

10 Cromwell Way Pirton SG5 3RD
Pirton Neighbourhood Plan Steering Group

25 August 2017

NHDC Planning and Development Control

Dear Mr Rea,

Re: Application No. 17/01543/1 Land off Holwell Road Pirton

I write on behalf of the Pirton Neighbourhood Plan Steering Group to OBJECT to this planning application by Gladman. The application should be refused on the following bases:

1. The land is outside of both the current and prospective development boundary for the village.

Under the current Local Plan, saved policy 7, there should be no development outside of the visual character area on this, the eastern boundary to the village. The policy is clear, if not always applied consistently by the NHDC. Saved Policy 6 also applies.

The emerging Neighbourhood Plan is now at the beginning of the Examination Process, an Examiner having been identified who has agreed to conduct the Examination. The site is outside of the proposed development boundary in the emerging Neighbourhood Plan. The proposed new Local Plan is now within the Inspection system. This site is not allocated to Pirton in the emerging Local Plan, as being outside of a new development boundary for Pirton. This new boundary has been the subject of much public consultation, not only during the various "SHLAA" processes since 2013, but also in relation to the emerging Local Plan itself, and the various consultations on the emerging Neighbourhood Plan for Pirton.

2. The land is "Best and Most Versatile Agricultural Land"

The whole of the site is Grade 3A agricultural land. To utilise this site for development would be contrary to NPPF para.112, and not in keeping with the emerging Neighbourhood Plan which values our agricultural industry.

3. Inability to rely on the applicant's reports due to their poor quality.

For example: The Landscape Assessment at para.8.2 describes the proposal for 99 homes as a "change of modest scale and nature". This cannot be right; the proposal is to change a Grade 3 A agricultural field into a major housing development. This development would completely block the view of the Chiltern Hills as one enters the village, thus completely removing the visual aspect of the village from its setting in

the landscape. This is important within the emerging Neighbourhood Plan as it helps to establish the rural character of Pirton Village.

The Transport assessment says there is a regular bus service, implying that it is adequate to sustain an influx of some 99 households (not to mention the 78 proposed for the site next door). The emerging Neighbourhood Plan discusses bus service provision which is not adequate enough to seriously displace the need for reliance on cars to travel to shops, station, work, in some cases school, and so on. The alternative proposals within the Transport Assessment, that people should walk or cycle into Hitchin for their shopping and for their commuter trains is frankly nonsense.

The Built Heritage Report: is seriously flawed. The map of Pirton's Heritage Assets is labelled "Project: Land off Dover Road, Deal". More importantly for a Built Heritage Assessment Report, it does not discuss the large scale of the development within the historic context of Pirton's incremental, small scale development along this side of Pirton from the 19th to the 21st century. Little regard has been had to the Neighbourhood Plan and its supporting Character Assessment, save to quote very selectively from it. .

Archaeology: The emerging Neighbourhood Plan and its supporting Character Assessment details the rich archaeological and historical remains that are part of the character of Pirton, and which are valued by the community. There is no Archaeology Assessment Report at all. There must be a detailed assessment of the archaeological potential on the site before any consideration of granting the application. Given the significance of the material found on the adjacent site, mostly Prehistoric Bronze Age and early Iron Age, including human burials, and the interest of Historic England in the site, it is essential that a detailed assessment report is prepared and available for consultation and comment, before decisions are made. No work on the adjacent site was carried out in the area near Hambridge Way where high status Roman finds were discovered as casual finds ;further work on this area and into this current site is needed to establish what Roman period activity was happening on this site.

The existing desk based appraisal is inadequate in many respects, not least that the sources of information are limited and, as has been the case on the adjacent site, important information is missing.

4. Green Space and biodiversity

The emerging Neighbourhood Plan places considerable emphasis on green space and biodiversity issues. Gladman propose that access should be through the adjacent site and down one small side street. The use of the small side road within the planned development on the adjacent site for all traffic to ingress and egress will involve the removal of part of a hedge, and cross the newly approved "green corridor" for wildlife as well as a proposed cycle path/footpath.

