

Pirton Parish Council

Parish Clerk:
Dr Janine Budd
Pirton Pavilion, Walnut Tree Road, Pirton SG5 3PX
Tel: 07503155747
Email clerk@pirtonparishcouncil.gov.uk



Naomi Reynard
Planning and Development
NHDC
Letchworth Garden City.
20 September 2026

Dear Ms Reynard,

Re: 25/01696/OP Land East of Drovers Way, Pirton.

We write in response to the third consultation following the submission of amended plans and documents. We maintain our objections in relation to earlier consultations. We do not think that the revised 2026 NPPF or NHDC Design Code 2026 make any material difference to the points made previously. The current Local Development Plan policies, and those of the Pirton Neighbourhood Plan nonetheless carry weight in accordance with their meeting NPPF 2026 policies.

The many adverse effects of this proposed development substantially outweigh any benefits of the proposal.

- **Outside of the Pirton Development Boundary/Unsustainable Development**

- We are familiar with S5 of the 2026 NPPF. We do not accept that the proposed development is “physically well related to an existing settlement” (S5 (j) (i)) except that it is accessed through a very minor side road off another development, Comice Meadows, and shares one boundary with that development. The design as shown in the illustrative masterplan bears no relationship to the design of Comice Meadows, which had made an attempt to incorporate street design features of Pirton village - curved roads, cul de sacs, scattered greens etc. None of this is demonstrated in the “masterplan”. This proposal merely “tags on” 130 dwellings to the edge of Comice Meadows. The Design Code is clear that a development must deliver buildings with a

clear sense of character and identity, shaped by a rigorous understanding of the site, its landscape setting and the distinctive qualities of the surrounding area. Looking at the “masterplan” it is clear that this application fails this Design Code test.

- Nor is it of a scale that can be accommodated into the existing or proposed availability of infrastructure. We acknowledge the proposed Sec 106 funds for an improved bus service, (funding only for 5 years, what it will purchase in terms of improvements to persuade people to use the bus, unknown) and for some village highways improvements, to encourage walking into the village, but fundamentally the influx of nearly 400 people in 130 new dwellings, particularly following the recent approval for 50 homes on a neighbouring site making total of 180 dwellings and c. 580 people, is totally unsustainable. Hitchin will remain the key draw for education, medical needs, shopping, and leisure. The roads leading to Hitchin are narrow and winding. We note that the applicant is arguing against Sec 106 funding for the village school and secondary school places.
- To give this Pirton’s context: The Applicant relies on Census 2021 information, for example, for calculating vehicle trip numbers (only at commuting times). This is completely outdated and again demonstrates that this proposed development is unsustainable as there have been virtually no improvements in capacity to village facilities save for the new Pirton Pavilion (itself kick-started by Sec, 106 funding, but primarily built by the PPC taking out a very substantial loan over 30 years, valuable donations from the residents of Pirton, and with grants from the Football Foundation and the NHDC).
- By 2018 when the Pirton Neighbourhood Plan was adopted, the village had c. 520 dwellings for 1300 people. By the 2021 census the village had grown to 577 dwellings and 1452 residents. Since then, with the completion of developments identified in the Neighbourhood Plan, and with some additional in-filling, there are 648 dwellings. On these figures we see an increase in housing of almost 30 percent. The additional permission for up to 50 houses is a further 10% since 2011; 130 dwelling would add more than another 20 percent.
- Furthermore, at today’s date neither Anglian Water nor the Highways authority have lifted their objections on infrastructure grounds.
- We have considered HO7 of the 2026 NPPF which leads out of S5. However, given that the masterplan is not a masterplan at all, containing as it does a minimum of information, and no evidence is presented as to how it complies with the NHDC Design Code beyond using Design Code terms to label some streets, there is a need to consider the impact of c 400 people on the infrastructure of Pirton and surrounds. This is not addressed at all in the Applicant’s proposals.

