

Development and Conservation  
North Herts Council  
PO Box 7075  
Manchester M28 8JX

6 October 2026

Re: Objection to Planning Application 26/01724/FP - 134 High Street Kimpton  
Hitchin Hertfordshire SG4 8QP

Dear Planning Officer,

I write to object to the above application at 134 High Street, Kimpton, Hitchin, Hertfordshire, SG4 8QP. The grounds below draw on the North Hertfordshire Local Plan 2011-2031 (Adopted), which is part of the development plan, and on the National Planning Policy Framework (2026 edition).

I live in the village. The proposal would increase traffic on the High Street, and I am concerned about the highway visibility splays and about how the access would interact with the major development next door. It would put two houses where one stands, which I consider out of character with the village.

I am also concerned about flooding and drainage. The High Street is always affected by run-off in heavy rain, and in my view this development would add to the flooding down the High Street. Beyond this site, I am concerned that approving it would set a precedent for every similar house on the High Street in Kimpton.

1. The Highway Authority has recommended refusal, and nothing on the file since answers its reasons

1.1 Policy T1: Assessment of transport matters, of the North Hertfordshire Local Plan 2011-2031 (Adopted), part of the development plan, grants permission only where "Development would not lead to highway safety problems or cause unacceptable impacts upon the highway network" (Local Plan Policy T1(a)) and where "Suitable Transport Statements, Transport Assessments and / or Travel Plans along with supporting documents are provided where required" (Local Plan Policy T1(c)). Paragraph 7.2 of the supporting text explains that the Council will be guided by Hertfordshire County Council, "who assess the impacts of development proposals on behalf of the Council as a Statutory Consultee to the planning process".

1.2 The Highway Authority's response, listed on the register as the HCC Highways Consultee Response and dated 9 September 2026, "recommends that permission be refused for the following reasons". It asked for a swept path assessment to "demonstrate that vehicles can safely enter, manoeuvre within, and exit the site in a forward gear", recorded that "no visibility splay details have been submitted for the proposed access", and recorded that no detailed drawing of the proposed pedestrian access had been provided.

1.3 The response closes: "Until the requested information has been provided and reviewed, the Highway Authority is unable to support the granting of planning permission." No further response from the Highway Authority appears on the application file. On the file as it stands, the statutory consultee the Council is guided by under Local Plan Policy T1 recommends refusal.

1.4 Two drawings were listed on 15 September 2026, after that letter: 25002-112-B - Highways Visibility Splays and 25002-113 - Parking and Swept Path Diagrams. Both carry the date 16-06-26, and both are already named in the Application Form Redacted, which lists drawing 112 B (Highways Visibility Splays) and drawing 113 (Car Parking Swept Path Diagrams) among the plans submitted. They are the sheets the Highway Authority had not seen on 9 September 2026, not material prepared in answer to it.

1.5 The Highway Authority asked that "Any revised drawings should be prepared to an appropriate scale, typically 1:200, to allow a detailed technical assessment to be undertaken." Drawing 25002-113 is printed at "1:250 @ A3", names no design vehicle and no tracking method, and describes itself only as showing the swept paths from the parking spaces. The requested industry-recognised assessment is not on the file.

1.6 Drawing 25002-112-B states a vehicular splay of 2.4m by 43m and a pedestrian splay of 2m by 2m. It states no speed survey and no design speed for the High Street, which the Transport Statement July 26. describes as "carrying traffic which has come into the village from a national speed limit area". The Highway Authority said that "suitable visibility splays should be demonstrated in accordance with the requirements of the Highway Authority"; a splay drawn without its speed basis does not demonstrate that.

1.7 The new pedestrian access at the eastern end of the frontage appears on drawing 25002-112-B only as a splay and a note. There is still no detailed drawing of it, which is the third item the Highway Authority listed. Without the information the Highway Authority asked for, the Council cannot be satisfied that Local Plan Policy T1(a) and T1(c) are met, and that is itself a reason to refuse.

2. Run-off from the site must meet the Kimpton greenfield rate, and the application does not show that it will

2.1 The Local Plan's text for Kimpton, printed with Policy KM3 (North Hertfordshire Local Plan 2011-2031 (Adopted)): Land north of High Street 13 homes, states at paragraph 13.184: "There are known flooding issues in Kimpton, from both surface water and groundwater, particularly along Claggy Road which acts as a flood route into the High Street. Development in Kimpton will be required to achieve the equivalent of greenfield run off rates to ensure existing issues are not exacerbated." This is a stated test for every development in the village.

