

IN THE HIGH COURT OF JUSTICE

Claim No. KB 2026-

KING'S BENCH DIVISION

IN THE MATTER OF SECTION 187B TOWN AND COUNTRY PLANNING ACT 1990

BETWEEN: -

SOUTH CAMBRIDGESHIRE DISTRICT COUNCIL

Applicant

And

- (1) TOM PRICE**
- (2) ASHLEIGH PRICE**
- (3) JACOB LEVY**
- (4) FRANCES O'DONOGHUE**
- (5) TRISTIAN SMITH**
- (6) MICHEAL FLYNN**
- (7) MARK COOPER**
- (8) WILLIAM DOHERTY**
- (9) DOUGLAS WARD**
- (10) WILLIAM FAULKNER**
- (11) MAISIE CLARKE**
- (12) MARY DOHERTY**
- (13) GERRY CONNORS**
- (14) DREWEY AMBROSE PRICE**
- (15) PERSONS UNKNOWN**

Defendants

FURTHER WITNESS STATEMENT OF CHRISTOPHER BARNES

Introduction

1. The facts and matters set out in this statement are within my own knowledge unless otherwise stated, and I believe them to be true. Where I refer to information supplied by others, the source of the information is identified; facts and matters derived from other sources are true to the best of my knowledge and belief.
2. I make this statement further to the witness statement I made dated 29 May 2026 in support of the interim injunction at land West of Moor Drove, Histon,

Cambridgeshire. I refer to those witness statements for my position at South Cambridgeshire District Council, my experience, and my knowledge of the site. I write this statement to update the court on G&T need, the planning application, and correspondence received advocating for one of the potential defendants.

Gypsy & traveller pitch need

- South Cambridgeshire District Council, together with Cambridge City Council, commissioned a Gypsy and Traveller Accommodation Needs Assessment, with the published report dated September 2024. Overall, over an 18 year period, the need for 130 pitches in South Cambridgeshire was identified, see below table:

Table ES1 Gypsy and Traveller pitch need across South Cambridgeshire 2023/24 to 2040/41

Period	Pitch need South Cambridgeshire
5 year Authorised Pitch Shortfall (2023/24 to 2027/28) (A)	41
Longer-term need	
Over period 2028/29 to 2032/33 (B)	37
Over period 2033/34 to 2037/38 (C)	30
Over period 2038/39 to 2040/41 (D)	22
Longer-term need TOTAL to 2040/41 (13 years) E=(B+C+D)	89
NET SHORTFALL 2023/24 to 2040/41 (A+E) (18 years)	130
Annual net shortfall	7.2

- Since then a number of sites have either been granted permission or acknowledged as having lawfully expanded, and the Council is also carrying out a number of enforcement actions on existing G&T sites which are being occupied by non-G&T's, to free-up pitches that are being misused.
- The latest figures I am aware of for the Council's 5-year supply from 2023/24 to 2027/28 was an identified need of 43 pitches. Based on the anticipated level of delivery set out in the table below and summarised above, it is anticipated that 52 pitches will be delivered within this five-year period, equating to a supply of 6.0 years.

Table a: Number of Gypsy and Traveller pitches by source of supply, with anticipated delivery period

Source of supply	Number of pitches	Anticipated delivery period	Number of pitches 2023/24 to 2044/45
A. Turnover on existing sites and pitches becoming vacant through household dissolution	16	2028/29 to 2040/41 [years 6-18]	16 (assumed to be 1.2 pitches per year)
B. Regularisation of pitches (or sites) that are not permanently authorised	22	2023/24 to 2027/28 [years 1-5]	22
C. Additional pitch provision using existing sites	at least 4-5	2023/24 to 2027/28 [years 1-5]	at least 4-5
D. Making pitches on existing sites available for occupancy by Gypsies and Travellers	up to 70	2025/26 to 2032/33 [years 3-10]	up to 70 (assumed to be 8.75 pitches per year)
E. New sites for permanent pitches identified either as standalone sites or associated with major development sites	120	2033/34 onwards [year 11 onwards]	60
F. Criteria-based policy	unknown	-	unknown
TOTAL	around 230	-	around 170

6. Whilst the overall need across the total period is significant, the Council is taking actions to allocate sites in appropriate and safe locations, and when looking at the 5-year position, there is a supply of sites coming through. The need for sites, and the plan that is in place to deliver them, does not justify allowing planning controls to be ignored, and if anything supports the need for continuation of the injunction, so that sites can be allocated through proper planning and consideration of applicants, not based on who purchases land first.

Planning application

7. The Council has now received a planning application for the site, which is currently being validated. The application seeks permission for 13 pitches, with each having a static mobile home, amenity block, and space for a tourer. Details of the application are included in exhibit **CB1**. Again, in my view this makes the need for continued injunction stronger, as what the applicant(s) are ultimately seeking involves further development of the land, which would likely happen without permission if not expressly prohibited.

Personal circumstances

8. On 1 June 2026, I received an email from Megan Archer, a caseworker at Friends, Families and Travellers. Attached to the email was a letter in support of Ms. O'Donoghue remaining on site permanently. A copy of the letter is provided in full in exhibit **CB2**. I have read the letter and given the contents proper consideration, but in my professional view I conclude that it does not alter the balance of my assessment contained within my first witness statement, dated 29 May 2026.

Statement of Truth

9. I believe that the facts stated in this witness statement are true. I understand that proceedings for contempt of court may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.


Signed:  Date: 29.05.2026

Exhibit CB1 – Planning application documents

Exhibit CB2 – Letter from Friends, Families & Travellers

Application for Planning Permission

Town and Country Planning Act 1990 (as amended)

Publication of applications on planning authority website

Please note that the information provided on this application form and in supporting documents may be published on the Authority's website. If you require any further clarification, please contact the Authority's planning department.

Site Location

Disclaimer: We can only make recommendations based on the answers given in the questions. If you cannot provide a postcode, the description of site location must be completed. Please provide the most accurate site description you can, to help locate the site - for example "field to the North of the Post Office".

Address Line 1

Land West of

Address Line 2

Moor Drove

Address Line 3

-

Town/City

Histon

County

Cambridgeshire

Postcode

CB24 9AN

Description of site location must be completed if postcode is not known:

Easting (x)

543634

Northing (y)

265352

Description of site location

-

Applicant Details

Name/Company

Title

mr

First Name

william

Surname

doherty

Address

Address Line 1

Land West of

Address Line 2

Moor Drove

Address Line 3

-

Town/City

Histon

County

Cambridgeshire

Country

-

Postcode

CB24 9AN

Are you an agent acting on behalf of the applicant?

Yes

No

Applicant Contact Details

Primary number

REDACTED

Secondary number

REDACTED

Fax Number

REDACTED

Email address

REDACTED

Agent Details

Name/Company

Title

-

First Name

Matthew

Surname

Taylor

Company Name

www.taylorplanningandbuilding.co.uk

Address

Address Line 1

13 WEST DELPH

Address Line 2

Whittlesey

Address Line 3

-

Town/City

Peterborough

County

Cambridgeshire

Country

United Kingdom

Postcode

PE7 1RG

Contact Details

Primary number

REDACTED

Secondary number

REDACTED

Fax number

REDACTED

Email Address

REDACTED

Description of Proposed Works

Please describe the proposed works

change of use of vacant green space to 13 traveller plots

Has the work already been started without consent?

Yes

No

Work Started Date

22/05/2026

Has Work Been Completed?

Yes

No

Is Public Service Infrastructure?

Yes

No

Site Information

Site Area

21139.29 sq. metres

Existing Use

Current Use of Site

open space / grassland /

Is the Site Currently Vacant?

Yes

No

Last Use Description

open space

Last Use End Date

-

Is the Land Known to Be Contaminated?

Yes

No

Is the Land Suspected to Be Contaminated?

Yes

No

Is the Proposed Use Vulnerable to Contamination?

Yes

No

Materials

Does the proposed development require any materials to be used externally?

Yes

No

Trees and Hedges

Are there any trees or hedges on the property or on adjoining properties which are within falling distance of the proposed development?

- Yes
- No

Will any trees or hedges need to be removed or pruned in order to carry out your proposal?

- Yes
- No

Pedestrian and Vehicle Access, Roads and Rights of Way

Is a new or altered vehicle access proposed to or from the public highway?

- Yes
- No

Is a new or altered pedestrian access proposed to or from the public highway?

- Yes
- No

Are there any new public roads to be provided within the site?

- Yes
- No

Are there any new public rights of way to be provided within or adjacent to the site?

- Yes
- No

Do the proposals require any diversions/extinguishments and/or creation of rights of way?

