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Standing up for Hertfordshire's countryside

Sally Robbins
Planning & Development
Dacorum Borough Council
The Forum, Marlowes
Hemel Hempstead
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Our Ref:

Your Ref:

26th June 2024 (by email)

Dear Sally Robbins,

Application no. 24/01239/MOA
Land at Nettleden Road, Potten End, Berkhamsted
Change of use from agricultural land to Suitable Accessible Natural Green Space (SANG),
together with a vehicular access, car park, paths, fencing and landscaping

I write with regard to the above application for the provision of Suitable Accessible Natural Greenspace (SANG) in respect of the mitigation of the impacts of public use on the Chiltern Beechwoods Special Area of Conservation (SAC). CPRE Hertfordshire is aware of the Mitigation Strategy agreed by Dacorum Borough Council and supports the provision of appropriate and significant SANG in the right locations while wishing to raise the following concerns about this application.

1. CPRE Hertfordshire is concerned that the Mitigation Strategy achieves the objectives of reducing the detrimental impacts of over-use at the Ashridge Estate, and is not seen simply as a means of developers discharging planning obligations for proposed developments without considering the full range of impacts on the locations selected. This is particularly important given the protection afforded by Green Belt, Rural Area and National Landscape (AONB) designations at this location.
2. The impacts on wildlife on the subject site could be severe and a major concern is the impacts on the four ground-nesting bird species known to be present on the SANG; corn bunting, (now a rare and rapidly-declining species with a national decline of 83% between 1967 and 2020) grey partridge, yellow wagtail and skylarks. These are Section 41 species and thus protected by paragraph 185b of the National Planning Policy Framework (December 2023) and they are likely to be displaced and disturbed by dogs roaming freely.
3. Increasing visitor numbers to the SANG area with dogs are likely to lead to increased access to the banks of the River Gade at Water End via the Public Right of Way which crosses the SANG site and crosses Nettleden Road to reach the riverside. This is a Local

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President: Sir Simon Bowes Lyon, KCVO
Chairman: Allan McNab

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Wildlife site and an area of wet meadow, very liable to wear and tear through over-use which could increasingly pollute the river, an internationally recognised chalk stream.

4. It is inappropriate in our view that measures designed to protect the SAC could damage another important habitat, and one which is less robust than the SAC itself. The wet meadow area is increasingly being used by commercial dog walkers and there is a local concern that the SANG could become similarly affected.
5. The planning application includes very limited indications of how and for how long the SANG is to be managed for the benefit of local communities and visitors. In the event that the Council grants permission, it should satisfy itself that the mechanism for continual maintenance is robust and long-lasting.
6. It will be necessary to include strong legal obligations on any institutional arrangements which are made with the developers and their agents. Any successor organisation should have clearly drawn responsibilities to maintain the high quality of this protected rural landscape and possess the resources to undertake necessary maintenance and management in perpetuity.

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.