previous infrastructure on the site to achieve this, I am concerned that the prospects of such a scheme being realised appear rather uncertain. Moreover, I saw during my accompanied site visit that a considerable amount of vegetation has been removed from parts of the site. It is unclear whether this will have reduced the site’s conservation value. In my view therefore the site needs to be reassessed before reaching any final conclusion as to whether to modify the policy in relation to this site.
- 15.2.23. If the Council is satisfied that the site retains sufficient nature conservation interest and believes that there is a genuine prospect that it could be acquired and managed as a community nature reserve then I believe it should be retained within the Bovingdon Airfield Policy. If not then, in my view, it should be deleted.

(h) Requirements for the proposed bypass

- 15.2.24. The Plan attached to the policy shows a possible route for a Bovingdon bypass. The objector merely requests that the need for details of any possible route take into account security and amenity considerations in respect of the prison. However it also points out that the bypass is not referred to in the transport policies of the Plan and is not shown as a ‘safeguarded line’ on the Proposals Map. In response to the objection the Council proposes under PIC214 to delete the bypass route from the Bovingdon Airfield Sites Map.
- 15.2.25. The issue of the possible bypass route was considered in some detail by the previous Inspector who considered the objections to the Dacorum Borough Local Plan Alterations Package 1996 (*see paragraphs 31. To 3.6 of CD40*). He concluded that the line of the bypass should be deleted. Quite why this recommendation was not acted upon is unclear. It is apparent that the bypass is not included in the Local Transport Plan or in the transport proposals in the Local Plan. In the circumstances, there seems little realistic prospect of it being realised during the Plan period. As such I consider its deletion is sensible and I endorse PIC214.

Recommendation

- 15.2.26. **The Plan be modified by the deletion of the Bovingdon Airfield Policy, which should be issued instead as supplementary planning guidance.**
- 15.2.27. **The following modifications be made to the Bovingdon Airfield Policy:-**
- (a) amend in accordance with PIC213;**
 - (b) delete the reference to Site 4, Long Lane from section 10;**
 - (c) review the inclusion of Site 11, Middle Lane in section 10;**
 - (d) alter the Bovingdon Airfield Sites Map in accordance with PIC214.**

END OF CHAPTER 15