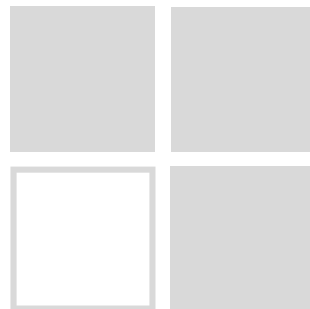


**MH Planning**

5 High Street  
Swaffham Prior  
Cambridge  
CB25 0LD



## **St Albans Local Plan Examination**

**Additional Documents Consultation, 4 July – 22 August 2025**

**Representation on SADC/ED79, Meeting the identified needs for  
Gypsies and Travellers and Travelling Showpeople – Additional  
Clarification**

**On behalf of:**

**Gate Herts (Gypsy & Traveller Empowerment, Hertfordshire),  
Representation 372; and  
Myles Green, Representation 158**

**MH Planning  
22 August 2025**

## **1.0 Introduction**

- 1.1 This representation builds on those we have already made on behalf of GATE Herts in regard to the Regulation 18 Consultation, September 2023; the Call for Gypsy and Traveller sites, August 2024;, and the Regulation 19 Consultation, November 2024, and on behalf of Myles Green in regard to the Regulation 19 Consultation, November 2024.
- 1.2 At para 4.14 of our Reg 19 submission on behalf of GATE we asked the Inspectors to indicate at the earliest possible point in the process that the plan cannot be found sound without adequate allocations for Gypsy and Traveller residential use. At para 4.16 we asked the Inspectors to require the Council to appraise which, if any, of the Broad Locations are the most appropriate to include allocations for Gypsies and Travellers, and the timescale for their delivery.
- 1.3 We are concerned that the Council's approach to provision for residential accommodation for Travellers is profoundly inadequate and unsound. To avoid unnecessary delay with the examination and adoption of the plan, in parallel with submitting these representations we have written to the Local Plan Examination Inspectors asking them to require the Council to carry out the following work in order that the Plan can be found sound:
- A review of the assessment of need for Gypsy and Traveller residential accommodation focussed on the needs of Gypsies and Travellers living in 'bricks and mortar' accommodation, and on the level of over-crowding on existing sites; and
  - A study to identify a supply of Gypsy and Traveller residential allocations, which would need to be brought forward as modifications to the Draft Plan. This should include an appraisal of the Broad Locations for Development to identify which of them should include site allocations and / or broad locations for growth.
- 1.4 A copy of the letter to the Inspectors is included at Annex 1.

## **2.0 What are the Identified Accommodation Needs for Gypsies and Travellers over the Plan Period?**

- 2.1 Subject to rounding and to the inclusion of the family living roadside in St Albans, the minimum Pitch Target of 98 pitches we suggested in the table at para 4.18 of our Reg 19 Representation corresponds with the 95 pitches to 2041, SADC/ED79 Table 1.
- 2.2 In the text below the table at para 4.18 of our Reg 19 Representation we stressed that 98 was a minimum requirement, which should be met, rather than a ceiling which should not be exceeded, and we summarised the reasons for believing 98 was an under-estimate.
- 2.3 In the light of changed circumstances since we submitted our Reg 19 Representations, we have two major concerns with the soundness of the needs assessment: the failure to include any need from Travellers in bricks and mortar housing; and the potential underestimate of need from concealed households / doubling up / overcrowding.

### **Travellers in Bricks and Mortar Housing**

- 2.4 Para 3.8 of our Reg 19 Representation explained why the need from Travellers in bricks and mortar housing should not be ignored.
- 2.5 Para 3.19 of the 2024 Gypsy and Traveller Accommodation Assessment (GTAA) explains that Opinion Research Services (ORS) only take account of need from housed residents that they have been able to identify through their own interviewing. This does not mean the need is not there, only that they have not been able to identify it. Para 3.18 explains how ORS attempted to identify Travellers in housing. In our submission, the approaches used by ORS are not adequate for a target group with distrust of officialdom and sometimes often limited literacy and who are 'hard to

reach', and often conceal their identities for reasons including prejudice from neighbours.

