



Planning Statement

Conversion of pavilion to form 3 dwellings (Retrospective)

Jacks Hill Farm, Graveley, Hertfordshire, SG4 7EQ

Ref: 2673

July 2026

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1.0 INTRODUCTION

1.1.0 Background

1.1.1 This report relates to a retrospective planning application submitted under Section 73A of the Town and Country Planning Act 1990, for the conversion of the existing pavilion to form 3 dwellings at Jacks Hill Farm, Graveley, Hertfordshire, SG4 7EQ.

1.1.2 The application is submitted following the issue of a Planning Contravention Notice by the LPA dated 26th May 2026 in connection with alleged breaches of planning control at the Site.

1.2.0 Scope

1.2.1 This document comprises an overarching Planning Report. Sections 2 to 4 consider the physical, economic, social and historical context of the site, identifying the relevant local, regional and national planning policy framework; Section 5 sets out the details of the proposal. All these sections inform the evaluation of the proposal in Section 6 against the identified planning policy framework. The overall conclusions are set out in Section 7 and which are summarised below at paragraph 1.3.0.

1.3.0 Summary

1.3.1 The report will show:

1. **Principle** As the re-use of an existing building which will result in no material impact to the openness and purposes of the Green Belt, the proposal is considered to clearly constitute not inappropriate development in accordance with NPPF paragraph 154 h) and LP Policy SP5. In addition, the Council cannot demonstrate a 5-year supply of deliverable housing land, and in the absence of any adverse impacts which would outweigh the benefits associated with the provision of 3-dwellings, the proposal should be approved as required by NPPF paragraph 11.
2. **Context** In the absence of material change to the scale, character and appearance of the premises, or their setting, the proposal would relate acceptably to its context as required by the NPPF and LP Policies D1 and SP9.
3. **Amenity** A satisfactory outlook and level of privacy would be achieved for occupiers of the proposed cottages and neighbouring residents.
4. **Movement** The proposal will result in a negligible impact on the surrounding highway network in compliance with LP Policies T1 and T2 and the provisions of the NPPF.
5. **Environment** There are no environmental barriers to the development.

2.0 SITE & CONTEXT ANALYSIS

2.1.0 Location

2.1.1 The Site is located on the eastern side of the B197, some 1.8km to the north of the village of Graveley and immediately to the north of Chesfield Downs Golf Club.

2.2.0 Application Site

2.2.1 Served by a relatively central access to the B197 frontage, the Site has an area of 2.26 ha, forming part of the wider Jacks Hill Farm, which comprises the following elements:

1. Set within a looped internal access road to the south of the vehicular access is the main concentration of built development. This includes the L-shaped 2-storey, hipped-roof farmhouse, within which there is also a self-contained one-bedroom apartment known as Finch Cottage. To the north of the farmhouse is a formal lawned garden. Immediately to the west of the main dwelling is a former single storey barn, which have been lawfully converted to provide two further self-contained dwellings: Nightingale Cottage (3-bed) and Pheasant Cottage (2-bed) See 3.1.0 below). To the rear (east) of the farmhouse is a detached indoor swimming pool.
2. Adjacent to the well screened B197 frontage, opposite the main complex of built development, is an open fronted car barn and parking area.
3. To the south of the farmhouse is Heron Cottage, a former bicycle store, which has recently benefited from a loft conversion and been converted to provide ancillary guest accommodation to the main farmhouse, and which is the subject of a separate retrospective application.
4. Beyond Heron Cottage to the south is a C-shaped range of single storey barns, comprising a longstanding detached barn, more recently extended as an additional workshop and store. The barns have now been adapted for occupation by the Applicant's daughter and her family and will be the subject of a separate application.
5. Directly to the rear (east) of the pool house, is an enclosed hard-surfaced tennis court, which is now disused. The tennis court is bounded to the east by a former single storey pavilion building, which has been adapted to form three self-contained dwellings, and which is the subject of this application, (see 2.2.3 below). This adjoins a lawned area, with an area of woodland beyond, which is under the applicant's control.
6. To the south-east of the former pavilion, falling within the applicant's ownership is a 2-storey, is a self-contained dwelling known as Millers Cottage, as approved in 2005 (see 3.1.0 below) with a range of outbuildings which are now utilised as ancillary accommodation to the cottage.

