

Standing up for Hertfordshire's countryside

Andrew Right
Planning and Building Control
St. Albans City and District Council
St. Peter's Street
St. Albans
Herts AL1 3JE

Our Ref:

Your Ref:

21st November 2018 (by email)

Dear Mr. Wright,

Application No. [5/2018/2725](#)
Change of use of land to residential caravan site for up to 10 caravans, new
hardstanding and boundary fence
on Land at Tullochside Farm, Hemel Hempstead Road, Redbourn, Hertfordshire

CPRE Hertfordshire have concerns regarding this application to increase the number of units on this site by almost 40%.

The right to place residential caravans on land at Tullochside Farm was achieved through appeal in 2011. This application attempts to substantially expand the site by relying on the Inspector's judgement in that appeal. However, circumstances have changed over the intervening period.

The site is in the Green Belt. The additional pitches proposed in this application represent inappropriate development in the Green Belt under the policies in the National Planning Policy Framework, the national Planning Policy for Travellers Sites and the Green Belt policies in the current St Albans Local Plan and the emerging Local Plan. In all cases it is necessary for the applicant to demonstrate very special circumstances sufficient to outweigh the potential harm to the Green Belt by reasons of inappropriateness, and any other harm. No such case is put forward.

Normally we would expect to see a demonstration of the need for such pitches. Unfortunately the Planning Statement accompanying the application does not present detailed information about need to live or work locally nor any attempts to explore the availability of alternative forms or locations for accommodation for the proposed occupants of the additional pitches.

The August 2015 revisions to Planning Policy For Travellers Sites states that "*Traveller sites (temporary or permanent) in the Green Belt are inappropriate development... and unmet need is unlikely to clearly outweigh harm to the Green Belt and any other harm so as to establish very special circumstances.*" (para. 16) Consequently the Council's current lack of Traveller Sites can only be given limited weight. Similarly, para. 17 states: "*Green Belt boundaries should be altered only in exceptional circumstances. If a local planning*

authority wishes to make an exceptional, limited alteration to the defined Green Belt boundary ... to meet a specific, identified need for a traveller site, it should do so only through the plan-making process and not in response to a planning application.” In other words, this change of use should be effected through the Local Plan process, currently underway, and not through ad-hoc planning applications such as this.

We urge the Council to reject this application.

Yours sincerely,

David Irving