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Standing up for Hertfordshire's countryside

James Gardner
Planning and Development
Dacorum Borough Council
Civic Centre
Marlowe
Hemel Hempstead
Hertfordshire HP1 1HH

Our Ref:

Your Ref:

7th May 2021 (by email)

Dear Mr. Gardner,

**Application No. 21/00834/FUL
Upper Bourne End Lane, Hemel Hempstead
Construction of snail tunnels, agricultural barn and related track.**

I write with reference to the above application for a snail farm which constitutes further proposed development in an area of the London Metropolitan Green Belt which is already subject to considerable encroachment into the open countryside. CPRE Hertfordshire objected recently to a previous application for development of a 'health sanatorium' adjacent to this location (reference 21/01238/FUL) and is similarly concerned about this application for the following reasons.

1. The land identified for this proposed development is located within the London Metropolitan Green Belt as identified in the existing Dacorum Local Plan. The National Planning Policy Framework (NPPF) as revised in February 2019 requires land designated as Green Belt to be kept "permanently open" (para. 133) and "inappropriate development should not be approved except in very special circumstances" (para. 143).
2. The area proposed for the development is covered by an Article 4 Direction which removes permitted development rights in sensitive locations, "when the character of an area of acknowledged importance is threatened" (Planning Portal). Designation of the land as Green Belt provides such acknowledgement and thus it is not appropriate for the "Permitted development of small-scale erection of snail tunnels, agricultural barn and related track" as noted by the applicant in their Supporting Statement and Agricultural Justification.
3. The application is significantly incomplete with regard to information in a number of important aspects. The Site Plan and Location Plan are both untitled and although apparently scaled, provide neither dimensions nor indication of how the proposed tunnels and barn are sited, nor of their relationship to immediately adjacent polytunnels or tracks. Materials are not specified beyond the use of timber and

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President: Sir Simon Bowes Lyon, KCVO
Chairman: Richard Bullen

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corrugated iron for the sheds and there is no detail regarding either the internal layout of uses and activities or external appearance and site treatment.

4. No adequate indication is given of the provision of services and facilities including water and electricity supply, and drainage. The applicant notes the need for 'huge water consumption' for the operation but the source is not specified, other than 'water tanks' which are not located on the plans. The need for highly controlled internal conditions for breeding will presumably require the installation of heating, ventilation and extraction equipment, none of which are specified.
5. The provision of a septic tank, as noted in the application, is highly unlikely to be satisfactory given the amount of water to be used, and there is no sanitary or other facilities indicated for operating staff. The application form indicates that there will be no employment on site which would appear to be an error.
6. No indication is given of the requirements of biosecurity with regard to the potential impact of snail propagation on surrounding crops and plant life. This is likely to be an important consideration and the Council will need to satisfy itself that the appropriate controls are put in place to prevent any impact from the introduction of alien species.
7. The addition of tunnels and barn on a site with existing polytunnels constitutes a significant increase in commercial activity on a protected site. The access down a small unimproved track is unlikely to be adequate for any additional activity and no indication is provided of any improvements which would be necessary for access by water supply and waste disposal tankers, for example, and other commercial vehicles.
8. No description is provided of the 'very special circumstances' which are required for development to be permitted in the Green Belt, as noted above. The accompanying 'Justification' document is inadequate in the information it provides; listing various references to policy and statute without providing any commentary on its relevance to the application, as well as referring to Shropshire Council on several occasions, presumably in error.

Yours sincerely,

Chris Berry
Planning Manager