



Pirton Sports and Social Club Ltd.

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Please reply to:

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Planning Dept.
North Herts District Council
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24th August 2026

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

Dear Sirs,

1. Introduction and Executive Summary

I am writing on behalf of the Pirton Sports and Social Club Ltd (PSSC) to register our strong, unequivocal objection to outline planning application **25/02064/OP**.

PSSC requests that the Local Planning Authority (LPA) at the current time refuse this application. The applicant has failed to make any amendments to the proposal that reflect our previous objections (09/10/25 and 23/07/26) or those made by Pirton Parish Council.

We note the new illustrative layout plan that has been proposed by the applicant. Unfortunately, this does not address the strategic issues we have with the current proposals and the required amendments:

Registered in England; Company No, 16597334.

Registered Office: The Recreation Ground, Walnut Tree Road, Pirton, Hitchin, Hertfordshire, SG5 3PX

Chairman: Stephen Smith ■ 6 Great Green, Pirton, Hitchin, Hertfordshire, SG5 3QD ■ Tel: 07721 746872
Secretary: Rosemary Manders ■ 10 Priors Hill, Pirton, Hitchin, Hertfordshire, SG5 3QA ■ Tel: 01462 712469

1. **The provision of an access from the extended Cotman Close into the Recreation Ground.**
2. **The set back from the Southern Boundary to protect the activities on the Recreation Ground from future restrictions from residents.**
3. **The inclusion of safeguarded areas for the future needs of the Recreation Ground for Pirton to provide the potential for an extra pitch, small sports hall, and car parking relocation to allow for the enhancement of the existing play area.**
4. **A revised drainage strategy that removes the risk of the current unacceptable adverse impact on the pitches and protects and enhances the Recreation Ground.**

These can all be incorporated into a suitable layout, updated reports, improved conditions and suitable planning obligations that we believe will materially enhance the application, may then meet planning policy, and could result in a successful profitable sustainable project for the landowner, developer, and village.

We would encourage the applicant to work with us to achieve that result and North Hertfordshire District Council to fully apply their policies to achieve that outcome.

The access is a simple matter of providing a link space from the new road into the Recreation Ground.

We have considered the recreational requirements and consider an area of approximately 40x50m can be provided on the existing open space proposed on the illustrative plan to the east of the site. This would provide the additional informal play area for the Recreation Ground currently required and the future provision of one 5x5 pitch or four 3x3 football pitches to provide enhanced play opportunities for under-10s and under-7s from the village respectively. Other future requirements on the sports hall etc can be safeguarded by land allocation within an amended masterplan.

We welcome the proposed "Play on the Way" indicated on the plan and we would be happy to work with the applicants and PPC to consider the expansion of the existing Playground Area on the Recreation Ground to meet the requirements of the new development. That would allow the required revised drainage / open space design to use the North East corner of the site, which would go some way to mitigating our drainage concerns set out below.

Risk to existing and future activities on the Recreation Ground can be properly considered and addressed. In similar situations landowners have offered suitable restrictive covenants on future occupants and Local Authorities have required easements over development sites for the benefit of existing uses as part of planning negotiations.

S106 and other requirements can be fairly considered. We have previously outlined what is considered required but there are efficiencies like the playground that can help all parties.

Clearly the application site comprises two greenfield meadows located in the open countryside beyond the defined settlement boundary of Pirton. It is not brownfield, nor is it low-quality "grey belt" land. We are profoundly disappointed that the applicant has treated this unallocated site as a speculative commercial exercise. They have failed to demonstrate how the proposals will benefit the village, and specifically, they have failed to provide the mandatory community, access, and infrastructure provisions required to mitigate the severe harms this project will inflict upon the Village and particularly the adjacent **Pirton Recreation Ground**.

We have therefore provided more details following the submission of the additional information by the applicant. This should be read together with our previous submissions. We apologise for duplication of information.

Our focus is on properly protecting and enhancing the Pirton Recreation Ground. We are not covering here the other strategic concerns expressed by PPC and other parties on the application or on the principle of development on the meadows. That is for the Councils to consider and would no doubt be reviewed in the future local plan.

Notwithstanding this objection, we consider that an appropriate, viable proposal could be brought forward with some simple changes outlined here adopted by the applicant and with the proper planning requirements and safeguards imposed by NHDC.

2. The Planning Balance

The local policies restrict development outside settlement boundaries.

Any shortfall in housing supply argued is **not a blank cheque** for speculative development on unallocated land. Under national planning policy, the presumption in favour of development is not appropriate if the site-specific adverse impacts outweigh the generic benefits of housing delivery.

If a development worsens existing overcapacity, creates highway safety hazards, or threatens vital community infrastructure without providing corrective, fully-funded mitigation, it constitutes an unmitigated community harm that warrants dismissal. As detailed below, the severe localized harms of this application currently heavily outweigh its housing contributions requiring a refusal.

