

FURTHER REPRESENTATION IN RESPONSE TO RE-CONSULTATION

Planning Application 25/01696/OP

Application: 25/01696/OP

Proposal: Outline application for the erection of up to 130 dwellings with public open space, landscaping, sustainable drainage system (SuDS), and associated works with all matters reserved save for access (additional supporting information received 17 September and 2 December 2025; amended and additional documents received 14 August 2026)

Site: Land South East of Holwell Road and North of Hambridge Way, Pirton, Hertfordshire

Applicant: Gladman Developments Ltd

Case Officer: Naomi Reynard

Submitted by: Michael Campbell, local resident

Date: 12 September 2026

Responding to: the Council's re-consultation letter dated 21 August 2026 (comments invited by 20 September 2026)

SUMMARY OF REPRESENTATION

This representation invites the Council to refuse planning permission. In summary:

- (a) The application now falls to be determined under the National Planning Policy Framework published on 17 August 2026 ("the Framework"). The tilted balance in paragraph 11(d) of the December 2024 NPPF, on which the applicant's entire case is constructed, no longer exists. The applicant's final submission of 14 August 2026 was framed against a policy regime superseded three days later.
- (b) The site lies outside the Pirton settlement boundary. Policy S5 of the Framework therefore governs the principle of development. The proposal falls within none of the categories at S5(1)(a) to (i). Its only candidate route is S5(1)(j), which requires not only an evidenced unmet need but that the development be of a scale which can be accommodated taking into account the existing or proposed availability of infrastructure.
- (c) The unmet need limb is conceded: the Council can demonstrate only 2.6 years' supply of deliverable housing sites. This representation does not dispute the need for homes. It addresses whether this site, at this scale, satisfies the Framework's tests. It does not.
- (d) The scale/infrastructure limb of S5(1)(j)(i) is not met. Anglian Water, the statutory sewerage undertaker, maintains a formal objection dated 24 August 2026 because no sustainable point of connection to the foul network has yet been identified, supported by a King's Counsel's Opinion and appeal authority. The Highway Authority's recommendation of refusal dated 4 February 2026 remains extant: of its three stated requirements, one has been rejected by the applicant in material part, one remains unassessed, and the third is unconfirmed. The education contributions are contested by the applicant itself. The Parish Council has evidenced a physical land-capacity constraint: in its words, there is "no other land available" within the village for the recreational infrastructure required.

- (e) These are the Council's own tests. In its Written Updates to Planning Control Committee on application 25/02064/OP (3 September 2026), the Council found the S5(1)(j)(i) infrastructure limb satisfied for a 50-dwelling scheme precisely because "no objections have been raised by the highways authority, lead local flood authority, education, health, or utility consultees." Applied consistently to this application, that methodology points strongly to the opposite conclusion.
- (f) The location is not sustainable and cannot be made so within the meaning of policy TR3. A Planning Inspector, dismissing the applicant's materially smaller scheme on this same field in January 2019, found accessibility by sustainable modes "marginal at best" with "much reliance on the private car." The Highway Authority's contemporary evidence corroborates that diagnosis: Pirton "is not of a size to be 'self-contained'," and interventions exceeding £2 million are sought expressly to reduce car dependency, while the applicant has rejected one of the active travel connections required by the Highway Authority and the other remains unresolved.
- (g) The Inspector's site-specific landscape findings remain directly applicable and are aggravated by a scheme 31 per cent larger: this field reads as part of the wider countryside, not the village fringe; its development would constitute a "very marked incursion into the countryside"; the completed Elm Tree Farm development forms the new village edge and establishes no principle of further eastward expansion; and planting would not remove the character change.
- (h) The appeal was dismissed even though the former tilted balance was engaged and substantial weight was given to affordable housing: the adverse impacts "significantly and demonstrably" outweighed the benefits. Those site-specific findings of fact, reached after a hearing and site visit, remain highly material. Two matters the Inspector resolved in the applicant's favour have since reversed against it: the drainage undertaker then confirmed adequate capacity and now objects; construction impacts were then assumed manageable by learning from adjoining development, and the Highway Authority now reports that experience as one of "significant impacts."
- (i) The applicant's own July 2026 soils survey confirms the entire site as Subgrade 3a best and most versatile agricultural land, engaging policy N2(1)(b).
- (j) Whether the proposal is tested against the S5(1)(j) proviso or, as this representation contends, against S5(4), the benefits are substantially outweighed by the adverse effects. Permission should be refused. Draft reasons for refusal are offered at Section O.

A. INTRODUCTION AND SCOPE

1. I make this representation in my own name, as a local resident writing for the benefit of the village, and in no representative or commissioned capacity. Pirton - with successive estates completed, a further 50 dwellings resolved for approval this month, and 130 more now sought on this application - is being asked to absorb new dwellings at a pace and on a scale that outstrips its infrastructure and erodes the countryside character and protected setting which the development plan set out to safeguard. This representation places that concern on its proper footing in planning policy. It responds to the Council's re-consultation letter of 21 August 2026, which invited comments on the amended and additional documents submitted by the applicant on 14 August

2026, including the Cover Letter, Design and Access Statement Addendum, Developable Area Parameter Plan, Soils and Agricultural Land Quality Report, Energy and Sustainability Statements, Outline Construction Traffic Management Plan, Statement of Community Involvement Addendum, revised Health Impact Assessment, and the applicant's letter responding to Anglian Water.

2. It responds to that additional material, but necessarily does so within the decision-making framework now in force, which has changed fundamentally since the material was prepared. My earlier representations are maintained except to the extent that they are inconsistent with this document, in which case this document supersedes them. In particular, this representation does not pursue certain matters raised previously (see Section K), and all citations of the previous appeal decision herein are made by reference to the decision itself.
3. Nothing in this representation disputes the district's need for housing, including affordable housing, nor the weight which policy HO7 of the Framework requires to be given to the benefits of providing homes. The issue for the Council is a different one: whether this particular unallocated countryside site, in a village which the development plan deliberately selected for no allocated growth, and which a Planning Inspector has already found unsuitable for a materially smaller scheme, satisfies the tests which the August 2026 Framework now applies. For the reasons set out below, it does not, and no amendment the applicant has made alters the site's geography, its relationship with higher-order services, its countryside character, or the evidenced land-capacity constraints of Pirton.

B. THE APPLICABLE DECISION-MAKING FRAMEWORK

4. On 17 August 2026 the Government published a new National Planning Policy Framework, replacing the December 2024 version. Annex A(1) provides that its policies are material considerations which must be taken into account in decision-making from the day of publication. There are no transitional arrangements for decision-taking. The Council has itself already confirmed this position: its Written Updates to Planning Control Committee on application 25/02064/OP (Land Adjacent to 10 Hambridge Way, Pirton), considered on 3 September 2026, record that "the new NPPF must be applied" and that references to December 2024 paragraph numbers "should be read as superseded."
5. The consequences for this application are structural, not cosmetic. Paragraph 11 of the December 2024 NPPF, footnote 8, and the "tilted balance" no longer exist. The presumption in favour of sustainable development is now set out in policies S3 to S6. The applicant's Planning Statement is constructed entirely upon the former paragraph 11(d) mechanism, contending that the absence of a five-year housing land supply renders the most important development plan policies out-of-date and engages the tilted balance. Every element of that architecture has been superseded. Even the applicant's final submission of 14 August 2026 was framed against a Framework superseded three days later. The application must be determined afresh against the policies now in force, and the Council is respectfully invited to ensure that the officer report does so explicitly.
6. Under policy S3, development proposals outside settlements are to be considered under policy S5. It is common ground that the site lies outside the Pirton settlement boundary, within the Rural Area Beyond the Green Belt. Policy S5(1) provides that only certain forms of development should

be approved outside settlements, and lists the supported categories at sub-paragraphs (a) to (j); development falling outside those categories is not thereby prohibited, but may be approved only through the exceptional-circumstances route at S5(4), addressed below. Even where a proposal falls within a listed category, approval is subject to the proviso that the benefits are not “substantially outweighed by any adverse effects, when assessed against the national decision-making policies in this Framework.”

7. The proposal falls within none of the categories at S5(1)(a) to (i). It is not agricultural, recreational or infrastructure development; it is not a rural business requiring a countryside location; it involves no existing building or previously developed land; it is not limited infilling; it is not a rural exception site under HO10 (both because of its overwhelmingly market-led composition and because its built extent would far exceed the one-hectare / five per cent limits at HO10(2)(b)); it is not near any station; and the land is not allocated. Its only candidate category is S5(1)(j): development which would address an evidenced unmet need, and which would “be physically well-related to an existing settlement ... and be of a scale which can be accommodated taking into account the existing or proposed availability of infrastructure.” Both limbs must be satisfied. Section G below demonstrates that the scale/infrastructure limb is not met. In that event, the proposal falls to be considered under S5(4): development outside the listed categories “should only be approved in exceptional circumstances, where the benefits of the proposal would substantially outweigh the adverse effects, including to the character of the countryside and in relation to promoting sustainable patterns of movement.”
8. As to the development plan, section 38(6) of the Planning and Compulsory Purchase Act 2004 remains the statutory starting point. The North Hertfordshire Local Plan 2011–2031 was adopted in November 2022. The proposal conflicts with Policies SP1 and SP2 (the settlement hierarchy, under which Pirton is a Category A village with no allocations and development is directed within defined boundaries), SP5 (restraint in the Rural Area Beyond the Green Belt), CGB1 (which permits only defined categories of rural development, none of which applies), NE2 (landscape), and with Policies PNP1 and PNP2 of the made Pirton Neighbourhood Development Plan. Annex A(2) of the Framework reduces the weight only of development plan policies which are “materially inconsistent” with the national decision-making policies, and its final sentence provides expressly that other development plan policies “should not be given reduced weight simply because they were adopted prior to the publication of this Framework.” The spatial strategy of the adopted plan - directing growth to selected settlements, defining boundaries, and exercising restraint beyond them - is the same architecture which the Framework itself now adopts in policies S2 and S5, and a previous Inspector has already rejected the applicant’s argument that the predecessor restraint policies were inconsistent with national policy (APP/X1925/W/17/3184846, paragraphs 16–18). Even if, which is not accepted, any part of Policy CGB1’s closed list were found materially inconsistent with S5(1)(j), that would avail the applicant nothing: policy S5 would itself then supply the operative restraint test, and the proposal must satisfy S5 in any event. The conflict with the adopted spatial strategy remains, and its weight falls to be assessed alongside S5.
9. For completeness, no reliance is placed on policy S6: the Pirton Neighbourhood Development Plan was made on 27 April 2018 and therefore falls outside the five-year window at S6(1)(a). The