2.2 Policy NE7: Reducing flood risk, of the North Hertfordshire Local Plan 2011-2031 (Adopted), part of the development plan, requires at Local Plan Policy NE7(d) that development "will be located, designed and laid out to ensure the risk of flooding is reduced whilst not increasing flood risk elsewhere". The flood route into the High Street that paragraph 13.184 identifies is the "elsewhere" that this site drains towards.

2.3 The application's own documents place the site above that flood route. The Design and Access Statement - June 2026 records "an annual likelihood of flooding of 1 in 30 from surface water flash flooding along the line of the High Street", and the Energy and Sustainability Statement V4 July 2026 states that "The site slopes down towards the road". The Application Form Redacted records the vehicle access and hard standing changing from "Grass, gravel and bare mud areas" to "Permeable paving and gravel areas", with parking rising from 3 spaces to 4.

2.4 Nothing on the file calculates the existing run-off rate from the site, the proposed rate, or the greenfield rate paragraph 13.184 requires. The

Energy and Sustainability Statement V4 July 2026 says instead that "Site specific calculations for each plot will be provided at the detailed design stage of development, prior to construction". A test the Local Plan sets for the decision cannot be met by a calculation promised for after it.

2.5 The like-for-like footprint comparison in the Design and Access Statement - June 2026 rests on a building that does not exist. It states that "The existing house, previously approved extension and existing garage have a combined footprint area of 148m<sup>2</sup>" and that "The Footprint of the new houses is 145m<sup>2</sup>", but the extension is described in the words "If the extension was built". Measured against what stands on the site today, the comparison has not been made. Without it, and without the run-off figures, the Council cannot be satisfied that Local Plan Policy NE7(d) and the paragraph 13.184 requirement are met.

3. The drainage strategy is a statement of intent, not a demonstrated sustainable drainage system

3.1 Policy NE8: Sustainable drainage systems, of the North Hertfordshire Local Plan 2011-2031 (Adopted), part of the development plan, grants permission where "The most appropriate sustainable drainage solution is used taking into account technical, viability and design issues to reduce the risk of surface water flooding" (Local Plan Policy NE8(a)) and where "Drainage solutions follow the SuDS hierarchy" (Local Plan Policy NE8(c)). Paragraph 11.45 adds: "Evidence will need to be provided that development has followed the surface water management hierarchy as detailed below."

3.2 NPPF policy F8: Sustainable drainage systems and watercourses (National Planning Policy Framework, 2026 edition) requires that such systems "Be designed in accordance with the National Standards for Sustainable Drainage Systems" (NPPF policy F8(2)(a)) and "Have maintenance arrangements in place to ensure an acceptable standard of operation for the anticipated lifetime of the development" (NPPF policy F8(2)(b)).

3.3 The only drainage design on the file is the annotation on drawing 25002-114-B - Existing and Proposed Site Plans, "all rainwater to be retained on site if at all possible", together with the description in the Energy and Sustainability Statement V4 July 2026 that "Downpipes from the roof will discharge first to water butts and then to soakaways in the gardens, if the butts are full." Soakaways are an infiltration device in the Local Plan's own hierarchy, and infiltration depends on the ground.

3.4 No infiltration test, no soakaway sizing, no storage volume for the swale and no maintenance arrangement appears anywhere on the file. The words "if at all possible" and "if the butts are full" describe a hope, not a design. The evidence paragraph 11.45 calls for has not been provided, and the Council cannot be satisfied that Local Plan Policy NE8(a) and NE8(c), or NPPF policy F8(2)(a) and F8(2)(b), are met. That is a reason to refuse.

4. Doubled vehicle movements from a single access beside the KM3 allocation have not been assessed together

4.1 NPPF policy TR6: Assessing transport impacts (National Planning Policy Framework, 2026 edition) requires at NPPF policy TR6(3) that "reasonable future scenarios should be considered, taking into account impacts at relevant times of the day, potential cumulative impacts, multimodal trip generation and the promotion of sustainable modes of travel". Local Plan Policy T1(a), quoted above, is the development plan test on highway safety and network impact.

4.2 The Transport Statement July 26. states that the proposal "will in broad terms generate double the amount of vehicle movements" through the single retained access. The Design and Access Statement - June 2026 describes the land immediately to the west: "This field is allocated site KM3 with outline planning permission pending approval for 15 residential dwellings." It adds that "The public footpath will become busier now that the Jarvis site has been completed and even more so when KM3 is built out."

4.3 The application's own documents therefore identify the cumulative scenario NPPF policy TR6(3) requires to be considered, and then do not consider it. The Transport Statement July 26. contains no assessment of the relationship between this access and the future KM3 access, no count of movements on this stretch of the High Street, and no assessment of the combined effect at any time of day.