3. Material Planning Grounds for Objection

Ground 1: Deficient Noise Survey and Unresolvable Land-Use Conflicts

The applicant's submitted Noise Impact Assessment contains severe methodological defects and omissions that fail to realistically assess the acoustic environment. As a result, it significantly understates the impact of the development on the long-established operations of the Pirton Recreation Ground and the new Community Pavilion:

- **Failure to Record Representative Peak Noise Events:** The applicant's survey was conducted over a highly limited, standardized time frame. It completely failed to capture peak-impact village events hosted at the Recreation Ground, including outdoor amplified music on community evenings, large wedding celebrations, the annual village fair, and the outdoor Brewfest. Under the facility's active Event Licence, music and community gathering can take place daily without restrictive curfews. Treating these vibrant community assets as "quiet rural background" during monitoring constitutes an unacceptable flaw.
- **Exclusion of High-Impact Sports Noise:** The assessment completely omits the low-frequency and impulsive noise generated by active, multi-week sports fixtures (e.g., impact noises from cricket/football matches, crowd shouting, whistle blasts, and team training sessions).
- **The Agent of Change Principle:** In accordance with **NPPF (the 'Agent of Change' rule)**, the onus is entirely on the applicant to ensure that new development can be successfully integrated with existing community facilities. By utilizing a deficient noise baseline and layout, the applicant cannot guarantee that future residents will not file statutory noise and nuisance complaints. This introduces an unacceptable, existential risk that could permanently curtail the lawful operation of this protected community asset.

Ground 2: Inadequacy of North Herts Proposed Conditions for Noise Mitigation & Deficient Set Backs

To counter these clear noise vulnerabilities, the developer and the Council are proposing generic, standard planning conditions (such as requiring a post-consent Noise Management Plan or specifying standard acoustic glazing/fencing). Deferring these

critical engineering choices to a pre-commencement condition is entirely inadequate for this site:

- **Inadequate Spatial Set Backs:** The plan indicates that houses will be built approximately 15m/20m from the Northern boundary of the recreation ground. This is significantly less than the required set back that is recommended by Sport England and is unacceptable due to the future risks to activities on the Recreation Ground.
- **The "Too Big to Fail" Trap:** Agreeing to a generic condition means the principle of high-density housing is approved *before* a workable acoustic boundary is proven. If subsequent detailed modelling shows that standard glazing cannot achieve a safe internal environment, due to loud outdoor events, the developer will be forced to implement deeply intrusive, visual interventions.
- **Destruction of Visual Amenity and Village Character:** To meet statutory noise thresholds without altering the layout, the developer would be forced to consider acoustic devices along the shared boundary with the open Recreation Ground. This heavily conflicts with **North Herts Local Plan Policy (Design and Sustainability)** and the **Pirton Neighbourhood Plan**, replacing an open, tranquil, rural edge with an oppressive, unsympathetic suburban enclosure.
- **Legal protection of future objections:** To reflect the Risk to existing and future activities on the Recreation Ground these can be properly considered and addressed. In similar situations landowners have offered suitable restrictive covenants on future occupants and Local Authorities have required easements over development sites for the benefit of existing uses as part of planning negotiations. These are required.

Ground 3: Deficient Drainage Report and Severe Flood Risk Omissions

The applicant's Flood Risk Assessment and Outline Drainage Strategy contain severe, systemic defects that fundamentally misrepresent the hydrological reality of the site and its direct relationship with the recreation ground:

- **Absence of Intrusive Ground Testing:** The drainage report relies entirely on superficial desktop-based, regional soil map modelling. It lacks actual site-specific, physical borehole percolation tests (such as BRE testing). The strategy presumes a high standard of subterranean infiltration that is completely unproven on these meadows.
- **Failure to Account for Local Clay Geology and High Water Tables:** The desktop model ignores Pirton's geology, which features heavy, impermeable clay and a high seasonal water table. Because the ground cannot absorb rapid water volume, converting these greenfield meadows into extensive, non-porous suburban roofs, driveways, and access

roads will cause massive surface water runoff. How this is managed to safeguard the Recreation Ground is not considered.

- **Vulnerability of the Recreation Ground:** The report completely omits a topographical analysis of the boundary lines. Because the recreation ground sits adjacent to the proposed development site and the drainage proposed concentrates all run off to the eastern end of the site, which is a problem drainage area on the Recreation Ground, any unabsorbed surface water or subsurface saturation will naturally migrate downwards and across into the playing fields. This introduces an immediate, unmitigated risk of surface flooding, waterlogging, and total loss of pitch utility during peak autumn and winter sports seasons.
- **Invalid assumptions on outfall methodology:** The collection of run off is concentrated adjacent to the recreation ground on the South East corner. That is not appropriate: the proposed outfall for the drainage is to an old ditch on the site's eastern boundary. This is not a viable drainage route. The adjoining footpath is already heavily waterlogged. The connecting ditch to the south is no longer viable or used. To attempt to address drainage concerns on this area of the Recreation Ground, a private ditch was recently constructed by the PSSC on the adjoining privately owned land. This is therefore not a resolved proposal and any attempt to use that system will inevitably result in a detrimental impact on the Recreation Ground.