- Yes
- No

see PL02

Parking

Does the site have any existing vehicle/cycle parking spaces or will the proposed development add/remove any parking spaces?

- Yes
- No

Vehicle Type	Existing Spaces	Proposed Spaces	Difference
Cars	0	30	30

Assessment of Flood Risk

Is the site within an area at risk of flooding?

- Yes
- No

Is your proposal within 20 metres of a watercourse (e.g. river, stream or beck)?

- Yes
- No

Will the proposal increase the flood risk elsewhere?

- Yes
- No

How will surface water be disposed of?

- Sustainable drainage system
- Existing water course
- Soakaway
- Main sewer
- Pond/lake

Biodiversity and Geological Conservation

Protected/Priority Species Present

No

Designated Sites/Habitats Present

No

Geological Features Present

No

Biodiversity Net Gain

Does BNG Condition Apply?

Yes

No

Pre-Development Biodiversity Value

0.14

Value Assessment Date

28/05/2026

Biodiversity Metric Version Date

28/05/2026

Document Type	Document Reference
Biodiversity metric calculation	BG01

Has Habitat Degradation Occurred?

Yes

No

Are There Irreplaceable Habitats?

Yes

No

Foul Sewage

Please state how foul sewage is to be disposed of

Package treatment plant

Are you proposing to connect to the existing drainage system?

No

Trade Effluent

Does the Proposal Involve Trade Effluent Disposal?

- Yes
- No

Waste Storage and Collection

Do the plans incorporate areas to store and aid the collection of waste?

- Yes
- No

Have arrangements been made for the separate storage and collection of recyclable waste?

- Yes
- No

Residential/Dwelling Units

Does your proposal include the gain, loss or change of use of residential units?

- Yes
- No

Section A – Proposed

Housing Categories

Self-build and Custom Build

Self-build and Custom Build

Other

1 Bedroom	2 Bedroom	3 Bedroom	4+ Bedroom	Unknown	Total
0	13	0	0	0	13

Self-build and Custom Build Totals

1 Bedroom	2 Bedroom	3 Bedroom	4+ Bedroom	Unknown	Total
0	13	0	0	0	13

Section B – Existing

Housing Categories

None selected

No existing housing units specified.

Section C – Overall Totals

	1 Bedroom	2 Bedroom	3 Bedroom	4+ Bedroom	Unknown	Total
Proposed	0	13	0	0	0	13
Existing	0	0	0	0	0	0
Net Gain/Loss	0	13	0	0	0	+13

All Types of Development: Non-Residential Floorspace

Does your proposal involve the loss, gain or change of use of non-residential floorspace?

Yes

No

Employment

Will There Be Existing or Proposed Employees?

Yes

No

Hours of Opening

Are Hours of Opening Relevant?

Yes

No

Industrial/Commercial Processes

Does the Proposal Involve Industrial/Commercial Activities?

Yes

No

Waste Management

Is This a Waste Management Development?

Yes

No

Hazardous Substances

Will Hazardous Substances Be Used or Stored?

Yes

No

Site Visit

Can the site be seen from a public road, public footpath, bridleway or other public land?

Yes

No

If the planning authority needs to make an appointment to carry out a site visit, whom should they contact?

Agent

Pre-application Advice

Has assistance or prior advice been sought from the local authority about this application?

Yes

No

Authority Employee/Member

With respect to the Authority, is the applicant and/or agent one of the following:

(a) a member of staff

(b) an elected member

(c) related to a member of staff

(d) related to an elected member

It is an important principle of decision-making that the process is open and transparent.

For the purposes of this question, "related to" means related, by birth or otherwise, closely enough that a fair-minded and informed observer, having considered the facts, would conclude that there was bias on the part of the decision-maker in the Local Planning Authority.

Do any of the above statements apply?

Yes

No

Ownership Certificates and Agricultural Land Declaration

Certificates under Article 14 - Town and Country Planning (Development Management Procedure) (England) Order 2015 (as amended)

Please answer the following questions to determine which Certificate of Ownership you need to complete: A, B, C or D.

Is the applicant the sole owner of all the land to which this application relates; and has the applicant been the sole owner for more than 21 days?

Yes

No

Is any of the land to which the application relates part of an Agricultural Holding?

Yes

No

Certificate A

I certify/The applicant certifies that on the day 21 days before the date of this application nobody except myself/ the applicant was the owner of any part of the land or building to which the application relates, and that none of the land to which the application relates is, or is part of, an agricultural holding***

**"owner" is a person with a freehold interest or leasehold interest with at least 7 years left to run.*

*** "agricultural holding" has the meaning given by reference to the definition of "agricultural tenant" in section 65(8) of the Act.*

NOTE: You should sign Certificate B, C or D, as appropriate, if you are the sole owner of the land or building to which the application relates but the land is, or is part of, an agricultural holding.

Person Role

The Agent

Title

-

First Name

Matthew

Surname

Taylor

Declaration Date

01/06/2026

Declaration Made

Yes

No

Declaration

I/We hereby apply for Application for Planning Permission as described in the questions answered, details provided, and the accompanying plans/drawings and additional information.

I/We confirm that, to the best of my/our knowledge, any facts stated are true and accurate and any opinions given are the genuine opinions of the person(s) giving them.

I / We agree to the outlined declaration

Signed

Matthew Taylor

Date

01/06/2026



PLANNING STATEMENT

In support of a planning application for a change of use to a residential Gypsy and Traveller site

Proposed development:

Change of use of land from open green space to a residential caravan site for 13 Gypsy and Traveller pitches, with retained green space to the rear, a central internal access road, amenity buildings, hardstanding and associated works

Site address	land west of moor drove histon cambs
Applicant	Mr William Doherty
Agent	M Taylor — Taylor Planning and Building Consultants
Local planning authority	South Cambridgeshire District Council (Greater Cambridge Shared Planning)
Application reference	TBC
Statement date	May 2026
Our reference	J26194/001

Prepared by Taylor Planning and Building Consultants on behalf of the applicant



Note to the author (delete before submission)

This statement has been drafted at speed following your appointment on Monday 18 May 2026. It is structured so that it can be finalised quickly.

- The application area is assumed to lie within 200m of the authorised Moor Drove site and therefore within South Cambridgeshire District Council's area, governed by the South Cambridgeshire Local Plan 2018 and the Histon & Impington Neighbourhood Plan. Confirm the correct LPA and development plan before issue.
- "Open green space" is treated here as undesignated, currently open land within the Cambridge Green Belt. the assessment changes materially (Local Green Space attracts Green Belt-equivalent protection and is excluded from the grey belt route). Confirm the designation from the proposals map.
- The grey belt argument (Section 9) is new since the adjacent appeals and is potentially decisive. It depends on a Green Belt purposes assessment of the site. Confirm the site does not strongly contribute to Green Belt purposes (a), (b) or (d) before relying on it.
- The decisive factor in the adjacent appeals was the relationship of the appeal sites to the established Price/Connor family site. Here the supportive-family case rests on the Doherty extended family group occupying the 13 plots. This will be confirmed in full with details later on the occupants and their needs including childrens schools, and medical needs .



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1. Executive summary

1.1 This Planning Statement is submitted by Taylor Planning and Building Consultants on behalf of Mr Doherty in support of a planning application for the change of use of land from open green space to a residential caravan site for 13 Gypsy and Traveller pitches at land west of Moor Drove, Histon Cambs. This will be called 'The Grove'. The applicants will be registering for council tax and correct addresses. The scheme retains an area of open green space to the rear of the site and is laid out around a central internal access road designed to satisfy the requirements of the Local Highway Authority.

1.2 The land lies within the Cambridge Green Belt. It is common ground that the proposal is, by definition, inappropriate development in the Green Belt and that planning permission should only be granted where very special circumstances are demonstrated. This statement sets out the harm arising from the proposal, the considerations weighing in its favour, and why those considerations clearly outweigh the harm.

1.3 The application is made against an important and very recent local precedent. Two appeals at land immediately adjacent to the site, within 200m, were **allowed** by the Planning Inspectorate on 8 February 2024 (refs APP/W0530/W/23/3322128 and APP/W0530/W/23/3322185). In allowing those appeals, the Inspector found that a substantial unmet need for pitches, the absence of available alternative sites, the personal circumstances of the families and the best interests of the children together carried very great weight, such that they clearly outweighed the harm to the Green Belt. The same considerations apply with equal or greater force here.

1.4 Since those appeals were decided, national policy has moved further in the applicant's favour. The National Planning Policy Framework (December 2024) introduced the "grey belt" and the Government has confirmed that the grey belt route applies to unmet traveller need. Where land does not strongly contribute to the purposes of the Green Belt and a demonstrable unmet need exists, development of that land is not to be regarded as inappropriate. That route is assessed in this statement as an alternative and additional basis for approval.

