

James Gardner
Planning & Development
Dacorum Borough Council
The Forum, Marlowes
Hemel Hempstead
Herts. HP1 1DN

Our Ref:

Your Ref:

8th December 2023 (by email)

Dear James Gardner,

Application no. 23/02508/MFA
Haresfoot Farm (Commercial), Chesham Road, Berkhamsted
Change of use from agricultural land to a Suitable Alternative Natural Greenspace (SANG)
together with provision of a new car park

I write with regard to the above application to which CPRE Hertfordshire objects strongly for the following reasons.

1. The land identified for this proposed change of use is designated as London Metropolitan Green Belt in the adopted Dacorum Local Plan. We recognise that the provision of Suitable Alternative Natural Greenspace (SANG) may be seen generally as compatible with Green Belt purposes in maintaining openness and the character of the countryside in this location.
2. Our principal objection to this proposal, however, is that it fails completely to provide a satisfactory open space of a size and form which is likely to mitigate the effects of over-use of the Chilterns Beechwoods Special Area of Conservation (SAC). By comprising a series of linked fields around a busy farm and commercial establishment it cannot provide an attractive alternative open space for people presently using the SAC.
3. The Mitigation Strategy prepared by Dacorum Borough Council and neighbouring authorities adjacent to the SAC provides guidelines for the provision of SANG. The Mitigation Strategy notes the quality of the Ashridge Commons and Woods SSSI as possessing an "air of relative wildness" (Chiltern Beechwoods Special Area of Conservation Mitigation Strategy, Dacorum Borough Council, 2022, page 28) and that "SANG should aim to reproduce this quality" (op. cit. page 30).
4. It is clear that Haresfoot Farm is used for business and commercial activities, as well as an equestrian centre and the use of the farm site generates heavy goods vehicle and other traffic related to recycling activities which generate contaminating material. The



immediate proximity of the proposed SANG, and apparent possible incorporation of part of the commercial establishment within its boundary renders the present proposal entirely inappropriate.

5. There will be noise from the A41 which is a fast and busy dual carriageway which would directly impact the site. The six feet high fence proposed to reduce noise impact would block the view from the Public Right of Way which runs along the northern edge of the proposed site.
6. It is also not credible to suggest that future residents of the proposed Grange Farm development at Bovingdon, to which this proposal is linked, are going to travel nearly three miles to walk or exercise their dogs when there is a plethora of paths and attractive open countryside much nearer. The only likely users of this proposed SANG will be local residents who may well be affected by the requirements for free-running dogs as specified in the SANG guidelines, in the light of the proximity of the farm and commercial activities.
7. The required length of circular path is only achieved by a sinuous route which includes three pinch points on the boundary of the farm buildings and will not provide the variety of views and experiences which is intrinsic to the SANG concept. It is self evident that this proposal will not provide any meaningful mitigation of the over-use of the SAC and we would request that the Council provides clear guidance and direction with regard to what would constitute appropriate mitigation to achieve the results intended. CPRE Hertfordshire would be pleased to assist in providing such guidance.
8. We urge the Council to refuse permission for this clearly inappropriate proposal.

Yours sincerely,

Chris Berry
Planning Manager

NOTE: We would request that this letter is published on the Council's website as a document relating to this application and should be grateful if you would notify us of the date of the appropriate meeting if it is to be determined by planning committee.