2. Making Efficient Use of Land

- NPPF policy L3 calls for “the efficient use of land”. This has to be seen in the context of the plot’s relationship with its immediate neighbour Comice Meadows, with its village, Pirton, and its place in the countryside.
- The average density for Pirton is c.18 dwellings per hectare (dph). Comice Meadows is under 20 dph. Other new developments respect Pirton’s historic density – Cotman End at under 20 dph, the Pryors 13 dph. The density of the housing development area on this plot is 34dph – only 1 dwelling per hectare lower than the Government’s recommended minimum for urban development next to busy railway stations in towns and cities. This is because the applicant has chosen to put all of the housing at one end of the site, instead of utilising the whole site, interspersing housing with a variety of green spaces. This approach is likely to mean fewer dwellings, of course, but would better mirror Comice Meadows. It is not “making efficient use of land” in the context of Pirton, and on land leading out in to the countryside.

3. Sustainable Travel.

- The Amended Design and Access Statement relies on a possible “hail and ride” bus stop on Holwell Road just before a significant blind bend in the road, outside of the Comice Meadows estate. Below is a photograph, rather more illustrative of the suggested place for a bus-stop than that within the Gladman documentation, with cars parked half on the pavement, showing the narrowness of the road, and beyond it, the 12 Apostles Cottages, where cars are parked all day and night. We very much doubt that the touted improvements to the bus service will (a) materialise any time soon, and (b) make sufficient difference in service levels to make this a sustainable form of transport for Pirton. In any event, in 2019 APP/X1925/W/17/3184846 the Planning Inspector when considering an appeal against the refusal of 99 dwellings on this plot found that accessibility by sustainable modes of travel to be “marginal” at best, and heavy reliance on private cars will continue. The Highways Authority 2026 evidence now states that Pirton is not of sufficient size to be self-contained; see NPPF TR3. Also, we see no evidence that the Applicant has used the Government’s Connectivity Tool; see NPPF TR3(2). The Sec 106 proposals do address some improvements (unknown) to the local footpaths and bridleways to encourage more walking and particularly cycling, especially into Hitchin, but we argue that simply improving surfaces is not sufficient to move people away from car use for shopping, appointments, work etc. or can genuinely be made so. Any suggestion of lighting for these rights of way will be fiercely opposed on the grounds of significant damage to the ecology and biodiversity that the rights of way harbour. TR 3 requires

development generating significant movement to be located where it is sustainable or can be made sustainable. Given the rural location of Pirton, the difficulties with public transport, the rose-tinted spectacles reliance on walking and cycling, it is doubtful that this location meets the TR3 test.

- We remain very concerned at the single accessway into a development of 130 dwellings. The first access road, Drovers Way, was designed for 77 dwellings. It is not without its problems as set out in earlier responses. There are no plans for a second access, or an emergency access directly off the site. What will happen in an emergency if Coopers Elms or its extension is blocked? As one respondent has put it, “the road network around Pirton is challenging”. There is no Road Safety Audit to guide a decision on access; this should be undertaken before any decision can be made. We refer to NPPF policy TR4 (4) which makes it clear that development proposals should be refused if there would be an unacceptable impact on Highway Safety. The Highways Authority has still not given approval, nor assessed the draft Construction Management Plan. The adverse impact on the residential amenity of residents of Drovers Way and particularly Coopers Elms is a material consideration.

4. Green Space. /Recreational Facilities

- The Applicant appears to have tried to address the need for Green Space to meet the NHDC design code. This has resulted in the overcrowding of the housing area. There is no attempt to analyse properly the need for community facilities and public service infrastructure contrary to NPPF HC3. The applicant continues to rely on access to play equipment in Comice Meadows, such play area and equipment being private and funded by the residents of Comice Meadows. It is very small, designed for children from 77 dwellings, not 200 dwellings. Alternative provision is on the Pirton Recreation Ground play area which is already too small for current residents' children. (see above). We have previously written that the Parish Council has no land on which to meet any further demand over and above our Sec.106 requests. This demonstrates that this site cannot accommodate 130 dwellings. More facilities are required on site, to include play equipment.
- The same applies to sports facilities which are already overstretched as a combined result of housing expansion in the last 5 years, and taking into account the outline permission granted for up to 50 dwellings on land next to the Recreation Ground, and a welcome increased interest in sport amongst all age groups. A new sports pitch to relieve the burden on the Recreation Ground pitches is required, and can only be accommodated on this site. The Applicant has made no serious enquiries as to the impact of 130 dwellings and up to 400 people on any of the facilities – Village Hall, Recreation Ground, Sports Pitches and Courts, Village Shop. In any event, much of the

proposed Green Space is taken up with SUDS ponds and swales, and as such are not useable spaces for residents.

