



Hillcrest and land at Tussocks, The Causeway, Therfield

Planning Statement

June 2024

1.0 Introduction

- 1.1 This Planning Statement accompanies a full planning application for the demolition of an existing dwelling and outbuildings at Hillcrest and erection of 7 No. dwellings at this property and within the grounds of the adjoining property, Tussocks. The development will be accessed from a new entrance off The Causeway into Tussocks.
- 1.2 This Statement sets out the planning policy considerations of the scheme and provides a summary of the findings of the impact on heritage assets; technical considerations; landscape impact; and environmental review of the site and proposed development.
- 1.3 Included with this application submission are the following supporting documents:
- Accompanying letter
 - Planning application forms including ownership certificate
 - Location plan
 - Existing topographical survey
 - Existing and proposed plans
 - Planning Statement
 - Design and Access Statement
 - Heritage Impact Assessment
 - Archaeological Desk Based Assessment
 - Arboricultural Impact Assessment and Method Statement
 - Landscape plan
 - Ecology Report (including Great Crested Newts and Bats survey results)(June 2024)
 - Statutory Metric Biodiversity Net Gain Assessment
 - Transport Statement
 - Flood Risk Assessment and SuDS Statement
 - Desk Top Study Report

2.0 Site Context and Proposed development

- 2.1 The application site comprises two properties known as Hillcrest and Tussocks, located within the village of Therfield, on the northern route (The Causeway) out of the village heading towards Royston. Hillcrest comprises a detached property set nearer to the front of the property. A number of outbuildings associated with Hillcrest are located at the back of the property.
- 2.2 Tussocks is a much larger property, with a detached house located towards the centre/south side of the property. A large garden area surrounds the house with a trees spaced around the garden and a pond towards the south east corner of the property.

2.3 The proposed development in this application is for the development of the site (including the demolition of the existing house at Hillcrest) for 10 No. dwellings comprising the following mix of market housing:

- 4 No. three bed dwellings
- 3 No. four bed dwellings

2.4 The existing vehicular access into both Hillcrest and Tussocks onto The Causeway will be removed and a new single entrance to the site will be provided more centrally along the frontage of Tussocks, providing access to all of the 7 new properties as well as the existing house at Tussocks.

2.5 The existing house at Tussocks will be retained along with an existing pond and surrounding land to the south-east of the house. Both the existing house and the south east corner of the property (including the pond) are located outside of the application site boundary.

2.6 The plans and Design and Access Statement submitted with the planning application provide more detail about the design of the scheme, how it has been laid out taking into account the surrounding context, and elevational treatment for the proposed housing.

3.0 Relevant Planning History

3.1 In 1987, planning permission was granted at Hillcrest for a two bed dwelling (LPA reference 87/00648/1). Planning permission was also granted in 2006 for a first floor extension and rear canopy at Hillcrest.

3.2 In relation to Tussocks, there are number of consents to remove and carry out works to trees on the property. There are no specific planning applications referred to on the Council's website.

3.3 In 2018, a pre-application submission was made to the Council for the development of Tussocks for 7 No. dwellings including a new access and closure of the existing driveway (LPA reference 18/02701/PRE). 6 No. the new dwellings were proposed across the full width of the front the site in two terraces of three properties. The seventh dwelling was proposed towards the rear and north of the existing dwelling at Tussocks.

3.4 Whilst the proposals were considered under the older adopted Local Plan, consideration was given at the time to the proposal through the emerging Local Plan (which has subsequently been adopted).

3.5 The overall conclusion of the Area Planning Officer at the time of the 2018 pre-application submission, was that the harmful impact of amount, layout and size of

dwellings proposed on the open character of this part of the Conservation Area, outweighed the benefits of delivering housing within the village.

- 3.6 The officer in this pre-application response did, however, make the following comments:

That said, if the scheme were amended to better reflect the established character of the conservation area the harm thereto might reduce to a point whereby the balance may be resolved in favour of supporting a modest sensitively designed scheme of housing.

- 3.5 The officer also commented that a less ambitious scheme of frontage development might be considered favourably in the planning balance.
- 3.6 Further consideration of these comments has therefore been taken into account in designing this current application, and highlighted the importance of undertaking a heritage review of the site and surrounding area, and a better understanding of the surrounding context. This could then be used to assist with designing a scheme for new housing that would respect surrounding context and ensure that the special character of the Conservation Area is retained.
- 3.7 More recently, a planning application to develop the site (along with an additional part of the curtilage of Tussocks) for 10 no. residential dwellings was submitted to the Council in October 2023 (LPA reference 23/02417/FP). This application was withdrawn on 3rd May 2023, as a result of discussions with the Council's Case Officer and Conservation Officer. During these discussions revised plans were submitted reducing the size of the application site and also reducing the number of dwellings from 10 to 7 no. dwellings. Prior to withdrawing the application, officers advised that they were supportive of the revised site area and layout for 7 no. dwellings, and requested the application be withdrawn to allow the revised scheme to be processed under a fresh planning application.
- 3.8 During application 23/02417/FP, comments were received from the Parish Council, the Highway Authority and the LLFA. The revised application seeks to address the comments raised by these consultees, which are reviewed in more detail through this Planning Statement, along with the submitted plans and other supporting documents included with the revised application.

4.0 Planning Policy Guidance

North Herts Local Plan 2011-2031

- 4.1 The Council adopted the new Local Plan 2011-2031 on 8th November 2022 and replaces the previous saved 2007 policies. Policies contained in the 2022 Adopted Local Plan are therefore a primary material consideration in determining this application.