- 2.6 We have been personally involved in carrying out a GTAA, [https://www.fenland.gov.uk/media/22223/Accommodation-Needs-of-Gypsies-Travellers-Travelling>Showpeople-Boat-Dwellers-and-Bargees/pdf/Fenland\\_GTANA\\_Report\\_-\\_May\\_2025.pdf?m=1749650411647](https://www.fenland.gov.uk/media/22223/Accommodation-Needs-of-Gypsies-Travellers-Travelling>Showpeople-Boat-Dwellers-and-Bargees/pdf/Fenland_GTANA_Report_-_May_2025.pdf?m=1749650411647) . The Report established, Table 4, page 66, that out of a gross need for 72 pitches in Fenland 2024/25 to 2028/29, 28 of that need, or 39% was from Travellers in housing. An important finding of the Fenland study was that while the proportion of housed Travellers who are in need of pitch accommodation is significantly lower than for those on sites, because the population in housing is larger, the absolute number in housing needing pitch accommodation is substantial.
- 2.7 We were able to identify so much need from Travellers because we interviewed a large number of people in housing, 175 out of 291 interviews, and because interviews were carried out by members of the travelling community, who were trusted by those being interviewed, Fenland report paras 6.9 – 6.15. In other examples of GTAAs we are familiar with, which identified a significant level of need from housed Travellers (Cambridge Sub-Regional Accommodation Needs Assessment, 2006, Leeds GTANA 2025, work in progress) interviewing was also carried out by Travellers.
- 2.8 While ORS generally do not identify need from housed Travellers, other prominent research firms do. At Annex 2 we include screen shots from Arc 4's Central Lancashire GTAA, December 2024, and from RRR's North Norfolk GTAA, September 2024. Here we would emphasise, that it is not that ORS do not accept there might be need from housed Travellers, it is that their approach to carrying out surveys means that they are generally unsuccessful in identifying that need.

- 2.9 Needs assessments tend to ignore or underplay need from housed Travellers because they are 'hard to reach' but also, because of the widespread but incorrect assumption that all Travellers living in housing will want to stay in housing. Over the years, many families were forced into housing by the complete lack of alternatives available to them. While some housed Travellers adapt and come to value the facilities that bricks and mortar housing can provide, a significant number do not. People's attachment to living on sites, in the open air, sleeping in caravans, and travelling for at least part of the year, and some people's intolerance and psychological aversion to bricks and mortar housing should not be underestimated.
- 2.10 Ignoring need from housed Travellers risks the GTAA underestimating needs by a large amount. Nationally 78.4% of those identifying as Gypsies and Travellers in the 2021 Census were in bricks and mortar accommodation, including 107 households in St Albans (which because of people concealing their identity is likely to be a serious under-estimate). If the Fenland figure of 39% of the need for pitches coming from housed Travellers is of the right scale the 2024 St Albans GTAA would underestimate needs by a large amount.

### **Overcrowding**

- 2.11 The 2024 GTAA implies a need for some 19 pitches from concealed households / doubling up / overcrowding.<sup>1</sup> It is not clear from the GTAA how these needs were identified.
- 2.12 The fire on 12 July on the Ver Meadows site, Annex 2, shows how devastating fires can be on Traveller sites, and the major importance of adhering to the required distances between different structures.

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<sup>1</sup> This is based on 17 from Travellers who meet the definition, Figure 8, plus 3 x 0.79 from undetermined Travellers, figure 13.

