

10 Cromwell Way, Pirton SG5 3RD

N Reynard

Planning Officer

Development and Conservation

NHDC

Letchworth Garden City

20.08.2025

Dear Ms Reynard.

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

I write to **OBJECT** to this application.

**Previous and Present Applications**

1. The same applicants have been unsuccessful 3 times in applying for planning permission on this site, including a planning appeal. I cannot see how anything has changed that should make the outcome different, especially as this application is for more than 30 more properties than any previous application.
2. I appreciate that the “tilted balance” in the NPPF’s paragraph 11 (2024) comes back in to play, as the NHDC cannot demonstrate a 5-year housing supply. Para 11 goes on to say that planning permission should be refused where the adverse impacts significantly and demonstrably outweigh the benefits when assessed against the policies in the Framework taken as a whole. The adverse impacts far outweigh the benefits of 40% affordable housing; I do not see any other material benefits.
3. The economic benefits are few and mostly short-term, as the Appeal Inspector (APP/X1925/W/17/318486) found (para 67). The social benefits he also found to be a neutral factor (para 66). Nothing in the NPPF 2024 would change these findings.
4. The environmental harm would be significant, he found, by adding a significant (then 99) houses in a location not identified for such growth with constrained accessibility by sustainable modes of transport and which could only be achieved with significant adverse effects on the character and appearance of the countryside. Planning decisions must be Plan led. Nothing in the NPPF would affect or change these findings.

## **5. Pirton Development Boundary**

The proposed site is outside the Pirton Development boundary. The development boundary helps to prevent “urban sprawl” in a rural context. This application is contrary to policies SP2 and CGB1, as well as PNP1.1 and PNP1.2 in the PNDP (development should be within the development boundary and for no more than 30 dwellings per site). See also the Pirton Character Assessment that supports the Neighbourhood Plan, and the Conservation Management Plan 2023, which demonstrates that this proposal is contrary to the development pattern for Pirton.

## **6. Unsustainable Growth – Numbers.**

Since 2011, Pirton has accepted a 28% increase in housing. This is significant for a village that in 2011 had merely 530 dwellings. In percentage terms, Pirton already has accepted more than Hitchin (12%), Letchworth (15%), and Royston (25%). There has been no corresponding expansion in services or infrastructure. A development of 130 dwellings will add a further 8.9% or thereabouts to this total. This is contrary to NPPF (2024) paragraphs 76A and 77. 130 dwellings would overwhelm Pirton, and breach SP2 and SP1’s emphasis on proportionate development. NPPF paragraph 129(d) notes the desirability of maintaining an area’s prevailing character and setting which this proposal clearly does not; and see paragraphs 129 and 130 generally and Pirton Neighbourhood Development Plan PNP 2.

## **7. Sustainable Travel**

This application does not meet NPPF para 110 in that it does not limit the need to travel or offer a genuine choice of transport modes. The location is equally clearly not designed to promote public transport or give priority to pedestrians and cyclists. See the comments of the Appeal Inspector noted above.

## **8. Inadequate Access and Connectivity**

The only access to the proposed development is through Comice Meadows, along Drovers Way and down a small side street, Coopers Elms. For a development of this size, there should be 2 entrances. The “emergency” entrance/exit is completely useless, being on the far side of Drover’s Way. . Coopers Elms, containing only 4 dwellings, was not designed for the volume of traffic which 130 dwellings will bring or for the construction traffic that will be constantly going up and down through a single narrow road. This proposed use of Coopers Elm is contrary to Local Plan policy D3. It will also severely and adversely affect the residential amenity of Coopers Elms to an unacceptable level.

The creation of the access road will involve the removal of trees and hedging, and breaches the green wildlife corridor established in the approved Cala Homes Scheme. The Ecology Report suggests 10 metres will be removed; the Design and Access Statement suggests 12 metres; the plan attached to the application suggests 9.5 metres. This contrasts with the 40 metres that the NHDC Ecology adviser suggested in the applicant's previous application would be necessary if work to include drainage etc is considered. All of this suggests that the mitigation measures put forward in the Ecology Report to replace the proposed losses at this point are a flight of fancy, and contrary NE1 and NE4. Given this loss of hedgerow, the planning Inspector was clear that a development of 99 dwellings on this site would lead to the overall impression of one large development stuck on to the edge of the village and out into the countryside, with adverse impacts on the countryside, users of Hambridge Way and views across the Pirton Lowlands and to and from the Chilterns AONB. How much more so when the proposal now is for 130 dwellings.

The increased traffic (not to mention the construction traffic) will enter and leave Comice Meadows via Holwell Road. From the Pirton village side, this road is virtually single track as a set of terraced cottages lie on one side whose front doors open out on to the road (there are no pavements) and which are protected by parked cars. It is along this road also that pedestrians will walk to get to the closest bus stop. In the other direction all traffic must negotiate the very narrow entrance to Holwell Village, which includes a blind bend on a steep short section of road. Safe connectivity to the main village is very poor, contrary to PNDP policy PNP 12 and Local Plan Policy D1. Also, NPPF 2024 paragraphs 115(B), 115(c) and 130 (f).