1.5 The application is retrospective in part and the applicant is aware of the enforcement action taken by the Council. The applicant's express purpose in bringing forward this application is to regularise the position and to work constructively with the Council towards an outcome that is acceptable to both parties. The applicant welcomes the imposition of conditions, including conditions securing a drainage strategy, a landscaping and planting scheme and a lighting scheme, and a personal and Gypsy/Traveller occupancy condition.

1.6 For the reasons set out in this statement, it is respectfully submitted that very special circumstances exist, that the proposal accords with the development plan when read as a whole together with material considerations, and that planning permission should be granted subject to conditions.



2. Introduction and instructions

2.1 Taylor Planning and Building Consultants ("TPBC") was instructed by the applicant, Mr Doherty, on Monday 18 May 2026 to prepare and submit this application and to act as agent in all dealings with the Council and, if necessary, the Planning Inspectorate.

2.2 This statement should be read together with the application drawings and the supporting documents listed at Appendix A. It addresses the principle of the development, the relevant national and local planning policy, the planning merits of the proposal, the case for very special circumstances, and the conditions the applicant invites the Council to impose.

2.3 The statement is structured as follows:

- Section 3 describes the proposal;
- Section 4 sets out the pre-application and enforcement context and the applicant's intention to work cooperatively with the Council;
- Section 5 describes the site and its surroundings;
- Section 6 sets out the relevant planning history, including the adjacent appeal decisions;
- Section 7 sets out the relevant planning policy;
- Section 8 addresses the applicant's status as Gypsies and Travellers;
- Section 9 assesses the planning merits, including Green Belt, grey belt, character, Policy H/22, highways, drainage, ecology and other matters;
- Section 10 sets out the case for very special circumstances;
- Section 11 sets out the overall planning balance;
- Section 12 sets out suggested conditions; and
- Section 13 concludes.

3. The proposal

3.1 Planning permission is sought for the change of use of land from open green space to use as a residential caravan site for 13 Gypsy and Traveller pitches. The principal components of the scheme are:

- 13 residential pitches, each capable of accommodating no more than two caravans (of which no more than one would be a static caravan/mobile home as defined by the Caravan Sites and Control of Development Act 1960 and the Caravan Sites Act 1968), together with parking;
- amenity buildings serving the pitches (
- a central internal access road and associated hardstanding, laid out and constructed to the requirements of the Local Highway Authority, providing safe vehicular and pedestrian movement within the site;



- an area of retained open green space to the rear of the site, which is deliberately left undeveloped to preserve openness, to soften the development in the wider landscape and to provide an amenity and ecological buffer;
- soft and hard landscaping, boundary treatments and surface water management infrastructure.

3.2 The proposed layout is shown on drawing PL01-03 The retained green space and central road arrangement are intended to produce a contained, well-ordered site that limits the spread of built form across the land and keeps the most sensitive part of the site open.

3.3 The application is made on a **part-retrospective basis**. Where development has already taken place on the land, the position is addressed openly at Section 4 below. What falls for determination is the development as shown on the submitted plans, assessed on its own merits.

4. Pre-application and enforcement context

4.1 The applicant is aware that the Council has taken formal enforcement action in respect of the land, including the service of stop notice and court orders and the obtaining of Nothing in this statement is intended to challenge the Council's right to take enforcement action where development has occurred without permission.

4.2 The applicant's clear and stated objective is to regularise the use of the land through the proper planning process and to reach an outcome that is acceptable to the Council as well as to the family. To that end the applicant: (i) has instructed professional advisers to bring forward a fully considered application; (ii) has designed the scheme to limit harm to the Green Belt, including by retaining open green space and containing built form; (iii) welcomes the imposition of conditions, including conditions controlling occupancy, numbers, drainage, landscaping and lighting; and (iv) is willing to engage in good faith with officers to agree any reasonable amendments and a programme for implementation.

4.3 The fact that development has taken place without permission is a material consideration. The Written Ministerial Statement of 31 August 2015 confirmed that intentional unauthorised development is a material consideration weighing against the grant of permission. However, as the Inspector found in the adjacent February 2024 appeals, where there is a serious lack of alternative pitches that consideration attracts only limited weight. The applicant's constructive approach, and the absence of anywhere else for the family lawfully to go, are relevant to the weight to be given to this factor. This is addressed further at Section 9 and in the planning balance at Section 11.

5. The site and surroundings

5.1 The application site comprises 2.1 of land located at land west of moor drove to the of the established Gypsy and Traveller site at Moor Drove The land is currently vacant scrub land with isolated areas of planting an was used for paddock land we believe from the applicants statements and is undeveloped save for the works described in Section 4.



5.2 The land lies within the Cambridge Green Belt. It is in open countryside outside any development framework boundary. The wider area is characterised by largely open fields with well-defined boundaries of hedgerows and trees, within which there is an established cluster of Gypsy and Traveller pitches off Moor Drove. The boundaries of the site comprise of open low level fencing and soft planting / hedgerow

5.3 The site benefits from a substantial degree of landscape containment. As the Inspector found in respect of the immediately adjacent land in February 2024, owing to local topography and dense field hedgerows, visibility into this part of the countryside from public vantage points is minimal.

5.4 The nearest settlements are Histon/Impington and Cottenham, which provide a range of services and facilities for day-to-day needs, including shops, primary schools and health facilities. The site is connected to those settlements by road and by a bus service from a stop nearby. Access to the site is taken from the existing track/ moor drove

5.5 The Council previously asserted that the adjacent land was at high flood risk but withdrew that assertion at the February 2024 Hearing. The applicant has nonetheless commissioned a Flood Risk Assessment for this site; its conclusions are summarised at Section 9.

6. Relevant planning history

6.1 There is an extensive and material planning history on the land at and around Moor Drove. The most significant decisions are summarised below; full copies are at Appendix B.

The Moor Drove appeals (8 February 2024)

6.2 On 8 February 2024 an Inspector **allowed** two appeals (refs APP/W0530/W/23/3322128 and APP/W0530/W/23/3322185) for residential caravan sites for, respectively, six and three Gypsy families at land east of Plots 2 and 5, Moor Drove — land within 200m of the present application site and of a directly comparable character. The Inspector concluded that very special circumstances existed which clearly outweighed the harm to the Green Belt. The key findings, which are highly material to the present application, were:

- the proposals were inappropriate development causing significant adverse harm to the openness and purposes of the Green Belt, attracting substantial weight;
- harm to the character and appearance of the area was nevertheless only minor, because the development infilled an area within the established built form, did not breach the existing field line, and was screened from public vantage points;
- there was a substantial unmet need for pitches (a total need of 149 permanent pitches against only 29 vacant pitches identified), attracting substantial weight;
- there were no available alternative or allocated sites, with only two Council pitches becoming available in seven years against 40–50 applications per pitch, attracting considerable weight;



- the case was one of intentional unauthorised development, but given the lack of alternatives that attracted only minor weight;
- the personal circumstances of the families, the mutual family support, the identified health needs and the best interests of the children each attracted significant or considerable weight; and
- taken together these considerations carried very great weight and clearly outweighed the Green Belt and other harm, so that very special circumstances existed.

6.3 The Inspector also confirmed that the families met the definition of Gypsies and Travellers in the PPTS; that the proposals complied with all the criteria of Local Plan Policy H/22; and that no temporary or five-year permission was necessary because of the site's relationship to the authorised pitches. Permanent permissions were granted subject to occupancy, personal, numbers, commercial-use, vehicle, and site-development-scheme conditions.

Earlier permissions and the Council's refusals

6.4 The established Moor Drove site has been occupied by the Gypsy and Traveller community since at least 2003. Pitches were allowed on appeal in 2008 (ref APP/W0530/A/08/2067087, originally application S/1895/07/F) and in 2018 (S/2896/16/FL), cumulatively authorising some 20 caravan pitches. The Council refused the two applications that became the February 2024 appeals on 17 November 2022, on Green Belt openness and character grounds; those refusals were not upheld.

6.5 The planning history demonstrates a long-established, lawful Gypsy and Traveller presence in this location, a consistent pattern of need outstripping supply, and a recent and authoritative appeal finding that development of this character, in this location, is acceptable when the full planning balance is struck.

7. Planning policy context

7.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that applications be determined in accordance with the development plan unless material considerations indicate otherwise.

