

Pirton Parish Council

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Naomi Reynard,  
Senior Planning Officer,  
NHDC,  
Gernon Road  
Letchworth Garden City  
15 January 2026

Dear Ms Reynard,

**Re: 25/01696/OP Land South East Of Holwell Road And North Of Hambridge Way, Pirton, Hertfordshire**

We write in response to the further consultation on this application, after the applicant's submission of additional/amended documentation.

We confirm all matters in our original response of August 2025.

## **Sustainable Travel**

The concept of sustainable travel is laudable and fully supported by the PPC. Unfortunately, the reality of the situation is that Pirton, because of its location and internal and external road structure, is severely limited in the attainment of government goals for increased walking, cycling and the use of public transport as an alternative to the use of cars.

The applicants have submitted a Transport Connectivity Study (the Study) which we believe attempts to address issues prompted by the response issued by HCC Highways to the development proposal. Clearly, HCC has significant concerns that the proposal does not accord with local and government sustainable travel policy. Indeed, so much so that they stated at this stage that:

**"Notice is given under article 22 of the Town and Country Planning (Development Management Procedure) (England) Order 2015 that Hertfordshire County Council as Highway Authority recommends that permission be refused as it is currently contrary to HCC LTP Policy 1, Policy 2, Policy 4, Policy 5 and NPPF Paras 109,115 117, 118"**

In our view, if the Study constitutes proposals to rectify such a substantial deviation from HCC LTP Policy and the NPPF, then it fails. We cannot see that it provides sufficient detail as a response, nor does it seem to make significant changes to that which was originally proposed. However, that is, of course for HCC to assess and address but we echo the concerns and issues raised.

In the PPC response, we will focus on our knowledge on the local area. Addressing site specifics, there are, in theory, two exits to the proposed development. One is via the Drovers Way exit and the other via the Hambridge Way exit. We would discourage the use of the Drovers Way exit for safety reasons. It would require walking or cycling past the row of terraced houses known as the "Twelve Apostles" which open directly onto the Holwell Road and have a line of refuse bins directly outside these houses as well as residents' cars (there is no provision for off-street parking). This severely restricts traffic to a single carriageway such that the 89 bus and larger vehicles often have difficulties in navigating that stretch of road. This is implicitly recognised in the Transport Connectivity Study (the Study), which only shows walking routes using Hambridge Way (please see Section 4). De facto, this means that for walking and cycling purposes there is only one plausible and safe route to access Pirton. External to the village there are two roads by which Hitchin can be accessed. One is the Pirton Road (Route 1) and the other the Holwell Road (Route 2).

Route 1 has no pavements along its length nor cycle lanes. Walking or cycling must be done on the road, which is relatively narrow with no space to safely overtake if there are oncoming vehicles. Prior to entering Hitchin there is a long steep hill where it is impossible to pass cyclists and this means traffic has to slow to a crawl on a busy road. It is for this reason that cyclists who know the situation avoid this route. When cyclists find themselves on this route it creates a severe tailback of cars.

Route 2 has similar problems. There are no pavements until Holwell Village and a series of blind bends just before reaching Holwell - the dangers of which are compounded, once again, by a steep hill where safe overtaking of cyclists and pedestrians is an issue of concern. It is, therefore, unsurprising that the Study only mentions short to medium journeys for walking and cycling within the village, which we will now address. Longer journeys to Hitchin and beyond are not practical via the road network.

Many of the points/facts stated below are contained in the Justification and Evidence in the Piton Neighbourhood Plan (PNP) for PNP 11 and PNP 12.

#### Walking

The Study recognises that Hambridge Way will be used. It states in Section 6 that "the two routes which are likely to be chosen are via the neighbouring site and along Hambridge Way". Hambridge Way is not a made-up road and has no pavements and its surface is, in places, uneven and often muddy. It is also unlit, which means that it is unsuitable for use at night or late winter afternoons. It has vehicles using the route for residential properties, including the development at Elm Tree Farm. As a result, it is unsuitable for pedestrians in the dark and its surface is less than ideal for those with mobility issues and totally impractical for those with more severe disabilities. This means that Village Pubs, the Recreation Ground Pavillion and the Village Hall, where activities are often in the evening, are not being served adequately for pedestrian access.

It is therefore contrary to both PNP 11.1. and 11.2. in addition to HCC and NPPF policies. It also should be noted that the proposed development is on the outermost periphery of the village. Highways' response to the application rightly required additional information to be further supplied to justify claims that walking to village amenities was practical. It noted, for example, that the village primary school was approximately 1km from the proposed development. The PPC has recently been asked by the school to consider ways of ameliorating traffic congestion (often blocking the road) at pick-up and drop-off times. If current residents on the new developments that have been built (which are closer) act in this manner, then it is self-evident that the proposed walking route will not be successful and children will continue to be picked up by cars. Children would have to cross the road system four times and at primary school age it is doubtful that they would be unaccompanied on a 1km walk of this nature.