7. To north of the vehicular access, separated from the curtilage to the farmhouse by a mature tree line, is an area of grassland and scrub of some 2.7ha, which is also within the applicant's ownership.
- 2.2.2 The Site slopes gently upwards from the B197 frontage. It is contained by mature landscape features to its perimeter.
- 2.2.3 **Former Pavillion** Further to the above, this comprises a single storey, timber boarded building of shallow pitched roof design, with a width of around 21.5m and a depth of some 8.4m. It is understood that it was erected around 15 years ago as a games, function room and sports pavilion to serve the tennis court. Access is via that existing from the B197.
- 2.3.0 **Context**
- 2.3.1 The wider Jacks Hall Farm Site adjoins arable land to the north and east, with further farmland to the opposite western side of the B197. To the south, is Chesfield Downs Golf Course.
- 2.4.0 **Policy Map Notation and other Designations**
- 2.4.1 The Policies Map of the North Hertfordshire District Council Local Plan 2011-2031 Policies Map shows the Site located within the Green Belt and with no other designation. Graveley itself is identified as a Category A village in the Local Plan, wherein general development will be allowed within the defined settlement boundaries.
- 2.4.2 The Site is located within Flood Zone 1, so as to have a low probability of flooding from rivers and the sea. It also has low potential for surface water flooding. It is not located within or adjacent to any site designated for its ecological or amenity value. There are no designated or non-designated heritage assets in the immediate vicinity of the Site.
- 2.5.0 **Accessibility**
- 2.5.1 There is a footpath to the western side of the B197, providing access to Graveley to the south and to the Bus Stops some 900m in the same direction, which are situated to both sides of the highway, adjacent to The Highway Man Public House and Jacks Hill Caravan Park. The bus stops provide access to the following services, in both directions:
- **Route 55 Letchworth to Stevenage** - 2 buses per hour Monday-to-Friday, with a reduced Saturday and Sunday service
 - **Routes 92 & 92A Baldock to Stevenage** – hourly service Monday to Saturday, with a reduced Sunday service.
 - **Route 391 Stevenage to Weston** Saturday only service providing 4 buses
- 2.5.2 All the above services call at Graveley village. Local services in Graveley include a primary school, village hall, and two Public Houses.

3.0 RELEVANT PLANNING HISTORY

3.1.0 Application Site

3.1.1 The relevant planning history of the Site is summarised in the table below

LPA Ref	Proposal	Outcome
03/00801/1	Development A: Conversion and extension of two storey outbuilding to a two bedroom dwelling Development B: Conversion of single storey outbuilding to an ancillary annexe to new dwelling	06/05/2004 Split Decision Development A Granted – not implemented Development B Refused
05/00050/1	Millers Cottage - Rebuilding and extension of former outbuilding to provide new two-bedroom dwelling	23/02/2005 Conditional permission
06/02758/1HH	Single storey outbuilding for use as home office and hobbies room following demolition of storage outbuilding and pole barn ancillary to Millers Cottage	02/05/2007 Conditional permission
16/02025/1EUD	Pheasant Cottage - Continued use of one bedroom converted barn.	21/10/2016 Granted
16/02026/1EUD	Nightingale Cottage - Continued use of three bedroom converted barn	20/10/2016 Granted
16/02027/1EUD	Finch Cottage: Continued use of one bedroom apartment within the main house building	21/10/2016 Granted
16/03002/1HH	Proposed single storey outbuilding and detached barn following demolition of existing outbuilding and pole barn	23/01/2017 Conditional permission

4.0 POLICY CONTEXT

4.1.0 National Policy / Guidance

4.1.1 The National Planning Policy Framework (NPPF) December 2024, sets out the Government's planning policies for England. The following sections are considered directly relevant:

- Section 2: Achieving Sustainable Development
- Section 5: Delivering a sufficient supply of homes
- Section 8: Promoting healthy and safe communities
- Section 9: Promoting sustainable transport
- Section 11: Making effective use of land
- Section 12: Achieving well designed places
- Section 13: Protecting Green Belt land
- Section 15: Conserving & enhancing the natural environment

4.1.2 The National Planning Policy Guidance contains detailed guidance on the application of the NPPF.

4.2.0 Development Plan

4.2.1 This comprises the North Hertfordshire Local Plan 2011-2031 (November 2022) The following policies are considered relevant.