- 2.13 Information provided by the Council in response to a query about the GTAA evidence stated that 7 of the need for 19 pitches from concealed households / doubling up / overcrowding came from the three local authority sites: 3 from Park Street, 4 from Ver Meadows, and none from Barley Mow. That implies that 12 of the need for pitches from concealed households / doubling up / overcrowding came from people on the private sites.
- 2.14 Our colleague, Pedro Rodriguez-Parets Maleras of Harvard University has carried out a review of over-crowding on the local authority sites, Annex 3. Based on the most recent aerial photographs on Google Earth Pro of March 2025 he found that 9 pitches on Park Street, 12 on Ver Meadows, and 11 on Barley Mow did not meet the requirements in the Model Standards 2008 for Caravan Sites in England for 6 metres between separately occupied caravans and for private cars to be at least 3 metres from adjacent caravans separation.
- 2.15 In Annex 4 Pedro has shown how occupation of sites has become much denser in recent years. Based on aerial photographs, the area of the site occupied by caravans, vehicles and amenity buildings increased by 26% between 2000 and 2025 on Barley Mow and Little Orchard, and by 72% on Park Street. Pedro's work suggests a much higher level of over-crowding than the figures for concealed households / doubling up / overcrowding from the GTAA. Given the importance of fire safety this issue requires further work before the Plan can be found sound.

### **Conclusions on Accommodation Needs**

- 2.16 The 95 pitch need to 2041 acknowledged by the Local Planning Authority is a significant underestimate and does not provide a robust evidence base to inform preparation of the Local Plan, as required by PPfTS para 7 c). We would ask the Local Plan Examination Inspectors to require St Albans to carry out an additional needs assessment focussing on the

needs of housed Travellers, and on the level of overcrowding on existing sites.

- 2.17 The review of over-crowding does not necessarily require additional interviewing. It may be that by comparing our data on over-crowding from Pedro's survey with ORS's data that we can reach agreement on an appropriate figure for need from concealed households, doubling up and over-crowding.

### **3.0 Does the Plan make suitable and effective provision to meet identified needs? Will needs be met in full?**

- 3.1 At para 4.1 of our Reg 19 Representation we stated that Policy HOU6 is profoundly inadequate and unsound. Apart from the proposals for two 15 - 20 pitch sites in East Hemel Hempstead, which may be equated with broad locations for growth, it ignores the para 10 a) and b) PPfTS requirement to identify a 5 years' supply of specific deliverable sites, and a supply of specific developable sites or broad locations for growth for years 6 to 10, and where possible for years 11 to 15. A plan which makes allocations for the housing needs of the settled community, but not Travellers, is likely to be discriminatory and contrary to the Public Sector Equality Duty.
- 3.2 At para 4.14 of our Reg 19 Representation we asked the Inspectors to indicate at the earliest possible point in the process that the plan cannot be found sound without adequate allocations for Gypsy and Traveller residential use. At Annex 2 to our Representation, we enclosed a note from the Inspectors who examined the Greater Norwich Local Plan relating to the work involved in bringing forward allocations through modifications. We would respectfully ask the Inspectors to make a similar request to St Albans. We cannot see how the plan can be found sound without an adequate level of allocations

- 3.3 On the assumption that the plan is adopted in 2027, and based on the minimum level of need in the table at para 4.18 of our Reg 19 Representation (that is before any additional need from housed Travellers, and from reviewing the overcrowding on sites is included):
- the 5 years supply of specific deliverable sites required by PPfTS para 10 a) would equate to the need for the 5 years 2024 – 2028 and four fifths of the need for 2029 to 2033, that is  $56 + 14 \times 4/5 = 67$  pitches (rounded);
  - the supply of specific developable sites or broad locations for growth for years 6-10 would equate to one fifth of the need for 2029 to 2033, and four fifths of the need for 2034 to 2038, that is  $14 \times 1/5 + 16 \times 4/5 = 16$  pitches (rounded).
- 3.4 This means that the Plan must as an absolute minimum identify allocations equivalent to  $67 + 16 = 83$  pitches, plus any additional needs from Travellers in housing and the review of overcrowding.
- 3.5 The assessment at paras 3.10 – 3.27 and Appendix of SADC/ED79 is inadequate. It does not represent an analysis of the suitability of sites for allocation. This is made clear by the statements at the end of the individual assessment sheets *'The identification above of potential capacity is undertaken on a without prejudice basis in relation to individual planning applications'* and at para 3.13 *'The proforma assessments represent a relatively high-level review. A more detailed assessment in relation to aspects including highway access, drainage details, ecological and landscape impacts and mitigation etc would be made at planning application stage when specific proposals are assessed.'* The failure to make allocations will mean that when applications come forward there risks the high level of conflict and cost to the applicant and LPA there often is with Traveller proposals, and there is no certainty that they will be approved and proposals.