Neighbourhood Plan nonetheless remains part of the statutory development plan, and the previous Inspector's interpretation of Policy PNP1 - that "the essence of the policy requirement is to ensure an incremental rate of change" (paragraph 27) - remains a material interpretation of a development plan policy with which the present proposal, at more than four times the policy's 30-dwelling ceiling, is in stark conflict.

10. Finally as to framework, one point of methodology. The Council's Written Updates on 25/02064/OP contain a concordance table mapping the December 2024 paragraph numbers to the new policies. That table maps former paragraphs 110, 115 and 116 to policy TR6 alone. Respectfully, the concordance is incomplete: former paragraph 110 - requiring significant development to be focused on locations which are or can be made sustainable, limiting the need to travel and offering a genuine choice of transport modes - is carried forward by policy TR3 ("Locating development in sustainable locations"), not by TR6, which addresses transport impacts and highway safety. TR3(2) further prescribes that the Government's Connectivity Tool "should be used" alongside other evidence in assessing the connectivity of locations proposed for development. This application - whose central issue is precisely the sustainability of its location - must be assessed against TR3, and the Connectivity Tool should be run for the site before determination. The omission was immaterial for a contained 50-dwelling site beside the recreation ground; it would be material here, and the officer report should not carry it forward.

C. HOUSING LAND SUPPLY AND UNMET NEED: THE POSITION STATED ACCURATELY

11. The Council's Five-Year Housing Land Supply Update (November 2025) records a supply of 2.6 years against the adopted stepped requirement of Policy IMR1, applying the Liverpool approach endorsed by the Local Plan Inspector, and 3.3 years measured against the new standard method. The cumulative shortfall to 31 March 2025 was 1,253 dwellings. The evidenced unmet need limb of S5(1)(j) is accordingly engaged through the Council's inability to demonstrate a five-year supply of deliverable housing sites, and this representation says so plainly. Annex A(3) of the Framework affords no protection, since it requires both a demonstrable five-year supply and a Housing Delivery Test result above 75 per cent.
12. The Housing Delivery Test 2024 and 2025 measurements were published by the Ministry of Housing, Communities and Local Government alongside the Framework on 17 August 2026; the 2025 measurement supersedes the 2024 measurement and is the operative measurement for decision-making. The official result for North Hertfordshire in the published 2025 results table is 75 per cent, against which the table itself records the consequence as "Buffer." Because the relevant thresholds are expressed as results below 75 per cent and below 85 per cent, two consequences follow and both are stated precisely. First, the Housing Delivery Test limb of S5(1)(j) - under which an evidenced unmet need is deemed to exist only where delivery falls below 75 per cent of the requirement (Annex D, paragraph 12(c)) - is not engaged by a result of exactly 75 per cent, consistently with the consequence recorded in the official table: the evidenced unmet-need route arises independently, from the Council's inability to demonstrate a five-year supply, exactly as the Council itself recorded in its Written Updates on application 25/02064/OP. Secondly, the result falls below 85 per cent and therefore requires a 20 per cent buffer in the five-year supply calculation (Annex D, paragraph 12(b)). The Council's November 2025 statement

applied a 5 per cent buffer on the strength of the now-superseded 2023 measurement of 105 per cent; its published 2.6-year position has not yet been recalculated with the higher buffer, which on the Council's published inputs can only reduce, not improve, the stated supply. The precise recalculated figure is a matter for the Council, and nothing in this representation turns upon it.

13. None of this is in dispute, and the Council should not be detained by it. The questions which determine this application are those which follow: whether the proposal satisfies the second limb of S5(1)(j)(i); whether the location satisfies policy TR3; and whether, on any view, the benefits are substantially outweighed by the adverse effects. The previous appeal on this site was dismissed at a time when the then-applicable presumption operated in the applicant's favour and the benefits of housing carried substantial weight; unmet need is accordingly the beginning of the analysis, not its end.

D. THE SITE'S DETERMINATION HISTORY

14. The application site is the same approximately 6.5-hectare field east of Pirton which has twice been refused planning permission and whose refusal has been upheld on appeal. The chronology is as follows:

Date	Determination	Scheme
18 September 2017	Application 17/01543/1 refused by the Council	Up to 99 dwellings
15 December 2017	Application 17/02563/1 refused by the Council	Up to 85 dwellings
18 January 2019	Appeal APP/X1925/W/17/3184846 dismissed (Inspector Brendan Lyons, following a hearing on 4–5 September 2018 and site visit)	Up to 99 dwellings
July 2025	Present application 25/01696/OP submitted	Up to 130 dwellings

15. The trajectory merits emphasis. Two schemes were refused within three months of each other in 2017 by two determinations; the larger was then dismissed at appeal after two days of hearing evidence. The applicant's response to those adverse determinations has been to return with a scheme approximately 31 per cent larger than the dismissed proposal and 53 per cent larger than the refused 85-dwelling variant, on an unreduced 6.65-hectare site at 34 dwellings per hectare, as the August 2026 Developable Area Parameter Plan (I000652 D_03-02 Rev B) confirms. Nothing in the amendments of April or August 2026 reduces the quantum, relocates the development, or alters the access strategy.
16. The Council's December 2017 refusal of the 85-dwelling scheme is itself instructive in two respects which remain live. First, reason 1 identified "the heavy use of planting to screen the largely open site" as an element of the harm rather than its cure: the diagnosis that a screening-led landscape strategy treats the visibility of harm rather than the harm itself was subsequently and independently endorsed by the Inspector (paragraph 35), and it is the same strategy on which the current submission again relies. Secondly, reason 2 recorded the land as Grade 3a best and most versatile agricultural land: a classification confirmed by the Inspector (paragraph 45) and now confirmed for a third time by the applicant's own survey (Section J below).

E. THE 2019 APPEAL DECISION: HIGHLY MATERIAL SITE-SPECIFIC FINDINGS OF FACT

17. The appeal decision APP/X1925/W/17/3184846 (18 January 2019) is not relied upon as binding precedent. The present application must be determined against the current development plan and the August 2026 Framework. The decision is, however, a highly material consideration: it contains detailed, site-specific findings of fact concerning this same field, this same village, and this same applicant, made by an Inspector following a two-day hearing and site visit, in respect of a materially smaller scheme. The principle of consistency in decision-making (*North Wiltshire District Council v Secretary of State for the Environment* (1992) 65 P&CR 137) requires that, if the Council is now minded to reach a materially different judgement on matters the Inspector determined, the officer report should identify the changed circumstances relied upon and explain why they justify departure from his findings.
18. The decision's force lies not least in its balance. The Inspector decided a series of matters in the applicant's favour, and it is right that they be acknowledged at the outset:

Finding in the applicant's favour	Reference
Pirton offers "a reasonable range of services for a village of this size"	Paragraph 50
Walking to facilities within the village is a realistic option	Paragraph 51
Bus services could allow a realistic alternative for some commuting and daytime trips	Paragraph 53
Cycling to Hitchin would provide an option for some residents	Paragraph 54
Accessibility "would not alone provide justification to reject the proposal"	Paragraph 56
The landscape carries no formal designation and was not a "valued landscape"	Paragraph 31
Impact on the wider Landscape Character Area as a whole would be modest	Paragraph 36
The loss of Grade 3a land is harm that is "relatively minor" in impact	Paragraphs 46–48
No unacceptable highway safety risk from the principal access	Paragraph 62
Archaeology capable of being addressed by condition	Paragraphs 57–60
Foul drainage acceptable, given the undertaker's confirmation of adequate capacity	Paragraph 61
Population assimilation concerns a neutral factor	Paragraph 66
Affordable housing provision attracting substantial weight	Paragraph 64

