

FORMAL OBJECTION TO THE AUGUST 2026 ADDITIONS AND AMENDMENTS

Land East of Pirton – Outline Planning Application for up to 130 dwellings

To: North Hertfordshire Council – Planning Department

I wish to object to the August 2026 additions and amendments submitted in support of the proposed development of up to 130 dwellings on land east of Pirton.

I have considered in particular the applicant's **Design & Access Statement Addendum (August 2026)** and **Health Impact Assessment (June 2026)**. In my view, these documents do not overcome the substantive planning concerns associated with the proposal. Indeed, the amended material exposes a number of further concerns regarding the realism, deliverability and health implications of the development.

My objection is therefore not simply to the principle of development, but to the inadequacy of the amended material in demonstrating that a development of the proposed scale can be accommodated satisfactorily on this site.

1. The amended submission retains the full 130 dwellings despite reducing the developable area

The most significant change is that the applicant proposes to retain the full quantum of **up to 130 dwellings**, whilst reducing the developable area in order to increase open space.

The applicant acknowledges that this results in an increase in indicative density from approximately **32 dwellings per hectare to 34 dwellings per hectare**.

This should not be presented simply as an improvement.

The consequence is that the same number of houses is being concentrated into a smaller developable area. The apparent increase in open space therefore does not represent a reduction in the intensity of the proposed development. Instead, it places greater pressure on the remaining developable area and increases the importance of ensuring that the eventual Reserved Matters scheme genuinely reflects the illustrative layout.

That is particularly important because the applicant expressly states that the amended masterplan is **illustrative only and does not form part of the parameter plans for approval**.

There is therefore a fundamental disconnect between the attractive development shown in the illustrative material and what would actually be controlled if outline permission were granted.

The Council should not give substantial weight to an illustrative layout as evidence that the site can satisfactorily accommodate 130 dwellings unless the relevant design principles, density, distribution and spatial relationships are secured through the actual parameters of the permission.

2. The illustrative masterplan cannot be relied upon as evidence of the final development

The Addendum repeatedly describes the amended masterplan as illustrative.

It states that it demonstrates merely “**one potential way**” in which the site could be developed and confirms that it does not form part of the parameter plans for approval.

This is particularly concerning because many of the applicant's claims regarding good design, active frontages, pedestrian permeability, surveillance, street hierarchy and the relationship between development and open space depend upon the particular arrangement shown on that illustrative plan.

Those characteristics cannot safely be assumed to survive the Reserved Matters process.

The Council should therefore assess the proposal against the **maximum development envelope and the actual binding parameters**, rather than against the most favourable illustrative layout.

At present, the submission effectively asks the Council to conclude that 130 dwellings can be accommodated because an attractive illustrative scheme has been drawn, while simultaneously making clear that the drawing is not what will ultimately be approved.

That is not a sufficiently robust basis upon which to conclude that the development would constitute good design.

3. The increased density is a material concern

The increase from approximately 32 to 34 dwellings per hectare is not insignificant when considered alongside the retention of 130 dwellings.

The applicant describes this as reflecting officer feedback and design guidance.

However, the issue should not be whether 34 dwellings per hectare can theoretically be achieved somewhere on the site. The relevant question is whether that intensity is appropriate **at this particular settlement edge**, having regard to:

- the rural character of Pirton;
- the relationship with existing properties;
- the landscape setting;
- the site boundaries;
- highway and pedestrian constraints;
- the availability and accessibility of services;

- the capacity of existing community infrastructure; and
- the health and wellbeing of both existing and future residents.

A higher density concentrated into a smaller area may increase pressure on roads, parking, pedestrian routes, public open space and community infrastructure.

The Council should therefore require clear evidence that the increased density does not result in a cramped or urbanised form of development which conflicts with the character and setting of Pirton.

4. The access arrangements remain fundamentally constrained

The applicant's own Addendum contains particularly important evidence concerning access.

It rejects a potential north-western vehicular connection because of the **tight bend, restricted visibility, risk of rear-end collisions, insufficient spacing between junctions and potential driver confusion**. It also acknowledges that large delivery and refuse vehicles would need to swing into the opposing lane within a blind spot.

These are not minor matters.

They demonstrate that the surrounding highway network has significant physical constraints.

The applicant also rejects a pedestrian connection to Holwell Road because of the absence of footways, the inadequacy of existing connections, lack of dropped kerbs and tactile paving, and highway safety concerns associated with a potential bus stop near the bend.

The applicant's own evidence therefore demonstrates that the surrounding network cannot simply be assumed to provide a safe and convenient pedestrian environment.

