



Pirton Sports and Social Club Ltd.

www.pirtonssc.co.uk

Please reply to:

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Planning Dept.
North Herts District Council
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2nd September 2026

Ref: 25/02064/OP Land Adjacent to 10 Hambridge Way, Pirton
Objection to Outline Planning for residential development on unallocated greenfield land

URGENT: Formal Response to Officer's Report & Late Representations
Submitted on behalf of: Pirton Sports and Social Club Ltd. (PSSC)

Dear Sirs,

I am writing on behalf of the Pirton Sports and Social Club Ltd. (PSSC) to formally submit our comments regarding the published Officer's Report for outline application [25/02064/OP](#).

We request that these critical matters are immediately brought to the Planning Committee's attention via the **Late Representations / Addendum Report**.

We have identified seven severe procedural flaws and unmitigated material harms within the current report that undermine the recommendation for consent:

1. Legal and Procedural Flaw: Failure to Assess Under the New NPPF

- **The Issue:** The Officer's Report relies on outdated national planning frameworks. The government enacted a completely reworked **NPPF**. This framework takes immediate effect for all live, undetermined applications.
- **The Planning Harm:** The new NPPF explicitly separates plan-making from strict **National Decision-Making Policies (NDMPs)**. Under **Policy S5 (Development Outside Settlements)**,

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unallocated greenfield land must be subjected to distinct, rigorous national tests. Furthermore, by failing to re-evaluate the planning balance against the active framework, the current report is legally deficient and open to immediate Judicial Review if approved.

2. Procedural Flaw: Lack of Local Consultation

- **The Issue:** The applicant has failed to materially engage with PSSC or the Parish Council. The project and the "new illustrative layout plan" was drawn up in isolation. This is not reported.
- **The Planning Harm:** Local planning policies and national frameworks strongly encourage proactive pre-application engagement with affected community entities. By bypassing consultation, the applicant has put forward a layout that introduces severe, unmitigated site conflicts that could have easily been resolved through dialogue.

3. Material Ground: Omission of Information: Insufficient Description of the Recreation Ground

- **The Issue:** The published Officer's Report fails to provide a description of the scale, capacity, operations, and licensed events of the adjacent Pirton Recreation Ground and Community Pavilion. The report completely sanitises the reality of this highly active facility, presenting it merely as passive open space.
- **The Planning Harm:** Because the report fails to provide a sufficient, accurate description of the active recreation ground, the true adverse impacts of the proposed development on the meadows — and the reciprocal land-use conflicts it will inflict upon the recreation ground — have not been adequately considered. This critical omission leaves an information vacuum that prevents the Planning Committee from accurately balancing the localized harms against the generic housing delivery. Without this information, the committee is procedurally blocked from making a proper, legally robust planning judgment.

4. Material Ground: Unresolved Drainage Risks and Flooding Mitigation

- **The Issue:** The application site comprises two greenfield meadows. The current proposed drainage strategy fails to protect the adjacent community assets, viz. the Recreation Ground and Footpath, from localized surface and water runoff. This is not reported.
- **The Planning Harm:** PSSC proposed a mitigation scheme — moving the drainage basin and open space design to the North East corner of the site to serve as a natural buffer and revised scheme and conditions to ensure protection of the Recreation Ground. The current report fails to secure this structural mitigation, exposing both future residents and existing community sports fields to unmitigated drainage risks.

5. Material Ground: Structural Risk of Statutory Noise Objections

- **The Issue:** The Cass Allen report in the planning application relies on a defective Noise Impact Assessment that was undertaken during a "Quiet" event and also when the old Pavilion was

operational. This therefore completely omitted peak village events (e.g., Brewfest, weddings, outdoor amplified music) and active match-day sports noise under our unrestricted Event Licence.

- The monitoring point was to the north west of the Recreation Ground and so was not representative of the noise levels which would be experienced by the new homes close to the north boundary.
- This was also therefore before the New Pavilion was operational. This is located nearer the Meadows and has an opening facade onto the Recreation Ground, joining up the inside with the open space for events. This is a fundamental concern and without further safeguards there is no protection to the Recreation Ground against complaints from the new residents. The ventilation strategy then adopts opening windows, undermining the benefits from any sealed glazing on noise mitigation. The condition proposed is then tied to the report so provides no protection.
- **The Planning Harm:** Under the NPPF '**Agent of Change**' principle, the onus is entirely on the developer to mitigate conflicts with existing uses. By the use of a flawed report and condition and failing to enforce a substantial spatial setback from our Northern boundary at this outline stage, the council is structurally guaranteeing future statutory nuisance complaints. This introduces an unacceptable legal and financial risk that could permanently curtail a protected community asset.

6. Material Ground: Complete Lack of Improved Physical Access

- **The Issue:** The current layout plans fail to include a dedicated pedestrian and vehicular link from the extended Cotman End into the Recreation Ground.
- **The Planning Harm:** A sustainable development must integrate into its surroundings. By failing to provide a simple link space into the recreation ground, the scheme isolates the new housing cluster, increases vehicle-dependency for sports and recreational access, and misses a critical opportunity to improve local infrastructure connectivity and improve safety to a Community Asset.