Policy No.	Title
SP1	Sustainable development in North Hertfordshire
SP2	Settlement Hierarchy and Spatial Distribution
SP5	Countryside and Green Belt
SP6	Sustainable Transport
SP8	Housing
SP9	Design and sustainability
SP10	Healthy Communities
SP11	Natural resources and sustainability
SP12	Green infrastructure, landscape and biodiversity
T1	Assessment of transport matters
T2	Parking
D1	Sustainable design
D2	House extensions, replacement dwellings and outbuildings
D3	Protecting living conditions
NE2	Landscape

4.3.0 **Supplementary Planning Guidance / Documents**

4.3.1 account is taken of the following documents:

- North Herts Design Code 2026
- Five-Year Housing Land Supply Update November 2025
- Vehicle Parking Standards at New Development 2011

5.0 DESCRIPTION OF DEVELOPMENT

5.1.0 Use & Amount

- 5.1.1 Permission is sought for the continued use of the former pavilion as 3 x 1-bedroom, self-contained dwellings. The dwellings are identified as Wren, Woodpecker & Robin Cottages on the submitted drawings. The dwellings would have internal floor areas of between 52m² to 55m².

5.2.0 Appearance and Scale

- 5.2.1 The premises have not been extended, and the only elevational change has been the replacement of an existing window with a new entrance door to the eastern elevation, to serve the central unit.

5.3.0 Access, Layout and Landscaping

- 5.3.1 The existing access from the B197 would be utilised. One parking space per unit is provided to the front (east) of the dwellings.
- 5.3.2 In common with the other dwellings on the Site, the dwellings have access to the existing shared amenity space.
- 5.3.1 There has been no loss of any significant landscape features as a result of the proposal.

6.0 PLANNING CONSIDERATIONS

Based on the analysis set out in Sections 2 to 5, it is considered that the application proposal raises the following issues, which are considered in turn below:

1. Principle
2. Context
3. Amenity
4. Movement
5. Environment
6. Planning Balance

6.1.0 Issue No 1: Principle

6.1.1.0 Policy Context

6.1.1.1 Local Plan (LP) Policy SP5 (Countryside and Green Belt) states that the Council will only permit development proposals in the Green Belt where they would not result in inappropriate development, or where very special circumstances have been demonstrated. The supporting text to Policy SP5 elaborates that proposals for development within the Green Belt will be considered against national policy.

6.1.1.2 Further to the above, paragraph 154 of the NPPF identifies 8 exceptions (a to h) to the normal policy of restraint in the Green Belt. Exception h) identifies - amongst other things - proposals for the *'re-use of buildings provided that the buildings are of permanent and substantial construction'*, as being not inappropriate, subject to the caveat that they preserve the openness of the Green Belt and do not conflict with the purposes of including land within it. In considering the potential impact of a development on the openness of the Green Belt the NPPG (Paragraph: 001 Reference ID: 64-001-20190722 Revision date: 22 07 2019), notes that *'openness is capable of having both spatial and visual aspects – in other words, the visual impact of the proposal may be relevant, as could its volume;'*. It also identifies the degree of activity likely to be generated, such as traffic generation as a potential factor

6.1.2.0 Evaluation

6.1.2.1 It is considered that the proposal complies fully with the requirements of NPPF paragraph 154 h) in the following circumstances:

1. The pavilion was only erected around 15 years ago, and prior to its conversion was of permanent and substantial construction.
2. The pavilion has not been extended or significantly altered, with the only modification being the replacement of a window with a door to the eastern elevation. There has thus been no change in the scale of the premises, and no material change in its character and appearance.
3. Parking spaces are provided to front of the dwellings utilising the pre-existing area of hardstanding, with the vehicles to be screened by or read against the premises
4. In common with the existing dwellings on the Site, the residents have access to the substantial amenity areas, including those immediately to the north and south. There is therefore no further subdivision of the Site, further minimising any impact to openness.

6.1.2.2 In summary, on the basis that the proposal utilises an existing single storey premises, which will not be extended or materially altered, located to the rear of the main complex of larger buildings, within a well screened plot, the proposal would not have any materially greater

impact on the openness or purposes of the Green Belt. This includes an assessment of the level of activity associated with the use. Given the existing residential use of the Site, it is also considered that the addition of 3 x 1-bedroom dwellings will have a negligible impact in terms of traffic generation and general activity.

