

DELEGATED FILE NOTE

CASE OFFICER: ...Thomas Howe.....

APPLICATION REFERENCE	BRIEF DESCRIPTION OF DEVELOPMENT	APPLICATION SITE
25/02289/FP	Siting of one mobile home for agricultural workers accommodation.	Graveley Fruit Farm Jacks Hill Graveley Hertfordshire

Submitted Plan Nos

Location Plan PL02 PL03

1.0 Policies

SP2	Settlement Hierarchy and Spatial Distrib
-----	--

SP5	Countryside and Green Belt
CGB3	Rural workers dwellings
D1	Sustainable design
D2	House exts, replcmnt dwellings outbuild
D3	Protecting living conditions
T1	Assessment of transport matters
T2	Parking
SECN12	Achieving well-designed places
SECN13	Protecting Green Belt Land
SECN14	Meeting climate change,coastal,flooding
SECN15	Conserve + enhance natural environment

2.0 **Site History**

2.1 Various applications, none that are relevant to this application.

3.0 **Representations**

3.1 **Neighbour Consultation** – None received.

3.2 **Parish Council** – Support.

3.3 **Ecology** – No BNG required.

4.0 **Planning Considerations**

4.1 **Site and Surroundings**

4.1.1 The application site comprises a parcel of land within Graveley Fruit Farm, Graveley. The site is brushed over by the Green Belt and it outside of the defined settlement boundary of Graveley.

4.2 **Proposal**

4.2.1 Planning Permission is sought for the siting of a mobile home for agricultural workers accommodation.

4.3 **Key Issues**

4.3.1 The key issues for consideration are as follows:

- The principle of the development.
- The acceptability of the design of the proposed development and its resultant impact on the character and appearance of the area.
- The impact that the proposed development would have on the living conditions of neighbouring properties.
- The impact that the proposed development would have on car parking provision in the area.
- The impact that the proposed development would have on the environment.

Principle of Development – Rural Worker Dwellings in the Green Belt:

4.3.2 Paragraph 84 of the NPPF discourages the erection of isolated dwellings but suggests that rural workers' dwellings can be viewed as an extension to this, allowing for habitation near to their place of work. Policy CGB3 of the Local Plan relates to the erection of isolated rural workers' dwellings in the Green Belt. I consider that the site is suitably isolated, given its location away from Graveley within the countryside. This policy sets out certain criteria and these are discussed below:

4.3.3 Planning permission for isolated new homes in the countryside to support agricultural, forestry and other rural businesses will be granted provided that:

a) There is a clearly established existing functional need;

The submitted planning statement details that the mobile home is required to provide a permanent presence on site as a deterrence for vandalism, and for proximity to pigs within the site. It is also proposed for ewes to be introduced to the site at a future point. Therefore, it is advised that a presence is required for the rearing of livestock.

I consider that there would be a functional need for a permanent presence on site as a means of vandalism deterrence, and primarily, for providing proximity to livestock tending.

b) The unit and the rural business concerned have been established for at least three years, have been profitable for at least one of them, are currently financially sound, and should remain so;

Financial information was provided by the applicant, and this indicated that the business has operated and been profitable for at least three years. Therefore, this requirement is met.

c) The functional need could not be fulfilled by another existing dwelling on the unit, or any other existing accommodation in the area which is suitable and available for occupation by the workers concerned; and

The submitted planning statement advises that the site does not benefit from any dwellings within the site, and existing accommodation in the surrounding area is too expensive. Given the short-term tenancy required for workers, and their relatively high churn, the statement advises that it is difficult to balance securing a rental tenancy and subsequently, securing workers.

The matters discussed in c) are therefore considered to be met.

d) The proposal responds appropriately to the site's local context and the needs of the business in terms of design, scale and function.

The business requires 2 on-site workers, and the mobile home would provide sufficient accommodation for 2 persons. Given that the mobile home is not fixed to the ground, and requires little enabling infrastructure, and is therefore suitable for its context at this rural site.