This is directly relevant to the applicant's Health Impact Assessment, which relies heavily upon walking, cycling and access to services as justification for concluding that the development will have positive health effects.

There is a clear inconsistency here.

The applicant says that active travel will produce significant health benefits, yet its Design & Access Addendum acknowledges that certain potential pedestrian connections cannot safely be provided because of deficiencies in the existing highway and footway network.

The Council should therefore require a realistic assessment of the actual pedestrian routes available to future residents, rather than relying upon the theoretical existence of connections within the development itself.

5. The Health Impact Assessment is overly dependent upon assumptions which the amended submission does not secure

The Health Impact Assessment describes itself as a **“rapid desktop Health Impact Assessment”**.

It nevertheless concludes that the development would have predominantly positive health outcomes.

That conclusion should be treated with considerable caution.

The HIA itself identifies transport and connectivity, access to services, community cohesion, environmental quality and green infrastructure as important determinants of health.

Yet the assessment largely treats the existence of future walking routes, green space and access to facilities as sufficient to generate positive outcomes.

It does not adequately demonstrate that these benefits outweigh the consequences of adding up to 130 dwellings to a village whose services and transport connections are inherently limited compared with an urban settlement.

Most importantly, the HIA appears to assess the development as a largely self-contained proposition rather than properly examining the **additional demand placed upon existing facilities and infrastructure by approximately 312 additional residents**.

The applicant itself bases its open-space calculations on an estimated future population of 312 people.

That is a substantial increase in the population of a small village and should be assessed in terms of the capacity of existing services, healthcare, education, recreation, transport and community facilities.

6. The claimed health benefits should not be allowed to obscure adverse health effects

The HIA gives positive ratings to virtually every population group and concludes that the proposal would generate predominantly positive health outcomes.

However, this appears to create an imbalance in the assessment.

The assessment gives considerable weight to benefits which are inherent in almost any new residential development – such as modern housing, open space and opportunities for exercise – while giving much less weight to the potentially adverse consequences of locating 130 additional dwellings at this particular location.

The HIA itself recognises that health is influenced by transport, access to services, environmental quality, community cohesion and safety.

Those factors need to be assessed in the actual context of Pirton rather than simply treated as potential benefits of development in the abstract.

In particular, the Council should consider whether:

- increased traffic is likely to discourage walking and cycling;
- additional vehicles will increase noise and air pollution;
- increased traffic will affect perceived pedestrian safety;
- existing community facilities have sufficient capacity;
- additional demand on local healthcare and education can be accommodated;
- future residents will genuinely be able to undertake everyday journeys without relying upon private cars; and
- the development will place additional pressure on existing recreational facilities.

These are health matters, not merely highway or infrastructure matters.

7. The rejection of the northern pedestrian connection undermines the active-travel case

The Addendum expressly states that the northern pedestrian connection has not been included because of concerns regarding the existing footway network and highway safety.

The applicant instead relies upon connections through Coopers Elms and Drovers Way.

This effectively means that the success of the active-travel strategy depends upon future residents using the existing surrounding highway and footway network.

The HIA nevertheless identifies walking and cycling as one of the principal sources of health benefit.

There is therefore a need for a much more rigorous assessment of whether those routes are genuinely attractive, direct, safe and accessible for all users, particularly:

- children;
- older people;
- people with disabilities;
- visually impaired pedestrians;
- people with mobility impairments; and
- parents with young children.

This is particularly important because the HIA expressly claims positive effects for those groups.

It is not sufficient to identify an internal footpath network and assume that it will result in active travel.

8. Off-site play provision is not an adequate substitute for properly planned facilities within the development

The Addendum proposes to rely upon existing play infrastructure adjacent to the site and a larger sports and recreation facility further south.

Although the applicant states that this enables policy compliance, compliance with a numerical open-space standard is not necessarily equivalent to delivering a genuinely healthy living environment.

The applicant's own figures show that **equipped designated play areas are not provided on site**, but instead are to be provided off-site.

This is important because the HIA places particular emphasis upon children and young people.

If children's play provision is dependent upon facilities outside the development, the Council must be satisfied that those facilities are:

- safely accessible;
- within an appropriate walking distance;
- of sufficient capacity;
- capable of accommodating the additional population; and
- secured for long-term use.

The applicant should not receive full health and design credit for facilities which it is not actually providing within the development.

9. The open-space figures should not be allowed to disguise the intensity of development

The applicant emphasises that total open-space provision would amount to **84.5 m² per person**, compared with a requirement of 40.5 m² per person.

However, this headline figure requires careful interpretation.

