

From: Ian Small <ian.small@therfieldparishcouncil.gov.uk>
Sent: 29 May 2026 19:24:53 UTC+01:00
To: "Planning Control" <Planning.Control@north-herts.gov.uk>;
"therfieldpc@therfieldparishcouncil.gov.uk" <therfieldpc@therfieldparishcouncil.gov.uk>;
"clerk@therfieldparishcouncil.gov.uk" <clerk@therfieldparishcouncil.gov.uk>
Subject: 26/01154/PIP
Importance: Normal

Good afternoon,

Please find below the Therfield Parish Council comments on the PIP for Land West Of Hay Farm

Objection to Application for Planning in Principle (PiP)

Objector: Therfield Parish Council

Target Authority: North Hertfordshire District Council

Therfield Parish Council strongly objects to the application 26/01154/PIP for Planning in Principle on the following grounds:

1. Location, Policy Conflict, and Factual Errors Regarding Heritage Assets

- **Factual Inaccuracy in Applicant's Planning Statement:** Section 6.5 of the applicant's Planning Statement asserts that the site is "*physically and visually separated*" from the Therfield Conservation Area and that there is "*no intervisibility or meaningful functional relationship.*" **This is factually incorrect.** The application site boundary does not merely sit adjacent to the Conservation Area; it directly overlaps with it.



Failure to Preserve or Enhance: Because the development site sits partially *within* the designated Therfield Conservation Area, any development here, and especially at the density proposed would likely fail to preserve or enhance its character and appearance, directly contravening local heritage policies and statutory duties.

- **Direct Conflict with Local Plan Policy CGB1:** Under the North Hertfordshire Local Plan, the site lies entirely outside the established settlement boundary in the "Rural Area beyond the Green Belt." Paragraph 4.64 of the Local Plan dictates that it is *"appropriate to restrain the types of development allowed"* here. The proposal fails all strict criteria for permitted development under Policy CGB1 (a–f).
- **Proximity to Important Landscape:** The site is within the immediate vicinity of the popular walkers route for the Icknield Way, it would be irreversibly compromised by this encroachment.

2. Land Use: Contradictory Policy Claims and False Sustainability Narrative

- **Applicant's Self-Contradictory Policy Arguments:** In Section 6.5, the applicant quotes Local Plan Policy SP1(D)(i), rightly highlighting that *"new homes will be delivered by... permitting development proposals within the defined settlement boundaries."* The applicant then immediately admits in the next sentence that *"this site is located just outside of the settlement boundary of Therfield."* By their own admission, the proposal fails the very strategic policy they have cited.

- **Deficit of Local Infrastructure and Key Services:** The applicant claims the site is in a *"sustainable location, within walking distance of the various services and facilities within Therfield."* This fundamentally misrepresents the reality of the village. Therfield has a severe lack of everyday facilities and services, a reality explicitly recognized by Paragraph 4.64 of the Local Plan, which notes that in this zone, *"outside of the defined settlements, many sites are not well located in relation to key services."* * **Unresolved Access and Operational Safety Risks:** The applicant's "sustainability" claim is further dismantled by severe, active safety conflicts on the ground. The proposed access route interacts directly with an active, working farm and a heavy-duty security gate. Mixing residential traffic, pedestrian movements, and heavy agricultural machinery creates a severe highway safety risk that renders the location entirely unsustainable.

3. Amount of Development, Density, and Settlement Character

- **Misrepresentation of Settlement Pattern:** Section 6.9 of the Planning Statement claims the residential use will *"sit comfortably with the scale and form of adjacent buildings,"* and Section 6.10 argues that a density of 16 to 21 dwellings per hectare (7–9 dwellings) allows them to *"sit in [a] row alongside each other in a similar manner to the surrounding built form."* This completely misreads the local context.
- **Incongruous and Over-Dense Layout:** A suburban style "row" of 7–9 tightly packed dwellings bears no resemblance to the historic, spacious, and organic settlement pattern of this part of Therfield (with the sole exception of Fordham Terrace, which is entirely hidden from view and does not set the character for this location).
- **The Tuthill Yard Precedent:** The compressed nature of this layout represents a significant overdevelopment of the plot. Unlike successful, sympathetically integrated developments like Grange Meadow, which was the explicitly highlighted plot for development within the Local Plan entry for Therfield. The density proposed here is congruent with developments within a town setting and entirely inappropriate for a rural low density village.

4. Failure to Meet "Rural Exception Site" and Housing Mix Criteria

- **Non-Compliance with Policy CGB2b and NPPF Section 5 (Policy HO10):** Under Local Plan Policy CGB2b and NPPF Section 5 (Policy HO10), housing outside settlement boundaries is restricted unless it meets a *"proven local need"* for affordable housing.
- **Absence of Evidenced Local Need:** NPPF Policy HO10 requires that such need be *"evidenced through a local housing needs survey or secondary data which is no more than five years old."* No such evidence has been produced. The compressed density indicates a commercially driven market housing development rather than a genuine, local-need affordable scheme.

- **Unsustainable Response to District Housing Delivery:** Even if the applicant attempts to rely on NPPF Section 5 (Paragraph j) regarding unmet district housing supply, speculative market housing in a rural village lacking key services fails to meet the framework's sustainability criteria.

5. Overdevelopment and Cumulative Growth

- **Exceeding Local Plan Allocation:** Therfield has already absorbed an unprecedented amount of development, with over 20 properties currently holding active planning permission or under construction. This pipeline represents a greater than 10% increase in the total number of dwellings in the village—well in excess of the allocations outlined in the Local Plan. Further speculative development outside the boundary is both unsustainable and unnecessary.
- **Cumulative Housing Type Impact:** The applicant has proposed other large properties in the immediate area. The Parish Council requests that these applications be considered in the round rather than in isolation. The cumulative effect exacerbates the severe imbalance of housing types in the village, which is already dominated by large, high-end properties, failing to provide the genuine affordable housing needed to sustain vital local infrastructure (such as pupil numbers for the Therfield First School).

Conclusion

The applicant's Planning Statement is undermined by a critical factual inaccuracy regarding the Conservation Area boundary and a direct policy contradiction regarding the settlement boundary.

Because the proposal violates **Local Plan Policies CGB1 and CGB2b**, fails to qualify as an exception site under **Section 5 (Policy HO10) of the NPPF**, relies on a false narrative of village sustainability, presents an over-dense layout alien to the surrounding built form, and introduces severe highway safety conflicts, Therfield Parish Council strongly urges North Hertfordshire District Council to **refuse** this application for Planning in Principle.

Kind regards

Ian Small

on behalf of Therfield Parish Council