

10 Cromwell Way Pirton SG5 3RD

Ms Naomi Reynard,

Planning,

NHDC

Letchworth Garden City

18 January 2026

Dear Ms Reynard,

Re: 25/01696/OP Land South East of Holwell Road

I have read and considered the additional/amended reports submitted by the applicant. I continue to object to this application and confirm the comments made in my earlier response.

Flooding.

I continue to argue that the reports do not adequately reflect just how wet this site is, or would be, were it not for the substantial number of field drains laid across the site. This gives a false impression of the wetness of the site. All along Hambridge Way, the fields traditionally have been very wet; it is one reason for Hambridge Way being raised above the surrounding fields. As an example, the now demolished Shoulder of Mutton Pub (the last remains lie under the verge leading into Drovers Way by the emergency exit there) was able to have its own brewhouse because there was a spring in the garden. Springs were very common across Pirton before modern draining methods, one reason for its abundance of apple and pear orchards, and of moated farmhouses. As the field drains will be dug out prior to building, the ground will revert to its original wet condition. This is potentially a considerable amount of water, which the reports do not appear to understand, nor take into account when proposing how to deal with, for example, surface water run-off.

I have referred earlier to the enormous hole in the ground that is supposedly the "attenuation pond" on the Comice Meadows site. We need to be assured by all experts that such a hole is not warranted on this site; if it is, there would not appear to be room for such a monstrosity, which, as you will see from Comice Meadows, requires it to be fenced off from the public due to safety concerns.

I am also concerned by the proposal that all surface water run-off from 130 dwellings will end up in ditches along Hambridge Way that do not belong to the developer/applicant or eventual householders. Someone else will be paying for any ditch-clearing/ repairs etc. Nor have safety issues been addressed. The proposals

are simply not sustainable, let alone fair, making the site unsuitable for development.

Transport

Really, this report could have been written for any site anywhere in England and is full of optimistic, unrealistic motherhood and apple pie.

Walking;

There is only one safe walking route to the village amenities and that is Bridleway 021 (Hambridge Way), accessed via Comice Meadows. There is nothing wrong with this walking route during daylight hours. It is completely dark at night, and must remain so, for the purposes of the local ecology that utilises the ditches and hedges for foraging, food and shelter. It is just rather a long way for many people, who will undoubtedly use their cars in an effort to go to the village shop etc, causing even more parking problems for the village. The alternative route is along the Holwell Road which is narrowed by parked cars, has no pavement, and takes considerable traffic including large lorries, delivery vans etc. The proposed site is not suitable for walking as a sustainable option for car use.

Cycling;

Pirton Parish has some good cycling routes for enthusiasts, particularly out in to the Chiltern AONB. Whilst cycling in to the village, particularly along Hambridge way, is perfectly feasible, there is nowhere to park cycles once in the village. The suggestion of a cycle park outside the village shop clearly tells us that the report writer has not visited Pirton; there is no pavement space, (it is very narrow with a run of terraced houses with no front gardens); and cars are parked along the High Street as the terrace, of which the shop is one unit, has no other parking for residents. I cannot see many of the residents of 130 houses using bicycles for anything other than leisure use, as is the case for the residents of Comice Meadows. The proposed site is not suitable for cycling as a sustainable option for car use.

Bus.

It is quite some walking distance to the nearest bus stop. The Pirton Parish Council explored the idea of buses stopping within Comice Meadows en route to Holwell, but we were told that there was insufficient turning area for this to be viable. I would expect some Sec.106 funds to be put towards an improved bus service, (you have information elsewhere about the limitations of the bus service) but there is no detail from the bus company about what this might mean, or when any improvements might happen, so it would be wrong to assume any improvement at all. The proposed site is not suitable for considering a bus service as a sustainable option for car use.

All of which mitigates against this site being considered sustainable or suitable for development. The proposals do not meet NPPF Section 8, in particular paras 96 -98, 115 and 117.

Ecology and Biodiversity.

The reports both underplay the current biodiversity of the site and surrounds, and overplay the extent to which 130 small gardens and a very narrow area of “green space” may be an improvement.

The field is currently out of production, but is normally a crop field. Whilst the use of herbicides and pesticides is harmful to biodiversity, nonetheless, crop fields provide shelter for ground nesting birds, hares, rodents; whilst deer and other large mammals undoubtedly benefit from eating a proportion of the very young green shoots. The hedges and ditches surrounding the field are full of birdlife, insect life, rodents and reptiles; food for predatory birds such as kestrels, kites, buzzards and barn owls, all of which patrol the area. This cannot be replicated by the gardens of 130 dwellings. Many of those gardens will not remain “green” of course. Many householders will continue to use chemicals; others will expand their patios and concrete over large areas. Nor is there any guarantee that the lighting levels for the new development will be “low Level”; we were promised this at Comice Meadows, but the developer decided they wanted Drovers Way to be adopted by HCC, so standard, large, bright lights had to be installed to meet Highways standards. This will adversely affect a healthy bat population.

Please also note that the applicant does not own the northern hedge; it belongs to the neighbouring house. Any proposal relating to that hedge must be ignored without the consent of the owner.

The building of up to 130 dwellings on this site is unsustainable and does not meet NPPF para 125b or para125 generally.

Finally, I would like to emphasise four points.

One concerns the proposed emergency or second exit from the site. The proposal is completely unacceptable, and poses a serious safety threat should an emergency arise on the site which blocks the only way from the site to Comice Meadows. The residents would be trapped. This makes the site totally unsuitable for development.

The second concerns open space. There is very little of it in this proposal, and most of it is taken up with attenuation pond (I sincerely hope it would not become another large bomb crater as at Comice Meadows) and swales. There really is little or no room for the ecologists’ proposed wood pile, small woodland etc. Reliance is placed almost totally on the inadequate open space on Comice Meadows, and on the inadequate children’s’ playground there. This is contrary to NPPF policy 103.

Thirdly, the proposals for development of up to 130 dwellings will not meet NPPF para 129 generally, and in particular, (c) and (d).

Finally, the archaeological investigations to date are wholly inadequate for a site of this size, with known archaeology very close by. Investigating a mere 2% of the area will make it almost impossible to identify pre-historic remains, for example, where the industry standard for evaluations is 5% to 7% of a site.

Yours sincerely,

Diane Burleigh OBE