- 6.1.2.3 In addition to the above considerations, with reference to the Council's Five-Year Housing Land Supply Update of November 2025, for the period 1st April 2025 to 31 March 2030, the Council cannot demonstrate a 5-year supply of deliverable housing land, with only a 2.6-year supply identified. In the context of paragraph 11 of the NPPF it thus follows that the proposal should be approved unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in the Framework as a whole. As will be demonstrated throughout this Statement, there are not considered to be any such adverse impacts on this occasion, which would outweigh the benefits associated with the provision of 3-dwellings set against the significant shortfall in supply.

6.2.0 **Issue No 2: Context**

6.2.1.0 **Policy Context**

6.2.1.1 Paragraph 135 of the NPPF states that planning policies and decisions should ensure that developments - amongst other things: add to the long-term quality of the area; are visually attractive; are sympathetic to local character and history, including the surrounding built environment and landscape setting; and establish or maintain a strong sense of place.

6.2.1.2 LP Policy D1 (Sustainable Design) states that planning permission will be granted for development proposals that respond positively to the site's local context. Policy SP9 (Design and Sustainability) states that new development will be supported where it is well designed and located.

6.2.2.0 **Evaluation**

6.2.2.1 Despite the change of use, in the absence of material change to the scale, character and appearance of the premises, they continue to be read as an ancillary outbuilding, associated with the wider residential use of the Site, in accordance with the above policy requirements.

6.2.2.2 Similarly, on the basis that the parking areas for the units utilises the pre-existing area of hardstanding to the front of the premises, and there is no subdivision of the Site to provide amenity areas with residents having access to the existing shared spaces, the proposal does not result in the introduction of any additional urban elements.

6.3.0 **Issue No 3: Amenity**

6.3.1.0 **Policy Context**

6.3.1.1 Paragraph 135 of the NPPF states that development should create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users. LP Policy D1 (Sustainable Development) seeks to maximise physical and social connectivity both internally and with neighbouring areas. It also requires that residential schemes, meet or exceed the nationally described space standards (NDSS). Policy D3 (Protecting living conditions) similarly seeks to ensure that proposals do not cause unacceptable harm to living conditions. The North Herts Design Code includes some privacy and amenity space standards for residential development.

6.3.2.0 **Evaluation**

6.3.2.1 **Outlook & Privacy** The proposed dwellings face onto an area of grass, beyond which is woodland. To the rear their outlook is across the disused tennis court onto the rear of the swimming pool premises, with a separation distance of over 50m. The dwellings would have an oblique relationship with Millers Cottage to the south-east, at a distance of some 13m. In these circumstances, it is considered that a satisfactory outlook and level of privacy would be achieved for occupiers of the proposed cottages and neighbouring residents. The tennis and cricket practice court directly west of the former pavilion have two sets of access gates. The eastern facing fence gates are left open, and the western facing gates are locked and accessed only for maintenance. This ensures amenity and privacy of the occupiers.

6.3.2.2 **Internal Space** All 3 of the dwellings would comfortably exceed the 50m² threshold for single storey, 1-bed / 2-person accommodation specified by the NDSS.

6.3.2.3 **Amenity Space** There are substantial areas of shared amenity space within the Site which the residents can access, and which provide opportunities for social interaction with the neighbouring residents on the wider Jacks Hill Farm site in accordance with Section 8 of the NPPF.

6.4.0 Issue 4: Movement

6.4.1.0 Location

6.4.1.1 In order to promote sustainable development, the NPPF states at paragraph 110 that *‘significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.’* It continues that *‘opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making’.*

6.4.1.1 As a proposal for 3 small dwellings, it is not considered that the proposal can be regarded as *‘significant development’*. On this basis, and mindful of the rural location of the site, it is considered that this scale of development is acceptable in this location. Whilst it is recognised that residents will largely rely on private motorised vehicles, the location does offer a choice of transport modes. The B197 can be safely utilised by cyclists and includes a footway to its western side, providing pedestrian access to Graveley some 1.8km to the south. Local services in Graveley include a Primary school, village hall and two Public Houses. As detailed in Section 2.5.0 above, it also allows access to the Bus Stops some located 900m in the same direction, where regular services to larger settlements including Stevenage, Letchworth and Baldock can be accessed.

6.4.2.0 Highway Capacity & Safety

6.4.2.1 NPPF paragraph 115 states that development should only be prevented or refused on highways grounds if there were an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe. Local Plan Policy T1 similarly seeks to ensure highway safety and to protect the road network.

