

Naomi Reynard
North Hertfordshire District Council Office
Gernon Road
Letchworth Garden City
SG6 3JF

Registered Office:
Gladman House
Congleton Business Park
Alexandria Way
Congleton
Cheshire
United Kingdom
CW12 1LB

14 August 2026

Sent via email only to Naomi.Reynard@north-herts.gov.uk

Dear Naomi,

Land South East Of Holwell Road And North Of Hambridge Way, Pirton (25/01696/OP)

I write in respect of the above application following the feedback received from the NHC Project Team in response to the amended plans and Design and Access (DAS) Addendum submitted in April 2026. Gladman has engaged in a collaborative design process with NHC during the application through a Planning Performance Agreement and the documents were submitted and NHC officers provided an informal review and this response constitutes a final response from the applicant.

Status of Documents Submitted

We welcome NHDC project team's recognition of the positive evolution of the proposals and have sought to incorporate the comments set out in the written feedback within this formal submission of revised documents as discussed below.

The application is submitted in outline and the documents to be approved reflect this position. Accordingly at the end of this letter, we detail the documents that are sought for approval as part of this application (this includes documents submitted through this process and others submitted with the planning application at the time of validation).

As discussed below and agreed with North Herts Council (NHC) the Illustrative Masterplan (IM) is not a drawing for approval. The Council has previously emphasised the importance of avoiding confusion for members of the public through the re-submission of documents and has requested that all material is subject to a single, coordinated round of consultation. The IM has been altered in order to demonstrate how the Council's requests for site features can be included in the Site's design, but it must be stressed that this document is not for approval.

Considering this position and noting requests made in the response to include vehicle tracking for driveways on the IM, supplying such detail is misleading and may give rise to unnecessary confusion. This is given that permission is not sought on that layout and therefore detail of such as driveways has not been applied for.



www.gladman.co.uk



01260 544710



land@gladman.co.uk

As requested by the Council we have provided a parameters plan which is now submitted for approval. This plan reflects the request of the Council to consolidate the developable area proposed whilst the IM demonstrates that the 130 dwellings in accordance with the Council's preferred mix can be accommodated on-site and reflecting other considerations given in feedback and will inform subsequent Reserved Matter applications.

Overall Masterplanning and Design

As set out within the DAS Addendum, a Strategic Masterplan has not been prepared for the Site. However, the proposals have been informed by an iterative and collaborative design process undertaken with the Local Planning Authority, in accordance with the requirements of Policy SP9.

The IM has been amended to omit the proposed footpath associated with 'play on the way' (POTW) along the western boundary and relocate POTW features into an area of informal play to the east of the existing play area on the western side of the site. This amendment responds to the comments from the Council's Senior Ecologist and Landscape Consultant, who now recommend that no hardstanding surfaces are provided within the 12m buffer along the western boundary of the site. As illustrated in Figure 8 of the DAS Addendum, a vegetated drainage swale is proposed partly within the 12m ecological buffer. The section drawing demonstrates the relationship between the proposed swale and adjacent tree belt evidencing that the proposed SuDS infrastructure will contribute to the benefits of the ecological buffer in accordance with Policy NE4 of the Local Plan. The relocated POTW connects with the existing footpath within the Drovers Way development and is considered to be a more appropriate location. This would encourage residents to utilise the central street and dedicated active travel routes, rather than relying on the mown path within the western buffer.

As discussed above several of the comments provided are more aligned with a reserved matters submission where a detailed layout is submitted for determination. This includes, for example, the preparation of site-specific design principles, which would typically be established through a Design Code at reserved matters stage. In response, we have provided a Design Code Compliance Statement within the DAS Addendum to demonstrate how the amended Illustrative Masterplan responds to the recently adopted North Hertfordshire Design Code. Details such as building heights¹, bin storage and waste collection, and lighting design are matters of detail that will be suitably addressed as part of future reserved matter applications as discussed in the DAS Addendum.

Site Access

We have had regard to the comments expressing a preference for the main access to be taken from Drovers Way into the northwest corner of the site, as well as the provision of a pedestrian link to (new) bus stops on Holwell Road. These matters have been considered within the DAS Addendum; a vehicular access in this location would not be feasible principally for safety reasons. Further with reference to the feedback from the Senior Transport Policy Officer, the applicant cannot reasonably rely on the delivery of a Section 38 highway adoption process which has neither been agreed nor implemented, and over which the applicant has no direct control. Given that formal adoption has not yet taken place, the applicant considers that amending the highways boundary plan within the DAS addendum at this stage would be premature and could create unnecessary confusion.

¹ Maximum building heights can be secured by condition.

It is therefore considered that the access via Coopers Elm remains the most appropriate solution and the applicant notes that the Local Highway Authority (LHA) raises no objection in respect of this access (and for which pre-application advice was sought). Having considered the request for an active travel link to the north, the proposals have been revised to include show where a pedestrian footpath to the north-west corner of the site can be located (as shown on the illustrative masterplan). This approach would allow for the continuation of the footway in the event that additional land is adopted by the Council in the future.