#### Cycling

As previously stated, there is little or no cycling (other than cycling groups) that uses the road system outside the village, due to the nature and topography of the available roads. Within the village, cyclists have to contend with roads, including the High Street, where there is effectively a single carriageway due to parked cars. The situation is compounded by "spill-over" parking at the entrance to Hambridge Way due to the parking situation in the village. The Study implies that secure bicycle storage would for the post office (as an example) encourage greater use. The reality is that the post office has parked cars outside (users of the post office and the terraced houses) and a narrow pavement. Useable space is not available at the Post Office. We doubt that cyclists from the new development would ride to the post office and then use secure parking some distance away. If the developers have concrete proposals to put forward and are prepared to fund them then we would welcome their input.

As for the school, we would not expect primary school children to use a route with no cycle lanes and which necessitate negotiating a narrow road with parked cars. Where provided, the narrow pavements are also unsuitable for mixed pedestrian/cycle use. In short, we feel that the applicant's contentions on sustainable travel are wholly unconvincing. If existing developments are not cycling or walking, then we doubt that this further development on the outermost periphery of the village will diminish the use of cars. Unfortunately for all concerned, the substantial increase in the village's size (mostly in the last 10 years and approaching 30%) has not been matched with improvements in the road network or other infrastructure both inside and

out with the village. As a result, car usage has increased, and continues to do so, with resultant on-road parking. Herts County Council has recognised this and has instituted a 20 mile speed limit in the village to protect residents - but the problem remains and the new development would exacerbate it further.

If cycling and walking is not a viable option to destinations outside the village, the only possible mitigation would be public transport. Pirton is poorly served with bus services (the 89 bus service) and has been for many years. It has one formal bus stop (with a bus shelter) at the Motte and Bailey public house, which according to the developer's submission is 1130 metres from the proposed development. The next plausible stop is at the Fox Public House (850 metres). Although the Post Office is mentioned (780 metres) it is not possible to stop there for the reasons stated above (i.e. parked cars).

The 89 bus is not stated by the operators as being a "hail and ride system" but we acknowledge that, in practice, they will stop to pick up passengers if road conditions permit. It is, therefore, possible that buses would stop in Royal Oak Lane as well as the two public houses. We do not have the developer's figures for this option but extrapolating from the above, we estimate it to be at least 600 metres. We question whether this is a truly viable option, bearing in mind the distance involved and the use of Hambridge Way. In addition, it should be noted that Royal Oak Lane has no pavements and users would have to queue on the road. There is no signage.

We understand that consideration is to be given to a more frequent bus service (of which we have no details or firm commitments) which we would welcome as it is currently poorly used, mainly by those who do not have cars or who no longer drive. However, we do not believe that residents from the new development will use an informal bus stop at least 600 metres from the development when there is no signage, shelter or pavement and passengers must queue in the road. It should also be noted that services direct to Hitchin Railway Station for onward commuting are even more infrequent and a change in Hitchin would be necessitated. The inevitable conclusion is that residents of the new development will use cars for journeys within and without the village rather than alternative transport methods. This will make life even more difficult for the community and further increase congestion and parking issues.

### **Ecology and Biodiversity**

We have read the reports filed with interest. We have also re-visited the NH Ecologist's Report. Knowing this area very well, we are of the view that the amended reports, whilst attempting to address the voids in information identified by the NH Ecologist in her report, continues to underplay the amount and significance of the biodiversity of not only the site itself, but its surroundings. The hedge line along the Hambridge Way is one of the most intensively used by a wide variety of birds in all seasons, not least because of its access to other woodland, scrubland, and crop fields. The Ecology report would have us believe that crop fields are of little value to birds/insects/mammals. The opposite is the case; many of our native and visiting species rely on eating lush new crops, and nesting therein. Barn owls patrol the hedge line, something they will not do when 130 dwellings with c.400 people living in them are built, if, indeed, they survive the building process.

Great emphasis is placed upon the improvement "garden space" is above an agricultural crop field. Whilst it is true that across the UK gardens provide a haven for wildlife, not all gardens are equal. It is folly to assume that all, even most, householders will not build patios, extensions, use herbicide, pesticides etc. Many will. It is therefore unlikely, indeed, that the site, because of the garden element, will be more biodiverse than is currently the case.

We have read the proposals for hedge-line improvement. Most welcome, should it ever materialise. We refer to our earlier comments regarding the amount of hedge line that will be lost to the proposed access road. However, we seriously doubt that it will be possible to make any other meaningful improvements, given the very limited "open space" proposed on the site. Most of it (as we have previously pointed out) is taken up with attenuation ponds and swales. Where are all the woodpiles etc. to go? Will any space remain for the narrow track around the site for people to walk on? There is certainly no room for play.

