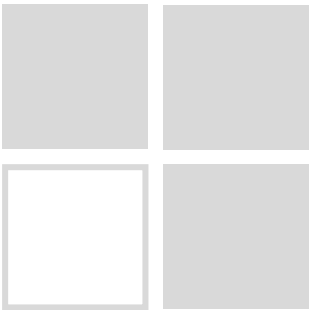


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St Albans Local Plan Examination

**Stage 2, Matter 6 Hemel Garden Communities, 21 - 22 October
2025**

Hearing Statement

On behalf of:

**Gate Herts (Gypsy & Traveller Empowerment, Hertfordshire),
Representation 372**

**MH Planning
12 September 2025**

1.0 Introduction

- 1.1 In responding to the Inspectors' questions this statement refers to the evidence in the representations we submitted to the Regulation 19 Draft Dacorum Local Plan, the Regulation 19 Draft St Albans Local Plan Consultation, and the response to St Albans' SADC/ED79, Meeting the identified needs for Gypsies and Travellers and Travelling Showpeople – Additional Clarification.

2.0 Issue 7 – North Hemel Hempstead (H1)

Q5 How have the mix of uses been established and how will development proposals come forward in a coordinated and coherent manner that achieves the aims and objectives of the wider HGC proposals?

- 2.1 In principle we support the requirement for provision for at least eight pitches for Gypsies and Travellers in North Hemel. Indeed, the scale of need in Dacorum, and the barriers to provision, including limited Traveller land ownership and extent of National Landscape might mean that North Hemel Hempstead would need to accommodate more than eight pitches if needs are to be met. This issue should be considered when the Examination considers the scale of need in Dacorum and the adequacy of the allocations
- 2.2 At paras 4.1 – 4.5 of GATE's representations on the Regulation 19 Dacorum Local Plan we indicated that the plan was unsound because the implied target of 20 pitches was too low and because of the failure to establish the need for transit pitches. At paras 4.16 – 4.18 we suggested a minimum target of 71 pitches. (We will revisit this in our evidence to the relevant hearing of the Dacorum Local Plan examination.)
- 2.3 At paras 4.6 – 4.14 of GATE's representations on the Regulation 19 Dacorum Local Plan we identified the weaknesses in the plan's

allocation for Gypsies. At paras 4.19 – 4.25 we asked the Inspector's to require Dacorum to identify and appraise an adequate supply of allocations.

- 2.4 At para 4.11 we stated, unless the Council can provide specific evidence that the pitches will be delivered within the plan period, that reference to the North Hemel Hempstead Growth Area should be deleted from the allocations in Table 5. This reflected the phasing for North Hemel Hempstead, which suggests it is doubtful the provision would be made within the plan period.
- 2.5 It reflected the lack of clarity about how the allocation would be delivered, as well as our concerns about the slowness of delivery through major developments, like urban extensions. Nationally, there is a strategic problem about Gypsy and Traveller proposals in major development schemes not being delivered. This problem has its roots in the unwillingness of developers to include such provision, and the reticence of LPAs to enforce requirements for them in the light of local opposition. While this is not necessarily the case in Dacorum, the process of moving to implementation on the sites west of Hemel Hempstead, and at Marchmont Farm has been ponderous, and no pitches have yet been delivered. There is a particular issue about the absence of agencies to manage sites. (We understand the S.106 agreement for West of Hemel Hempstead states, if a suitable provider / management company is not found, that the site will revert to housing.)
- 2.6 On reflection, we support the North Hemel Hempstead allocation, but the examination needs to be clear about what type of provision is proposed, social rented, private, or some kind of mid-tenure, such as the clusters of part-developed owner-occupied pitches, we suggest at para 3.12 below, and how they would be funded, delivered, and managed, and about the approximate timetable for the delivery of pitches.

3.0 Issue 8 – East Hemel Hempstead (North) H2

Q5 How have the mix of uses been established and how will development proposals come forward in a coordinated and coherent manner that achieves the aims and objectives of the wider HGC proposals?

Issue 9 – East Hemel Hempstead (Central) – H3

Q8 What is the justification for the provision of accommodation to help meet the needs of gypsies and travellers on H3, and not all other sites within the HGC Programme Area?

Issue 10 – East Hemel Hempstead (South) – H4

Q8 What is the justification for the provision of accommodation to help meet the needs of gypsies and travellers on H3, and not all other sites within the HGC Programme Area?