Much of the additional provision is natural/semi-natural space and an orchard rather than conventional recreation and equipped play provision.

The Council should therefore assess the **function, accessibility, location and usability** of the open space rather than simply its total area.

An area of ecological buffer or landscape space cannot automatically perform the same recreational function as a children's play area, sports facility or accessible park.

Furthermore, increasing open space while retaining 130 dwellings necessarily results in a more concentrated built form elsewhere on the site.

The Council should therefore examine the spatial quality of the development rather than relying upon aggregate square-metre calculations.

10. The applicant's own documentation demonstrates that the proposal remains dependent upon future detail

The Addendum confirms that detailed lighting will only be developed at Reserved Matters stage.

Similarly, the applicant repeatedly states that detailed design will be dealt with at Reserved Matters.

This creates a fundamental issue for an outline application of this scale.

The more the applicant relies upon future decisions to establish whether the scheme will actually be attractive, safe, accessible and healthy, the less confidence the Council can have that the illustrative masterplan represents a realistic outcome.

The Council should therefore be particularly cautious about treating the illustrative masterplan as evidence of acceptability.

11. The applicant's conclusion of "policy compliance" is premature

The Addendum concludes that the amended proposals represent a coherent, design-led and policy-compliant approach.

That is the applicant's conclusion, rather than an established fact.

The Design Code Compliance Statement is largely a table identifying policies and stating that the proposal complies with them. It does not, by itself, demonstrate that the development will necessarily achieve the qualitative outcomes required by those policies.

For example, simply stating that streets will comply with street-tree, parking, junction-radius and movement requirements does not establish that the resulting development will be appropriate to this particular settlement edge.

The Council must make its own assessment against the Development Plan and other material considerations.

12. The HIA's conclusion is therefore insufficiently robust

The HIA concludes that the development will have a positive effect on health and wellbeing and that any adverse construction effects will be temporary and capable of mitigation.

That conclusion should not be accepted without a more critical examination of the underlying assumptions.

The HIA itself acknowledges that health is determined by the interaction of housing, transport, access to services, community cohesion, environmental quality and green space.

The proposed development creates a significant additional population and additional traffic at a location where the applicant's own Design & Access Addendum identifies shortcomings in the surrounding pedestrian and highway network.

Those matters cannot simply be treated as minor issues capable of being resolved by standard conditions.

13. Overall conclusion

The August 2026 amendments do not satisfactorily address the fundamental concerns arising from the proposal.

Instead, they:

1. retain the full **130 dwelling** quantum;
2. reduce the developable area and consequently increase indicative density from approximately **32 to 34 dwellings per hectare**;
3. rely heavily upon an illustrative masterplan which is expressly **not for approval**;
4. acknowledge significant constraints in the surrounding highway and pedestrian network;
5. reject a potential northern pedestrian connection because of identified safety and connectivity deficiencies;
6. rely upon existing off-site play facilities rather than providing equipped play provision on the site;
7. rely upon future Reserved Matters decisions to deliver many of the claimed design and health benefits; and
8. present an HIA which gives predominantly positive ratings without adequately demonstrating that the substantial increase in population and traffic can be accommodated without adverse health and wellbeing consequences.

The applicant's own documents therefore provide evidence that the site and its surrounding infrastructure are constrained.

In these circumstances, it is not sufficient for the applicant to demonstrate that an attractive development **could** potentially be achieved. The Council must be satisfied that the development **as controlled by the outline permission** can be delivered at the proposed scale without unacceptable consequences.

I therefore respectfully request that the Council **refuse the proposed amendments and/or the planning application** unless and until the applicant can demonstrate, through robust and site-specific evidence, that:

- the full quantum of 130 dwellings can genuinely be accommodated within appropriate and enforceable development parameters;
- the increased density will not result in an unacceptable form of development;
- safe and convenient pedestrian and cycling connections can actually be delivered;

- existing highway constraints can safely accommodate the additional traffic;
- local education, healthcare, recreation and community infrastructure has sufficient capacity;
- play provision is appropriately located and accessible;
- the claimed health benefits are supported by a genuinely site-specific assessment rather than assumptions about the benefits of residential development generally; and
- the final development can deliver the design quality claimed by the applicant within the parameters actually proposed for approval.

The Council should attach substantially greater weight to the **actual constraints and risks identified in the applicant's own supporting documents** than to the aspirational claims contained within the illustrative masterplan.

For these reasons, I consider that the August 2026 additions and amendments fail to demonstrate that the proposed development of up to 130 dwellings would constitute an appropriate, sustainable and healthy extension to Pirton.