#### **9. Archaeology and Heritage Constraints.**

The application does not conform with NPPF paragraphs 205-207, Local Plan Policy HE1, PNDP Policy 8. The plans and Design and Access Statement do not reflect the Conservation Areas that have been in place since June 2023 and so have not adequately reflected on the impact on Heritage Assets. I support the comments made by Dr. Gil Burleigh of the North Hertfordshire Archaeological Society regarding the potential archaeology on this site and the need for more extensive trial trenching, geophysical survey, and metal detecting survey.

#### **10. Green Space**

The proposals are very poor with regards to the provision for green space within the development, except for some enhancing of hedgerows around the perimeter of the site. There are no open/green spaces within the development itself. The largest section of green space is in fact taken up with the proposed SUDS. This is poor design. The proposal also appears to rely on connectivity with Comice Meadow's green space which contains a SUDS and playground.

Such connectivity does not exist. The boundary has been planted with trees and shrubs as part of the planning permissions granted for the Comice Meadows development, in accordance with their landscaping proposals. When the young trees and shrubs mature, there will be no connection at all between the two sites at this point. Wild flowers are also thriving here helping to increase the biodiversity of the Comice Meadows site. The proposals therefor are contrary to Local Plan policy NE6 and D1. The Comice Meadows “green space” itself is now very limited in terms of usable space. Instead of a completely open space with attenuation pond, the “pond” is a deep crater surrounded by a “keep out” fence. The children’s play area is very small with limited play furniture. It is not designed to cope with the children from 130 dwellings on top of Comice Meadows’ own 77 dwellings.

## **11. Adverse Impact on the Character and Setting of Pirton in the Landscape.**

This site lies within the Pirton Lowlands Landscape Character Area (LCA). The Inspector for the Appeal against refusal of planning permission for 99 dwellings in 2018 concluded that the site is visually much more part of a wider landscape rather than of the village fringe, notwithstanding the development of Comice Meadows. The Character Assessment which defines the Pirton Lowlands advises that there may be scope for carefully located and small-scale developments within the LCA but the application for 99 dwellings did not fall within the definition. Neither will an application for 130 dwellings.

An overwhelmingly large development in the countryside, beyond a planned large development, is out of character for Pirton; will adversely affect the symmetry of the village, and urbanise this side of the village.

There will also be an adverse impact on Hambridge Way and the many recreational users of this section of the ancient Icknield Way. A significant adverse impact (agreed by the Appeal Inspector) will be the loss of views across arable land to the Stondon Ridge along with the urbanising of the landscape, and noise.

Furthermore, views from Holwell Road on leaving and entering the village will be compromised, and further north on Holwell Road, the development will be very visible despite the existing trees and planned extra planting. There would be, as the Appeal Inspector noted, a clear perception of development extending out in to the countryside. The Inspector concluded that the proposal would have long term adverse effects, both on the character of the landscape and on its appreciation by users of local roads and footpaths. This would be particularly so because the proposed housing would inevitably be seen in conjunction with Comice Meadows. This is even more so given the proposals for access through Comice Meadows and the reliance placed on access across to Comice Meadows’ open space and children’s play area. The

proposals lead to conflict with NPPF para 128 and 129; Local Plan Policy NE2 and PNDP policy PNP2.1 and 2.4.

## **12. Water and Drainage**

The residents of Comice Meadows already have difficulty with low water pressure, a difficulty yet unresolved. This is not a site that can be considered sustainable for housing development while the issue of water pressure is unresolved.

Anglian Water has objected to this application on the grounds that the entire foul water system will not cope with the pressure of another 130 dwellings adding to a system already under considerable strain, with regular zones of flooding and sewage spillage in the village. I support the approach of Anglian Water, knowing very well how the drains do not cope and flood regularly. It has been noticeable even more so since the completion of Comice Meadows. Note NPPF para 181 which advises that permission for development should not be approved were it leads to a greater flood risk elsewhere.

## **13. Climate Policy and Net Zero Non-Compliance**

The application fails to comply with climate targets and policies both at Government and Local level.

There is no indication that this application plans for any form of carbon offsetting including tree planting anything close to the required scale.

This represents a major conflict with Policy D1(sustainable design) and Net zero policies at all government levels and the NPPF's climate objectives. The site is unsustainable for the amount of construction envisaged by the application.

The loss of a Grade 3A agricultural field is also a concern given the ever increasing focus of making the UK self-sustaining in food and increasing resilience to external events.

## **Conclusion**

The list of adverse impacts is long. This is a totally unsustainable site for up to 130 dwellings, and accordingly should be refused.

Yours sincerely,  
Diane Burleigh OBE