19. Notwithstanding every one of those findings, the appeal was dismissed. The decisive matters, synthesised at paragraph 68, were the combination of: significant new housing "in a location not identified for this level of growth," with "constrained accessibility by sustainable modes of transport," achievable only with "significant adverse effects on the character and appearance of the countryside." The Inspector held: "These are matters of substantial weight." At paragraph 71 he concluded that the adverse impacts would "significantly and demonstrably outweigh the benefits" even applying the then tilted balance, and at paragraph 72 that no conditions, alone or in combination, would render the proposal acceptable.
20. The principal findings, each of which is addressed against the current Framework in the Grounds below, were these. On location: the site's development would be inconsistent with national policy supporting a plan-led approach and with local policy (paragraph 29); Pirton was not among the villages selected for a greater share of growth, and a considerable degree of growth had already

been permitted within the plan period (paragraphs 20–21). On landscape: despite the adjoining Elm Tree Farm development, the site’s character was “much more of the wider landscape rather than of the village fringe” (paragraph 32); the proposal “should in itself be regarded as a large scale extension,” there being “no published justification for counting only the likely built core of the site,” with green areas around the edges forming “part of the development rather than of the wider landscape” (paragraph 33); taken with Elm Tree Farm it would create “a very marked incursion into the countryside to the east” (paragraph 34); neither tree planting nor the perimeter hedge was likely to be fully effective mitigation, with effects “at least ‘moderate adverse’” at both one and ten years (paragraphs 35–36); the effect on users of Hambridge Way, part of the long-distance Icknield Way Trail, would be much greater than the applicant’s appraisal allowed (paragraph 38); and, decisively for present purposes, the Inspector expressly assessed the position with the neighbouring development completed: it “would form a new edge,” beyond which “an important open aspect over the appeal site ... would be lost” (paragraph 39), and the approval of Elm Tree Farm “does not establish a principle of continued incremental expansion to the east of the village” (paragraph 42). On accessibility: access for “virtually all employment, secondary and higher education, shopping, leisure and medical needs” would require trips to larger places (paragraph 52); even with a Travel Plan the development “would involve much reliance on the private car,” and national policy “does not suggest that development of this scale is best located where sustainable options are relatively limited” (paragraph 55); accessibility by sustainable modes was “marginal at best” (paragraph 56). On the recreational route: increased use of Hambridge Way could lead to pressure for surfacing and lighting, “which could result in a harmful change of character” (paragraph 51).

21. The question the Council must therefore ask of the current application is a narrow and practical one: what has materially changed since 18 January 2019, and in whose favour? The answer is stark. The scheme is 31 per cent larger. The adjoining development is complete and occupied - a circumstance the Inspector expressly anticipated and held against further eastward expansion. The village has since absorbed additional growth, most recently the 50 dwellings resolved for approval on 3 September 2026 (Section L). The Highway Authority’s contemporary evidence corroborates and hardens the accessibility findings (Ground One). And the two material matters the Inspector resolved in the applicant’s favour on the evidence then before him - foul drainage and construction impacts - have both reversed against the applicant on the evidence now before the Council (Grounds Two and the matters at Section K). The principal changes in the site-specific harm evidence do not displace the Inspector’s findings and, in several material respects, reinforce them; the principal material change in the planning balance running in the applicant’s favour - the deepened housing supply shortfall - is acknowledged and addressed expressly in the balance at Section M. New assessments and different professional conclusions cannot, without evidence of changed circumstances, alter the underlying geography of the site and its relationship with higher-order services.

F. GROUND ONE: THE LOCATION IS NOT SUSTAINABLE AND CANNOT BE MADE SO (POLICY TR3)

22. Policy TR3(1)(a) requires development proposals which could generate a significant amount of movement to be “in locations that are sustainable (or which can be made so, taking into account

planned improvements, including any provided for as part of the development itself),” meaning that “the location should limit the need to travel, particularly by private car, and offer a genuine choice of transport modes.” The Chapter 4 objective of the Framework likewise includes “limiting development away from settlements” to safeguard the countryside, and policy S5(4) makes “promoting sustainable patterns of movement” an express component of the exceptional-circumstances test. It is accepted that TR3 contemplates that a location may be made sustainable; it is for the applicant to demonstrate that, and the evidence set out below shows that it cannot.

23. The starting point is the Inspector’s findings at paragraphs 50 to 56, summarised above, reached after full argument and having given the applicant every reasonable concession: accessibility by sustainable modes “marginal at best”; “much reliance on the private car” even with a Travel Plan; development of this scale not best located where sustainable options are relatively limited. Those findings concerned a scheme of 99 dwellings. The present scheme is 130.
24. The Highway Authority’s formal response of 4 February 2026 does not displace those findings; it corroborates them. Hertfordshire County Council, as Highway Authority, recommended under Article 22 that permission be refused for insufficient information. Its analysis records, on the applicant’s own evidence, that walking and cycling connectivity “is constrained by discontinuous footways, the absence of tactile dropped kerbs and dedicated cycle infrastructure”; that the applicant’s route audit was not undertaken in accordance with the Active Travel England Route Selection Tool and omitted the northern routes towards the Holwell Road bus stop; that the trip distribution rests on 2011 Census data for commuting journeys only, without assessment of other journey purposes or sustainable modes; and that the applicant “has been unable to demonstrate and deliver a scheme which meets NPPF para 116 a & c” in respect of cycle connections. Most tellingly, the Highway Authority records in terms: “It is acknowledged that Pirton is not of a size to be ‘self-contained’ in terms of facilities and amenities.” That is the 2026 restatement, by the statutory transport consultee, of the Inspector’s 2019 diagnosis.
25. The scale of intervention sought is powerful evidence of the baseline accessibility deficit, and it makes the effectiveness, permanence and deliverability of that mitigation central to the TR3 assessment. To offer future occupants “realistic and suitable opportunities to travel sustainably” and “reduce car dependency,” it seeks £800,000 of bus service support over five years (tied to Service 89 or, given the uncertainties of bus franchising, a standalone service), together with £1,281,930 of active travel contributions at £9,861 per dwelling, bus stop upgrades, PRoW improvements, and a full Travel Plan regime. Two observations follow. First, the principal public transport mitigation is a time-limited subsidy of a service whose operator and continuity are not assured: it is precisely the class of measure whose limitations the Inspector identified, finding the existing service “limited, particularly for return trips at and beyond the evening peak and at weekends,” recording that doubts about its reliability were voiced at the hearing, and concluding that even with a Travel Plan secured by condition and obligation the development “would involve much reliance on the private car” (paragraphs 53 and 55). The subsidy, moreover, expires after year five while the development’s trip generation endures for its lifetime. Secondly, the Council’s own transport officer’s supplementary recommendation of 30 June 2026 - a single club car secured for a minimum of three years, with a £50,000 payment in lieu if no operator can be found

- is mitigation of a token character relative to 130 households' daily travel needs, and the officer expressly reserved his position pending the applicant's response to the Highway Authority.
26. Whether the location "can be made" sustainable must also be judged by what the applicant is actually prepared to deliver. The record is one of refusal. The Highway Authority required an active travel access from the north-west corner of the site to Holwell Road/Drovers Way, and from the south of the site onto PRow 21, as express conditions of withdrawing its objection. The Design and Access Statement Addendum (August 2026, "Pedestrian Access" section, pages 10–11) rejects the north-west pedestrian connection which the Addendum itself records was "requested by the Local Planning Authority," on the ground that it is "not considered to provide a benefit and may give rise to safety concerns," offering instead a footway terminating at the site boundary so that the local planning authority may itself "provide the onwards connection should they wish to do so in the future." The Access Parameter Plan (ref. I000652 D_03-03 Rev B) "has been amended to remove the potential locations of active travel access points" and, in the applicant's own words, "it is not proposed as a" drawing for approval - the required connections now appearing only on illustrative material. The southern connection onto PRow 21 remains undelivered; and the Addendum further records (Figure 8) that the Council's Senior Ecologist and Landscape Consultant "now recommend that no hardstanding surfaces are provided within the 12m buffer" along the western boundary - a recommendation in response to which the western footpath was deleted from the Illustrative Masterplan, and against which the Addendum's own Figure 8 shows a vegetated drainage swale sited partly within that buffer. And the Highway Authority's February response records the applicant's own position that "the rural context and scale of the development limit the extent of sustainable transport interventions that can be reasonably required," only minor improvements being, on the applicant's case, justified. An applicant who contends that the interventions necessary to make the location sustainable cannot reasonably be required of it, and who declines to deliver the specific connections the Highway Authority has required, cannot at the same time contend that the location "can be made" sustainable within TR3(1)(a).
27. Nor is car reliance here a matter of prediction alone; it is observed behaviour, and the walking network on which any contrary case depends is seasonally unusable. The Parish Council's evidence records that residents of the adjoining completed development already drive to the recreation ground, particularly in winter; that Hambridge Way is in winter "very muddy and virtually unusable" and Footpath 13, the link to the Recreation Ground, "a quagmire and dangerous"; and that Footpath 1 (the Baulk) is "more or less impassable in the winter," such that parents drive their children to the primary school and bus stop. The application site lies further from the recreation ground than the completed development whose residents already drive to it. It is further noted that, on the Parish Council's understanding, the Highway Authority's package of PRow improvements does not extend to Footpath 1 - the school route - at all. A sustainable-location case built upon year-round walking to village facilities must confront the evidence that the routes concerned do not function year-round, and that the proposed mitigation omits the route most relevant to daily school travel.
28. The mitigation package also contains unresolved internal tensions which the Council must confront before it could conclude that TR3 is satisfied. The Highway Authority's Strand 2 works

contemplate surface and accessibility improvements to the Public Rights of Way network, including Hambridge Way (PRoW 21), “which may include lighting.” The Inspector found that pressure for surfacing and lighting of Hambridge Way “could result in a harmful change of character” (paragraph 51) on this important recreational route forming part of the Icknield Way Trail; and the Council’s ecologist requires dark corridors to be preserved along hedgerows and boundaries in the interests of the site’s notable bat assemblage, in which barbastelle was the third most recorded species. The transport case thus pulls against both the landscape findings and the ecological conditions. These tensions are posed here as questions the decision-maker must resolve; on the current material they are unresolved, and they illustrate that the site cannot reconcile the connectivity its location demands with the constraints its edges impose.