4.4 Policy T2: Parking, of the North Hertfordshire Local Plan 2011-2031 (Adopted), part of the development plan, requires at Local Plan Policy T2(d) that applicants "clearly identify how they provide for all likely types of parking demand and demonstrate that parking will be safe and of a design and layout that will function satisfactorily". The Design and Access Statement - June 2026 asserts that "Turning space has been provided to enable all 4 cars to enter and leave the site independently of each other".

4.5 That assertion rests on drawing 25002-113, which, as set out in ground 1, is at 1:250, names no vehicle and no tracking method, and has not been accepted by the Highway Authority. Visitor parking is left to the High Street. Without an assessment of the doubled and cumulative movements, and without a demonstrated parking layout, the Council cannot be satisfied that NPPF policy TR6(3), Local Plan Policy T1(a) and Local Plan Policy T2(d) are met.

5. The relationship with the bungalow at 132 High Street is described, not demonstrated

5.1 Policy D3: Protecting living conditions, of the North Hertfordshire Local Plan 2011-2031 (Adopted), part of the development plan, states: "Planning permission will be granted for development proposals which do not cause unacceptable harm to living conditions", and "If the Council is not satisfied that mitigation proposals would address the identified harm, development proposals will not be permitted." Paragraph 9.19 lists the harms, including "loss of daylight and sunlight, noise, overlooking, pollution (including light pollution) and dominance".

5.2 NPPF policy P3: Living conditions and pollution (National Planning Policy Framework, 2026 edition) requires at NPPF policy P3(2)(b) that development should "Not give rise to, or contribute to, an unacceptable level of access to daylight and sunlight for neighbouring residents and occupiers".

5.3 The Design and Access Statement - June 2026 records that "There is a bungalow, number 132 High Street, to the east of the site", and that the new building has "small projections of the new plan beyond the limits of the bungalow to both the front and back". The rear is "a double gabled elevation" of two storeys, and the first-floor side windows face the bungalow, with the statement that "the side windows to the first floor will be obscured glass".

5.4 The acceptability of those projections is attributed to pre-application advice that is not on the file. Drawing 25002-110-B - Floor Roof Elevations and Site Section contains the four elevations and "SECTION AA as proposed through the site from back to front"; there is no section or elevation

across the boundary showing the new building against the windows and garden of 132. No daylight, sunlight or overshadowing assessment accompanies the application. The size of the projections past the bungalow is nowhere dimensioned.

5.5 The front elevation is labelled south, so the bungalow lies to the east of a two-storey building that will stand between it and the afternoon and evening sun. It appears to me that this is the relationship Local Plan Policy D3 and NPPF policy P3(2)(b) exist to test. Paragraph 9.20 of the Local Plan says "there is a need to ensure that any impacts a development has are identified and appropriate mitigation built into the scheme"; here the impacts have not been identified at all. The Council cannot be satisfied, on this file, that the test in Local Plan Policy D3 is met.

6. Two external heat pumps beside a neighbouring boundary with no noise assessment

6.1 NPPF policy P3(2)(d), already introduced above, requires development to "Mitigate and reduce to a minimum potential adverse impacts resulting from noise". Noise is among the harms paragraph 9.19 of the Local Plan names under Local Plan Policy D3, and that policy withholds permission where the Council is not satisfied that mitigation would address the identified harm.

6.2 The Energy and Sustainability Statement V4 July 2026 states: "Each house has an Air Source Heat Pump to the rear." The manufacturer's sheet, listed as Air Source Heat Pump Information, gives a sound pressure level at 1m of 45 dBA and a sound power level of 58 dBA for a single unit. The application is for two air source heat pumps.

6.3 Nothing on the file states the distance from either heat pump to the boundary with 132 High Street or to any neighbouring window, and nothing assesses the combined level of both heat pumps at that boundary, by day or at night. A manufacturer's figure at one metre for one unit is not an assessment of the effect of both on a neighbour.

6.4 The noise of the completed use, as distinct from construction, is a planning matter the Local Plan lists expressly. Without an assessment, the Council cannot identify the impact, cannot judge any mitigation, and cannot be satisfied that Local Plan Policy D3 and NPPF policy P3(2)(d) are met.

7. A lowered frontage and a four-car parking court break the building line at the entrance to the village

7.1 Policy D2: House extensions, replacement dwellings and outbuildings, of the North Hertfordshire Local Plan 2011-2031 (Adopted), part of the development plan, grants permission for replacement dwellings where "The location of the proposal does not have an adverse impact on the character and appearance of the streetscene or area" (Local Plan Policy D2(d)). Policy D1: Sustainable design, of the same Local Plan, requires development to "minimise the visual impact of street furniture and parking provision" (Local Plan Policy D1(b)(viii)) and to "retain existing vegetation and propose appropriate new planting" (Local Plan Policy D1(b)(iv)).