5. Connectivity and Safety

The proposal is to more than double the use of the Y junction on the adjacent site as well as the narrow lane of Holwell Road in and out of the Pirton village, and through Holwell to the A600. There is no road safety audit to comment on. The residents of Holwell Road are without pavement, and we have particular concern about the effect on those living along Holwell Road, and in the terraced houses known as "The 12 Apostles". Further, there is little concern within the Gladman proposal for pedestrians. Except for access to the Hambridge Way, which is itself often wet and muddy, there are no proposals for direct access to the remainder of the village. It will be a nearly 400 meter walk partly on unpaved and unlit roads to the nearest bus stop. Thus safe connectivity to the main village and beyond is very poor, contrary to the design aspects of the emerging Neighbourhood Plan and Character Assessment, the NPPF and good design generally.

6. Overdevelopment

The emerging Neighbourhood Plan already proposes a minimum 18% increase in housing provision within Pirton Village to 2031. This is already more than is proposed in the draft Local Plan for Hitchin (11%) or Letchworth (15%). With "windfall" development within that period Pirton could see an increase of more than 20%. If proposals for 99 houses are approved, then, with the recent approval of 78 houses on the adjacent site, and other approvals/building since 2011, the NHDC will be expecting Pirton to expand by 34%. This is considerably more than the NHDC's expectation for Hitchin (11%), Letchworth (15%), or Royston (25%). Whilst Pirton is designated as a Category A Village, capable of taking some housing development (as opposed to other categories of villages), such an enormous increase in a very short space of time is not sustainable and would be contrary to the NHDC's policy both now and in the emerging Local Plan for where most development should take place. Additionally, 99 dwellings on this site would be of far too high a density for an edge of village development and so constitutes gross overdevelopment on the site itself.

7. Adverse Impact on the Character and Setting of Pirton in the countryside.

Pirton is a rural village, with an identifiable centre, and development has been steady and small scale, covering a wealth of architectural types and periods. An overwhelmingly large development in the countryside, beyond a planned/possible contemporaneous and large development, is very out of character for Pirton; will adversely affect the symmetry of the village, urbanise this side of the village and indeed fulfil the description of a "monstrous carbuncle" that I see others have used. It would be quite contrary to how development is proposed within the emerging Neighbourhood Plan.

8. Adverse Impact on Hambridge Way, part of the Historic Ickniel Way.

The Hambridge Way is well used by both villagers and visitors, as part of the long distance and historic Ickniel Way and an important feature of Pirton and Pirton Parish (emerging Neighbourhood Plan and Character Assessment). A significant adverse impact will be the loss of the views across arable land to the Stondon Ridge, along with an urbanising of the landscape, and noise. This will cause substantial harm to the amenities of all users of this ancient path. Additionally, visiting walkers and cyclists bring trade in to the village, and we would be very concerned if this trade was discouraged in any way.

9. Negative Cumulative Impacts.

The cumulative impacts of this application, if granted, on top of the recently approved 78 houses on the adjacent field to this application would of itself mean that the development would lead to harm that significantly and demonstrably outweighs the benefits of any development (para14 NPPF). The proposal is to urbanise this side of the village. The cumulative impact on social, health, education and community facilities has not been assessed. The emerging Neighbourhood Plan only supports development that enhances village facilities and will not approve development that adversely impacts on facilities and amenities in the village.

10. Prematurity

Both the new Local Plan and the Neighbourhood Plan are within their relevant Inspection/Examination processes. The impact of this development is contrary to both Local and Neighbourhood Plans, taken as a one off development or as cumulative with the adjacent site. To grant permission would undermine the plan making process by pre-determining issues about character, scale, location, and phasing of new development contained in both Plans and which, in relation to both Plans, have been the subject of thorough public consultation.

The application is also premature in that there are still outstanding matters relating to the adjacent site, which may prevent development of that site. If this application were to be granted before it is clear that the adjacent site will be developed, this site would be entirely isolated in the countryside, and without any method or mode of access to it.

For all of the above grounds, the Pirton Neighbourhood Plan Steering Group urges that this application be Refused.

Yours sincerely,

Diane Burleigh OBE

Chair, Pirton Neighbourhood Plan Steering Group.