- 4.2 The application site falls within the settlement boundary of Therfield and also within the village's Conservation Area.
- 4.3 The following Adopted Local Plan policies are relevant to the consideration of this planning application and include:
- 4.4 Policy SP1: Sustainable development in North Hertfordshire – This principle policy highlights that the Local Plan supports the principles of sustainable development within North Herts. Part b) of the Policy specifically seeks to maintain the long-term vitality of the District's villages by supporting growth, which provides opportunities for existing and new residents and sustain key facilities. Part c) of Policy SP1 sets out the following criteria that are required to be achieved through the grant of planning permission:
- *deliver an appropriate mix of homes, jobs and facilities that contribute towards the targets and aspirations in this Plan;*
 - *create high-quality developments that respect and improve their surroundings and provide opportunities for healthy lifestyle choices;*
 - *provide the necessary infrastructure required to support an increasing population;*
 - *protect key elements of North Hertfordshire's environment including biodiversity, important landscapes, heritage assets and green infrastructure (including the water environment); and*
 - *secure any necessary mitigation measures that reduce the impact of development, including on climate change;*
- 4.5 Policy SP2: Settlement Hierarchy and Spatial Distribution – This policy sets out the Council's strategic plan for distributing and delivering housing across the District. The Plan makes provision between 2011 and 2031 for at least 13,000 new homes, with 80% being delivered within the District's towns, 13% within 5 of the larger villages, and the remaining development being dispersed across the District as set out by Policy SP2. This Policy identifies Therfield as one of 18 Category A villages, wherein there is support in principle to provide housing.
- 4.6 Policy SP2 states that within the defined settlement boundaries general development will be allowed. The application site at Hillcrest and Tussocks falls within Therfield's settlement boundary, and as such, Policy SP2 establishes the principle of development on these properties, subject to the consideration of the development under other policies.
- 4.7 Policy SP6: Sustainable transport – This policy seeks to promote the use of sustainable transport modes insofar as reasonable and practicable. Part e) of the policy requires developments to be assessed against the Plan's parking standards, and, part f) require applicants to provide assessments, plans and supporting documents to demonstrate the safety and sustainability of their proposals. A comment raised by the Highway Authority to the original application submitted for 10 no. dwellings was that pedestrian access and footpaths were lacking along The Causeway. To address this

issue a pedestrian footpath is proposed along the frontage of Tussocks with the main road to improve pedestrian access along this section of The Causeway either side of the new entrance into the site. In front of Hillcrest, the existing vehicular access from The Causeway is proposed to be changed to a pedestrian only access and footpath will be provided set back from the roadside, due to changes in land levels. This new inset footpath will connect through the new footpath proposed at the front of Tussocks. These proposals will therefore improve pedestrian access along this section of The Causeway.

- 4.8 *Policy SP7: Infrastructure requirements and developer contributions* – This policy requires development proposals to make provision for infrastructure that is necessary in order to accommodate additional demands resulting from the development. Consideration of this policy requirement will be undertaken through the consultation process of the planning application, in discussion with the local planning authority.
- 4.9 *Policy SP8: Housing* – This policy provides more detail in relation to setting out the strategy for delivering housing across the District. This revised application proposes a mix of 3 and 4 bed properties, that will provide a mix of family homes within a village setting, which is considered to be generally in line with the emphasis of this policy and taking into account the application site's location and constraints.
- 4.10 *Policy SP9: Design and sustainability* – This policy requires good design to be a key aspect of sustainable development. It highlights the Council will support new development where it is well designed and located and responds positively to its local context. It also highlights that they Council will adopt the Government's technical standards for the size of new homes, water efficiency and, in specified circumstances, accessibility, and directs consideration of schemes to the Council's Design SPD. The proposed scheme in this application has been designed through understanding the heritage context surrounding the site and which it lies within, as well as protecting the natural environment through retaining trees and providing a net gain in biodiversity. Through understanding the development constraints of the site and identifying opportunity, reviewing the density and urban grain of the surrounding area, a scheme has been designed to achieve a high quality contributing to the character and appearance of the area in compliance with Policy SP9. The scheme has also been discussed in detail with officers prior to submitting the revised application and they have given their support to the proposed new scheme.
- 4.11 *Policy SP12: Green Infrastructure, biodiversity and landscape* – This policy seeks to protect, enhance and manage green infrastructure network and seek opportunities to create new green infrastructure. It also requires biodiversity networks to be protected and enhanced. An Arboricultural Impact Assessment and Method Statement have been included with the application, which assesses the quality and condition of existing trees and has been used to advise on the positioning of houses, parking and access roads to ensure as many of the better quality trees are retained. A landscape scheme has also been provided for this application, providing more detail of the hard and soft landscaping proposed for the scheme. The ecology review of the site has also

been undertaken again to inform the design of the scheme, but also to calculation and set out how a net gain in biodiversity will be achieved.