National policy

7.2 The **National Planning Policy Framework (December 2024)** ("the Framework") is the principal statement of national policy. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and permanence (paragraph 142). The five purposes of including land in the Green Belt are set out at paragraph 143. Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances; substantial weight must be given to any harm to the Green Belt, and very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations (paragraph 153).



7.3 The Framework now contains the **"grey belt"** provisions. Paragraph 155 provides that development in the Green Belt should not be regarded as inappropriate where it would utilise grey belt land, would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan, and where there is a demonstrable unmet need for the type of development proposed. Grey belt is defined (Glossary/paragraph 143 context) as land in the Green Belt that does not strongly contribute to Green Belt purposes (a), (b) or (d). The Government has confirmed that the grey belt provisions, and footnotes 56 and 57, apply to **unmet need for traveller sites**. *Traveller sites are not required to meet the "Golden Rules" in paragraphs 156–157. The paragraph numbers should be verified against the current consolidated Framework before issue.*

7.4 The **Planning Policy for Traveller Sites (December 2024)** ("the PPTS") sets out specific policy for traveller sites, including the updated definition of "gypsies and travellers" in Annex 1 (reflecting *Smith v Secretary of State for Levelling Up, Housing and Communities [2022] EWCA Civ 1391*). The PPTS requires authorities to identify and maintain a five-year supply of deliverable sites (Policy B), recognises that rural and countryside sites may be appropriate (Policy C), and confirms that traveller sites in the Green Belt are inappropriate development. The relevant Green Belt policy provides that, subject to the best interests of the child, personal circumstances and unmet need are unlikely to clearly outweigh harm to the Green Belt and any other harm so as to establish very special circumstances (PPTS Green Belt policy)

7.5 A further revised draft Framework was published for consultation on 16 December 2025 (consultation closed 10 March 2026), with publication of the final version now anticipated in Summer 2026. As an unadopted consultation draft it carries only limited weight, but its direction of travel — including the proposed incorporation of the PPTS into the Framework and continued support for grey belt release to meet traveller need — is broadly supportive of the proposal and is a material consideration.

7.6 Other relevant national considerations include the National Planning Practice Guidance, the Equality Act 2010 (and the Public Sector Equality Duty), the Human Rights Act 1998 (in particular Article 8 ECHR and Article 1 of the First Protocol), and the United Nations Convention on the Rights of the Child (Article 3). Biodiversity Net Gain is now a statutory requirement and is addressed at Section 9.

Development plan

7.7 The development plan comprises the **South Cambridgeshire Local Plan (2018)** and the **Histon & Impington Neighbourhood Plan (2020–2031)**

The most relevant Local Plan policies are:

Policy	Subject
S/4	Cambridge Green Belt
S/7	Development frameworks (development in the countryside)

HQ/1	Design principles
NH/2	Protecting and enhancing landscape character
NH/4	Biodiversity
NH/8	Mitigating the impact of development in and adjoining the Green Belt
NH/9	Redevelopment of previously developed sites and infilling in the Green Belt
H/20	Provision for Gypsies and Travellers and Travelling Showpeople
H/21	Gypsy and Traveller provision at new communities
H/22	Proposals for Gypsies, Travellers and Travelling Showpeople sites on unallocated land outside development frameworks
H/23	Design of Gypsy and Traveller sites

7.8 The evidence base includes the Cambridgeshire and West Suffolk Gypsy and Traveller Accommodation Assessment 2016 (the "GTAA"). The shortcomings of the GTAA, and the more recent appeal findings on need, are addressed at Section 10.

8. Gypsy and Traveller status

8.1 The relevant planning policies for traveller sites apply to persons who fall within the definition of "gypsies and travellers" in Annex 1 of the PPTS. Following *Smith* and the December 2024 revision, the definition is no longer to be read as excluding those who have permanently ceased to travel; account is taken of those who have ceased travelling on grounds of their own or their family's or dependants' education or health needs or old age.

8.2 The applicant and the proposed occupiers are members of the Gypsy and Traveller community. **We will include a personal statement for all occupants of the site**

8.3 The Council confirmed in the adjacent February 2024 appeals that the occupiers there met the PPTS definition. Subject to the evidence to be supplied, it is anticipated that the proposed occupiers here likewise meet the definition. The Council is invited to confirm its position at the earliest opportunity. In any event, and as the case law makes clear, the personal circumstances and accommodation needs of the occupiers are material whether or not they meet the planning definition.

9. Planning assessment

Principle: inappropriate development in the Green Belt

9.1 It is accepted that the use of land as a residential caravan site is inappropriate development in the Green Belt, both under the Framework and under the PPTS. It is therefore, by definition, harmful, and substantial weight is given to that harm. The question is whether the harm by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations so as to



amount to very special circumstances. That balance is struck at Section 11, following an assessment of the actual harm and the considerations in favour.

Whether the land is "grey belt"

9.2 The Framework's grey belt provisions provide an **additional and alternative basis** on which the development need not be regarded as inappropriate. Grey belt is Green Belt land that does not strongly contribute to Green Belt purposes (a) checking unrestricted sprawl of large built-up areas, (b) preventing neighbouring towns merging, or (d) preserving the setting and special character of historic towns.

9.3 It is submitted that the application site does not strongly contribute to those purposes: it is detached from any large built-up area and from any historic town; its development would not cause towns to merge; and it adjoins an established, authorised developed site rather than open countryside on all sides.

9.4 If the site is grey belt, paragraph 155 of the Framework provides that the development should not be regarded as inappropriate where (i) it utilises grey belt land; (ii) it would not fundamentally undermine the purposes, taken together, of the remaining Green Belt across the plan area; and (iii) there is a demonstrable unmet need for the type of development proposed. The unmet need for traveller pitches is demonstrated at Section 10. Traveller sites are not required to meet the Golden Rules. On this basis the proposal would not be inappropriate development at all, and the very special circumstances test would not be engaged. The grey belt route is advanced **in addition to**, and without prejudice to, the very special circumstances case below.

Effect on openness

9.5 Openness has both spatial and visual dimensions. Spatially, the siting of caravans, amenity buildings and hardstanding would result in a loss of spatial openness which has a significant adverse effect on openness, and would represent an encroachment into the countryside. That harm is acknowledged and is given substantial weight.

9.6 Visually, however, the impact is limited and localised. Owing to local topography and existing hedgerow and tree screening, visibility into the site from public vantage points is minimal, as the Inspector found for the adjacent land. The proposal is also designed to limit harm to openness: built form is contained around a central access road, plots are single storey and of modest mass, and **an area of open green space is retained to the rear**, keeping the most sensitive part of the site permanently open. These measures reduce, though they do not remove, the harm to openness.

9.7 The proposal would conflict with Local Plan Policy NH/8 and with the openness objective of the Framework. That conflict is acknowledged and weighed in the balance.

Effect on Green Belt purposes

9.8 The only Green Belt purpose materially engaged is the safeguarding of the countryside from encroachment; the proposal would represent some encroachment and there is conflict in that

respect. The proposal would not lead to the merging of settlements, would not affect the setting of any historic town, and would not constitute unrestricted sprawl of a large built-up area. As in the adjacent appeals, the parties are likely to agree that no other Green Belt purpose is offended.

Character and appearance

9.9 The wider area is one of open fields with hedgerow and tree boundaries, within which the Moor Drove Gypsy and Traveller site is an established feature. The proposal would be read as part of, or an extension to, that established pattern of development, of a similar character and appearance. Critically, the scheme is designed so as maintaining the integrity of the wider field structure, and the retained rear green space preserves an open edge.

9.10 While there would be a loss of part of an open field, the containment of the site in the context of the established development means the harm to the character and appearance of the area is, at most, minor. There would be conflict with Policies HQ/1 and NH/8 in this respect, to which minor weight is attributed. A landscaping and planting scheme, which the applicant invites the Council to secure by condition, would further integrate the site and could deliver biodiversity and visual benefits over time.

9.11 Policy NH/9 (redevelopment of previously developed sites and infilling) is not engaged, as the proposal is neither the redevelopment of previously developed land nor infilling as defined by that policy — a point the Inspector accepted in the adjacent appeals.

Compliance with Policy H/22

9.12 Policy H/22 governs proposals for Gypsy and Traveller sites on unallocated land outside development frameworks. Where, applying Green Belt policy, a site is found acceptable in principle, it must also satisfy the criteria of the policy. Each is addressed in turn. In the adjacent appeals the Inspector found the equivalent scheme complied with every criterion.