The matter of the design of the mobile will be discussed and considered in full in the design section of this report. I do not consider that the location and type of accommodation would be similar to other proposals for market housing, and would therefore expect it be used for the housing of agricultural workers. The scale and design of the dwelling would meet its function.

4.3.4 CGB3 goes on to advise:

If a new home is deemed essential to support a rural business, it should first be permitted through a time-limited permission, or temporary accommodation such as a caravan. Permission for permanent dwellings will normally only follow in the event of a persistent need.

Given that this proposal is for the introduction of a static home/caravan, I consider that it is of a sufficiently temporary nature to comply with the provisions of this policy.

Principle of Development – Green Belt:

4.3.5 The site is set within the Green Belt in the Local Plan. The NPPF in paragraph 154 sets out what development is not inappropriate in the Green Belt.

4.3.6 Development in the Green Belt is inappropriate unless one of the following exceptions applies:

- a) buildings for agriculture and forestry;
- b) the provision of appropriate facilities (in connection with the existing use of land or a change of use), including buildings, for outdoor sport, outdoor recreation, cemeteries

and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;

c) the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;

d) the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;

e) limited infilling in villages;

f) limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites); and

g) limited infilling or the partial or complete redevelopment of previously developed land (including a material change of use to residential or mixed use including residential), whether redundant or in continuing use (excluding temporary buildings), which would not cause substantial harm to the openness of the Green Belt.

h) Other forms of development provided they preserve its openness and do not conflict with the purposes of including land within it. These are:

i. mineral extraction;

ii. engineering operations;

iii. local transport infrastructure which can demonstrate a requirement for a Green Belt location;

iv. the re-use of buildings provided that the buildings are of permanent and substantial construction;

v. material changes in the use of land (such as changes of use for outdoor sport or recreation, or for cemeteries and burial grounds); and

vi. development, including buildings, brought forward under a Community Right to Build Order or Neighbourhood Development Order.

Paragraph 150 states:

Certain other forms of development are also not inappropriate in the Green Belt provided they preserve its openness and do not conflict with the purposes of including land within it. These are:

a) mineral extraction;

b) engineering operations;

c) local transport infrastructure which can demonstrate a requirement for a Green Belt location;

d) the re-use of buildings provided that the buildings are of permanent and substantial construction;

e) material changes in the use of land (such as changes of use for outdoor sport or recreation, or for cemeteries and burial grounds); and

f) development, including buildings, brought forward under a Community Right Build Order or Neighbourhood Development Order.

- 4.3.7 Graveley is categorised as a Category A village and within the settlement boundary general development is permitted. Given that the site is outside of the settlement boundary I would not consider this to be of relevance and would consider the development to be inappropriate in terms of its relationship with Local Policy SP2. I do not consider that exception a) of Paragraph 154 is of relevance to the proposal given that this relates to the provision of accommodation, rather than for solely agricultural/forestry reasons such as for storage or livestock. No other exception applies, and I therefore consider that the proposal comprises inappropriate development in the view of the NPPF. As set out in Paragraph 153, the development would likely be refused unless a Very Special Circumstances (VSC) case can be suitably demonstrated. The submitted planning statement advises that significant weight should be given to the delivery of this mobile home due to it meeting a required

need, and would provide economic and social benefits, safeguarding the contributions that the business makes to the area.

Grey Belt:

4.3.8 The NPPF defines the Grey Belt as being:

“For the purposes of plan-making and decision-making, ‘grey belt’ is defined as land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143. ‘Grey belt’ excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development.”

4.3.9 Paragraph 143 advises that the five purposes of the Green Belt are:

- a) to check the unrestricted sprawl of large built-up areas;**
- b) to prevent neighbouring towns merging into one another;**
- c) to assist in safeguarding the countryside from encroachment;
- d) to preserve the setting and special character of historic towns; and**
- e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

4.3.10 Paragraph 155 of the NPPF sets out the following exceptions for development in the Green Belt, including for development on Grey Belt land. This is below:

The development of homes, commercial and other development in the Green Belt should also not be regarded as inappropriate where all the following apply:

- a. The development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan;
- b. There is a demonstrable unmet need for the type of development proposed;
- c. The development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of this Framework; and
- d. Where applicable the development proposed meets the ‘Golden Rules’ requirements set out in paragraphs 156-157 below.