3.6 Here we would point out two particular issues with the Council's assessment.

3.7 For the following reasons the assumption of an **average** pitch size of 320m<sup>2</sup> is too small:

- It is extremely difficult, if not impossible, to accommodate the required provision, on individual pitches – amenity building, mobile home, touring caravan, parking, small garden area – and to provide the 6m. spacing between separately occupied caravans that licencing requires for fire safety reasons;
- The fire on the Ver Meadows site shows the importance of adequate distance between caravans;
- Compared with the position when most social rented sites were developed in the 1960s and 1970s, mobile homes, and on some private sites, amenity buildings have increased in size;
- Traveller families often have a significant number of cars, as well as commercial vehicles;
- The shortage of accommodation, combined with the tendency of Travellers to live in extended families, means pressure to increase the number of residential units and vehicles within pitches;
- Individual sites be irregular in shape, and, as well as pitches, sites may also need to provide space for internal access roads, sustainable drainage systems, strategic landscaping and green space;
- One authority arc4 (eg at Central Lancashire GTAA para 3.18) has recommended, on the basis of residential units being at least 3m from the pitch boundary and 6m apart a minimum pitch size of 25m x 25m or 625m<sup>2</sup> to accommodate a twin unit chalet, touring caravan, amenity building, two parking spaces and amenity space, and a larger pitch of 25 x 30m or 750m<sup>2</sup> for larger households requiring several units;
- While work by Leeds City Council cited by the LPA pointed to average pitch size of 320m<sup>2</sup>, a concept design by the City Council

for a 10 pitch site included a number of smaller pitches with more limited accommodation and had a total area of 7,125m<sup>2</sup> or 712.5m<sup>2</sup> per pitch.

- 3.8 Based on the above and on work we have done for individual Traveller applicants, we would suggest that in assessing the number of pitches that can be accommodated on different sites that a typical land requirement per pitch ie including access roads, strategic landscaping etc of 550 – 700m<sup>2</sup> should be assumed. This would substantially reduce the number of pitches that could be accommodated from the sites assessed by the Council.
- 3.9 The second even more fundamental problem with the LPA's assessment is that the Council has not checked with the land owners whether they wish to have their sites allocated and when they would bring forward any proposals. Site owners will only bring forward proposals and incur the costs and stress of the planning application process when it is in their own interests. People may be content with a small family site, even though they own adjoining land.
- 3.10 Through the 2024 Call for Sites we had suggested a number of land holdings as having potential because we were concerned that the Council did not appear to have commenced the process of identifying and appraising sites for allocation. In the covering letter attached at Annex 5 we stressed: *'We would emphasise that at this stage we are not acting on behalf of and with the support of the land-owners, but are identifying the land as potentially available and suitable for accommodating additional Gypsy & Traveller accommodation. In determining which sites to allocate in the Local Plan the Council will need to liaise with the land owners.'*
- 3.11 To comply with the definition of specific deliverable sites in footnote 4 to PPfTS, sites need to be deliverable now and be achievable with a realistic prospect development will be delivered within five years. This will not be possible without the active support and intention of the land owner.

- 3.12 We would also suggest that the emerging plan does not make suitable and effective provision because it effectively promotes a mix of provision: larger social rented sites and larger private sites, that does not correspond with meet people's needs and aspirations. In soundness terms we would question whether the approach is justified, an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.
- 3.13 The plan acknowledges a need for additional social rented pitches. We support this. Its proposals would result in 30 – 40 social rented pitches all in East Hemel. We will come onto our concerns with East Hemel, but at this stage, we would ask the Council whether this is the correct scale of additional social rented provision, and what the basis is for the figure.
- 3.14 Our other concern is the undue emphasis on expanding existing sites. We support the expansion of existing sites as one of a range of approaches to provision in St Albans. However, it should be recognised that it does not meet the aspirations of many Travellers to own their own home. It is unpopular with many families because they are dependent on private renting from other Travellers who will tend to favour their friends and family as tenants.
- 3.15 There is a strong demand within the Traveller communities for low cost, self-developed owner-occupied sites. One possible approach would be to develop small clusters of perhaps four pitches, with the pitches developed to a basic level with services and infrastructure, and sold, possibly on a part rent part buy basis, with site completion by the site purchasers. This type of provision would represent a form of affordable accommodation and would be less expensive to provide than social rented sites.
- 3.16 The following paragraphs outline our concerns with the Council's approach on specific sites.