Criterion	Assessment
(a) Need / lack of alternatives	A clear, unmet need for pitches in the district is demonstrated at Section 10, which cannot be met by a lawful existing or available allocated site. Criterion (a) is met.
(b) Sustainable location / accessibility	The site is close to Histon/Impington and Cottenham, which provide shops, primary schools and healthcare, with a bus service nearby. While the footway lacks street lighting in part, the PPTS recognises that traveller sites may be located in rural areas, and the site is a very short journey from services. Criterion (b) is met.
(c) Pressure on services	There is no evidence that local services would be placed under undue pressure. The occupiers are or would be registered with local health and education services. Criterion (c) is met.

(d) Number and nature of pitches	The number and nature of the pitches is appropriate to the size and location of the site. As the Inspector held, it is not legitimate to treat the pitches as inappropriate merely because Green Belt development is inappropriate, as that would mean the criterion could never be met. Criterion (d) is met.
(e) Health, safety and living conditions	The layout provides acceptable living conditions and adequate separation between pitches. Criterion (e) is met.
(f) Domination of the settled community	The settlements are large; the cumulative scale of the Gypsy and Traveller site remains modest in comparison and is set a reasonable distance away. There would be no domination of the nearest settled community. Criterion (f) is met.
(g) Impact on amenity, countryside and landscape	For the reasons given above, any harm to the countryside and landscape character is minor and not unacceptable. Criterion (g) is met.
(h) Public rights of way	The site is not on or close to any public right of way and there is no adverse impact on any PROW. Criterion (h) is met.
(i) Travelling Showpeople	The applicant is not a Travelling Showperson; criterion (i) is not engaged.

9.13 It is submitted that, as in the adjacent appeals, the proposal complies with all the criteria of Policy H/22. As permission would be granted consistently with Green Belt policy (whether on the grey belt route or on very special circumstances), there is no conflict with H/22.

Highways and accessibility

9.14 Access is taken from moor drove The scheme provides a central internal access road and parking laid out to the standards of the Local Highway Authority. In the adjacent appeals the Highway Authority raised no objection. The development would not have a severe or unacceptable impact on highway safety or capacity, in accordance with the Framework and Local Plan Policy T/3.

Flood risk and drainage

9.15 A Flood Risk Assessment has been prepared The site lies within zone 1 Council confirmed at the adjacent appeal Hearing that this land is not at high flood risk. The applicant **welcomes a condition** requiring a detailed surface water and foul drainage strategy to be submitted to and approved by the Council, in accordance with Local Plan Policies CC/7 and CC/8. A suitable scheme can be secured by condition, as the Council's drainage officer accepted in respect of the comparable proposals at Moor Drove.

Ecology and biodiversity

9.16 An initial ecological appraisal of the site has been undertaken by the applicant's ecological consultant, providing a preliminary overview of habitats and constraints. Given the speed at which



this application has been brought forward, a full **Preliminary Ecological Appraisal (PEA)** is currently being undertaken and will be submitted to supplement this statement (Appendix [1]). The applicant invites the Council to allow the PEA to be provided during the determination period and, if necessary, to address any reasonable ecological mitigation, enhancement and management by condition.

9.17 **Biodiversity Net Gain (BNG)** is now a statutory requirement. The applicant will provide a biodiversity metric and, as required, secure the mandatory minimum 10% net gain. The retained green space to the rear of the site offers a genuine opportunity for on-site habitat creation and enhancement, supporting compliance with Local Plan Policy NH/4 and the BNG requirement. Supplied calcs have been provided and large improvements to the front of the site and rear where the site has been left redundant

Residential amenity and living conditions

9.18 The layout provides acceptable living conditions for occupiers and adequate separation from neighbouring pitches and dwellings. The nearest conventional dwellings are a significant distance away and would not experience any material loss of light, outlook or privacy. The proposal would provide a safe, settled and serviced base for the family, which is itself a benefit weighing in favour of the scheme.

Trees and landscape

9.19 The development and retains existing boundary vegetation so far as practicable. A landscaping and planting scheme, secured by condition, would reinforce the site's boundaries and assimilate the development into its surroundings, consistent with Policies NH/2 and HQ/1.

Intentional unauthorised development

9.20 For the reasons given at Section 4, the unauthorised commencement of development is a material consideration weighing against the grant of permission. Consistent with the adjacent appeals, however, the weight to be afforded to that consideration is reduced to **limited weight** by the serious lack of available alternative pitches, the personal circumstances of the family and the applicant's constructive willingness to regularise the position and accept controlling conditions.

10. The case for very special circumstances

10.1 The following considerations weigh in favour of the grant of permission and, taken together, are submitted to carry very great weight. They mirror, and in material respects strengthen, the considerations the Inspector found decisive in the adjacent appeals.

Unmet need for pitches

10.2 There is a substantial unmet need for Gypsy and Traveller pitches in the district. In the adjacent February 2024 appeals it was common ground that there was a total need for 149 permanent pitches, against only 29 vacant pitches identified by the GTAA, leaving a considerable unmet need to which the Inspector gave **substantial weight**. The GTAA's methodology is



acknowledged to understate need, because the survey reached only a limited proportion of the community.

10.3 Where an authority cannot demonstrate an up-to-date five-year supply of deliverable traveller sites, that is a significant material consideration in favour of the grant of permission, and is also the gateway to the grey belt route under the Framework.

Absence of available alternative sites

10.4 There are no available alternative pitches for the family. There are no allocated traveller sites in the district and no vacant pitches on existing lawful sites. The Council's own Gypsy and Traveller Liaison Officer has confirmed that, across the Council's two sites (32 pitches), turnover is very low — only a handful of pitches becoming available in seven years, against 40–50 applications per pitch. The Inspector gave the lack of suitable and available alternative sites **considerable weight**. The emerging local plan and any new GTAA will not deliver sites for some years and cannot meet the family's present need.

Personal circumstances and family support

10.6 The 13 pitches would be occupied by members of a single extended family group. The family members rely on one another for mutual support — childcare, care for those with health needs, and employment — and there is a positive and settled family dynamic. The need for the extended family to remain together to provide that mutual support is a significant consideration.

This will be provided in a separate document to be kept private

Best interests of the child

10.8 Article 3(1) of the United Nations Convention on the Rights of the Child requires that the best interests of the child be a primary consideration in all actions by public authorities concerning children. There are children who would live on the site. Their best interests would be served by remaining at a settled, safe and serviced base with continuity of education and access to health facilities and the support of their extended family. This will be in the private document

10.9 If the appeal site were lost the children would be forced into a roadside existence or to double-up elsewhere, with inevitable negative effects on their education and wellbeing and the loss of family support. The best interests of the children attract significant weight, and the qualifying words of the PPTS Green Belt policy ("subject to the best interests of the child") are directly engaged.

Health needs

10.10 A settled base ensures continuing access to GP and hospital facilities and to the family support on which those with health needs depend. The identified health needs attract significant weight.

Equalities and human rights

10.11 Romany Gypsies and Irish Travellers are recognised ethnic groups protected under the Equality Act 2010. In determining this application the Council must discharge the Public Sector Equality Duty (section 149), having due regard to the need to eliminate discrimination, advance equality of opportunity and foster good relations. The acute shortage of culturally appropriate accommodation, and the consequences of refusal for a protected group, are material to that duty.

10.12 Refusal would engage Article 8 of the European Convention on Human Rights (respect for private and family life and the home) and Article 1 of the First Protocol, and would have to be justified as necessary and proportionate. Given the absence of alternatives, the presence of children and those with health needs, and the limited and localised environmental harm, refusal would be a disproportionate interference with the family's rights. These considerations reinforce the case for permission.

11. Planning balance

11.1 Drawing the threads together, the harm and the considerations in favour are weighed as follows.

Harm

Harm	Weight
Inappropriate development in the Green Belt	Substantial
Harm to openness (spatial loss; visual harm limited and localised)	Substantial
Harm to character and appearance of the area	Minor
Intentional unauthorised development	Limited

Considerations in favour

Consideration	Weight
Unmet need for pitches / absence of a five-year supply	Substantial
Absence of available alternative sites	Considerable
Personal circumstances and mutual family support	Significant / considerable
Best interests of the children	Significant
Health needs of residents	Significant
Equality Act duties and Article 8 rights	Significant
Provision of a settled, lawful, serviced base	Moderate



11.2 If, contrary to the grey belt case at Section 9, the proposal is assessed as inappropriate development, it is submitted that the considerations in favour — and in particular the unmet need, the absence of alternatives, the personal circumstances, the health needs and the best interests of the children — together carry **very great weight**, such that they clearly outweigh the harm to the Green Belt by reason of inappropriateness and the other harm identified. Very special circumstances therefore exist to justify the development. That conclusion is consistent with, and directly supported by, the Inspector's reasoning in the adjacent appeals decided on 8 February 2024 on materially identical considerations.