- 4.12 *Policy SP13: Historic environment* - The application site falls within the village's Conservation Area. This policy takes into account the Council's need for growth, whilst balancing against the proper protection and enhancement of the historic environment. It also highlights that "*great weight*" will be given to the asset's conservation and management of its setting. A Heritage Impact Assessment has been undertaken of the site, considering in detail the relevance of the site within the Conservation Area, impact on listed buildings and the impact of the proposed development on the identified heritage assets. A summary of this reports findings is provided in Section 5.0 of this Planning Statement.
- 4.13 The application site is also located within an Area of Archaeological Significance. A Desk based Archaeological Assessment has also been undertaken for this site and its findings are also summarised in Section 5.0.
- 4.14 *Policy T1: Assessment of transport matters* – This policy requires major development (10 units +) to demonstrate how a proposed scheme would be served by public transport and provide safe, and provide direct and convenient routes for pedestrian and cyclists. A Transport Statement has been undertaken for the site assessing the sustainability credentials of the scheme and demonstrating the safe access and egress from the site. A summary of the Statement's conclusions are summarised in Section 5.0.
- 4.15 *Policy T2: Parking* – Policy T2 sets out the need to provide parking for residential developments in accordance with the minimum standards set out in Appendix 4 of the Plan.
- 4.16 *Appendix 4: Car Parking Standards* – This sets out a minimum of 1 space per 1 bed dwellings and 2 spaces for 2+ beds, with 1 secure covered cycle space. Visitor spaces should be between 0.25 and 0.75 spaces per dwelling. Garages should be 7m x 3m to count towards parking. The proposed development provides parking that is in compliance with the requirements of Policy T2 and Appendix 4. Two visitor spaces have been provided either side of the driveway between plots 4 and 6. These will allow visitors and service vehicles to park within the site rather than along The Causeway.
- 4.17 *Policy HS2: Affordable Housing* – This policy sets out the following affordable housing thresholds:
- 11 to 14 dwellings - 25% of dwellings to be affordable
 - 15 to 24 dwellings – 35% of dwellings to be affordable
 - 25 or more dwellings – 40% of dwellings to be affordable

- 4.18 The proposed development in this applications is for 7 No. new dwellings (net gain of 6 No. dwellings). As such, the lower threshold level is not exceeded and the proposed application does not require the delivery of affordable housing under Policy HS2.
- 4.19 *Policy HS3: Housing mix* – This policy sets out the Council’s strategy for delivering the right mix of housing. It takes into account findings from the most up-to-date Strategic Housing Market Assessment, location and accessibility of the site; and recent completions, exiting permissions and sites in the 5 year supply. It also requires schemes to provide a density, scale and character of development appropriate to its location and surroundings.
- 4.20 The Council’s current evidences suggests that they will seek to deliver a broad balance between smaller (2 bed or less) and larger (3 bed or more) homes over the plan period up to 2031. Further guidance then states that in most suburban and edge of settlement sites, developments should provide 60% larger (3+ bed) and 40% smaller (1 and 2 bed) homes. It is recognised though that each site will be considered on its own merits, and taking into account the rural village location this may present an alternative option in terms of mix that takes into account local need. The proposed scheme in the planning application provides 3 and 4 bed family homes, which will assist in delivering this type of housing within a village setting. As such, it is considered that the proposals comply with the housing mix requirements of Policy HS3.
- 4.21 *Policy HS5: Accessible and adaptable housing* – This policy requires at least 50% of homes to be built to M4(2) Accessible and Adaptable standard. This requirement will be achieved within this scheme and its compliance is shown on the submitted plans.
- 4.22 *Policy D1: Sustainable design* – This policy lists a number of opportunities that need to be taken into account in designing schemes, including:
- i. *create or enhance public realm;*
 - ii. *optimise the potential of the site by incorporating Sustainable Drainage Systems (SuDS);*
 - iii. *reduce energy consumption and waste;*
 - iv. *retain existing vegetation and propose appropriate new planting;*
 - v. *maximise accessibility, legibility and physical and social connectivity both internally and with neighbouring areas;*
 - vi. *future proof for changes in technology and lifestyle;*
 - vii. *design-out opportunities for crime and anti-social behaviour; and*
 - viii. *minimise the visual impact of street furniture and parking provision.*
- 4.23 Parts c. and d. of this policy also further emphasis the need to comply with the Council’s Design SPD and for the development to meet or exceed nationally described space standards and the additional optional water efficiency standards. The submitted plans demonstrate how the proposed development will comply with the nationally described space standards.

- 4.24 *Policy NE2: Landscape* – Sets out how the Council will seek to ensure that development does not have a detrimental impact on the appearance of the immediate surroundings and landscape character.
- 4.25 *Policy NE4: Biodiversity and geological sites* – This policy states that planning permission will only be granted for development proposals that appropriately protect, enhance and manage biodiversity, and should deliver a measurable net gain for biodiversity and geodiversity, contribute to ecological networks and the water environment. The policy requires the submission of an ecological survey that is commensurate to the scale and location of the development and likely impact on biodiversity.
- 4.26 *Policy NE8: Sustainable drainage systems* – This policy requires the most appropriate sustainable drainage solution is used taking into account technical, viability and design issues to reduce the risk of surface water flooding, enhance biodiversity, water quality and provide amenity benefits.
- 4.27 *Policy NE10: Water conservation and wastewater infrastructure* – This policy sets out requirements for complying with water environment and framework directives, and requires adequate foul water treatment and disposal to exist or provided in time to serve the development.
- 4.28 *Policy NE11: Contaminated land* – This policy requires that for development affected by contaminated land, a contamination land study/risk assessment is submitted as part of the application. A Desk Study has been prepared for this application site and included as part of the application submission. The findings of this report are included in Section 5.0 of this Planning Statement.
- 4.29 *Policy HE1: Designated heritage assets* – There is a requirement under this policy that a Heritage Assessment/Justification Statement will be required for the application(s) at Hillcrest and Tussocks. This statement should:
- i. *Assess the significance of heritage assets, including their setting.*
 - ii. *Justify and detail the impacts of any proposal upon the significance of the designated heritage asset(s).*
 - iii. *Inform any necessary measures to minimise or mitigate against any identified harms.*
- 4.30 The criteria that the development should then be assessed against includes:
- a) *The use of heritage asset in a manner that secures its conservation and preserves its significance*
 - b) *Incorporate a palette of materials that make a positive contribution to local character or distinctiveness, where it is appropriate and justified.*
 - c) *Where there is less than substantial harm to the significance of the designated heritage asset, this harm is outweighed by the public benefits of the development, including securing the asset's optimum viable use.*