6.4.2.2 No ‘severe’ impacts are anticipated on the basis that:

- the proposal would utilise the existing access
- the looped internal access allows vehicles to enter and exit the site in a forward gear; and
- the modest scale of the proposal would result in a negligible impact on the surrounding highway network.

6.4.3.0 Parking

6.4.3.1 LP Policy T2 requires parking provision that is in accordance with Appendix 4 of the Local Plan. 1 parking space is provided for each of the 1-bedroom dwellings with sufficient parking space on the wider site to satisfy demand from visitors in accordance with adopted standards. Secure covered cycle parking is available in the timber barn to the south of the former Pavillion building Each property has a secure parking space running parallel between the access road and eastern boundary fence. The building has restricted

power supply such that it cannot accommodate individual EV charging points near the dwellings. However, the occupiers can use the EV charging points at the existing open car barn at Jack's Hill Farmhouse.

6.5.3.0 **Conclusion**

6.5.3.1 To conclude this issue, this modest proposal would utilise the existing access, allowing vehicles to safely enter and exit the site, and would include sufficient off-street parking provision, thus resulting in a negligible impact on the surrounding highway network. The Site also offers some opportunities to utilise sustainable transport modes, including electric vehicles, appropriate to the limited scale of development. The proposal would therefore comply with Local Plan Policies T1 and T2 and the provisions of the NPPF.

6.5.0 Issue 5: Environment

6.5.1 On the basis that the proposal relates solely to the use of an existing building and is not situated within or adjacent to a site of ecological or amenity value and has not resulted in the loss of any significant landscape features, no undue environmental impact is anticipated.

6.5.2 Furthermore, as a retrospective application under Section 73A, the application is exempt from the national mandatory requirements for Biodiversity Net Gain (BNG). Moreover, the proposals do not impact more than 25m² of existing biodiversity, which is below the threshold for BNG provision.

7.0 CONCLUSIONS

7.1.0 Background

7.1.1 This report relates to a retrospective planning application for the conversion of the pavilion to form 3 dwellings at Jacks Hill Farm, Graveley, Hertfordshire, SG4 7EQ. The application is submitted following the issue of a Planning Contravention Notice by the LPA dated 26th May 2026 in connection with alleged breaches of planning control at the above address, including the conversion of the pavilion building. The proposal is promoted on the following basis.

7.2.0 Principle

7.2.1 On the basis that the proposal utilises existing single storey premises of permanent and substantial construction which will not be extended or materially altered, and which are set well within a large and landscaped site, which includes significant built development, such that there will be no material impact to the openness and purposes of the Green Belt, the proposal is considered to clearly constitute not inappropriate development in accordance with NPPF paragraph 154 h) and LP Policy SP5.

7.2.2 In addition to the above considerations, the Council cannot demonstrate a 5-year supply of deliverable housing land, with only a 2.6-year supply identified. In the context of paragraph 11 of the NPPF, it thus follows that the proposal should be approved unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in the Framework as a whole. There are not considered to be any such adverse impacts on this occasion, which would outweigh the benefits associated with the provision of 3-dwellings in the context of the significant shortfall in supply.

7.3.0 Context

7.3.1 In the absence of material change to the scale, character and appearance of the premises, they continue to be read as an ancillary outbuilding, associated with the wider residential use of the Site, whilst the parking and shared amenity space arrangements preclude the introduction of any additional urban elements. The proposal thus reflects the requirements of Section 12 of the NPPF and LP Policies D1 and SP9.

7.4.0 Amenity

7.4.1 A satisfactory outlook and level of privacy would be achieved for occupiers of the proposed cottages and neighbouring residents. The proposals would comply with adopted internal and amenity space standards and would allow opportunities for social interaction.

7.5.1 This modest proposal would utilise the existing access, allowing vehicles to safely enter and exit the site, and would include sufficient off-street parking provision, thus resulting in a negligible impact on the surrounding highway network. The Site also offers some opportunities to utilise sustainable transport modes, appropriate to the limited scale of development. The proposal would therefore comply with Local Plan Policies T1 and T2 and the provisions of the NPPF.

7.6.0 **Environment**

7.6.1 On the basis that the proposal relates solely to the use of an existing building and is not situated within or adjacent to a site of ecological or amenity value and has not resulted in the loss of any significant landscape features, no undue environmental impact is anticipated.