29. Policy TR3(2) requires the Connectivity Tool to be used, alongside other quantitative and qualitative evidence, in assessing the connectivity of locations proposed for development. No Connectivity Tool assessment accompanies the application. The Council is invited to require one before determination, and to test the applicant’s trip evidence - 2011 Census commuting data for a 2026 decision - against policy TR6(3), which requires assessment of reasonable future scenarios, multimodal trip generation and journey purposes beyond the commute.
30. The conclusion under Ground One is that the location neither is sustainable nor can be made so in the sense TR3 requires. The proposal would not limit the need to travel by private car; it would entrench it, for 130 households, in a village the Highway Authority itself describes as not self-contained. That conclusion carries through the Framework: it weighs decisively in the S5(1)(j) proviso, it forms an express limb of S5(4), and it replicates - on stronger contemporary evidence and for a larger scheme - the constrained accessibility to which the Inspector attached substantial weight at paragraph 68.

G. GROUND TWO: THE PROPOSAL FAILS THE SCALE AND INFRASTRUCTURE LIMB OF POLICY S5(1)(j)(i)

31. Policy S5(1)(j)(i) admits unmet-need housing outside settlements only where it would be “of a scale which can be accommodated taking into account the existing or proposed availability of infrastructure.” This is a gateway condition, not a matter for the residual balance. The Council has very recently stated its own methodology for applying it. In the Written Updates on application 25/02064/OP, the officers’ conclusion that a 50-dwelling scheme satisfied the limb rested on a single, transparent basis: “No objections have been raised by the highways authority, lead local flood authority, education, health, or utility consultees subject to conditions or planning obligations.” The Updates drew a further distinction of principle in respect of that scheme’s unresolved highways negotiation: the outstanding matter was “just the amount that it costs to deliver the infrastructure,” not whether it would be delivered, so that the scheme “would remain capable of being accommodated.” Applied consistently, that methodology points firmly away from any finding that the limb is satisfied here, for the following four reasons.

(1) Foul drainage: a maintained statutory-undertaker objection and no identified point of connection

32. Anglian Water, the statutory sewerage undertaker, objects to this application and has maintained that objection throughout 2026. Its position, most recently restated on 24 August 2026 in direct

- response to the applicant's letter of 14 August 2026, is that while the Hitchin Water Recycling Centre has treatment capacity, no sustainable point of connection (SPOC) to the used water network has yet been identified for this development, that the development's flows risk pollution and deterioration of the receiving watercourse, and - in terms - that Anglian Water's "position is to object until a SPOC has been identified for this development site."
33. The applicant's answer, in its letter of 14 August 2026, is that the Water Industry Act 1991 renders the matter one for the undertaker after permission: sections 106 and 94 are said to guarantee a right of connection and a duty to provide capacity, such that no planning control is necessary. Anglian Water's 24 August response answers that argument point by point, and the Council should accept the undertaker's analysis: section 94 imposes a high-level, ongoing duty enforceable only by the Secretary of State or Ofwat, not by developers, and does not require capacity to be provided within the timescales of any individual development; the Water Industry Act duties "do not constitute a pollution control regime" for the purposes of national planning policy, wastewater discharges being controlled separately under the Environmental Permitting regime; and, on the authority of the Supreme Court in *Barratt Homes Ltd v Dŵr Cymru Cyfyngedig (Welsh Water)* [2009] UKSC 13, once unconditional permission exists the undertaker must accept a connection regardless of downstream capacity or pollution risk, section 106 of the 1991 Act being concerned only with the mode and method of connection. It is for precisely that reason that the Supreme Court recognised the planning system as the proper point of control, and that the undertaker's objection at the planning stage is not a formality but the only effective safeguard.
34. This analysis engages policy DM7 directly. DM7(1) instructs decision-makers to assume that separate regulatory regimes will operate effectively "unless there is clear evidence to the contrary." Here the clear evidence to the contrary is supplied by the statutory undertaker itself: the regime on which the applicant relies neither identifies a connection point nor secures capacity within the development's timeframe, and cannot lawfully refuse a connection once permission is granted. The assumption is displaced on the undertaker's own evidence.
35. Anglian Water's position is supported by a King's Counsel's Opinion submitted to the Council on 24 August 2026, which confirms that under-capacity sewerage infrastructure is a material planning consideration and that a Grampian condition restraining commencement or occupation pending capacity is lawful; the Opinion further distinguishes between cases in which a programmed capital scheme will provide capacity in time (where a condition may be apt) and cases in which sufficient capacity has no realistic prospect of being provided within the relevant period (where refusal may be the logical outcome). No programmed Anglian Water capital scheme addressing the Pirton foul network within the development's delivery horizon has been identified anywhere in the application material or the undertaker's correspondence. On the evidence presently before the Council, therefore, the applicant has demonstrated neither an identified sustainable point of connection nor the reasonable prospect and timing of delivery necessary to support reliance upon a Grampian condition; until that evidential gap is closed, the Council cannot safely proceed on the basis that the S5 infrastructure requirement is satisfied. Anglian Water's submission is further supported by appeal decisions 3204432 and 3204434 (enclosed with the undertaker's response) and by the committee precedent at Land North of

Bayswater Brook (South Oxfordshire District Council, P22/S4618/O), each endorsing the SPOC-led approach.

36. The contrast with the Council's contemporaneous experience in the same village is decisive, and it also answers any suggestion - advanced by the applicant through its invocation of the Minister's letter of 22 May 2026 - that Anglian Water objects indiscriminately. For the 50-dwelling scheme at Hambridge Way (25/02064/OP), Anglian Water raised no objection, and the committee report's Condition 15 names two identified sustainable points of connection (manhole 9602 in Hambridge Way and manhole MH8503 in Walnut Tree Road). Same village; same undertaker; same decision period. Nor is the pattern confined to Pirton: for a 100-dwelling scheme at Land South of Turnpike Lane, Ickleford (25/02401/OP), Anglian Water again raised no objection, the officer-recommended condition again naming two identified connection points (manholes MH9901 and MH4102). In both comparator cases, where identified sustainable connection points were available, Anglian Water raised no objection and conditions secured them. For this scheme of 130 dwellings, no sustainable point of connection has yet been identified or agreed. The applicant's proposed dilution of the undertaker's condition - substituting a pre-occupation requirement, deleting the consultation with Anglian Water, and deleting the requirement to identify a sustainable point of connection - is itself eloquent: it removes precisely the elements which give the condition its purpose.
37. It follows that, on the Council's own Blakeney methodology, the utility consultee objects and the infrastructure limb of S5(1)(j)(i) is not satisfied. The primary position of this representation is that the application should be refused on this ground. If permission were nevertheless contemplated, any condition should at minimum preserve the substance of Anglian Water's safeguards: a strategic foul water strategy prepared in consultation with the undertaker, an identified sustainable point of connection, and no occupation until the necessary infrastructure is demonstrably available. The applicant's proposed dilution does not preserve those safeguards in full, in particular the identified point of connection and the consultation requirements.

(2) Highways: the Highway Authority's objection remains extant and its conditions undischarged

38. The Highway Authority's Article 22 recommendation of 4 February 2026 is that permission be refused, subject to three stated requirements upon whose satisfactory delivery it "will be in a position to raise no objection": (i) submission of an outline Construction Traffic Management Plan as specified; (ii) provision of an active travel access from the north-west corner of the site to Holwell Road/Drovers Way and from the south of the site onto PRoW 21; and (iii) confirmation of the Section 106 request. As at the date of this representation: the outline CTMP has been submitted, but the applicant has declined the Council's advice to seek the Highway Authority's pre-application input upon it, and no Highway Authority assessment of it is published; the north-west active travel connection has been expressly rejected by the applicant, while the required southern connection onto PRoW 21 remains unresolved and undelivered, both surviving only on illustrative material not for approval (Ground One above); and the Section 106 request is not confirmed - the applicant offers only obligations it considers to meet the statutory tests, while separately contesting the education contributions, and its recorded position is that significant transport mitigation would not meet the tests for a development of this size.

39. The Council's own Blakeney distinction between cost and capability places this application on the wrong side of the line. The Blakeney negotiation concerned the price of infrastructure whose delivery was not in doubt. Here, the dispute is not about price: the applicant declines to provide the required connections themselves, and the undertaker states that no sustainable point of connection has yet been identified at all. Unless and until the Highway Authority publishes a further Article 22 response assessed against the August 2026 Framework - including policy TR3 and the Connectivity Tool - the extant position of the statutory highways consultee is a recommendation of refusal, and the Council is respectfully invited not to determine the application without that updated response.

(3) Education: contributions contested by the applicant and unconfirmed

40. The applicant's 14 August 2026 letter challenges the education contributions sought by the County Council, contending on Department for Education data that spare capacity exists at Pirton Primary School and The Priory School and questioning compliance with Regulation 122 of the CIL Regulations 2010. No view is advanced here on the correct quantum; that is a matter for the County Council's evidence. Two consequences follow. First, the education position is presently unresolved: the Council could not, today, record - as it recorded for Hambridge Way - that the education consultee's requirements are agreed subject to obligations. Before any finding on this element of the infrastructure limb, the Council should obtain the County Council's current position, recalculated to take account of the pupil yield of the 50 dwellings now resolved for approval. Secondly, the County Council's evidenced position, endorsed by committee only days ago in respect of the 50-dwelling Hambridge Way scheme, is that contributions of £775,325 towards the expansion of Pirton Primary School and £713,910 towards The Priory School are necessary for even that smaller development - a development whose pupil yield will now reduce whatever headroom the applicant's data identifies. The applicant's capacity argument is thus contradicted by the education authority's current, committee-tested position and is further eroded by the development now resolved for approval.