Ground 4: Inadequacy of North Herts Deferral Conditions for Drainage Mitigation

North Herts Council and the Lead Local Flood Authority (LLFA) propose a standard "pre-commencement" planning condition, requiring the developer to submit a detailed Sustainable Drainage Scheme (SuDS) for approval at a later date. This standard deferral is physically and structurally dangerous for this specific location:

- **Approving Principle Before Proof:** Deferring engineered calculations means the LPA is granting outline consent before the developer has proven that a safe, self-contained drainage solution is even mathematically or physically possible on this clay-dense site able to protect the Recreation Ground.
- **The Compromised Overflow Risk:** If the developer later proves during detailed design that full on-site water attenuation cannot be achieved due to high groundwater and poor infiltration, the council will be backed into a corner. To avoid revoking permission, the LLFA could accept compromised, sub-standard technical alterations. These adjustments almost always involve creating emergency surface-water runoff spillways or overflow discharge channels routed straight into the nearest open boundary—the public Recreation Ground.
- **Lack of Off-Site Accountability:** Standard pre-commencement conditions only enforce how water is managed *inside* the developer's red-line boundary. They provide no legal

safeguards or funding mechanisms to address slow, creeping subsurface water logging that will rot the soil quality and damage the usability of the sports pitches over time. A fully engineered, site-tested drainage strategy must be proven **prior to determination**, not pushed into a placeholder condition.

- **Required Inclusion of the Recreation Ground:** The safeguarding, and ideally the improvement, of drainage of the Recreation Ground should be included as a clear criteria for any drainage design and subsequent condition.

Ground 5: Shortfall in Playing Pitch Supply Against Requirements

The applicant's attempt to introduce a substantial residential population directly conflicts with the local demands for outdoor sport.

- **Deficiencies Identified in the North Herts Playing Pitch Strategy: The North Herts Playing Pitch and Outdoor Sports Strategy (September 2025)** establishes clear benchmarks for the preservation and expansion of grassroots sports infrastructure across the district. It explicitly highlights existing shortfalls in youth and adult pitch capacities. Adding up to 50 homes on the site directly increases the localized deficit without expanding the physical dimensions needed for organized match play. Work with the PPC and the Football Foundation has shown the requirements to enhance recreational and sporting activity and pitch provision.
- **Alignment with Sport England Policies and established needs** Developments bordering or impacting active recreational infrastructure must not compromise current or future playing field configurations. Speculative residential development of the meadows directly restricts the future expansion potential of the playing fields, violating **Local Plan Policy (Open Space and Recreation)**. We note the Sports Facilities Calculation and Playing Pitch Calculator just published on the Planning Portal. We are considering this, but would highlight that this is deficient in consideration of the total need as it fails to reflect that there has been no increase in the Recreation Ground since it was created over 70 years ago. There is an established shortfall in the Playing Pitch Strategy, the need to provide facilities for all, particularly children's and women's sport and fundamentally that this is a Recreation Ground with Pitches and serves a whole range of critical functions for the village from informal recreation to American Football. The village invested £1.5million in the New Pavilion recognising the importance of community, fitness, sporting and recreational activities to Pirton's current and future residents and its future must be protected.

Ground 6: Geographical Exclusivity of Pitch Expansion and Compounding Growth

- **The Meadows as the Only Viable Location:** Due to the geography of Pirton and the constraints of the surrounding landscape, the application site—comprising these specific

meadows—presents the **only physically viable and logical location** for the expansion of the village Recreation Ground. Consequently, if this land is built over without safeguarding sports provision, the village is permanently blocked from ever solving its playing pitch and recreational requirements or providing those for future needs.

- **Reflecting Past and Future Development Demands:** Pirton has absorbed substantial housing growth over past planning cycles and faces ongoing speculative pressure. This cumulative development has systematically expanded the village population and placed severe stress on existing community facilities without a commensurate expansion of recreational footprint. The Recreation Ground and Facilities also operate as an important Hub for the adjoining wider area. Therefore, allocating extra pitch space and facilities on these meadows is a vital mechanism required to retroactively absorb the unmitigated infrastructure strain of **past village developments**, while simultaneously building the necessary capacity to support any **future housing growth** in Pirton.

