



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

Our Ref:

Your Ref:

12th January 2024 (by email)

Dear James Gardner,

**Application no. 23/02972/MFA
Land at Castle Hill, Berkhamsted**

Planning application for the change of use from agricultural land to Suitable Accessible Natural Green Space (SANG), with vehicular access, car park, paths, fencing and landscaping

I write with regard to the above application for SANG as part of the Mitigation Strategy to reduce the public impact on the Chilterns Beechwoods Special Area of Conservation (SAC). Whereas we accept that SANG may constitute an appropriate use for land in the Green Belt and Chilterns Area of Outstanding Natural Beauty (AONB), we have several significant concerns which we would appreciate the Council taking into account in their determination of this application.

1. In general, the importance of issues relating to the countryside are considerably increased by the location of the site in the Chilterns AONB and partly in the Green Belt. The site immediately adjoins the settlement boundary of Berkhamsted and so performs a critical purpose of the Green Belt in preventing encroachment and urban sprawl.
2. The site is already an important open area widely used by the local communities that value both the landscape character and the network of Public Rights of Way (PRoW) providing access for public recreation. It is important that this character is protected and enhanced as required by several policies in the adopted Dacorum Core Strategy as well as those of the Chilterns Conservation Board.
3. A key concern relates to the openness of the countryside which is a particular feature of the site, enabling superb views of the Chiltern Hills in the area covered by the site. Tree planting is proposed which will jeopardise this landscape character at the higher elevations and affect detrimentally views from the PRoWs just outside the site; further consideration should be given to tree planting at lower levels which will benefit biodiversity while maintaining the open aspect of the site and impressive views.



4. The benefits of the SANG are reduced by the location of only three entrance points as identified in the Applicant's consultant's Transport Statement (Figure 4.1) and this may diminish the attractiveness of the site for visitors. Pedestrians from residential areas to the south and further afield will need to walk along the boundary fencing before being able to access the open space and there appear to be no access points at all to the north and east of the site, except in the south-east corner.
5. A crucial issue for CPRE Hertfordshire is to maintain the open and natural countryside nature of the site, as required by the Mitigation Strategy in its call for SANG to reflect the "wild" nature within the Chiltern Beechwoods SAC, and specifically the Ashridge Commons and Woods Site of Special Scientific Interest (SSSI). We believe that such an objective is significantly prejudiced by the presence of permanent fencing within the site, and any fencing as part of measures to increase biodiversity should be temporary at best.
6. It will also be necessary to prevent the possible proliferation of additional facilities such as cafes, toilets or other activities which are incompatible with a more natural landscape character. Similar concerns relate to the shielding of car-parking and we would urge the Council to be flexible with regard to the amount of car-parking required to be provided which will also have a direct impact on the landscape character.
7. Further concern may be expressed with regard to the lack of detail in the application on the future management of the SANG and overall monitoring of the performance of a management entity. This is a wider issue which applies to SANG generally and requires careful consideration by the Council to prevent the deterioration of this site and others through lack of maintenance and upkeep.
8. Although a significant increase in biodiversity is proposed by the Applicant, the proposal is silent with regard to specific protected species, principally skylarks, which are present on the site and in severe decline nationally. A much more comprehensive treatment of the biodiversity issues is required than is presently being proposed to ensure that the fullest possible protections are being provided.
9. A specific concern relates to the impacts of a likely increase in dog-walking in relation to the guidelines for SANG which promote dogs running freely. This is likely to have significant consequences for wildlife. There may be additional impact if dog-owners transfer from local commercial dog-walking facilities to the free provision offered by the SANG.



10. CPRE Hertfordshire supports fully the wide range of local community responses which relate to the above concerns and related matters. The provision of this SANG in respect of a potential development approximately three miles away west of Hemel Hempstead is not credible when there are many options for residents much closer.
11. A coordinated and more comprehensive review of SANG provision is required to fulfil the objectives of the Mitigation Strategy, rather than the piecemeal determination of individual applications initiated by developers. CPRE Hertfordshire would be pleased to assist the Council in responding to the requirements of the Mitigation Strategy in providing a robust and effective response to the over-use and damage being caused to the Chilterns Beechwood SAC.

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.