(4) Community and recreational infrastructure: a demonstrated physical land-capacity constraint (policy HC3)

41. Policy HC3(1) requires proposals giving rise to significant numbers of additional people to be informed by an understanding of the need for improvements to community facilities, and to provide the new or improved facilities and public service infrastructure "necessary for the development to be acceptable in planning terms," whether directly or by contribution; HC3(2) imports the Fields in Trust and Sport England standards where the plan sets none; HC3(3) requires timely delivery so that facilities are available on occupation. The critical question under HC3, and under the scale limb of S5(1)(j)(i), is not whether a contribution can be levied but whether the necessary provision can actually be delivered.
42. The Parish Council's evidence of 5 June 2026 answers that question, and it is evidence of a physical land constraint, not of financial preference: the village's recreational land is fully committed; a second MUGA, expanded play provision, or any of the further facilities sought by residents could be delivered only "at the expense of" the existing football and cricket provision, itself already inadequate; land for expansion "should be found within the proposed developments"; and - in the Parish Council's words - "there is no other land available." The

Village Hall, built in 1933 with a capacity of 120, is effectively fully booked and cannot serve a village of the size now proposed. This is precisely the distinction that matters in law and policy: where mitigation is merely financially inconvenient, an obligation may cure the harm; where it is physically incapable of delivery, a payment does not make the development acceptable.

43. The Council's own recent practice provides material corroboration for the Parish Council's concern. The Section 106 schedule for the 50-dwelling Hambridge Way scheme - a site immediately adjoining Pirton's recreation ground - directs virtually every pound of outdoor and indoor sport contribution outside the village: football at Walsworth Common; changing rooms and cricket at Ickleford; rugby and tennis at King George V Playing Field, Hitchin; hockey at Hitchin Boys' School and Lucas Lane; a 3G pitch at The Priory; swimming and sports hall works at Hitchin Swimming and Fitness Centre. Only £13,300 for the Village Hall remains in Pirton, and the committee found it necessary to reserve delegated authority in respect of Pirton Sports and Social Club and a ball trajectory assessment. The Hambridge Way obligations thus demonstrate that a substantial part of the recreational demand generated by further growth in Pirton is already proposed to be met outside the village - the committee reserving delegated authority to investigate what, if anything, can be secured at Pirton Sports and Social Club. Read together with the Parish Council's evidence of finite local land capacity, that materially reinforces the question the Council must answer under S5(1)(j)(i) and HC3: not whether a contribution can be levied from a further 130 dwellings, but how and where the recreational needs of those dwellings would actually be met. On the present evidence, the answer is: substantially outside Pirton, at facilities reached by precisely the car-borne trips to higher-order settlements which Ground One addresses, while the deficit within the village remains uncured. A financial contribution does not of itself answer the S5 infrastructure question, and on this element too the applicant has not demonstrated that the scale of the development can be accommodated within the meaning of S5(1)(j)(i).

Conclusion on Ground Two

44. On the Council's own stated methodology, the proposal fails the gateway at S5(1)(j)(i): the statutory utility consultee objects; the statutory highways consultee's extant recommendation is refusal with its conditions undischarged; the education position remains unresolved pending the County Council's updated assessment; and, on the Parish Council's evidence of a physical land-capacity constraint, the community and recreational infrastructure necessary to serve the development has not been demonstrated to be capable of local delivery. The proposal therefore falls outside every category in S5(1) and must be considered under S5(4), where it could be approved "only in exceptional circumstances" and only where the benefits would "substantially outweigh the adverse effects, including to the character of the countryside and in relation to promoting sustainable patterns of movement." No exceptional circumstances sufficient to satisfy S5(4) have presently been demonstrated; and the adverse effects on countryside character (Ground Three) and sustainable movement (Ground One) are the very matters on which this scheme is at its weakest. In the alternative, if the Council were to conclude that the gateway is passed, the proposal fails the S5(1) proviso for the reasons drawn together in Section M.

H. GROUND THREE: SIGNIFICANT AND ENDURING HARM TO THE CHARACTER AND APPEARANCE OF THE COUNTRYSIDE WHICH MITIGATION WOULD NOT REMOVE (POLICIES N2, DP3 AND S5(4); LOCAL PLAN POLICIES SP5, CGB1, NE2; PNP2)

45. The Framework's Chapter 4 objective includes "limiting development away from settlements to help safeguard the intrinsic character and beauty of the countryside." Policy N2(1)(a) requires proposals to consider the environmental qualities of the land, "including habitats, landscape character and the natural beauty of the countryside"; N2(1)(d) requires the conservation of existing natural features and the use of landscaping to integrate development into its surroundings - a policy about integration, not about excusing incursion. Policy DP3 requires development to be sympathetic to local character, including landscape setting. Local Plan Policies SP5 and NE2, and Policy PNP2 of the Neighbourhood Plan, are to the same effect and are in no respect inconsistent with the Framework.
46. The landscape case against this proposal has already been determined on its facts, twice. The Council's 2017 refusal of the 85-dwelling variant found that the siting beyond the built limits, the location within the open farmland of the Pirton Lowlands Landscape Character Area, and "the heavy use of planting to screen the largely open site" would cause significant and demonstrable harm to the intrinsic beauty of the countryside. The Inspector then found, on the fuller evidence of a hearing: that the site's character is of the wider landscape, not the village fringe (paragraph 32); that the whole 6.5 hectares constitutes the development for character purposes, its green margins being part of the scheme and not retained countryside (paragraph 33); that with the adjoining development it would form "a very marked incursion into the countryside to the east" (paragraph 34); that landscape mitigation would not be fully effective, effects remaining at least moderate adverse at years one and ten (paragraphs 35–36); that harm to users of Hambridge Way and the wider footpath network, including elevated views from within the Chilterns designation, would be materially greater than the applicant's appraisal allowed (paragraphs 38–40); and that the completed neighbouring development "would form a new edge" whose approval "does not establish a principle of continued incremental expansion to the east" (paragraphs 39 and 42).
47. Nothing in the 2026 submissions answers those findings; the amendments restate the approach the findings rejected. The Developable Area Parameter Plan allocates 3.82 hectares to housing at 34 dwellings per hectare and presents 2.63 hectares as "green and other infrastructure": on the Inspector's paragraph 33 analysis, that green land is part of the development of the field, not a continuation of the countryside, and the character change extends across the whole 6.65 hectares. The landscape strategy remains one of boundary reinforcement, buffer planting and reliance on the maturation of vegetation - the same screening-led approach which the Council in 2017 treated as part of the harm and which the Inspector in 2019 found would not be fully effective - mitigation that moderates the visibility of a change of character rather than removing it. And the scheme is now larger by 31 dwellings than the proposal those findings condemned, on an unreduced site area.
48. As to the Chilterns, the position must be stated with precision, and it is. The site carries no landscape designation and lies outside the Chilterns National Landscape, whose boundary rises to the west of the village. Policy N4(4) nonetheless requires development within the setting of a

Protected Landscape to be sensitively located and designed to avoid or minimise adverse impacts upon it, and section 245 of the Levelling-up and Regeneration Act 2023 places a duty on the Council, in exercising functions affecting land whose development may impact the designated area's natural beauty, to seek to further its statutory purposes - a duty which, as Natural England's letter of 17 December 2025 records, applies to proposals outside the designated area. The Inspector found that the development would be partly seen from elevated positions within the designation "as an incursion into the countryside" (paragraph 40). Separately, and as evidence of landscape quality rather than of designation, Natural England's letter records that the site lies within or partly within the area of search assessed for the proposed variation of the Chilterns boundary, in the course of which Natural England noted the Chilterns to be a valued landscape; that boundary review was cancelled in 2025 on funding grounds following the withdrawal of Defra resources, not on the merits of the landscape assessed. The natural-beauty evidence assembled for it remains material to the quality and sensitivity of this countryside under N2(1)(a).

49. The cumulative dimension has moved further against the applicant since 2019. The Elm Tree Farm development is complete and occupied; the village has absorbed further consents; and on 3 September 2026 the Council resolved to grant a further 50 dwellings at Hambridge Way. The Inspector's paragraph 42 finding - that change at the village edge establishes no principle of continued expansion - speaks directly to the present moment: each successive consent is now deployed as the springboard for the next, and it is precisely that ratchet which the finding forecloses. Ground Three accordingly stands as the second limb of the paragraph 68 combination, undiminished and aggravated, and engages the express countryside-character component of S5(4).