- 3.1 We address the issues relating to the three sections of land within St Albans District jointly.
- 3.2 We understand the work by Crown Estates on the urban design for East Hemel is suggesting the East Hemel Hempstead (Central) site is located between East Hemel Hempstead (North) and (Central). This has the potential to address our concerns about locating it within the commercial Central area.
- 3.3 In principle we support the inclusion of provision for Gypsies and Travellers within East Hemel, but we have a number of concerns with the Council's proposals.
- 3.4 We do not understand or support St Albans Council's assumption (HOU 04.01 - Meeting the Accommodation Needs of Gypsies and Travellers and TSP Evidence Paper Addendum para 1.2) that it should accommodate all the additional social rented provision for the District.
- 3.5 It is unclear why only East Hemel Central and East Hemel South are expected to deliver social rented provision and, for instance, the

potential of some of the other Broad Locations for Development to facilitate such development has not been considered. Through the 2024 Call for Sites, we suggested that land adjacent to the existing Gypsy and Traveller site, Watling Street, Park Street was potentially suitable to accommodate a social rented site. The rejection of that suggestion at page 39 of SADC/ED79 does not stand up to scrutiny. There is no mention of the fact that the Council's ownership of the land means it has the advantage that it can be brought forward for development more easily. The argument that provision will be made at East Hemel is circular if the case for all the provision to be made there is not robust.

- 3.5 We question whether two relatively large 15 -20 pitch sites in East Hemel is an appropriate way to accommodate need. Para 4.7 of the withdrawn Designing Gypsy and Traveller Sites Good Practice Guidance (Communities and Local Government, 2008), stated *'experience of site managers and residents alike suggest that a maximum of 15 pitches is conducive to providing a comfortable environment which is easy to manage. However, smaller sites of 3 - 4 pitches can also be successful.'*
- 3.6 The Council's assumption of an average pitch size of 320m², which we believe is too small, GATE Representation on SADC/ED79 para 3.7, suggests that what the Council may have in mind is to reproduce the local authority sites of the 1970s, which, with the growth in size of static caravans and of families, can easily lead to over-crowding.
- 3.7 The views of Travellers suggest that social rented sites should accommodate a range of types of pitch. A possible approach would be to develop:
- some pitches for older residents, freeing up larger pitches for bigger families. Such pitches could be developed with a small bungalow, garden area, and parking for one vehicle and one touring caravan;

- Standard pitches with room for an amenity building, mobile home, touring caravan, parking, and small garden area; and
- larger pitches for extended families.

- 3.8 This suggests that sites with a maximum of 10 -12 pitches and a range of pitch sizes is more likely to be justified and effective than 15-20 pitch sites, sites.
- 3.9 We do not believe that all the provision in East Hemel being on social rented sites is justified and would be effective. While there is an urgent need for additional social rented pitches, there is also intense demand for owner-occupied pitches on small sites.
- 3.10 The second problem with an over-dependence on social rented sites is the dearth of agencies with skills and experience to run such sites. Hertfordshire County Council manages the existing social rented sites in the county, but is not willing to take on new sites, and very few housing associations are interested in taking them on.
- 3.11 St Albans envisages, apart from the social rented provision in East Hemel, that the rest of the needs will be met by extending existing sites. We accept that extending existing sites should be one of the ways through which needs are met, but an over-emphasis on it risks Traveller landlords favouring friends and family, and charging high rents to others, or, in some cases, renting out static caravans to non-Gypsies. Such an approach would be unpopular with many Gypsies.
- 3.12 To meet the need for small privately owned sites we are suggesting that clusters of perhaps four pitches should be provided, with the pitches developed to a basic level with services and infrastructure, possibly including mains water, sewer connection, electricity, core washroom and kitchen unit (which could be extended later), and fencing. Such pitches could be sold, possibly on a part rent part buy basis, with site completion by the site purchasers. This type of approach has a number

of advantages. It is based on what many Travellers want, rather than what they have to put up with. It gets round the problem of the lack of agencies to manage sites. The cost to the developer or public purse would be lower, and the receipts from sales could be recycled into further such schemes.

- 3.13 We have suggested this model to Crown Estates, and suggested that one cluster of part developed self-build pitches, could be developed at an early stage in the development of East Hemel as a pilot project. This type of provision could be an appropriate feature of a number of the Broad Locations for Development.
- 3.14 Reflecting the above considerations, rather than two 15-20 pitch social rented sites within East Hemel, we would suggest that a better justified and effective approach might be one 10 -12 pitch social rented site containing pitches with a range of pitch sizes (or perhaps two 5-6 pitch such sites) together with two clusters of four part-developed self-build pitches. This is not prescriptive, but indicative of the type of approach, which is more likely to be justified and effective.
- 3.15 A corollary of this approach (and of the higher level of need in St Albans and of the requirement for the plan to make allocations) is that allocations are needed across the different parts of St Albans, and not just adjoining Hemel Hempstead on the other side of the M1 from most of the district.