- 4.31 Where it is considered there is substantial harm to, or loss of significance, of a designated heritage asset the Council will refuse consent unless it can be demonstrated that the scheme is necessary to deliver considerable public benefits that outweigh the harm or loss.
- 4.32 A Heritage Impact Assessment has been undertaken for this planning application and included in the supporting documents. Its findings and assessment of impact are summarised in Section 5.0 of this Planning Statement and an evaluation of public benefits is also undertaken in this section of the Statement.
- 4.33 *Policy HE4: Archaeology* – As both properties lies in an Area of Archaeological Significant, this policy requires the submission of an appropriate desk-based assessment and where justified an archaeological field evaluation.

North Herts Council Design SPD 2011

- 4.34 The 2011 SPD sets out the Council's design guidance. It is not prescriptive in setting out standards, but provides more general guidance.
- 4.35 The Council's SPD also sets out the following urban design principles, which have been taken into account in designing the scheme:
1. Character (sense of place and history)
 2. Continuity and Enclosure (distinguish between public/private space)
 3. Quality of the Public Realm (sense of well-being and amenity)
 4. Ease of movement (connectivity and permeability)
 5. Legibility (ease of understanding)
 6. Adaptability (ease of change)
 7. Diversity (ease of choice)
 8. Quality of Private Space (usability)
 9. Sustainability (reducing carbon and increasing efficiency)

Therfield Conservation Area Character Statement

- 4.36 The Therfield Conservation Area Character Statement was prepared on behalf of the Council in April 2019. This document highlights that the Conservation Area was designated in 1969 and its boundary was amended in 1979. The report was prepared for the purpose of appraising the character of the Conservation Area, highlighting key features, a statement of special interest, and a list of designated and non-designated heritage assets and key views.
- 4.37 The Heritage Impact Assessment submitted with this application goes into greater detail about this Character Statement, but is noted the Character statement does not show either Hillcrest nor Tussock as a building or feature that contributes to the character of the Conservation Area. The school buildings to the south and houses to

the north are highlighted as buildings that do. The nearest listed building is a Grade II opposite at Elm House, to the south west of the properties.

- 4.38 A “Significant key view” is highlighted outside the front of Tussocks looking into the village, reference KV10. The Statement makes the following comment about the view:

KV10: View from The Causeway adjacent to Fordham’s terrace south towards the village green. This view shows a variety of boundaries within the conservation area including estate railing, formal hedges and soft margin planting, as well as the rural character of the road treatment only including short lengths of kerb.

- 4.39 The Heritage Impact Assessment provides a review of these key heritage asset feature and consideration of the impact of the proposed development.

National Planning Policy Framework 2023

- 4.40 A revised National Planning Policy Framework (NPPF) was published in December 2023, setting out the Government’s planning policies for England and how they are expected to be applied. This section highlights particular sections and paragraphs of the NPPF that are relevant to this application.

- 4.41 The NPPF requires the planning system to perform economic, social and environmental roles (NPPF, Paragraph 8). These three overarching objectives are interdependent and need to be pursued in mutually supportive ways.

- 4.42 At the centre of the adopted NPPF, which sets out Central Government’s overarching national strategic planning objectives is a presumption in favour of sustainable development:

*“So that sustainable development is pursued in a positive way, at the heart of the Framework is a **presumption in favour of sustainable development**...For decision-taking this means approving development proposals that accord with an up-to-date development plan without delay...” (NPPF, para. 10 and 11)*

- 4.43 Section 5 of the NPPF sets out the Government’s intention to deliver a sufficient supply of homes, and paragraph 60 states:

“To support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.”

- 4.44 Paragraph 69 highlights the importance of how small and medium sized sites (such as the application site) can make an important contribution to meeting the housing requirement of an area, which the application site would provide.

4.45 Paragraph 78 refers to housing development within rural areas and states: *“In rural areas, planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs.”* The application at Hillcrest and Tussocks will provide a good mix of housing, including smaller houses and family homes. There is a requirement to maintain local services within the village, along with providing a continued flow of children to the local primary school. Currently, the school has to advertise heavily to Royston nursery’s and surrounding area outside of the village to attract people to come.

4.46 Paragraph 79 goes on to state:

“To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities.”

4.47 Section 11 of the NPPF seeks to ensure development *“makes effective use of land”*, but whilst safeguarding and improving the environment and ensuring safe and healthy living conditions (NPPF, paragraph 119). Paragraph 124 and 125 seeks to ensure that appropriate densities of development are achieved taking into account the needs for housing in the locality, but also taking into account the local circumstances in terms of maintaining the area’s prevailing character and setting. The scheme in this application is relatively low density, but that this takes into account the surrounding density of properties and the Conservation Area setting of the site. A balance has therefore been taken to ensure that the character and appearance of the locality are maintained, whilst providing a mix of housing that will support the village and local community.

4.48 Section 12 of the NPPF seeks to *“achieve well-designed places”* and provides the following guidance in Paragraph 126, which states:

“The creation of high-quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.”