I. GROUND FOUR: A SCALE OF DEVELOPMENT THE VILLAGE CANNOT ACCOMMODATE

50. The Parish Council's evidence establishes the quantitative context. At the Neighbourhood Plan's making in 2018 the village comprised some 520 dwellings and approximately 1,300 residents; by the 2021 Census, 577 dwellings and 1,452 residents; today, in excess of 600 dwellings. Fifty further dwellings have now been resolved for approval by the Council's resolution of 3 September 2026. The present proposal would add 130 more: cumulatively some 180 dwellings, an increase approaching 30 per cent on the Parish Council's stated housing stock, taking the village's population beyond 2,200. Taken alone, the applicant's 130 dwellings would be a very substantial addition to a village of a little over 600 homes - and more than four times the 30-dwelling ceiling which Policy PNP1 sets for any single site, a ceiling whose purpose, as the Inspector held, is "to ensure an incremental rate of change" (paragraph 27).
51. The development plan's judgement on this question was deliberate: Pirton is a Category A village with no allocations, and was not among the villages selected for a greater share of growth - a strategy of which the Inspector observed that "a considerable degree of growth of the village has already been allowed" (paragraphs 20–21), and by reason of which he attached only moderate weight to the market housing (paragraph 65), the identified local need having been met by the 39 affordable homes delivered at Elm Tree Farm and Priors Hill. That local context has since been augmented by the 20 affordable homes within the Hambridge Way resolution. Scale is also where Grounds One and Two converge: 130 dwellings is a quantum whose daily travel demand the

location cannot sustainably serve, and whose infrastructure requirements - foul drainage, education, recreation - are respectively unresolved as to connection, contested, and subject to a demonstrated local land-capacity constraint. The scale limb of S5(1)(j)(i) is not satisfied.

J. BEST AND MOST VERSATILE AGRICULTURAL LAND (POLICY N2(1)(b))

52. The applicant's own Soils and Agricultural Land Quality Report (Land Research Associates, July 2026), commissioned at the Council's request, confirms that the entirety of the 6.5-hectare site is Subgrade 3a. That is best and most versatile agricultural land: the Framework's definition (Annex B) places Subgrade 3a within the protected category alongside Grades 1 and 2, so the applicant's characterisation of the land as at the "lower end" of BMV does not remove it from the category to which policy N2(1)(b) attaches - it confirms membership of it. No part of the site falls below the BMV threshold: the loss would be total and permanent across all 6.5 hectares. The classification also aligns the applicant's evidence with the Council's 2017 refusal (reason 2) and the Inspector's finding (paragraph 45); any earlier references in representations to Grade 2 are superseded accordingly.
53. Policy N2(1)(b) requires decisions to take into account "the quality of agricultural land (including that classified as best and most versatile agricultural land, and its grade)" and, "if significant development of agricultural land is necessary," to "use areas of poorer quality land where possible." The corresponding plan-making objective steers development away from higher-quality agricultural land where poorer land is available; and current Natural England guidance (Guide to Assessing Development Proposals on Agricultural Land, updated 24 July 2026) describes Subgrade 3a as "good quality agricultural land" capable of consistently producing moderate to high yields of arable crops. Two questions therefore arise for the Council. First, what weight attaches to the permanent and irreversible loss of 6.5 hectares of proven BMV land? Secondly, if development of agricultural land is said to be necessary to meet housing need, why this Grade 3a land rather than poorer-quality land? The application does not attempt that question: no assessment of poorer-quality alternatives, within the district or otherwise, accompanies it, and the applicant's submission that the loss is "modest" and merits "limited weight" is advocacy about weight, not an answer to the avoidance question N2(1)(b) poses. Nor is the site's 6.5-hectare extent an answer: the 20-hectare figure in the guidance is the threshold for mandatory consultation of Natural England, not a threshold below which BMV loss ceases to be material - the same guidance directs authorities to take account of smaller losses where significant, and states that decisions "should avoid unnecessary loss" of BMV land. The point carries particular force here because the site is unallocated: the loss would not be the outcome of a plan-led site-selection exercise in which agricultural quality was weighed against reasonable alternatives, but of a speculative application for countryside the plan did not choose.
54. The previous Inspector recognised the loss of this same Subgrade 3a land as a real economic and environmental harm, to which he attached relatively limited weight in the circumstances then before him (paragraph 48). That factual finding stands; the weight to be given to the harm today, however, falls to be assessed under the August 2026 Framework, whose decision-making policy expressly requires the BMV classification and its grade to be taken into account. The loss is not advanced as an automatic bar to development. It is a real, permanent and irreversible environmental and economic harm arising across the whole of the agricultural site, now common

ground on the applicant's own survey, and it belongs on the adverse side of the S5 balance alongside the location, accessibility and landscape harms with which the Council's 2017 decision expressly coupled it.

K. MATTERS NOT PURSUED, AND MATTERS FOR CONDITIONS IF PERMISSION WERE GRANTED

55. In fairness to the applicant and to assist the Council, the following matters are expressly not advanced as reasons for refusal on the current evidence. The geometric form of the principal access from Coopers Elms is not challenged: the Highway Authority's 4 February 2026 response confirms that the proposed carriageway extension and 2-metre footways accord with its Place and Movement Design Guidance, and further confirms that PRoW 21 formally begins east of the proposed emergency access, which is therefore not directly disturbed. That concession is deliberately limited. It does not address the materially different questions whether it is appropriate to convert an occupied residential cul-de-sac into the sole principal day-to-day vehicular gateway to a further 130 dwellings, nor whether the construction traffic of a major development can acceptably be routed through that occupied residential environment; both are addressed below. Archaeology: the County Council's Historic Environment Advisor confirmed on 10 September 2026, upon re-consultation on the amended documents, that no heritage assets of national significance are indicated and that three conditions suffice. Protected species and general ecology: the Council's ecologist confirmed on 5 February 2026 that, with the completed surveys and the District Level Licensing arrangements for great crested newts, the proposal would not detrimentally affect a protected species, subject to conditions. Surface water drainage: the Lead Local Flood Authority confirmed on 28 January 2026 that it has no objection subject to detailed conditions keyed to the Flood Risk Assessment (Fourth Issue, November 2025).
56. Three residual matters are nonetheless recorded, because they condition any grant and inform the balance. First, biodiversity net gain: the October 2025 Statutory Metric shows an on-site gain of only 2.16 per cent in habitat units against the statutory 10 per cent, the balance to be met by off-site offsetting which is not yet secured; the ecologist's conditions (a 30-year Habitat Management and Monitoring Plan, an Ecological Enhancement Plan, a biodiversity CEMP, and a lighting strategy preserving dark corridors along hedgerows and boundaries) would be indispensable, and the vegetated swale shown partly within the 12-metre western ecological buffer requires resolution against the advisers' requirement that no hardstanding intrude upon it, as does the protection of hedgerow H3, safeguarded under the conditions of the adjoining development's permission. Secondly, the receiving surface-water ditch: the applicant's CCTV survey found defects to structures along the ditch to which site flows would discharge, and a blockage to the east of the site; any conditioned scheme must resolve the condition and maintenance of that watercourse. Thirdly, and materially, construction: policy TR6(4) now applies the severe-impact and highway-safety test expressly "during the construction phase" as well as following completion. In 2019 the Inspector considered construction impacts time-limited and capable of management by a plan which could "learn from the experience of the adjoining development" (paragraph 62). That experience has now occurred, and the Highway Authority reports it as one of "significant impacts to the operation of the highway network caused by other recent developments in Pirton" - the express reason it requires the outline Construction Traffic

Management Plan to be assessed before determination rather than left to condition. The applicant has submitted an outline CTMP but declined further engagement with the Highway Authority upon it. The Council should not determine the application until the Highway Authority has assessed that document against its ten-point specification and policy TR6(4).

57. Nor is the access question exhausted by construction. Access is the one matter not reserved: it is applied for, and falls to be determined, now. Coopers Elms is presently a residential cul-de-sac off Drovers Way, the spine street of the completed adjoining development, serving a small number of occupied homes. The proposal would change its function fundamentally, converting it into the sole principal day-to-day vehicular gateway to a further 130 dwellings. The Highway Authority's acceptance of the geometric form of the access does not answer that place-making question, and the Council's own North Herts Design Code - adopted as a supplementary planning document in June 2026 and a material consideration for residential-led development of more than two homes - supplies the framework within which it must be answered. The Code's Sociable Streets objective requires that "vehicles must be accommodated in a way that respects the needs of people first"; code SS06.01 provides that "cul-de-sac based street patterns will not be permitted"; and the street-selection methodology at ST01 distinguishes street types by function, asking expressly whether a street serves more than 50 dwellings or performs a distributor function. On that methodology, the proposal would convert a street designed, built and occupied as a residential cul-de-sac into one serving more than 130 further dwellings with a distributor function - a categorically different street type. It is not suggested that the Code mechanically prohibits the proposal, and it falls to be applied proportionately to an outline application. But the change in the function and character of an existing occupied street, and its effects upon the character and living conditions of the existing residential environment, is a matter the Council's own Code requires to be assessed expressly, and no such assessment accompanies the application.
58. The construction question is acute here for a reason of simple geography, and it should be stated plainly. The application provides a single point of vehicular access, via Coopers Elms, an occupied residential cul-de-sac reached from Holwell Road along Drovers Way, the spine street of the completed adjoining development; the Hambridge Way access is for emergency use only; the applicant has rejected any access from the north-west as unfeasible; and no dedicated or temporary construction access segregated from those occupied streets is identified anywhere in the application. On the material submitted, every heavy goods vehicle movement generated by a construction programme of several years for up to 130 dwellings would therefore enter and leave through streets in which families now live - precisely the class of impact which the Highway Authority reports as having already arisen from recent construction in Pirton. The applicant's own covering letter confirms that the outline plan identifies construction routes but defers the "full detail of construction vehicles and routings" to a detailed plan at reserved matters stage; yet vehicle numbers, types and routing are the first item of the Highway Authority's ten-point specification for the outline document it requires before determination. To be clear, this is not a revival of the access objection, which is not pursued: the Highway Authority has accepted the permanent access for the operational development. It is the distinct construction-phase question which policy TR6(4) now expressly poses, and a plan which defers the very particulars the Highway Authority required now, in respect of the one matter its recent local experience identifies as the live risk, has not answered it.