4.3.11 The application site is within parcel ‘15a’, as defined by the North Herts Green Belt Review 2016. The review identifies the parcel, as a whole, makes a moderate contribution to Purpose A, a strong contribution to purpose B, and a limited contribution to purpose D. In isolation, the proposal seeks to introduce a temporary structure within an existing agricultural unit, with some built form in its vicinity. Given the isolated nature of the site, and the presence of built form, comprising poly-tunnels and other associated permanent buildings, I do not consider that the land/wider site makes a strong contribution to purpose A. Furthermore, its isolation from the built core of Stevenage is not considered to allow for a finger of development or an extension to the main built core. Turning to purpose B, I do not consider that the proposal would result in the erosion of this gap between Stevenage and Baldock, or cause a loss of visual separation of the two towns. Therefore, the proposal would not undermine Purpose B, and the site does not make a strong contribution to Purpose B. I do not consider that Purpose D would be harmed owing to the site’s isolation from the setting of a Historic Town. In the round, it is considered that the proposal is set on land in the Grey Belt.

- 4.3.12 Point a. within Paragraph 155 would be complied with. Compliance with Policy CGB3, together with the narrative provided in relation to a functional need, including for tending to livestock, both existing and proposed, and for security reasons, and the lack of suitable accommodation in the area is considered to be sufficient to prove a demonstrable need for such accommodation in the area. Given the site's proximity to Graveley and Stevenage, both with various amenities, it is considered that the site is in a suitably sustainable location. Point d. is not relevant given that this is not a major development. Therefore the proposal would meet the provisions of NPPF 155 and would not be inappropriate development within the Green Belt.

Sustainability:

- 4.3.8 The application site is considered to be in a moderately sustainable location. Graveley, a Category A Village, benefits from amenities and the application is in relative proximity to these amenities. Residents can walk to Graveley, though it is likely that they would cycle or drive. Public transport links are in the area and these provide links to the local area and wider district/area. This would reduce the likelihood that a private vehicle is required on medium to long distance journeys and is viewed positively.
- 4.3.9 Social and economic sustainability would be benefited by the development by virtue of prospective employment benefits for contractors nearby during the construction and maintenance of the dwellings.

Design and Appearance:

- 4.3.6 Policy D1 of the Local Plan states that development will be granted provided the design of the development appropriately and positively responds to the site's local context together with other criteria to encourage a positive and sustainable form of development. Policy D2 of the Local Plan requires extensions to houses and the erection or replacement of buildings to incorporate design that is sympathetic to the main building in terms of its scale, form and orientation and does not harm the character and appearance of the locality around the site. These policies are broadly consistent with Section 12 of the National Planning Policy Framework.
- 4.3.7 The proposal comprises the introduction of a single storey, rectangular mobile home. It would feature an appearance tantamount to a static caravan. Its siting is within a grassed areas presently used as an informal storage area, and would be sited behind a large hedge away from areas predominantly used by visitors and members of the public to the site. Given the obscured nature of the location, and its relatively utilitarian appearance, I do not consider that the proposed mobile home would be harmful to the character and appearance of the surrounding area.
- 4.3.8 The proposed development is therefore considered to be in compliance with Policies D1 and D2 of the Local Plan and the core principles set out within Section 12 of the National Planning Policy Framework. The design and appearance are therefore acceptable.

Impact on Neighbouring Properties:

- 4.3.9 Policy D3 of the Local Plan permits development that does not result in unacceptable harm to the amenity of neighbouring occupiers and where necessary encourages the use of mitigation measures to reduce these impacts. This is generally reflected by the provisions within the National Planning Policy Framework.