4.49 Paragraph 130 of the NPPF advises that both planning policies and decisions should aim to ensure that developments:

- *will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
- *are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*
- *are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);*
- *establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;*

- *optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and*
- *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; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.*

- 4.50 Paragraph 131 highlights the need for well-designed schemes that incorporate trees within the design and also reflects local design policies and government guidance on design.
- 4.51 Paragraph 133 highlights the need to use assessment frameworks such as “Building for Healthy Life when design schemes. Paragraph 134 states that significant weight should be given to *“development which reflects local design guidance and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes.”*
- 4.52 The application proposals have been designed with particular regard to this national guidance and has fully taken into account the requirements of the Council’s Design SPD and Conservation Character Assessment, ensuring that the density and layout design respect the character, appearance and urban grain of the village and its Conservation Area setting.
- 4.53 The NPPF 2023 highlights the need to protect and enhance biodiversity and geodiversity. Paragraph 180 does set out criteria for determining planning applications and highlights that where there is “significant” harm to biodiversity resulting from a development which cannot be avoided, adequate mitigation, or, as a last resort, compensated for, then planning permission should be refused. This therefore emphasises the assessment in terms of significant impact is part of the assessment as to what level of mitigation should be provided. This issue has been addressed by the ecological survey work that has been undertaken at the application site and through a biodiversity net gain calculation that has been carried out for the development, along with a landscaping scheme.
- 4.54 Section 16 of the NPPF provides guidance in relation to *“conserving and enhancing the historic environment.”* Paragraph 194 of the NPPF 2021 considers the impact on the heritage assets, such as Conservation Areas and listed building, and, what level of heritage assessment should be undertaken. It requires the level of detail should be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance. Paragraph 195 then requires that the level of significance should then be taken into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset’s conservation and any aspect of the proposal. The Heritage Impact Assessment submit with the application provides a full and detailed assessment of the site, its siting within the Conservation Area and impact of

the proposed development on the character, appearance and setting of the Conservation Area and nearby listed buildings.

4.55 Paragraph 197 of the NPPF then states: In determining applications, local planning authorities should take account of:

- a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;*
- b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and*
- c) the desirability of new development making a positive contribution to local character and distinctiveness.*

4.56 Paragraphs 199 to 208 of the NPPF provide further guidance on assessing the level of harm to heritage assets, weighed against other matters such as public benefits. This is further reviewed in Section 5.0 of this Planning Statement.

5.0 Supporting Documents

Design and Access Statement

- 5.1 A Design and Access Statement has been prepared by PJB Planning dated October 2023.
- 5.2 The Statement reviews the site and its surrounding, providing commentary in relation to the site context and local context. It highlights how the application site connects through to the village and to local amenities.
- 5.2 The Statement sets out how the scheme subject of this application has progressed and been designed through an analysis of the settlement structure and pattern of existing development, demonstrating how the density, layout and form of development proposed in this application blends in with the existing settlement and surrounding urban grain.
- 5.3 Through assessing the settlement structure and site constraints and opportunities presented at the application site, the proposed site layout and scheme has been prepared to respond to issues that have been raised through this review and other reviews undertaken for the application, such as the Heritage Impact Assessment.
- 5.4 The Design and Access Assessment demonstrates the proposed scheme will achieve a high-quality design and sustainable form of development, in compliance with the Adopted Local Plan Policy SP9, guidance contained with the Council's Design SPD, and Section 12 of the NPPF 2023.

Heritage Impact Assessment

- 5.5 A Heritage Impact Assessment has been prepared by HCUK Group dated June 2024. The Assessment sets out the relevant planning policy framework in relation to the consideration of the scheme and its impact on heritage assets. It provides a description and understanding of the site and surrounding context from a historical perspective, and sets out a statement of significance of the site within the Conservation Area and impact on heritage assets. Based on this background information and evidence, the report then provides a heritage impact assessment of the proposed development in this planning application.

- 5.6 In conclusion, the Heritage Impact Assessment makes the following comments:

This assessment has considered the heritage significance, character and appearance of a site within the village of Therfield, occupying two existing properties Hillcrest and Tussocks. As identified in the introduction no listed buildings or other designated assets, aside from the conservation area are affected. Neither building within the site is a heritage asset of any type, but the open area of the Tussocks site is considered to make a small positive contribution to the area's historic values having been relatively open throughout the village's history and into the current time. Though the undeveloped nature is ostensibly long lived its character has changed noticeably from a paddock or pasture to a domestic garden. The open nature of the site contributes to an identified 'Key View' within the conservation area particularly in respect of its openness as a 'gap' between historic buildings and in the informal grassy road edges to The Causeway which preserve a more rural character.

The proposals have been informed by an understanding of the built characteristics of the conservation area and in particular the material and aesthetic qualities of positive contributor buildings to either side of the site. They have sought to position and locate new dwellings in such a way that preserves important elements such as the informal soft road edges to The Causeway and a sense of a gap between Fordham's Terrace and Hillcrest and School House. The positioning also acknowledges both the strong linear development pattern of The Causeway but also that to the south of the site, within the village core, the pattern of development does include several examples of houses set behind the road frontages as an existing characteristic of the conservation area.

This scheme has evolved in direct consultation with officers and has addressed concerns raised, reducing the proposed number of dwellings, increasing garden areas and limiting built form to the rear/interior of the site.

The proposed development of the Hillcrest part of the site is not considered harmful to the character or appearance of the conservation area.