L. THE HAMBRIDGE WAY RESOLUTION (25/02064/OP) DISTINGUISHED: THE COUNCIL'S OWN S5 METHODOLOGY, CONSISTENTLY APPLIED, POINTS TO REFUSAL

59. It is anticipated that the applicant will rely upon the Council's resolution of 3 September 2026 to grant up to 50 dwellings at Land Adjacent to 10 Hambridge Way as demonstrating that housing outside the Pirton settlement boundary is now acceptable. No challenge is made here to that resolution. Properly understood, it assists the Council in refusing the present application, because the officers' Written Updates constitute the Council's first reasoned application of the August 2026 Framework to an edge-of-Pirton housing site, and every step of that reasoning, applied to this site, points the other way:

	Hambridge Way (25/02064/OP)	This application (25/01696/OP)
Scale and site	Up to 50 dwellings on 3.06 ha	Up to 130 dwellings on 6.65 ha
Containment	Enclosed by mature vegetation; existing housing on two boundaries; recreation ground to the south; adverse effects assessed as "localised and limited"	Open field with development on one boundary only; found by an Inspector to read as part of the wider landscape and to constitute a "very marked incursion", at least moderate adverse at years one and ten
Determination history	No relevant planning history	Refused twice (2017); appeal dismissed (2019)
Foul drainage	Anglian Water: no objection; two named sustainable points of connection secured by Condition 15	Anglian Water: maintained objection; no sustainable point of connection yet identified
Highways	Highway Authority: no objection subject to conditions and Strand 1/2 obligations	Highway Authority: extant recommendation of refusal (4 February 2026); north-west connection rejected by the applicant; southern PRoW 21 connection unresolved; obligations unconfirmed
Infrastructure finding	S5(1)(j)(i) satisfied because "no objections have been raised by the highways authority, lead local flood authority, education, health, or utility consultees"; outstanding highways negotiation a matter of cost, not capability	On the same test: the utility consultee objects; the highways consultee recommends refusal; the education package is contested; the dispute is one of capability, not cost

60. The consistency principle does not require like outcomes; it requires that a decision-maker departing from directly relevant recent reasoning confront that reasoning and explain the departure. The Council's approach at Hambridge Way supplies a directly relevant and transparent methodology for applying S5(1)(j)(i), and the materially different consultee position on this application points strongly towards a different conclusion. If officers nevertheless conclude that the infrastructure limb is satisfied, the report should explain why a maintained objection from the statutory sewerage undertaker and unresolved Highway Authority requirements are compatible with that finding - and why the Inspector's findings on this specific field, which have no counterpart at Hambridge Way with its absence of any relevant planning history, no longer hold.

M. THE PLANNING BALANCE UNDER THE AUGUST 2026 FRAMEWORK

61. The benefits are acknowledged in full and weighed without reservation. Policy HO7 requires substantial weight to be given to the contribution of homes towards evidenced needs; the proposal offers up to 130 dwellings including, at the development plan's 40 per cent requirement, some 52 affordable homes in a district with an acknowledged affordable shortfall (policy HO8; Local Plan

- Policy HS2). There would be temporary construction-phase economic benefits and modest longer-term local expenditure, to which - as the Inspector held at paragraph 67, such effects being equally deliverable by plan-compliant development - limited weight attaches. It is also acknowledged that the benefits side of the balance is heavier today than in 2019, the supply shortfall having deepened. This representation does not shrink from that: the question is whether the harms side has moved further, and it has - the scheme is 31 per cent larger; the statutory undertaker whose positive assurance underpinned the Inspector's paragraph 61 now objects; the Highway Authority's evidence corroborates and hardens the accessibility findings; the construction experience the Inspector relied upon has occurred, adversely; and the cumulative baseline has grown, most recently by the 50 dwellings resolved for approval at Hambridge Way. The affordable benefit, moreover, differs from 2019 only in degree - it already attracted substantial weight and did not save a smaller scheme - whereas the new harms differ in kind.
62. One further discipline, drawn from the appeal decision itself, should govern the benefits ledger. At paragraph 70 the Inspector held that, other than the delivery of affordable housing, the obligations "predominantly address mitigation of impacts rather than benefits, and do not add any extra weight in support of the proposal." The same principle applies to the present package. A subsidised bus service required because the location is car-dependent; active travel works required because the existing network is deficient; education and recreation contributions required because the development generates the pressure; and any foul drainage works required to permit safe connection - each is mitigation of the development's own impacts. Such measures may, where deliverable, bear upon the acceptability of those impacts; they are not to be counted a second time as free-standing public benefits weighing in favour of permission. The Council should be astute to that distinction when the applicant presents more than £2 million of required transport mitigation as investment in the village.
63. On the primary case advanced above, the proposal fails the gateway at S5(1)(j)(i) (Ground Two) and falls to be determined under S5(4). No exceptional circumstances sufficient to satisfy S5(4) have presently been demonstrated. The benefits, however weighty, come nowhere near substantially outweighing adverse effects which include precisely the two matters S5(4) singles out: the character of the countryside (Ground Three) and sustainable patterns of movement (Ground One). The application should be refused.
64. In the alternative, if the Council concludes that the proposal passes the gateway, it should be approved under S5(1) only if the benefits are not "substantially outweighed by any adverse effects, when assessed against the national decision-making policies." Assessed against those policies, the adverse effects comprise: conflict with policy TR3 on stronger evidence than that which grounded the Inspector's findings of constrained accessibility and car reliance; landscape and countryside harm quantified by an Inspector at not less than moderate adverse, which he found planting would not remove (policies N2, DP3, and the Chapter 4 objective); conflict with the adopted spatial strategy and the Neighbourhood Plan, to which the statutory primacy of section 38(6) attaches; the unresolved foul drainage objection of the statutory undertaker; the demonstrated land-capacity constraint on community and recreational infrastructure (policy HC3); the unassessed construction impacts (policy TR6(4)); and the permanent loss of best and most versatile agricultural land on the applicant's own evidence (policy N2(1)(b)). A materially

smaller scheme, generating the same categories of benefit, was dismissed on this field when the applicable presumption operated in its favour, the Inspector finding the adverse impacts to outweigh the benefits not marginally but “significantly and demonstrably.” Those findings of fact, carried into the present balance on site-specific harm evidence that is unchanged or materially more adverse, admit of one answer: the benefits are substantially outweighed, and permission should be refused.

N. MATTERS REQUIRING EXPRESS FINDINGS IF THE COUNCIL IS MINDED TO APPROVE

65. If, notwithstanding the matters set out above, officers are minded to recommend the grant of planning permission, I respectfully request that the officer report addresses the following matters expressly. They are not tests invented by this representation; each arises directly from the development plan, the August 2026 Framework, the statutory-consultee evidence or the previous appeal decision on this site.

- (1) **Policy S5(1)(j)(i) - infrastructure capacity.** On what evidential basis can the Council conclude that development of 130 dwellings is “of a scale which can be accommodated” having regard to existing and proposed infrastructure, when Anglian Water maintains a formal objection and the Highway Authority’s latest formal Article 22 response recommends refusal pending specified requirements?
- (2) **Anglian Water and foul drainage.** If the foul water objection is considered capable of resolution by condition, what evidence demonstrates a reasonable prospect that an identified sustainable point of connection and the necessary downstream infrastructure will be available within the development timetable, notwithstanding the absence of an identified point of connection at the date of determination?
- (3) **Policy TR3 - sustainable location.** On what evidence does the Council conclude that this location would limit the need to travel, particularly by private car, and offer a genuine choice of transport modes, when the previous Inspector found accessibility by sustainable modes “marginal at best” and that the development “would involve much reliance on the private car,” and the Highway Authority now records that Pirton is not of a size to be self-contained? A withdrawal of the Highway Authority’s objection on network and safety grounds would not of itself answer this separate locational question.
- (4) **Making the location sustainable.** If reliance is placed upon proposed transport mitigation to satisfy TR3, how has the effectiveness, permanence and deliverability of that mitigation been established, including the five-year bus subsidy, the active travel connections the applicant has declined to provide, and the absence to date of the Connectivity Tool assessment required by TR3(2)?
- (5) **The 2019 appeal decision.** What material change in circumstances justifies a materially different conclusion from the Inspector’s site-specific findings on landscape character and sustainable accessibility, particularly when the present proposal, at 130 dwellings, is materially larger than the 99-dwelling scheme dismissed on appeal?

