Planning Committee Members/Mr J. Gran

NHDC Planning Department

Letchworth Garden City 24 May 2017

Dear Councillors,

Re: Amended Planning Application 16/02256/1 Land Adjacent to Elm Tree Farm.

The Pirton Parish Council has spent considerable time considering the latest application from Cala Homes. Our comments follow the order in which they are discussed within your Officer’s Report.

We would like to make clear our positive reaction to the following amendments to the plans that were before you at your March meeting:

Access: the inclusion of a “Y” junction as the access way into the proposed development and which, after discussion with HCC Highways, has added safety features

Layout: the removal of the front terraces and the improved “greening” of the entrance to the development; the moving of the entrance to the front car park facility so that it now emerges in to the main artery road within the development and not in to Holwell Road.

Appearance: the lowering of roof heights to more houses.

However, we continue to object to the proposals on the following planning grounds:

**Access:** The proposal for a roundabout as the main access route is still on the table. This is a very urbanising feature totally out of character for Pirton, and North Hertfordshire. Our previous lengthy and detailed objections remain. The proposals are a move towards urbanisation, and in no way reflect the current approach from Holwell, nor the approaches from Shillington or the Hitchin Road. This remains contrary to the Core Principles of the NPPF, the Build for Life Principles and NPPF para 131 and should be rejected on these grounds and the Y Junction approved in principle. However, the amount of greening is still small, and efforts should be made to further “soften” this edge.

**Layout:** The “greening” of the front entrance to the development, and the removal of the terrace of houses, has resulted in a loss of green space within the development, and a much denser, more crowded interior. We remind the Committee that the interior green space behind the car parking area was created after concerns expressed by the PPC and members of the community, and no doubt NHDC officers, at the lack of green space within the development and did not form part of the original application. This has been “moved” to the front of the development. It must therefore remain the case that more green space within the development is required. Whilst rear gardens may be “adequate”, many front gardens are virtually non-existent, and increase the sense of overcrowding if not ameliorated by green space. We again remind the Committee that this development forms the new village edge and should be sympathetically designed as to layout internally as well as externally. No effort has been made to reduce the density of dwellings on the site. It has not been made clear to you within the Officer’s Report, but the figure of 17dph for Pirton as a whole, and 11dph for neighbouring Royal Oak Lane, are reached having first deducted green spaces and recreational spaces from the equation. If they were included, the dph would be considerably lower than 17. Cala Homes figure of 17.7dph is reached after including green space. Thus the density is in fact far higher on this development than within Pirton generally. The development by layout is congested, dense, and out of keeping with the rural character of the village and area and is contrary to the NPPF Core Policies, NPPF para131, the Build for Life Principles, the Emerging Local Plan (HDS4 “new development on the periphery of a settlement should generally be at a lower density to mark the transition to the rural area beyond”) and Neighbourhood Plan and the Pirton Village Design Statement (Supplementary Planning Guidance). The application should be rejected on the basis of Layout.

**Scale:** Ridge heights remain too high. This scale does not “integrate well with the scale of existing buildings in the village” as the Officer’s report claims; the heights in many instances are significantly above most buildings in Pirton. It is wrong to suggest otherwise. The harm to the setting of the village and its context in the setting of the Chilterns AONB remains material. The Scale of the development as to heights, and overall pattern and spacing of buildings is contrary to NPPF para 58, and the Pirton Village Design Statement (supplementary planning guidance). The application should be rejected on the ground of Scale.

**Design and Appearance:** The development remains very congested in appearance, which is not the norm for Pirton. The Officer’s Report seems to suggest that internal congestion/lack of green space is acceptable because internal areas of the development will be screened from sight by hedging and trees, and cannot therefore have an adverse impact on the character of Pirton or its setting. This view would suggest the creation of an enclave that is not to be associated with the rest of the village and parish. This is absolutely contrary to the NPPF Core Principles, NPPF para 61 (planning policies and decisions should address the …integration of new development into the natural, built and historic environment), and to NHDC Saved Policy 57 “Size of gardens should relate to both the need of future residents and to the amount of public amenity space”. The removal of “public amenity space” from within the development makes garden size an issue. The application should be rejected until proposals for appearance are acceptable.

**Landscaping:** The definition of “landscaping” for planning purposes is “the treatment of land for the purpose of enhancing…the amenities of the site and area in which it is situated”. Our comment is that the ”pond” area mains unusable for residents and visitors, so that apart from the small village green, small recreation area, and the green at the entrance area, there is very little enhancement of amenities by landscaping on this site. The Officer’s Report speaks of “good areas of open space” within the development. We disagree and have addressed our concerns above. Front gardens are mostly small if they exist to any extent at all. Whilst we have always approved of other landscaping proposals (retention of natural hedges, addition of new tree and shrub planting) the application should be rejected on landscaping grounds.

**Material Considerations:**

These remain as:

1. the adverse impact on the character of Pirton and the surrounding landscape:
2. layout issues including plot size (gardens) and green/ amenity space
3. density which remains too high when properly compared with Pirton and especially the neighbouring areas
4. appearance
5. scale
6. access(regarding the proposal for a roundabout)
7. Landscaping

Appeal Decision 12/00694/1

The officer’s comments on this issue as raised by Cllr Strong at the March meeting do not quite reflect the Inspector’s decision. He stated that the concerns he had expressed as to Highway Safety and the adverse impact on the landscape arising from a small development would lead to him rejecting the application if the harm arising from the application could not be mitigated. The method for mitigating adverse impacts lies in either refusing the development, or in Section 106 agreements, to avoid refusal. As the parties had not entered into a Section 106 Agreement, he could not be certain that the adverse impacts of development would be mitigated. He therefore had no option but to refuse the application.

Section 106 Agreements should only be used where it is considered possible to address the adverse impacts of development by their use. They are not designed, as the Officer’s report might suggest to be a”primary benefit” of development. That would be to put the cart before the horse.

Yours sincerely

Alison Smither (Chair)

For Pirton Parish Council