Following informal feedback from NHC Officers in relation to the Access Parameter Plan (ref: I000652 D_03 – 03 Rev B), the submitted Access Parameter Plan has been amended to remove the potential locations of active travel access points. Consequently, it is not proposed as a drawing for approval, nor submitted separately, as the information shown is also provided on the Access Drawing. Potential locations of active travel access points are, however, shown for illustrative purposes within the Access Parameter Plan and Illustrative Masterplan included in the DAS Addendum. **Section 106 Agreement**

Gladman is willing to enter into a Section 106 Agreement to agree obligations which, are necessary, directly related to the development and fairly related in scale and kind to the development. Specifically, Gladman is willing to make appropriate contributions to mitigate the impacts of the proposed development, in response to the Local Highway Authority's consultation response dated 4th February 2026.

On the basis of the information provided by Hertfordshire County Council's Growth and Infrastructure Unit², Gladman would like to request further information in relation to the primary and secondary education contributions to ensure they meet the requirements of the CIL Regulations. Evidence available through the Department for Education's Get Information About Schools database indicates that there is currently capacity for 39 primary school pupils at Pirton Primary School³ and 79 secondary school places available at The Priory School⁴. These schools would therefore appear capable of accommodating at least a proportion of the pupils arising from the proposed development. In this context, it is unclear how the requested contributions have been calculated, the extent of any forecast pupil yield associated with the development, and whether the available capacity within local schools has been appropriately taken into account. Gladman therefore requests further details regarding the methodology used to calculate the contributions, together with details of local school capacity and any identified shortfall, in order to demonstrate that the obligations sought meet the statutory tests in CIL Regulation 122.

Agricultural Land

As requested by the Council, the submission includes a Soils and Agricultural Land Quality Report prepared by Land Research Associates Ltd. The report identifies that the site comprises Subgrade 3a agricultural land, which falls within the lower end of the Best and Most Versatile (BMV) classification. While the loss of BMV land is a material consideration in the planning balance, the extent of loss in this instance is relatively modest and should be considered in the context of the identified need for housing in North Hertfordshire. The applicant's view is that when weighed against the pressing and well-documented need to deliver housing within North

² Growth & Infrastructure Unit Consultee Response dated 12th August 2025

³ [Pirton School - GOV.UK](#)

⁴ [The Priory School - GOV.UK](#)

Hertfordshire, the modest loss of lower-grade BMV land should only be afforded limited weight in the planning balance and should not act as a constraint to sustainable development in this location.

Energy and Sustainability

As requested by the Council, the submission includes an Energy Statement, a Sustainability Statement, and a Sustainability Checklist (Appendix A of the Sustainability Statement), all prepared by Thomas Owen (OCDEA ref: EES/021896) of Daedalus Environmental Ltd, a certified assessor, in accordance with the requirements of the Sustainability SPD.

Anglian Water

A letter, prepared by Gladman and dated 14th August 2026, is formally submitted in response to Anglian Water's consultation response dated 13th January 2026.

Outline Construction Traffic Management Plan (CTMP)

An outline CTMP has been prepared by Icen Projects. Construction routes to the Site have been identified in this document. Full detail of construction vehicles and routings will be provided at Reserved Matters stage within a detailed CTMP secured by condition.

The applicant notes that NHC has advised that pre-application advice should be sought from the LHA in relation to the outline CTMP. However, having already sought and received pre-application advice from the LHA prior to the submission of the planning application, the applicant does not consider that a further pre-application process is necessary. Accordingly, this outline CTMP should be consulted on as submitted.

Addendum to the Statement of Community Involvement (SCI)

The submission includes an Addendum to the Statement of Community Involvement (SCI) prepared by Build There, a specialist community engagement partner committed to enhancing the quality, accessibility, and representativeness of public participation in the planning process. Build There undertook an additional programme of public consultation using accessible, digital-first engagement methods to reach new audiences and broaden participation. This included advertising across Facebook and Instagram, focused on residents within a 10-mile radius of Pirton. The engagement identified housing affordability, opportunities for younger generations, and the provision of homes for local people as key priorities, reflecting wider concerns about access to housing in rural communities. The proposals include 40% affordable housing to help address these challenges.

Public Health

The Health Impact Assessment has been revised in line with the comments received from the Public Health Officer and is submitted for re-consultation.

Summary

Accordingly, in response to the workshop meeting held on 10th March 2026 and feedback provided by the Council this formal submission comprises the following documents for approval:

- Location Plan (Drawing ref: I000652-DL00) (previously submitted)
- Access Drawing (Drawing ref: I000653-01-Rev A) (previously submitted)
- Developable Area Parameter Plan (Drawing ref: I000652 D_03 –02)

The following documents are also formally submitted providing detail that will be secured by condition, inform Reserved Matter applications and/or are response to NHC consultee comments:

- Design and Access Statement Addendum (standard and low-resolution version) including the Illustrative Masterplan
- Health Impact Assessment
- Response letter to Anglian Water
- Outline Construction Traffic Management Plan
- Statement of Community Involvement Addendum
- Energy Statement
- Sustainability Statement
- Soils and Agricultural Land Quality Report

The applicant is grateful for the feedback provided by the Council and has sought, where feasible, to incorporate it within the revised submission documents. It is therefore respectfully submitted that the application should now be determined by the Council on the basis of the materials before them.

Yours Sincerely,

Victoria Betts

Email: v.betts@gladman.co.uk