11.3 If the proposal is grey belt development, it is not inappropriate, the very special circumstances test is not engaged, and permission should be granted subject to conditions.

11.4 Either way, while there is conflict with Policies NH/8 and HQ/1, the proposal accords with Policy H/22 and with national policy, and the material considerations identified clearly outweigh the limited conflict with the development plan. Permission should be granted.

12. Suggested conditions

12.1 The applicant invites the Council to grant permission subject to conditions and offers the following, modelled on the conditions imposed by the Inspector in the adjacent appeals. The applicant specifically welcomes the conditions securing a drainage strategy, a landscaping and planting scheme and a lighting scheme.

1. The development shall be carried out in accordance with the approved plans (to be listed), to provide certainty.
2. The site shall not be occupied by any persons other than Gypsies and Travellers as defined in Annex 1 of the Planning Policy for Traveller Sites.
3. There shall be no more than 13 pitches on the site, and no more than two caravans per pitch (of which no more than one shall be a static caravan as defined by the Caravan Sites and Control of Development Act 1960 and the Caravan Sites Act 1968).
4. A personal occupancy condition limiting use to the named members of the Doherty family (to be scheduled), reflecting the personal circumstances on which permission is granted.
5. Submission, approval and implementation of a Site Development Scheme within a defined period, covering internal layout, hard and soft landscaping (including planting and a maintenance schedule), means of foul and surface water drainage, and external lighting, with a fail-safe cessation mechanism if the scheme is not submitted, approved or implemented.
6. Approval and implementation of a surface water and foul drainage strategy (Policies CC/7 and CC/8).
7. Approval and implementation of a hard and soft landscaping and planting scheme, retained and maintained.



8. Approval and implementation of an external lighting scheme designed to minimise light spill and protect the rural character and the dark countryside.
9. Submission and implementation of ecological mitigation and enhancement, and a biodiversity net gain scheme and habitat management plan, informed by the PEA.
10. Retention of the rear green space as undeveloped open space.
11. No commercial activities, including the storage of materials or goods, on any part of the site.
12. No vehicle over 3.5 tonnes to be stationed, parked or stored on the site.

12.2 The applicant does not consider a temporary or time-limited permission to be necessary. As the Inspector found in the adjacent appeals, where the site has a settled relationship to established development and the personal and need-based circumstances are made out, a permanent (but personal) permission is appropriate.

13. Conclusion

13.1 This application seeks to regularise, through the proper planning process, a residential Gypsy and Traveller site of 13 pitches for a single extended family at a location with a long-established and lawful traveller presence. The applicant has approached the application constructively, has designed the scheme to limit harm — retaining open green space and containing built form around a central access road — and welcomes a comprehensive suite of controlling conditions.

13.2 The proposal causes acknowledged harm to the Green Belt through inappropriateness and loss of spatial openness, together with minor harm to character and appearance. Against that harm stand a substantial unmet need for pitches, the absence of any available alternative, compelling personal circumstances including the health needs of residents and the best interests of the children, and the Council's duties under the Equality Act and the Human Rights Act.

13.3 On the grey belt route, the development is not inappropriate. On the conventional route, the considerations in favour carry very great weight and clearly outweigh the harm, so that very special circumstances exist. That conclusion is squarely supported by the Planning Inspectorate's decisions of 8 February 2024 on adjacent, materially identical land. The applicant respectfully invites the Council to grant planning permission subject to conditions, and looks forward to working with officers to that end.

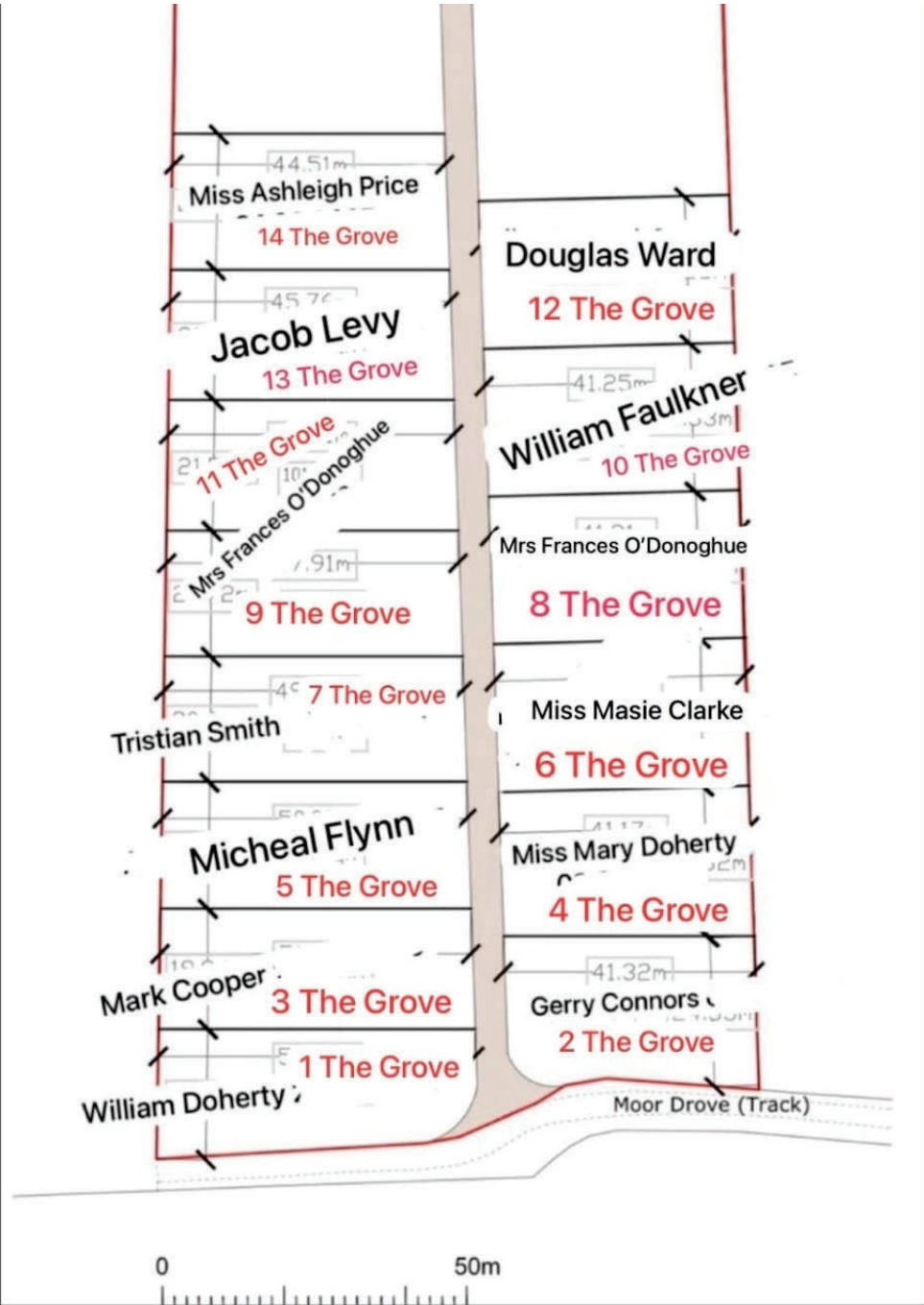
Taylor Planning and Building Consultants
23rd May 2026



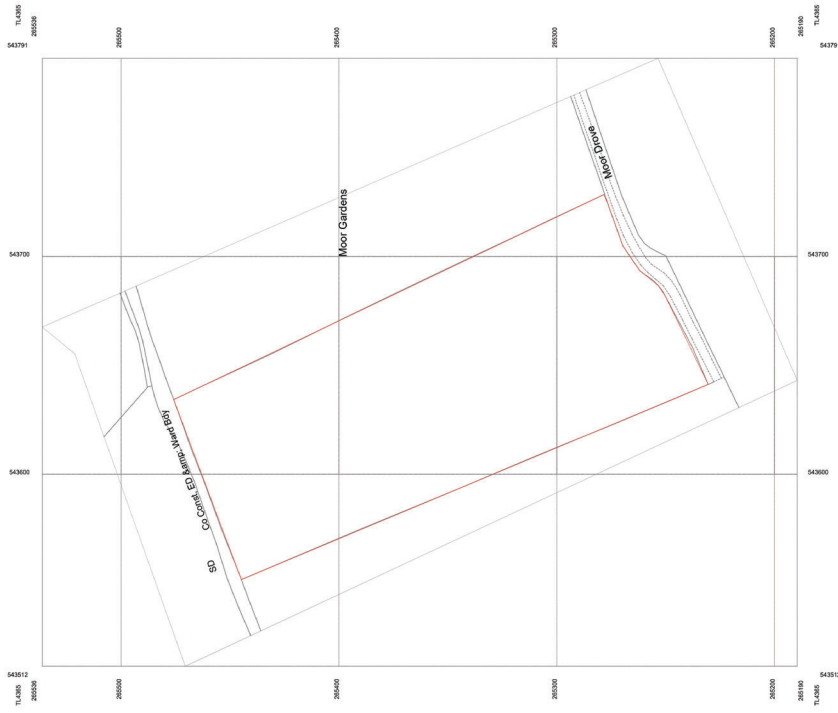
Appendix A — Documents accompanying the application