It is also hard to accept the comment that the development as proposed will have "no significant effect" on the bat population. No matter the detailed lighting plan (should there ever be one.) The reality is, that if the developer seeks to have the site road(s) adopted by HCC Highways,

there will be no option but to have in place the regular tall, bright street lighting illustrated in the DAS. We were promised low level lighting for Comice Meadows. This did not happen as Cala Homes sought to have Drovers Way, the main estate road, adopted by HCC Highways. The bat population that currently uses the field and hedgerows to forage for insects will be, at the very least, displaced.

Finally, we make the following comments on two of the photographs at appendix. Photo 2 is entitled "neutral grassland filled margin." Actually, this is meant to be a planted hedgerow /tree line, although, due to neglect, the hedge (planted as small twigs, and initially cut down in the first year by mistake) has been left to go wild. The photograph 4 entitled "defunct hedgerow with ditch H6 along southern boundary" is hardly defunct as it contains a number of species and is well used by birds etc.; however, proposals for improvement are welcome.

#### Flood Risk

We have carefully considered the several documents relating to this issue. We have also considered paragraphs 181 and 182 of the National Planning Policy Framework. We have to say immediately that we are not at all clear about what the myriad of photographs of the ditches and hedges along the field/Hambridge Way to the water course are meant to demonstrate. We know that those along Hambridge Way and on to the Oughton are overgrown, and harbour wildlife as well as providing food and shelter for birds, small mammals, and reptiles. There is no information provided about the effect of these ditches taking overflow surface water from this site on these habitats.

Nor is ownership mentioned. The owner of the ditches proposed as a solution to the developer's problem is not, in fact, for the most part, the developer. It is a combination of the landowners whose fields are next to the ditch, and in this case, we believe Hertfordshire County Council. The proposals are unacceptable as they place a considerable burden on landowners and others who will not in any way benefit from the development.

Part of the burden of responsibility lies in relation to the wildlife living in and around the watercourses. There is no information on this issue and on how any wildlife will be affected. There is insufficient information to do anything other than refuse permission on this basis. The Executive Summary to the CTA Flood Risk Assessment says this: "In-situ soakaway tests have demonstrated insufficient soil permeability for point-load soakaways. Shallow groundwater was encountered which limits the use of permeable surfacing with direct infiltration. Attenuated discharges to the existing ditch watercourse will be required with flows limited to greenfield runoff rates."

The greenfield run off rates do not take into account how very wet this greenfield site would be if it were not for the field drains installed in recent years and which will be removed to make way for the development. Historically, this area was very wet indeed, with much lying water in marsh conditions. The report has not taken this into account.

On the other hand, the Gladman response to the Lead Local Flood Authority says "The methodology for calculating runoff from green open space into the SuDS scheme was agreed with the LLFA officers during the meeting on 16 October 2025. The site surface soils are freely draining with a soil factor of 0.1. Therefore, a runoff coefficient of 15% was agreed." Clearly, they are not freely draining, if the CTA Flood Risk Assessment is to be believed. This conflict requires clarification and a further report.

Furthermore, the admission that shallow groundwater was encountered not only confirms this history of very wet land but also raises concerns about on-going surface water issues when householders seek to further develop their properties while attempting to use permeable concreting solutions, or not being able to do so. The site remains unsuitable.

We are very mindful of the problems of flooding in Walnut Tree Road after the completion of the construction of 10 houses (now Cotman End) where the answer to run-off issues is to run surface water into a holding tank and then release it into the ditch/watercourse that runs along Walnut Tree Road. From this water course the water should flow under the road and eventually into a ditch on one side of the recreation ground and eventually to Oughton Head. The road has consistently flooded, damaging not only the road surface but the walls and gates of neighbouring properties. It has involved the Parish Council, in an effort to address the flooding

issue, (note, not the developer) spending ratepayers' money to dig out part of the ditch to attempt to move the water along. This should not be repeated for a development more than ten times the size of that at Cotman End.

We also note that the updated reports do not deal with Anglian Water's objection that the Pirton Foul Water system cannot cope with 130 more dwellings. It merely repeats that foul drainage will be pumped to the existing sewer network in Drovers Way.

The site is not sustainable for housing development due to its potential for flooding (not fully addressed by Gladman); the effect of diverting excess surface water into ditches and water courses not owned by the developer, which means no control over the effectiveness of the ditches *etc.* to take this extra water; and no solution to the problems of the foul drainage system.

#### Conclusion

The additional and amended documentation, whilst by their filing with NHDC mark an attempt in compliance with the NPPF and Local Plan to produce such reports, contains nothing that will give assurance that this site is sustainable for development.

Yours sincerely,



Jill Rogers,  
Chairman