

Naomi Reynard
Senior Planning Officer
North Hertfordshire District Council
Town Lodge, Gernon Road
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Hertfordshire
SG6 3HN

31 August 2025

Dear Ms Reynard

Planning Application ref: 25/01696/OP - Land Southeast of Holwell Road and North of Hambridge Way, Pirton.

I write in relation to the above referenced application and seek to register an objection to the proposals on behalf of the Cole Family who live in Pirton.

As you are well aware, this is the third application submitted on behalf of the applicant on this site, the previous two applications having been refused and an appeal dismissed for similar, but less dense proposals than are currently being proposed.

My client would like to register an initial in principle objection to meet with the current timescales for consultation responses but reserves the right to provide further comments once all the statutory consultee responses have been received. Currently, there are important objections from Place Services, Hertfordshire County Council Highways (HCCCH) and the Local Lead Flood Authority (LLFA) that all confirm the inappropriateness of this development. There are also outstanding responses in relation to planning policy, heritage and ecology, which will no doubt all have a bearing on the acceptability of the proposals and your final recommendation.

In the meanwhile, I would like to register an in-principle objection to the development on the basis of the following points.

It is noted that the applicant is reliant on the fact that NHDC cannot currently demonstrate a five year housing land supply (5YHLS) and therefore para.11 of the NPPF is engaged to apply the presumption in favour of sustainable development. However, the tilted balance still allows weight to be given to local policies where they are consistent, or there remains a degree of consistency with the NPPF. In addition, the benefits of the scheme must outweigh any harm. It is our position that the proposals are contrary to local policies that remain consistent with national policy, and that the benefits of the scheme do not outweigh the harm in terms of sustainable development and landscape impacts.

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The site falls outside of the settlement boundary of Pirton and is classed as 'Rural Areas beyond the Green Belt', which is set out at Policy CGB1 of the adopted Local Plan. This policy remains consistent with national policy, specifically para.110, which seeks to **focus significant development** at locations that are, or can be made sustainable, through limiting the need to travel and offering genuine choice of transport options. The Inspector in determining the previous appeal at this site considered this development to be a large scale urban extension, and as such gave this point significant weight. There is no reason or change in circumstances that should alter the weight given to this in applying the tilted balance to the current application.

It is accepted that further development within Pirton may need to be identified as part of the Local Plan process, and it is understood that the Council are looking to undertake a new Strategic Housing Market Assessment (SHMA), to understand what need exists across the District to help inform the Local Plan review. The Pirton Neighbourhood Plan 2011-2031 (PNP) supports residential development that is a maximum of 30 dwellings per site (Policy PNP1). Whilst the PNP is considered out of date in the context of para.11 of the NPPF, this policy should still be afforded weight due to its alignment with national policy. The principle of seeking smaller housing schemes to meet housing demand within the village remains relevant from an urban design, landscape and sustainability perspective, and the proposed scheme would be contrary to this.

Turning to the landscape character and visual impact of the scheme, the site falls within the Pirton Lowlands Landscape Character Area (LCA) as defined in the North Herts and Stevenage Landscape Character Assessment. This assessment considers that there may be scope to accommodate **small scale development** within this area. The current scheme would comprise a large-scale urban extension of the village, which the Inspector previously described the proposals as. As previously, Place Services consider the visual impacts of the scheme both in the short and longer term have been under-estimated. It is noted that the effects become more adverse post establishment of the mitigation, and that the indirect effects resulting from the development are considered to be major-moderate adverse. It is considered also that the scheme would continue to be read in combination with the adjacent CALA scheme, and as a result be read as a large urban extension, which would not deliver a sympathetic design, respectful of the local village or landscape character, thus contrary to para.135 of the NPPF.

Observations within the Pirton Conservation Area Character Appraisal and Management Plan (PCA CAMP) (2023) notes that further development of Pirton, such as a suburban block form on the edge of the village could detract from the character, appearance and overall aesthetic value. Both the PNP and PCA CAMP documents point to the need for small scale, sensitively designed development, that is of a scale in keeping with the overall size and character of the village. The proposals before you now do not take account of or accord with these requirements, and as such, the scale of the proposals would be detrimental to the character and appearance of the village and the Conservation Area, resulting in substantial detrimental impacts.



In our view the scheme presents significant detrimental impacts, which outweigh the benefits of the scheme, when applying the tilted balance. These detrimental impacts can be summarised as follows:

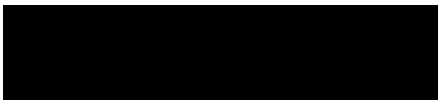
- the impact on the character of the village, in terms of the overall scale and density of development
- the visual impact on the surrounding landscape (recognised by Place Services in their response), which by virtue of its density will not provide a suitable visual transition with the countryside beyond
- the unsustainable location of the site for a scheme of this quantum, with the lack of public and sustainable travel options, and thus the heavy reliance on the private car to access many every day services that are not available in the village itself.

Outstanding statutory consultee responses may also identify further harmful impacts.

Considering the scheme against the sustainable development requirements of the NPPF as set out at para.11, it is our view that the above issues represent detriment impacts that would significantly and demonstrably outweigh the benefits of the scheme, and in applying the tilted balance, the scheme does not meet the tests of para.11, with in-principle objections remaining that should result in refusal of the application.

As stated previously, we would like to reserve the right to register further comments upon receipt of outstanding consultee responses, and any response from the applicant in relation to the current objections posed.

Yours sincerely



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