Ground 7: Foul Sewage Infrastructure Deficit

Pirton’s underlying foul water network operates under historical strain. The proposal lacks front-loaded evidence from the water authority confirming network capacity for up to 50 additional dwellings. This violates **Local Plan Policy (Infrastructure Requirements)**, introducing an unacceptable risk of sewage backup and environmental pollution adjacent to the public Recreation Ground.

4. Mandatory Requirements for Local Mitigation (Section 106, Land Allocation, and Critical Access)

Should the Local Planning Authority be minded to grant permission despite these and the other Objections from third parties’ severe policy conflicts, the PSSC maintains that **the application must be refused unless extensive, mandatory community infrastructure and highway mitigation are legally secured and strictly ring-fenced for the local benefit of Pirton and the Recreation Ground.**

Under **CIL Regulation** and **NPPF**, planning obligations must be directly related to the development and necessary to make it acceptable. Because the entirety of the physical and operational harm is felt directly by this village and the adjacent Recreation Ground **any infrastructure mitigations or S106 financial benefits must be focused entirely on the Recreation Ground and the immediate village infrastructure, rather than being absorbed into wider, district-level allocations.**

- **Compulsory Physical Land Extension for Noise, Drainage, and Pitch Deficits:** To satisfy the **Agent of Change principle**, rectify the sports shortfalls and meet the benchmarks of the **North Herts Playing Pitch Strategy**, the developer must not be permitted to build housing up to the current boundary. A portion of the application site must be legally protected to provide the community with a physical, level, and fully integrated expansion of the Recreation Ground. This land must serve a multi-functional role: operating as a permanent landscape buffer zone to absorb residential noise without requiring intrusive acoustic treatment, acting as a natural topographical drainage buffer to intercept surface runoff before it hits the pitches, and providing the extra physical footprint necessitated by the village's past, present, and future sports demands.
- **Mandatory Provision of Section 106 Enhancement Funding:** To satisfy the requirements of **North Herts Local Plan Policy (Infrastructure requirements and developer contributions)**, any grant of consent must be conditional upon a legally binding Section 106 agreement that delivers substantial capital and revenue funding directed to the enhancement of the Pirton Recreation Ground. In order to mitigate the increased user footprint and direct sports demands generated by the incoming population, these financial contributions must be structurally allocated to funding the physical expansion of the playground, upgrading existing facilities and laying down the new recreational and children pitch spaces outlined in our layout requirements. This funding is legally necessary to ensure recognition of the harm and local leisure infrastructure capacity formally keeps pace with speculative development and to avoid imposing a deficit on local taxpayers.
- **Resolution of Highway Infrastructure Risks & Creation of New Site Access:** The existing access to the Recreation Ground relies entirely on a restrictive, single-way track. This current access is a major highway bottleneck and a safety hazard during peak sporting fixtures and large village events, causing severe congestion and risking blocking emergency vehicle access. The influx of new residents from this proposed development will dramatically worsen traffic volume in the immediate vicinity. Therefore, as a non-negotiable planning mitigation under **Local Transport Policies and to offset harm**, the developer **must provide a vehicle and pedestrian access point directly from the proposed development onto the Recreation Ground**. This new access route can link seamlessly with the site's internal estate roads, safely distributing traffic flow, bypassing the hazardous single-way track, and securing a safe, compliant route for visitors, maintenance teams, and emergency services.
- **Exclusion of Wider, Non-Specific Allocations:** PSSC strongly objects to any attempts to satisfy S106 requirements through generalized capital contributions pooled into wider, district-level funds. General funding formulas allocated to regional schemes do nothing to fix the acute, physical capacity constraints inflicted on our rural community. Financial compensation redirected outside the village boundaries fails to solve the localized unsustainability, directly conflicting with **Local Plan Policy**.

5. Conclusion

The proposed development currently represents an unsustainable, speculative encroachment into open countryside that directly violates planning policy.

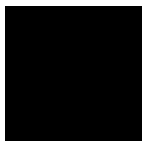
The irremediable harms—namely the threat to the operation of a protected recreational asset due to a defective noise baseline and unacceptable 15-20m spatial set backs, severe unmitigated surface-water flood risks to lower-lying playing fields masked by deficient drainage reporting, explicit sports pitch capacity deficits on the only viable site expansion, and severe highway safety constraints caused by the existing single-track access—significantly and demonstrably outweigh the benefits of any housing delivery.

PSSC strongly requests the Council to urge the applicant to reflect these comments in order to create a sustainable application, but if that is not achieved to **refuse planning permission at this time**.

We would be pleased to work through these issues with NHDC, PPC, the Landowner and the applicant.

Should for any reason the Council choose to consider the application positively then all the safeguards and mitigations outlined in our representations are fundamental to any consent.

Yours faithfully
Pirton Sports and Social Club Ltd.



Stephen Smith, B.Sc., CiLCA
Chairman

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