- This Planning Statement
- Application forms and certificates
- Location plan and site layout plan
- Amenity building / day room elevations and details
- Boundary treatment details (post and rail / screen fencing)
- Flood Risk Assessment
- Preliminary Ecological Appraisal (to follow) and biodiversity metric
- Personal circumstances bundle (witness statements; education and health evidence) — to follow with consent

13.4 Persons in control of plots



← Reply



13 WEST DELPH
 WHITTLESEY
 PE7 1RG
 01733 530757
 WWW.TAYLORPLANNINGANDBUILDING.CO.UK



REVISIONS:

STATUS:
PLANNING

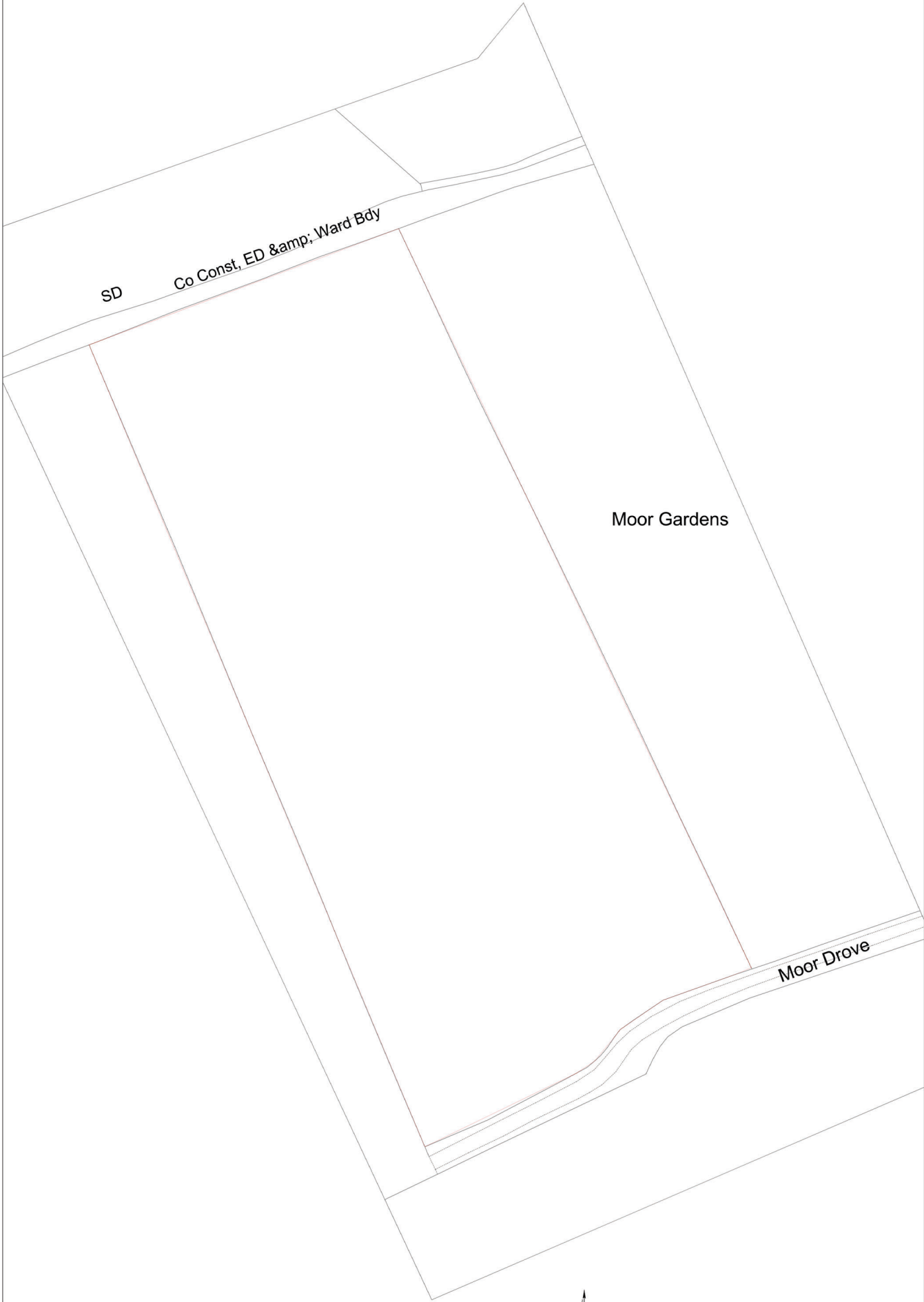
PROJECT:
land west of moor
drove histon cambs

DRAWING TITLE :
LOCATION PLAN

DATE: MAY 2026
SCALE: 1:1250 @ A1

PROJECT NUMBER :
J26194

DRAWING REFERENCE :
PL00A



EXISTING SITE PLAN 1:500



13 WEST DELPH
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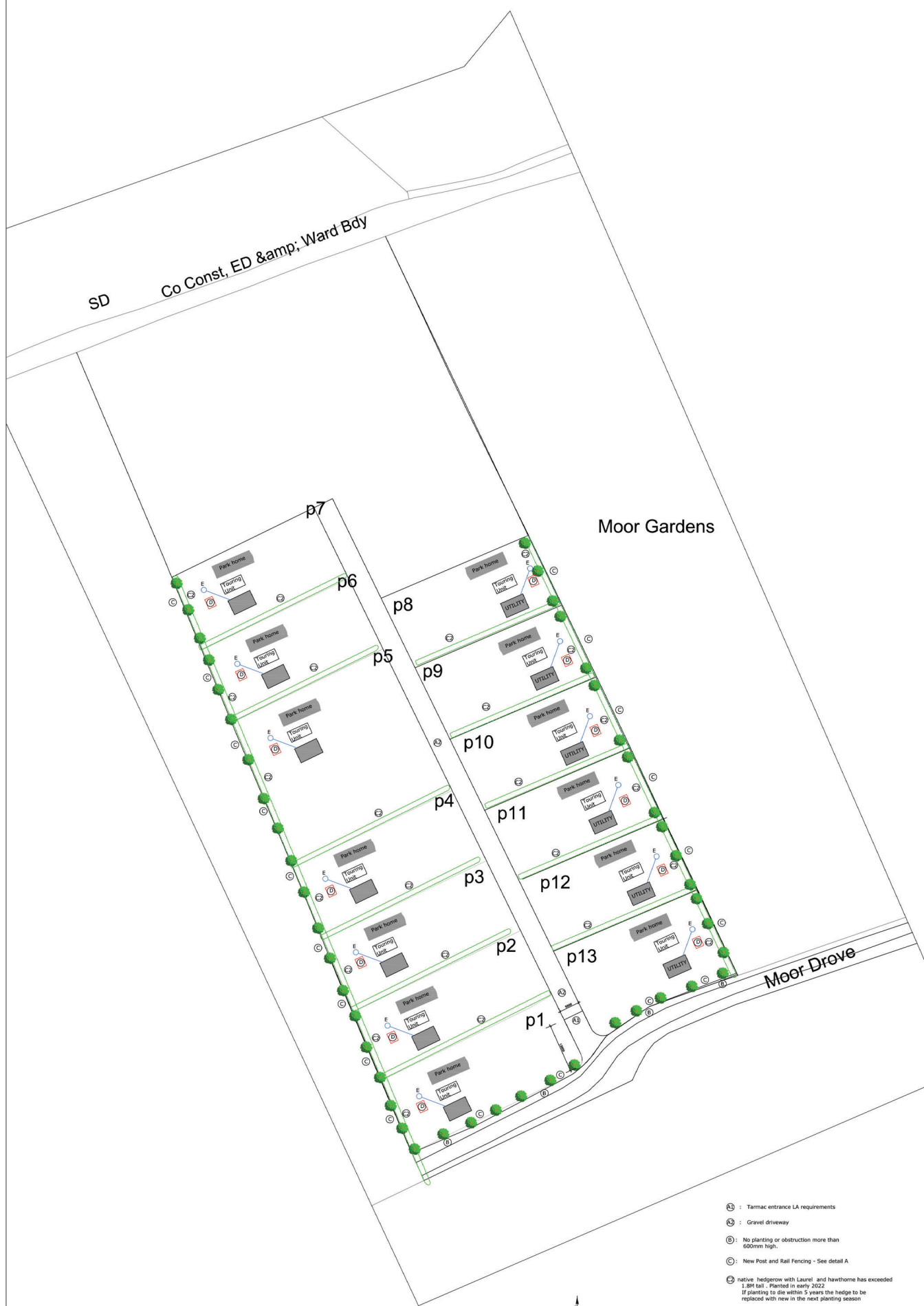
REVISIONS:

STATUS:
PLANNING

PROJECT:
land west of moor
drove histon cambs

DRAWING TITLE :
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DATE: MAY 2026
SCALE: 1:500 @ AI