## **East Hemel Hempstead**

3.17 We have been in discussions with Crown Estates about their proposals for East Hemel Hempstead. Key points we have made to them include:

- We support the inclusion of provision for Gypsies and Travellers within East Hemel, but have concerns with St Albans' assumption that the area should accommodate all the additional social rented provision for the District;
- The East Hemel Central allocation lies in a predominantly business area. Whether this is an appropriate location needs justification;
- The Hemel area will need to accommodate significant Traveller provision for Dacorum's own needs. Local residents in Hemel have suggested St Albans's requirements have been located on the far side of the M1, seemingly to distance it from areas more valued by St Albans Council;
- Larger social rented sites tend to be less successful. Previous government guidance suggested a maximum of 15 pitches. We would suggest a more cautious cap of 10 pitches;
- Rather than two 15-20 pitch social rented sites within East Hemel, we have suggested an appropriate level of provision might be one 10 pitch social rented site, and two clusters of four part developed self-build pitches.

## **The other Broad Locations**

3.18 The scale of provision required in St Albans means the appraisal of potential allocations needs to include the other Broad Locations in the Local Plan. The Plan does not explain why only East Hemel Hempstead is the only Broad Location asked to make provision for Travellers. One, or a number of the other Broad Locations may need to contribute to the required social rented provision. The Broad Locations are likely to be suitable for accommodating clusters of part developed self-build pitches.

### **Park Street / Watling Street**

- 3.19 For the reasons in our submission to the 2024 Call for sites, including the Council's own land ownership, and the fact that it can be brought forward at an early stage, the land at Park Street / Watling Street is a particularly suitable area to accommodate allocations. The fact that the Council has proposed allocations within East Hemel Hempstead does not represent a sound reason for not also allocating land at Park Street.

### **Luton Lane**

- 3.19 Its location in the countryside, but close to the facilities in Redbourn and with good highway access, suggests Luton Lane is a strong candidate for allocation. Indeed, it is among, if not the most suitable and available site, in St Albans. Unlike all the other privately owned sites appraised through SADC/ED79, where the Council does not know if the owners want to allocate their sites, the land has been promoted by willing Traveller site owners, and can be brought forward for development at an early stage. Following the fire at Ver Meadows, the owners offered it to the County Council and St Albans Council for emergency accommodation, an offer that was refused by St Albans for reasons related to an injunction on the land. We are advised that the injunction need not prevent development of the site for Traveller development, and in order to confirm whether the land can be allocated the work on site allocation should clarify this issue.

### **Conclusions on Provision**

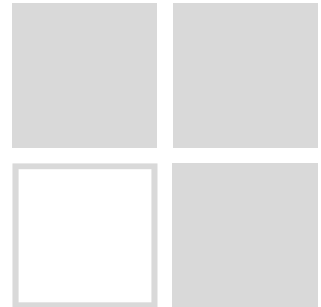
- 3.20 The Draft Local Plan does not comply with the requirements of PPfTS paras 10 a) and b). We would ask the Local Plan Examination Inspectors to require St Albans to carry out a study to identify a supply of Gypsy and Traveller residential allocations. The potential allocations would need to be subject to public consultation and sustainability appraisal, and brought forward as modifications to the Draft Plan. This work should include an

appraisal of the Broad Locations for Development to identify which of them should include site allocations and / or broad locations for growth.