7.2 NPPF policy DP3: Key principles for well-designed places (National Planning Policy Framework, 2026 edition) states at NPPF policy DP3(1) that "Development proposals should respond to their context (the history, character and features of their site and its setting), so that they integrate with and enhance their surroundings", and at NPPF policy DP3(3) that "Development proposals should be refused if, without clear justification, they conflict with paragraph 1 of this policy".

7.3 The Design and Access Statement - June 2026 describes the neighbouring frontage to the east as "detached bungalows, a chalet bungalow, and detached 2 storey houses on long individual plots in a variety of styles, all set back from the road with large front and rear gardens". It records that the new building projects forward of the bungalow at 132, and that the existing frontage hedge, "at around 7m high", is to go: "it has been decided to remove the existing hedge". Its replacement is to be kept at around 2 to 2.5m.

7.4 Behind that lowered hedge the front garden becomes a block-paved drive, turning area and 4 parking spaces, with bin stores screened by 1.5m fencing, and a paved bin stand set into the verge at the back of the footway. The site sits at the western edge of the built frontage on this side of the High Street, beside the open field, where the village is first seen by anyone arriving from the west.

7.5 In my view the change from a mature screened frontage with a single-width drive to an open parking court behind a 2m hedge is the opposite of minimising the visual impact of parking provision under Local Plan Policy D1(b)(viii). No street-scene elevation showing the pair against 132 and its neighbours is on the file; the only street-scene material is the statement's own sketch of the trend of house fronts. The Council cannot be satisfied on this file that Local Plan Policy D2(d) and NPPF policy DP3(1) are met.

8. Replacing one detached house with a semi-detached pair changes the plot pattern of this part of the High Street

8.1 Local Plan Policy D2(c) grants permission for a replacement dwelling where "The proposal does not harm the character and appearance of the site", and Local Plan Policy D2(d), quoted above, protects the character of the area. Paragraph 9.2 under Local Plan Policy D1 states: "Development must respond positively to the site and the local context taking into consideration position, orientation, scale, height, layout, massing, detailing and use of materials."

8.2 The existing arrangement is a detached house on a long plot with a single-width drive running, as the Transport Statement July 26. puts it, "up to and beyond the house, leading to double garage behind the house". The proposal gathers that spread of built form into one two-storey block across the frontage: the pair is "designed individually to make the best use of the available width of the site" (Design and Access Statement - June 2026), and "The outline of the building is almost square" (Energy and Sustainability Statement V4 July 2026).

8.3 The result is a semi-detached pair, each house with its own front door, its own parking and its own heat pump, on a plot whose neighbours to the east are described in the application's own words as detached houses and bungalows on long individual plots. It appears to me that a pair filling the width of the plot is a different pattern from the one it joins, however similar the floor area may be to a house, an unbuilt extension and a garage added together.

8.4 Whether that pattern is to change along the High Street is the Council's to weigh against its own record of the street, and I ask it to do so. On the file, the massing is justified only by a footprint comparison that counts a building never built, and by a pre-application view that is not before the Council. On that basis the Council cannot be satisfied that Local Plan Policy D2(c) and D2(d) are met.

For the reasons set out above, I ask the Council to refuse planning permission for application 26/01724/FP.

Without prejudice to that objection, should the Council nonetheless be minded to grant permission, I ask that conditions be imposed requiring: (a) no development, including demolition, until infiltration testing and a detailed surface water drainage design demonstrating the greenfield run-off rate have been submitted and approved; (b) the first-floor side windows of both dwellings to be fitted with obscure glazing and to be non-opening below 1.7m above internal floor level, and so retained; and (c) a scheme fixing the siting of both air source heat pumps and a rated noise limit at the boundary with 132 High Street, with construction and demolition confined to 08:00 to 18:00 Monday to Friday and 08:00 to 13:00 on Saturdays. These requests do not diminish the objection.

Yours faithfully,

Tim James

Documents referred to:

- National Planning Policy Framework (2026 edition):  
[https://assets.publishing.service.gov.uk/media/6aabe97844ec1aa417346c0b/National\\_Planning\\_Policy\\_Framework.pdf](https://assets.publishing.service.gov.uk/media/6aabe97844ec1aa417346c0b/National_Planning_Policy_Framework.pdf)
- North Hertfordshire Local Plan 2011-2031 (Adopted): <https://www.north-herts.gov.uk/sites/default/files/2022-12/North%20Hertfordshire%20Local%20Plan%202011-2031.pdf>