In respect of the Tussocks site though design considerations and most recent revisions have limited the extent of effect, because this area continues to have a relatively strong degree of openness, the development will erode this slightly further, lessening the sense of this as an historically open area within the village. Because this area has

already been domesticated with a house and garden its contribution to the character of the village is lower and the resultant harm from the current proposals remains firmly at the lower end of less than substantial.

The current scheme was developed in conjunction and consultation with officers and has addressed concerns with the reduction in unit numbers and focus of development more towards the frontage of the site, rather than to the rear.

Having identified less than substantial harm at the lower end of the spectrum decision makers are directed to the planning statement for a review of the public benefits coming forward as part of the proposals which can be considered in the necessary balancing exercise against the identified less than substantial harm to the Conservation Area.

5.7 The Heritage Impact Assessment has therefore evaluated the impact of the development at the lower end of the spectrum of “less than substantial harm”. Under planning guidance contained within the NPPF and Adopted Local Plan, this lowest form of impact on heritage assets needs to be balanced against what will be the “public benefits” of the scheme.

5.8 The “public benefits” of the scheme can be outlined as follows:

- a) *Delivery of housing within the village settlement boundary* – There is an Adopted Local Plan policy presumption in favour of allowing development within the village boundary of Therfield (Adopted Local Plan Policies SP1 and SP2). Policy SP2 also seeks to deliver outside of the main towns and 5 main villages around 7% of the total housing requirement of at least 13,000 new dwellings from 2011 to 2031, which equates to at least 910 dwellings. The development of 7 no. new houses (net gain of 6 dwellings) at the application site, will contribute to this housing delivery requirement through its delivery during the Plan period and is located in a sustainable village location.
- b) *Support to local services and local school* – The occupation of 7 no. new dwellings will increase the number of residences within the village, which from its occupants will help contribute to local services and businesses, such as the The Fox & Duck Public House, Saint Mary’s Church, Therfield Cricket Club, and Therfield’s Pre-school and First School.

In relation to the village schools, prior to submitting this planning application contact has been made with the Head Teacher of Therfield First School to discuss the delivery of housing within the village. A copy of an email from the Head Teacher is included with this planning application submission and it confirms the following:

Small school sustainability is a huge topic of discussion at present and we have to work very hard to ensure that we have our full intake of pupils each year. Typically only about 25% of the pupils attending our school live in the village of

Therfield. This means that we need to attract pupils from the local towns of Royston, Buntingford and the various surrounding villages to make up our numbers; all of which have their own nearer, local schools. Additional housing within the village would certainly support the school's current and longer term sustainability. Therfield First School offers outstanding education, nurture and experience to its pupils and we really want as many children to benefit from this as possible, but especially those families wishing to raise their children in such a special close-knit community. The school continues to be an important deciding factor for many families considering relocating to the village and we want this to continue.

- c) *Biodiversity net gain* – The proposed scheme will provide a biodiversity net gain through maintaining many of the existing trees on site, and providing planting of new trees, hedging and meadow grass. This will create a positive element to the proposed scheme and generally within the local area in terms of improving the natural environment.
- d) *Employment opportunity* – Through the construction of the site, this will provide opportunities for local contractors and businesses to bid for work on the site and will thus contribute to the local economy.

- 5.9 Taking into account these “public benefits” and their cumulative positive effects for the District and village, balanced against the Heritage Impact Assessment that the proposed development will have at the lowest level of less than substantial harm, it is considered that the proposed development can be supported under Policy HE1 of the Adopted Local Plan and Section 16 of the NPPF 2023.

Archaeological Desk Based Assessment

- 5.10 An Archaeological Desk Based Assessment has been prepared by Groundworks Archaeology dated May 2023.
- 5.11 Through this Desk Based Assessment the report concludes:

*The site is within an historically significant area with Prehistoric barrows recognised to the north-west and east. Anglo Saxon activity has also been identified in close proximity to the west. The assessment has highlighted that the site has **moderate to high** potential for the Prehistoric period, **low** potential for the Roman period and **moderate to high** potential for the Early Medieval period. Potential for the Medieval period is **low** while the Post-medieval period is deemed to be **high**.*

The impact of the proposed development is deemed to be severe with truncation of any early deposits that may be preserved within the site. Based on the results of the DBA it is recommended that an archaeological evaluation would represent an appropriate first phase of investigation to establish the presence or absence of archaeological features within the site.

- 5.12 The requirement for further archaeological investigation and evaluation could be addressed by an appropriately worded planning condition.

Arboricultural Impact Assessment and Method Statement

- 5.13 An Arboricultural Impact Assessment and Method Statement has been prepared by Tracy Clarke Tree Consultancy dated May 2024.

- 5.14 In summary, the report states the following:

A total of thirty nine individual trees, three groups, six hedges and one shrub are included in the assessment. Of these, thirty five are assessed as low quality or value, three are poor and eleven are moderate value trees either arboriculturally or because of their wider landscape value. There are no high quality trees on or adjacent to the site.

The proposal will require a loss of seven individual trees of low value (T4, T58, T60, T64, T65, T77, T78), one low value shrub (S79), one tree of moderate value (T62), and three small sections of low value hedges. One other tree, T63 cannot be sustainably retained due to its poor health and condition.

None of the trees proposed to be removed are identified as significant within the Therfield Conservation Area Statement (2019).

Pruning is specified for the management of some trees in relation to building footprints, and for construction access, it is recommended that trees T5-T9 and T12 are managed as a high hedge rather than allow to develop into mature trees.