7. Material & Legal Flaw: Absence of Local Section 106 Allocation to the Village

- **The Issue:** The proposed Section 106 planning obligations allocate sport and infrastructure funding to facilities **outside of the village**. Other than the calculation of School funding and transport there is only a nominal sum for the Village Hall. There is no other benefit to the village whatsoever. There is no explanation over why Pirton is not benefiting from this project.
- **The Planning Harm:** This allocation directly violates **CIL Regulation 122**, which mandates that planning obligations must be directly related to the development. 100% of the infrastructure strain from these new homes will be absorbed by Pirton and the local Recreation Ground and playground. Starving the village of these funds, while allocating them externally, fails the legal test for mitigation.

- o **The Planning Argument:** One hundred percent of the immediate population pressure and physical infrastructure strain generated by this development will be absorbed by the adjacent **Pirton Recreation Ground and playground** — not by distant, external sports hubs. Siphoning developer contributions away from the point of impact leaves the actual community absorbing the growth completely unmitigated. This fails the statutory legal tests.
- o **The Required Mitigation:** To make this development acceptable in planning terms and legally compliant with CIL Regulation 122, **one hundred percent of the sports infrastructure funding must be ring-fenced and allocated locally to Pirton.** There are fully costed proposals. Recommending a Section 106 agreement that starves the host community of its required infrastructure expansion while exporting mitigation funds externally, If approved in its current form, the Section 106 agreement will be legally deficient and open to challenge.
- To assist the Planning Committee in making a compliant and balanced decision, we have set out below an alternative Infrastructure Allocation and Mitigation Matrix. This schedule directly addresses the deficiencies in the current Officer's Report by realigning the proposed Section 106 contributions with the statutory tests of CIL Regulation 122, ensuring that mitigation funding is legally retained where the physical infrastructure harm will actually be felt.

Comparative Infrastructure Allocation & Mitigation Matrix

Infrastructure Category	Proposed Allocation	Correct Material Allocation	Statutory Planning & Legal Justification (CIL Regulation 122)	Concrete Local Project to Fund
Outdoor Sports Facilities (Pitches / Squares)	£120,000 (MUGA £100,000, Cricket £20,000)	100% Retained in Pirton (PSSC / Recreation Ground)	Direct Proximity & Point of Impact: Future residents will use Pirton's pitches for casual and youth sport. Siphoning funds away leaves the immediate host facility unmitigated, breaching the CIL "directly related" test.	Expansion of the existing MUGA to provide sports use. Replacement of the defective cricket hard-wicket and square expansion.
Children's Play Space (LEAPs / NEAPs)	£97,000	100% Retained in Pirton (Pirton Playground Expansion)	Accessibility & Walking Distance: National standards and the Local Plan require equipped play areas to be within safe walking distance of new homes. Sending play space funds outside the village forces car dependency and fails local design codes.	Comprehensively refresh safety-surfacing, and expansion of the existing Pirton Recreation Ground Playground to absorb the influx of new families.

Community & Indoor Sports Facilities	£110,000 (£35,000 Village hall completion of the Pavilion) £75,000	100% Retained in Pirton(Community Pavilion)	Double Counting Mitigation: The applicant's design relies heavily on the presence of Pirton's newly built Pavilion to claim compliance with health and well-being policies. The mitigation must legally follow the asset being utilized.	Village Hall Project as 11/08 scheme .Funding the external surfacing, landscaping, and final completions of the new Community Pavilion (completed March 2026), which exhausted all local funds.
Informal Open Space & Connectivity	To be allocated in reserved matters.	100% Retained in Pirton (Site Boundary Links)	Site Integration & Sustainability: To prevent the new housing cluster from becoming an isolated enclave, developer contributions must fund local physical connectivity improvements directly at the site boundary and protect the future of the recreation ground.	Delivery of a dedicated pedestrian and vehicle physical access link from the extended Cotman End directly into the Recreation Ground. Safeguarded area to provide a buffer to the Recreation ground and for future provision of small sports hall and 40x50m recreational space with capacity for 1 5vs5 children's pitch (which can also provide 4 3vs3 children's pitches)

By substituting the Officer's proposed external allocations with this village-centric framework, the Council can successfully mitigate the localized strains of this development, satisfy statutory planning laws, and secure a sustainable, integrated future for the infrastructure of Pirton and demonstrate a democratic balance.

Conclusion

The cumulative adverse impacts of this speculative application therefore heavily outweigh its generic housing contribution. We urge the Planning Office to reconsider its position and recommend **refusal**, or at minimum, **defer the application** to allow adjustments to the layout to secure a safe access, the southern setback, a relocated drainage basin, revised noise approach and conditions and a correct village-centric S106 agreement.

Please note that these points will be robustly reinforced at the committee meeting by representatives from PSSC, **Parish Councillor Diane Burleigh OBE** and **District Councillor Claire Strong**.

Yours faithfully
Pirton Sports and Social Club Ltd.



Stephen Smith, B.Sc., CiLCA
Chairman

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