PROJECT NUMBER :
J26194
DRAWING REFERENCE :
PLO1A

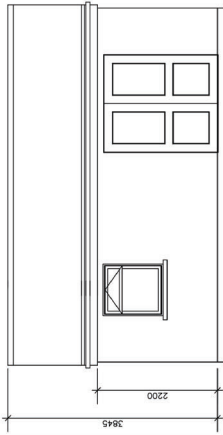


PROPOSED SITE PLAN 1:500
 0 5m 10m 15m 20m 25m



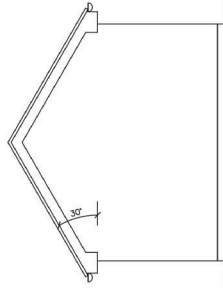
- (A) : Tarmac entrance LA requirements
- (B) : Gravel driveway
- (C) : No planting or obstruction more than 600mm high.
- (D) : New Post and Rail Fencing - See detail A
- (E) native hedgerow with Laurel and hawthorne has exceeded 1.8M tall - Planted in early 2022. If planting to die within 5 years the hedge to be replaced with new in the next planting season. Planting to be maintained to be max. 1.8m tall
- (F) : Clear Water 4600L (suitable for 17 people each) septic tank installed to each plot. Under contract with Bales Environmental LTD for regular removal. Unit can be upgraded to package treatment plant if required
- (G) : Soakaway for site - refer to DAS /001 for specification
- (H) : New medium Tree to boundary (30-60cm DBH)
- (I) : Grassed Areas



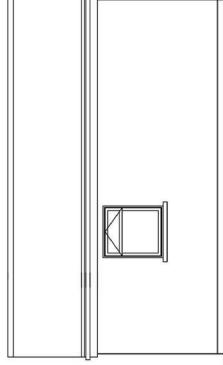


Front elevation 1:50

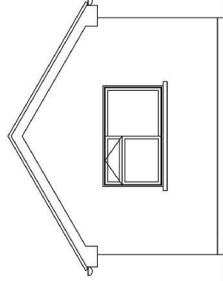
0 1 2 3 4 5 meters



Side elevation 1:50

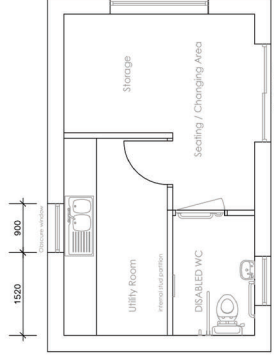


Rear elevation 1:50

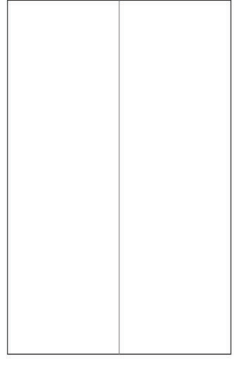


Side Elevation 1:50

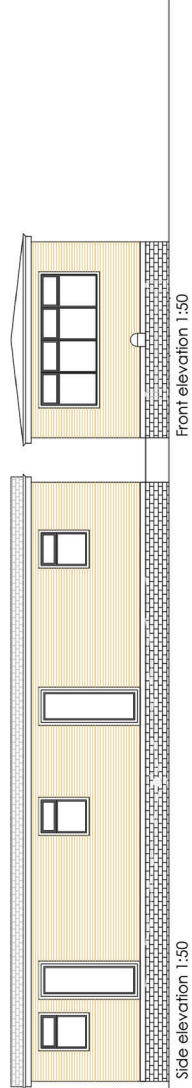
DAY ROOM



Floor Plan (20.5m² internal floor area) 1:50

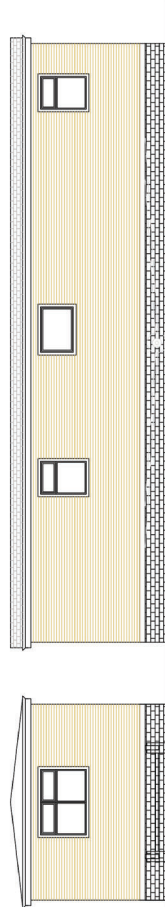


Roof Plan 1:50



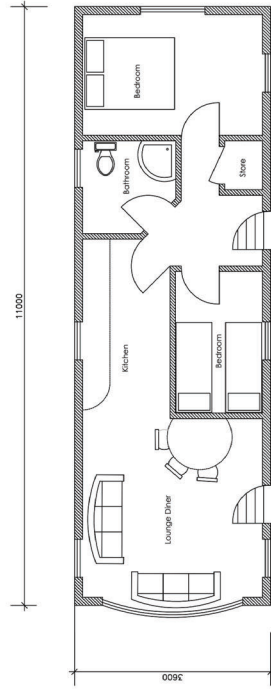
Side elevation 1:50

Front elevation 1:50



Rear elevation 1:50

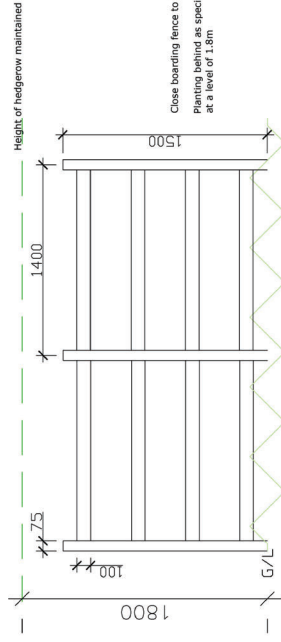
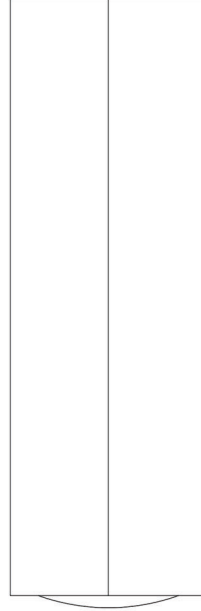
Side elevation 1:50



Floor Plan 1:50
35m² internal floor area

EXAMPLE STATIC / PARK HOME

Roof Plan 1:50



Detail A: Post and rail 1:20

BOUNDARY TREATMENT



13 WEST DELPH
WHITTLESEY
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01733 530757
WWW.TAYLORPLANNINGANDBUILDING.CO.UK

REVISIONS:

PLANNING

PROJECT:
land west of moor
drove histon cambs

DRAWING TITLE:
DETAIL

DATE:
MAY 2026

SCALE:
VAR @ AI

PROJECT NUMBER :

J26194
DRAWING REFERENCE :
PL03A

To whom it may concern,

I am writing to support the request to stay the injunction, and to support any planning application that would allow Miss Karina O'Donoghue to remain on the land that she is currently living on.

Ms. O'Donoghue and her family have experienced severe hardship over the last few years, having had to flee their formerly stable plot at Coldharbour Caravan Site in Kent due to violence. She has two children, and her son is severely disabled and requires 24-hour care and supervision. The family have been moved between unsuitable temporary accommodations and have recently been moved on from another bit of land. The disruption to their lives has been significant, and Ms. O'Donoghue has fought extremely hard to keep her son in his specialist education, meaning that she has been travelling the 30 miles each way in her last home, and now 90 miles to take him to school.

She desperately needs to be situated somewhere that she can stay long term, so that she is able to find and settle her son in another specialist school. He reacts very strongly to disruption in routine and so it is imperative that they remain somewhere long term.

I ask you to consider the need of the family in your deliberation over the application for residential planning permission on this site. Further, as you will be aware, there is a dearth of suitable sites available for Travellers across the country, and in Cambridgeshire it has been identified in the 2024 Traveller Accommodation Needs Assessment report that a minimum of an additional 130 were needed to satisfy the need.

Many thanks,



Megan Archer

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