## Annex 1: Letter to St Albans local Plan Examination Inspectors

### MH Planning

5 High Street  
Swaffham Prior  
Cambridge  
CB25 0LD



Inspectors Matthew Birkinshaw BA(Hons) Msc MRTPI, and  
Thomas Bristow BA Mac MRTPI  
Care of Louise St John Howe, Programme Officer  
St Albans Local Plan Examination

22 July 2025

Dear Inspectors Birkinshaw and Bristow,

### **Soundness of Gypsy and Traveller Policy in the St Albans Draft Local Plan 2041**

I write on behalf of GATE Herts (Gypsy and Traveller Empowerment, Hertfordshire) and my client, Myles Green.

I am writing to you directly to you in parallel with submitting our response to SADC/ED79, *Meeting the identified needs for Gypsies and Travellers and Travelling Showpeople – Additional Clarification* because of our profound concerns with the Plan's provision for Gypsy and Traveller residential needs. A copy of our response to SADC/ED79 is attached.

We believe that because of ignoring needs from Travellers in housing, and potentially because of underestimating need from concealed households, doubling up and overcrowding that the St Albans Gypsy and Traveller Accommodation Assessment, September 2024 does not provide a robust evidence base to establish accommodation needs to inform preparation of the plan, as required by Planning Policy for Traveller Sites 2023 para 7c).

Apart from the proposals for two 15 -20 pitch sites in East Hemel Hempstead, which may be equated with broad locations for growth, it ignores the para 10 a) and b) PPfTS requirement to identify a 5 years' supply of specific deliverable sites, and a supply of specific developable sites or broad locations for growth for years 6 to 10, and where possible for years 11 to 15. A plan which makes allocations for the housing needs of the settled community, but not Travellers is likely to be discriminatory and contrary to the Public Sector Equality Duty. Given the substantial level of need in St Albans, we cannot see how a plan which makes no allocations for residential provision for Gypsies and Travellers can be found sound.

We are concerned that the work needed to ensure the plan is sound will take time, and risks extending the timetable for adoption of the Plan. For instance, see the Note from the Greater Norwich Local Plan Inspectors, at Annex 1 to our response to SADC/ED79. The Inspectors Note outlines the work involved in identifying, appraising, and making allocations.

In the light of the time constraints, I am respectfully writing to ask you to require the City Council:

- to carry out an additional needs assessment focussing on the needs of housed Travellers, and the level of overcrowding on existing sites; and
- to carry out a study to identify a supply of Gypsy and Traveller residential allocations, which would need to be brought forward as modifications to the Draft Plan. This work should include an appraisal of the Broad Locations for Development to identify which of them should include site allocations and / or broad locations for growth.



Yours sincerely,



Michael Hargreaves BA BTP MRTPI

Copies to:

James Gummery, Chris Briggs, St Albans City and District Council

Josie O'Driscoll, GATE Herts

Myles Green

## Annex 2: BBC coverage of Ver Meadows Fire

<https://www.bbc.co.uk/news/articles/c20p2x4z7jqo>

# Council 'saddened' after fire destroys caravan site



Image source, Three Counties Guttering & Roofing

Image caption,

What was left of the caravan site after Saturday's fire

Danny Fullbrook

BBC News, Hertfordshire

Nicola Haseler

BBC News, Hertfordshire

- Published

14 July 2025

**A senior council officer said the authority was "deeply saddened" after a caravan site was left badly damaged by a fire.**

Hertfordshire Fire and Rescue Service was called to the Ver Meadows site near Redbourn in Hertfordshire at about 15:05 BST on Saturday.

The fire was out by 22:30, but 15 of the 18 camping pitches were hit.

Hertfordshire County Council's Scott Crudginton, deputy chief executive and executive director of resources, said he was "deeply saddened" to learn of the "devastating fire".



Image source, Three Counties Guttering & Roofing

Image caption,

The local council has started a fundraiser to help the travelling community

He added: "I would also like to reassure those affected that we at Hertfordshire County Council, alongside our partners at St Albans District Council, stand by you and will be supporting you.

"Since the fire, a range of organisations, including St Albans District Council and Hertfordshire County Council, have been working with those affected to ensure they are temporarily rehoused and their needs are met.