- We attach as an addendum a document from the Pirton Sports and Social Club, as occupiers and managers of the Recreation Ground which sets out their informed views of the limitations of the Recreation Ground and the need for further capacity.
- We know, of course, that the recent decision to grant outline planning permission for 50 dwellings on land next to the recreation ground has relied on Sec 106 funds for sport being used in Hitchin and Ickleford. This is a direct incentive for individuals and parents of children and young people to use their cars to access these facilities, undermining, once again, the idea of sustainability if a further 130 families are to be reliant on off-village provision.

5. NPPF DM1 Community Involvement

- This has been minimal, some leaflets, and an “online” questionnaire of little direct use to Pirton. There has been no attempt to present to the Parish Council or community, or to learn from feedback.

6. Health Impact

- Unfortunately, the Health Impact Assessment very much minimises the impact on the health and safety of current residents of Drovers Way and Coopers Elms who will be severely impacted by construction traffic over more than 3 years, and then by vastly increased traffic, not only private vehicles belonging to residents, but of their visitors, or delivery vehicles, of waste lorries etc. The Health Impact Assessment sees this development as very much a contained neighbourhood, which supports our argument that this development as presented is contrary to both the 2026 NPPF and the Design Code; see above. That there is no separate access for construction vehicles during a long construction phase may well be contrary to NPPF policy TR4(4). The adverse impact on the residential amenity of residents of Drovers Way and particularly Coopers Elms is a material consideration.

7. Agricultural land v. Housing development.

- The soil survey confirms that the whole site is Subgrade 3a “best and most versatile agricultural land. The 2026 NPPF recognises the need to protect such land from development whenever possible: NPPF Policy N2(1) (b).

8. Contrary to Character and Setting of Pirton in the Landscape

- The 2026 NPPF expressly seeks to limit development away from settlements to safeguard the intrinsic character and beauty of the countryside. We refer again to the 2019 Appeal, and the Inspector’s landscape findings. This site

was found as a fact to form part of the wider countryside, with the development constituting a very marked incursion with planting not fully mitigating the resulting change in character (see NPPF N2 and DP3; together with Local Plan policies SP5, CGB1 and Neighbourhood Plan PNP2). The Inspector found that the site's character is of the wider landscape, not the village fringe; that the whole 6.5 hectares constitutes development for character purposes; its green margins not being part of the countryside. He found harm to users of Hambridge Way and the wider footpath network including elevated views from within the Chilterns AONB. Policy N4(4) requires development within the setting of a Protected Landscape to be sensitively located and designed to minimise or avoid impacts upon it.

9. Draft Construction Management Plan.

We have grave concerns about the safety and adverse effects on residential amenity under this very minimalist draft plan. We see nothing in it that is not pretty much standard practice, including hours of working, in a context of all construction traffic on and off the site passing along Coopers Elms. The adverse effect on residential amenity will be substantial. Contrary to the claim in the Plan, Holwell Road is not two way for all of its length – where it meets Waterloo Lane it is single track; and is normally single track by virtue of parked cars by “the 12 Apostles” terraces. Indeed, for much of their length both West Lane and Shillington Road in Pirton are single track for the same reason. Cars are parked outside of the Comice Meadows estate on Holwell Road and utilise the pavement for parking in order to feel safe from traffic negotiating the narrow road. Furthermore, the draft plan does not meet the demands of the Highways Authority in their letter published on 4/02/2026.

In short, the many adverse impacts of development on this site, particularly of up to 130 dwellings, outweighs the benefit of new housing, including affordable housing.

Yours sincerely,

Jill Rogers

Chairman, Pirton Parish Council.

Attachments:

1. Pirton Recreation Ground and Pavilion Sport and Leisure Investment Strategy, compiled by the Pirton Sports and Social Club
2. Pirton Sports and Social Club comments the Applications sport provision
3. Photograph taken 19/09/2026 of Holwell Road proposed bus stop site.