There will be a need to adopt a No-Dig approach within parts of the RPA of T1, T2, T3, T76 and T59. Provided these operations are carefully detailed within an arboricultural method statement, there will be limited risk to the long term health of these trees.

The proposed development seeks to retain and protect the significant trees, and hedges, and intends to mitigate for the loss of mainly those of low or poor value to ensure that with the delivery and successful establishment of a high quality landscape design, and is therefore sustainable and acceptable in relation to national and local planning policies.

Ecology and Biodiversity Net Gain reports

- 5.15 A Preliminary Ecology Appraisal has been prepared by Applied Ecology Ltd dated June 2024.

- 5.16 The Preliminary Ecology Appraisal highlighted that:

The Site is located within a Natural England development Impact Risk Zone related to Therfield Heath SSSI which identifies residential developments of 25 or more units as

being a potential threat to the SSSI. The number of residential units proposed here is less than the 25-unit threshold, and adverse impacts upon Therfield Heath SSSI are therefore considered unlikely to occur as a result of the development proposal.

Bell Meadow LWS is separated from the development by a road called the Causeway and will not therefore be directly impacted during construction operations as building activity and machinery will be confined to the development Site and screened from the LWS by hoarding/fencing during construction.

- 5.17 The Appraisal also highlighted that the application site is dominated by species-poor lawn of low habitat value. The report identifies trees and hedges within the site being of higher relative value that should be retained and protected, where possible.
- 5.18 Also included in the Appraisal are the results of a Great Crested Newt and Bat Surveys. In relation to Great Crested Newts the pond to the south-east of Tussocks outside of the application site was found to support a medium size breeding population. Whilst the proposed development would not result in the loss or damage to the pond, a Natural England licence will be required to carry out works within the vicinity of the pond.
- 5.19 In relation to roosting bats, it was concluded that the development within the application site will have no adverse impact on roosting bats, as it will not result in the loss of any identified bat roosts in buildings or trees within the application site.
- 5.20 In terms of mitigation measures the report highlighted:

Great Crested Newt

It is recommended that the existing areas of amenity grassland lawn continue to be maintained as short turf grassland of minimal value to terrestrial great crested newts.

Any development related Site clearance and construction operations should be completed under the auspices of an appropriate great crested newt development licence.

Nesting Birds

The clearance and removal of cover habitats and buildings should take place outside of the bird nesting season (i.e. during the period September–February) or, if during the breeding season (March–August), immediately after a check by an experienced ornithologist that confirms nesting bird absence.

Compensation and enhancement

Consideration should be given to build ecological enhancements into the development. These could include, for example, integrated bird and bat boxes built into new buildings, hedgehog friendly boundary fences, and wildlife friendly planting.

- 5.21 The Biodiversity Net Gain Assessment and Metric Calculation are set out in a report dated June 2024. This Assessment uses the baseline ecology surveys that have been undertaken on the site and the calculations presented are high level and preliminary reflecting the interpretation of the outline landscape proposals submitted with the application.
- 5.22 The outcome of the BNG metric calculation is that there is a net loss of -0.22 habitat units, equivalent to a net loss of -8.39%, as well as a net gain of +0.10 hedgerow units of net gain of +29.90%. The BNG Assessment advises:

In order to deliver an overall minimum net gain of 10% for habitats, a further 0.48 habitat units would need to be created, either via off-site habitat creation or the purchase of biodiversity units from an off-site provider. However, due to losses from the baseline not adequately compensated for in the post-intervention landscaping, the development also delivers a habitat trading loss for Individual trees, a medium distinctiveness habitat, of - 0.41 units. In order to comply with habitat trading rules (Rule 1 of the Metric), 0.41 units of Individual trees (or a higher distinctiveness habitat) must be created or purchased from a suitable provider. An additional 0.07 units of any habitat type should then be created or purchased to achieve the required 10% gain.

- 5.23 Through the application process the applicant intends to discuss options with the Council as to how the 10% net gain can be met, whether that being off-site provision or through payment of credits, that can be controlled by either condition and/or a S106 planning obligation.

Transport Statement

- 5.24 A Transport Statement has been prepared by Transport Planning Associates dated June 2024.
- 5.25 In summary, this Statement comments:

The scheme would encompass the construction of 7 houses to be accessed from The Causeway. The proposed scheme will include car parking and cycle parking spaces in accordance with the standards set by North Hertfordshire District Council.

A new priority junction will be established on The Causeway, along with a new footway that connects to the existing provision to the south. This new junction will facilitate vehicular access, including bicycles, refuse vehicles, deliveries, and services. Visibility splays have been generated, demonstrating ample visibility in both directions.

The proposal includes the provision of a new footway along the site's frontage, improving the existing pedestrian infrastructure and allowing for safe pedestrian movement along The Causeway.

Regarding road safety, five-year PIC data was acquired from CrashMap for the period 2018 to 2022. No collisions were reported within the area. Given the absence of

collisions, there is no fundamental highway design flaw on the roads near the site. A further review has been undertaken, with a focus on pedestrian and cycle safety, which shows that there is no pedestrian or cycle safety issue on the roads surrounding the site.

According to the analysis conducted using the TRICS database, the proposed development is projected to generate flows of up to four vehicles during the AM peak and five vehicles during the PM peak. This level of traffic generation is unlikely to have a significant impact on the highway network.

HCC have raised concerns with respect to the sustainability of the site. The proposals include pedestrian infrastructure improvements which are considered to be commensurate with the scale of development, cycle parking in accordance with local planning policy guidance and electric vehicle charging points for each new dwelling. The proposals therefore provide sustainability enhancements and features that will encourage sustainable travel choices.