- (6) **The completed Elm Tree Farm development as the settlement edge.** How is any conclusion that completion of the adjoining development now makes this site an appropriate extension reconciled with the Inspector's express findings that the completed development "would form a new edge," that an important open aspect over this field would still be lost, and that its approval "does not establish a principle of continued incremental expansion to the east of the village"?
- (7) **The Council's own recent application of policy S5 at Hambridge Way.** How is a finding that the present proposal satisfies S5(1)(j)(i) reconciled with the Council's reasoning on application 25/02064/OP, where the infrastructure limb was found satisfied principally because no highways, flood, education, health or utility consultee objected, and the outstanding highways issue concerned the cost of the infrastructure rather than the capability to deliver it?
- (8) **Cumulative scale and infrastructure.** How has the Council satisfied itself that the combined effect of the 50 dwellings resolved for approval at Hambridge Way and the present 130 dwellings - up to 180 homes, approaching a 30 per cent increase against the Parish Council's housing-stock evidence - can be accommodated by Pirton's transport, wastewater, education, community and recreational infrastructure, addressed category by category rather than by generic reference to Section 106 contributions?
- (9) **Community and recreation provision.** In light of the Parish Council's evidence of a physical land-capacity constraint, and the direction of a substantial proportion of the Hambridge Way scheme's recreational mitigation to facilities outside Pirton, where and how would the additional recreational needs generated by a further 130 dwellings actually be met?
- (10) **Best and most versatile agricultural land.** What weight has been given under policy N2(1)(b) to the permanent loss of the entire 6.5-hectare agricultural site, all of which the applicant's own survey confirms to be Subgrade 3a best and most versatile land, and how has the policy direction to use poorer-quality land where possible been addressed?
- (11) **The development plan.** What weight has been given to the proposal's conflict with the adopted spatial strategy and the made Pirton Neighbourhood Development Plan, including the Inspector's interpretation of Policy PNP1 as securing an "incremental rate of change," and what material considerations justify departure from that strategy for a 130-dwelling unallocated countryside scheme?
- (12) **The planning balance and mitigation.** What weight has been given to each identified harm, and how has it been ensured, consistently with the Inspector's approach at paragraph 70, that measures required to mitigate the development's own impacts - including transport, education, recreation and foul water measures - are not counted a second time as free-standing benefits in favour of permission?
- (13) **Coopers Elms and construction access.** What assessment has been made of the consequences of converting Coopers Elms, an existing occupied residential cul-de-sac off Drovers Way, into the sole principal day-to-day vehicular access for a further 130 dwellings, including its consistency with the street hierarchy and place-making principles of the North Herts Design Code? Separately, on what evidence is it concluded under policy TR6(4) that the construction

traffic and HGV movements of a build programme of several years can acceptably pass through that occupied residential environment - particularly given the Highway Authority's recorded experience of significant impacts from recent construction in Pirton, and the outline plan's deferral of vehicle numbers and routings to reserved matters - and has the feasibility of a temporary construction access avoiding the occupied streets been assessed?

66. Those questions go to the central policy issues in the application. If the Council concludes that permission should nevertheless be granted, a reasoned answer to each would assist residents, Members and any subsequent decision-maker in understanding why a materially larger proposal is now considered acceptable notwithstanding the previous appeal findings and the present consultee evidence.

O. CONCLUSION, REQUESTS, AND DRAFT REASONS FOR REFUSAL

67. For the reasons set out above, the Council is invited to refuse planning permission. The Council is further respectfully invited to: (i) determine the application against the August 2026 Framework, with the officer report setting out the S3/S5 analysis expressly, as was done for application 25/02064/OP; (ii) complete the concordance adopted in the Written Updates on that application so that former paragraph 110 is carried forward to policy TR3, and require a Connectivity Tool assessment of the site before determination; (iii) obtain and publish an updated Article 22 response from the Highway Authority, including its assessment of the outline Construction Traffic Management Plan, before determination; (iv) ensure that the officer report engages with the findings of appeal decision APP/X1925/W/17/3184846 and, if any departure from them is proposed, identifies the changed circumstances relied upon; and (v) if, contrary to this representation, the Council were minded to grant permission notwithstanding the objection of the statutory sewerage undertaker, impose a condition preserving the substance of Anglian Water's safeguards - an identified sustainable point of connection, consultation with the undertaker, and no occupation until the necessary infrastructure is demonstrably available - and not the applicant's dilution of them. In the further alternative, if the Council is not presently minded to refuse, the application should not be determined until each of those matters is resolved - in particular, until Anglian Water has confirmed an identified sustainable point of connection, and until the cumulative infrastructure implications of the resolved Hambridge Way scheme, assessed together with this proposal, have been addressed.

68. The following draft reasons for refusal are offered to assist the Council. Construction-phase impacts under policy TR6(4) are deliberately folded into the third reason rather than advanced alone, since the Highway Authority's evidence presently establishes the need for determination-stage assessment rather than the refusal threshold itself; should the Highway Authority's assessment of the submitted Construction Traffic Management Plan prove adverse, a free-standing reason under TR6(4) would follow:

1. The application site lies outside the Pirton settlement boundary within the Rural Area Beyond the Green Belt, in a location which a Planning Inspector has found (APP/X1925/W/17/3184846) to read as part of the wider countryside rather than the village fringe and whose accessibility by sustainable modes is marginal at best. The proposal falls within none of the categories of development which policy S5(1) of the

National Planning Policy Framework (August 2026) supports outside settlements: in particular, it fails the requirement of policy S5(1)(j)(i) to be of a scale which can be accommodated taking into account the existing or proposed availability of infrastructure, and no exceptional circumstances sufficient to satisfy policy S5(4) have been demonstrated. The development would neither limit the need to travel by private car nor offer a genuine choice of transport modes, contrary to policy TR3 of the Framework, would cause significant and demonstrable harm to the character and appearance of the countryside which landscaping would not remove, and would result in the permanent loss of 6.5 hectares of Subgrade 3a best and most versatile agricultural land without evidence addressing whether poorer-quality land could be used where possible, contrary to policies N2(1)(a), N2(1)(b) and DP3 of the Framework, Policies SP1, SP2, SP5, CGB1 and NE2 of the North Hertfordshire Local Plan 2011–2031, and Policies PNP1 and PNP2 of the Pirton Neighbourhood Development Plan. The benefits of the development, including the provision of market and affordable housing, would be substantially outweighed by these adverse effects.

2. In the absence of an identified sustainable point of connection to the public foul sewerage network, and having regard to the maintained objection of Anglian Water as statutory sewerage undertaker - clear evidence that the separate regulatory regime does not of itself secure adequate capacity within the timescale of the development - the applicant has not demonstrated that adequate foul water capacity and a sustainable point of connection will be available within the development timetable, or that foul drainage can be provided without an unacceptable risk of pollution and deterioration of the receiving watercourse. The development is accordingly not of a scale which can be accommodated taking into account the existing or proposed availability of infrastructure, contrary to policies S5(1)(j)(i) and DM7 of the National Planning Policy Framework (August 2026) and Policies NE9 and NE10 of the North Hertfordshire Local Plan 2011–2031.

3. In the absence of the active travel connections and sustainable transport measures required by the Highway Authority, whose recommendation of refusal remains extant; of an outline Construction Traffic Management Plan assessed as satisfactory by the Highway Authority, notwithstanding the reported significant impacts of recent construction in Pirton upon the operation of the local highway network; of secured planning obligations necessary to make the development acceptable in planning terms; and of community and recreational infrastructure which, on the evidence of a physical land-capacity constraint within the village, has not been demonstrated to be capable of provision to serve it, it has not been demonstrated that the development would be served by, or is of a scale which can be accommodated taking into account, the necessary existing or proposed infrastructure. The proposal is thereby contrary to policies S5(1)(j)(i), TR3, TR6, HC3 and DM6 of the National Planning Policy Framework (August 2026) and Policies SP6, SP7, T1 and NE6 of the North Hertfordshire Local Plan 2011–2031.

69. This representation is made in my own name as a local resident, for the benefit of a village being asked to absorb development at a cumulative scale and rate which the evidence does not demonstrate its infrastructure can sustainably accommodate, and at the permanent cost of the

countryside character within which it sits. My earlier representations are maintained to the extent consistent herewith, and I would welcome the opportunity to address the Planning Control Committee should the application be reported for determination.

MICHAEL CAMPBELL

Local resident

12 September 2026

SCHEDULE OF PRINCIPAL DOCUMENTS CITED

- Appeal decision APP/X1925/W/17/3184846, Land off Holwell Road, Pirton (Inspector B. Lyons), 18 January 2019
- Decision notice, application 17/02563/1 (up to 85 dwellings), North Hertfordshire District Council, 15 December 2017
- National Planning Policy Framework, MHCLG, 17 August 2026 (including Annex A)
- Housing Delivery Test: 2025 measurement, MHCLG, 17 August 2026
- North Herts Council, Five-Year Housing Land Supply Update, November 2025
- Hertfordshire County Council (Highway Authority), consultation responses of 11 August 2025 and 4 February 2026
- North Herts Council Transport Policy Officer, comments of 30 June 2026
- Anglian Water, consultation responses including that of 24 August 2026, with enclosures (Counsel's Opinion; appeal decisions 3204432 and 3204434; South Oxfordshire DC committee report, Land North of Bayswater Brook, P22/S4618/O)
- Gladman Developments Ltd, Cover Letter, Design and Access Statement Addendum, Developable Area Parameter Plan (I000652 D_03-02 Rev B), letter in response to Anglian Water, and accompanying documents, 14 August 2026
- Land Research Associates, Agricultural Quality of Land East of Pirton, Report 1271/2, July 2026
- Natural England, Guide to Assessing Development Proposals on Agricultural Land, updated 24 July 2026
- North Herts Council, North Herts Design Code, adopted as a Supplementary Planning Document, June 2026
- Hertfordshire County Council (Lead Local Flood Authority), consultation response, 28 January 2026
- North Herts Council Ecologist, consultation response, 5 February 2026
- Hertfordshire County Council Historic Environment Advisor, consultation responses of 15 September 2025 and 10 September 2026
- Natural England, consultation response, 17 December 2025
- Pirton Parish Council, letters of 5 June 2026 and 20 July 2026
- North Herts Council, committee report, decision record and Written Updates, application 25/02064/OP (Land Adjacent to 10 Hambridge Way, Pirton), Planning Control Committee, 3 September 2026

- North Herts Council, committee report, application 25/02401/OP (Land South of Turnpike Lane, Ickleford)
- North Herts Council Housing Officer, memorandum of 30 July 2025
- CPRE Hertfordshire, objection of 3 September 2025