- 4.3.10 Given the isolated location of the mobile home from neighbouring dwellings, and its central location within the wider site, the mobile home is not considered to overbear or overlook neighbouring occupiers. No neighbour objections have been received.
- 4.3.11 Given the above, it is considered that the proposed development would result in no unacceptable detrimental impact upon neighbouring occupiers and is therefore compliant with Policy D3 of the local plan and the aims of the National Planning Policy Framework.

Standard of Amenity for Future Occupiers:

- 4.3.12 The proposed caravan would comprise approximately 38 sqm of accommodation, and would be for 1-2 workers at a time. Given that this is a caravan, I do not consider that it is reasonable to require compliance with national space standards for a dwelling. Each worker would benefit from an individual bedroom space, a shared bathroom and a shared living space. I consider that this would deliver a suitable level of amenity for the occupants.

Environmental Implications:

- 4.3.13 The proposed development, by virtue of its limited scale in general terms together with the sustainable location would have no significant implications for the local environment in terms of carbon emissions and therefore would be generally in compliance with Section 14 of the NPPF.
- 4.3.14 The proposal is not subject to nationally required BNG, and therefore no metric is required. The unit would be set on an existing area of grass. Given the temporary nature of the proposed mobile home, I do not consider that it should be required to deliver measurable BNG as required by Policy NE4.

4.4 Conclusion and Planning Balance

- 4.4.1 The proposed mobile home, for use as an agricultural worker's dwelling would normally constitute inappropriate development in the Green Belt, but is concluded as comprising development on Grey Belt land and the provisions of NPPF paragraph 155 would be met in this instance. Notwithstanding this, the applicant has identified material considerations in support of the application that would constitute very special circumstances that would clearly outweigh the harm to the Green Belt if it was considered that the proposal would be inappropriate development. Given the above, I consider that the development should be acceptable subject to a condition being imposed that ties that use of the dwelling to the agricultural work that its resident is part of.
- 4.4.2 The proposed development is considered acceptable and is considered to comply with the necessary provisions of the Local Plan policies and the National Planning Policy Framework. Grant conditional permission.

4.5 Alternative Options

- 4.5.1 None applicable.

5.0 Recommendation

- 5.1 That planning permission be **GRANTED** subject to the following conditions:

1. The development hereby permitted shall be begun before the expiration of 3 years from the date of this permission.

Reason: To comply with the provisions of Section 91 of the Town and Country Planning Act 1990 as amended by Section 51 of the Planning and Compulsory Purchase Act 2004.

2. The development hereby permitted shall be carried out wholly in accordance with the details specified in the application and supporting approved documents and plans listed above.

Reason: To ensure the development is carried out in accordance with details which form the basis of this grant of permission.

3. The occupation of the mobile home shall be limited to a person solely or mainly employed, or last employed, in the locality in agriculture as defined in Section 336 of the Town and Country Planning Act 1990, or in forestry, or a dependent of such a person residing with him or her, or a widow or widower of such a person.

Reason: The site is within an area where there is a presumption against new development unless it is essential for agricultural or other special reasons. Permission in this case is granted solely in the light of the agricultural necessity and thus the occupation of the dwelling is restricted to ensure its continued use in fulfilling that need and to comply with Policy CGB3 of the North Hertfordshire Local Plan 2011 to 2031.

Biodiversity Net Gain

1. This development is not subject to the statutory Biodiversity Gain Plan condition because it is considered exempt under the statutory exemptions (<https://www.gov.uk/guidance/biodiversity-net-gain-exempt-developments>) or transitional arrangements in respect of the biodiversity gain condition.

Proactive Statement:

Planning permission has been granted for this proposal. The Council acted proactively through early engagement with the applicant at the pre-application stage which led to improvements to the scheme. The Council has therefore acted proactively in line with the requirements of the Framework (paragraph 38) and in accordance with the Town and Country Planning (Development Management Procedure) (England) Order 2015.

Signed  Shaun Greaves Determining Officer	Development Management North Hertfordshire District Council Council Offices Gernon Road Letchworth Herts SG6 3JF
Date: 18 November 2025	