The introduction of new dwellings in this village location will also have a positive impact on sustainability, in supporting the viability of the existing local amenities.

5.26 In conclusion, the Transport Statement states:

The proposed development is not predicted to result in a significant or noticeable impact on the local highway network and will not have any negative impact upon highway safety. Based on the above, there are no transport or highway reasons why the proposed development should not be granted planning consent, especially when considering paragraph 115 of the National Planning Policy Framework, which advises:

“Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.”

Flood Risk Assessment and SuDS Statement

5.27 A Flood Risk Assessment and SuDS Statement has been prepared by EAS dated June 2024.

5.28 This report and drainage strategy for the development confirm that it is proposed that the foul water for the properties will be connected to the main sewer, and that surface water will be disposed of through deeper soakaways. In conclusion, the report states:

Flood Risk

The site is located wholly in Flood Zone 1 and has not been identified to be at risk from all assessed sources. No specific mitigation measures are considered to be required.

SuDS Strategy

The proposed strategy consists of directing roof runoff into permeable paving subbase where possible. All road areas are to be permeable paving, split into 4 sections based on the site topography. Surface water flows are then to be directed to two borehole soakaways to the rear of plot 5. To provide further attenuation, two geocellular storage tanks are proposed.

The proposed drainage strategy provides suitable pollution mitigation to exceed the requirements for the runoff from the site. Where flows cannot pass through the permeable paving subbase, a downstream defender is proposed to ensure suitable pollution mitigation.

A rising main sewer diversion is proposed for the foul water Thames Water sewer passing through the northern half of the site.

Maintenance of the Proposed Drainage System

The maintenance of the SuDS/drainage infrastructure will remain the responsibility an appointed management/maintenance company; other than individual pipework, raingarden planters and other features within private curtilage, which will be the responsibility of the house owner.

Regular inspections and maintenance should be carried out, particularly after periods of heavy rainfall. Maintenance tasks and frequencies for permeable paving, raingarden planters, proprietary treatment stages, and geocellular storage are detailed in the CIRIA SuDS Manual (C753) and are summarised below in Section 6 of this report.

Conclusion

The proposed development has been demonstrated to be acceptable on flood risk and drainage grounds.

Desk Top Study Report

- 5.29 A Desk Top Study Report has been prepared by HESI dated August 2023.
- 5.30 The report identifies a number of potential sources of contamination within the application site and local features off site. It notes that at the time of writing the report there were no reports relating to contaminated land on the site.
- 5.31 Taking into account the potential sources of contamination that have been identified the report makes the following recommendations that could be addressed by planning condition:

- *Intrusive shallow based excavation using window sampler to assess the geological conditions and recover samples.*
- *Initially assess soils for presence / absence of fuels and if encountered: - o Install standpipe for the monitoring of both groundwater and land gas / vapour risks.*
- *Targeted and spatial sampling to assess on site source risk.*
- *Consideration through the site assessment as to the presence of Asbestos product within the site and subsoil within the site.*
- *Assess the risk to and from the groundwater - Leachate testing and groundwater sampling if required.*
- *Visual observations of the subsoil encountered to make initial assessment of the potential risk from contamination.*
- *Watching brief to record assess and report on unexpected contamination.*

Based on the above, a risk assessment should be completed when the findings of the investigation have been completed. This will result in a revised conceptual model based on actual site conditions and confirm the risks in place.

6.0 Conclusions

- 6.1 This Planning Statement has reviewed the planning policy requirements and guidance that applies to the consideration of this application at Hillcrest and land at Tussock, as set out by through the Council's Adopted Local Plan and Supplementary Planning Guidance, and also national planning guidance contained within the NPPF 2023.
- 6.2 It has been established that as the application site lies within the village boundary and that Therfield is classified as a Category A village (one of eighteen), that there is not an objection in principle to new housing development on this site, in compliance with Policies SP1 and SP2 of the Adopted Local Plan.
- 6.3 The application site lies within the village's Conservation Area and a Heritage Impact Assessment has been prepared to support the application in terms of assessing nature of the site within its context, the level of impact on heritage assets, and guiding the form of development proposed. The overall conclusion assessed against policy and planning guidance, is that the site and development proposed is at the lower end of the spectrum of "less than substantial harm". Balancing this against the public benefits of delivering housing, supporting local services and the local village school, and biodiversity net gain proposed by the scheme, along with contributing to the local economy during the construction of the development; it is considered that this gives significant weight to granting planning permission for the development. As such, it is

considered the development complies with Policy HE1 of the Adopted Local Plan and Section 16 of the NPPF 2023.

- 6.4 The scheme has also been sensitively designed, taking into account best practice and will achieve a high quality as required by Adopted Local Plan Policy SP9, guidance contained with the Council's Design SPD, and Section 12 of the NPPF 2023. The scheme has also been designed in consultation with the Council's Planning and Conservation Officers, reducing the number of dwellings from the original scheme of 10 no. dwellings to 7 no. dwellings, and reducing the size of the application site.
- 6.5 Through understanding the constraints of the site, protecting the retention of many existing trees, the density of the scheme and provision of 7 no. dwellings has been achieved. This amount of housing, density and layout of development, will not only contribute to the local need for housing, but will be in-keeping with the character and appearance of the village.
- 6.6 As such, the scheme has been fully justified and shown to be compliant with the relevant planning policies set out in the Adopted Local Plan and national guidance contained with the NPPF 2023.
- 6.7 It is therefore considered on this basis that planning permission be granted for the proposed development in this planning application.