"We will continue to help them as they begin the gradual process of rebuilding their lives."

Redbourn Parish Council has set up an online fundraiser as it attempts to collect £5,000 for site users.

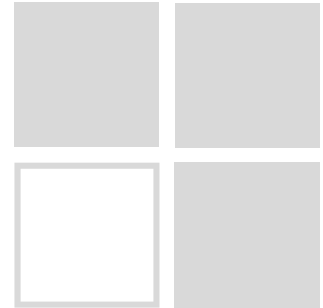
A spokesperson said the council had been "overwhelmed" with "requests from local residents to support our Redbourn traveller community".

Within two days, 115 people had donated a total of about £4,000.

## Annex 5: Covering letter to 2024 Call for Sites

### MH Planning

5 High Street  
Swaffham Prior  
Cambridge  
CB25 0LD



James Gummery  
St Albans City and District Council

10 August 2024

Dear James

### St Albans Local Plan 2041 Call for Gypsy and Traveller Sites

I write on behalf of GATE Herts (Gypsy and Traveller Empowerment, Hertfordshire).

Thank you for attending the workshop on 25 July, and for inviting GATE to submit proposals to the St Albans Local Plan Call for Gypsy and Traveller Sites.

GATE is specifically proposing the following area, which we understand is owned by St Albans Council:

- Land in the vicinity of Caravan Site, Watling Street, Park Street, St Albans AL2 2PZ.

The land at Watling Street is a particularly valuable resource because all the other sites we are suggesting or are aware of are in private ownership and consequently likely to be limited to private site provision. In our submission on Watling Street, we identify a number of options for how it could be developed. GATE would be happy to work with you, the existing site residents, the County Council Gypsy and Traveller team, and other partners to develop a proposal for the land.

We have identified a number of sites in the ownership of Gypsies and Travellers, which already provide accommodation, and have potential for site extensions (and in a small number of cases for unauthorised development to be authorised). Together this groups of sites provide substantial potential for contributing to meeting St Albans' needs because Gypsy and Traveller land owners tend to be strongly motivated to ensure sites are delivered.

We would emphasise that at this stage we are not acting on behalf of and with the support of the land-owners, but are identifying the land as potentially available and suitable for accommodating additional Gypsy & Traveller accommodation. In determining which sites to allocate in the Local Plan the Council will need to liaise with the land owners.

In the following cases we have identified the extent of the area potentially suitable for allocation:

- Meadowside;
- Adjoining 73 Chiswell Green Lane;
- Mill House Yard;
- Woodview Lodge;
- Nuckies Farm.

In these cases, we are not suggesting all the potential land is allocated, but that the Council should work with the land owners to agree the extent of the allocation:

- Ardens Rise;

- Tullochside.

We support the principle of the allocation of land for additional Gypsy and Traveller accommodation within the sites promoted through the previous call for sites:

- To the north-west and to the south of the Barley Mow caravan site; and
- Adjoining the Ver Meadows caravan site.

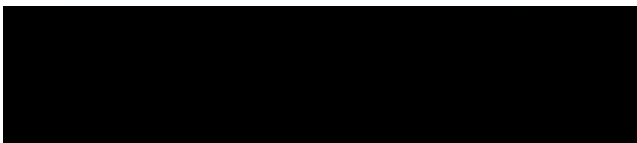
In both those cases we recognise the fact that the land is in private ownership, and that any development would need to be carried out in such a way as to ensure and guarantee the delivery of Traveller accommodation.

We strongly support the proposal submitted on behalf of James Cash to develop land at Luton Lane, Redbourn as a 15 pitch Gypsy & Traveller site.

We propose that all of the above sites are removed from the Green Belt and allocated as a Gypsy and Traveller residential site on the basis of Planning Policy for Traveller Sites para 17.

We welcome the opportunity to work with you to achieve a once in a generation improvement in the amount and quality of accommodation for Gypsy people in St Albans.

With kind regards,

A large black rectangular box redacting the signature of Michael Hargreaves.

Michael Hargreaves BA BTP MRTPI