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Standing up for Hertfordshire's countryside

Naomi Reynard
Planning and Building Control
North Herts Council
PO Box 10613
Nottingham
NG6 6DW

Our Ref:

Your Ref:

3rd September 2025 (by email)

Dear Naomi Reynard,

**Planning application no. 25/01696/OP
Land South East of Holwell Road and North of Hambridge Way, Pirton
Outline application for the erection of up to 130 dwellings with public open space,
landscaping, sustainable drainage system (SuDS), and associated works
with all matters reserved save for access.**

I write with regard to the above planning application to which CPRE Hertfordshire objects for the following reasons.

1. The use of land identified for this proposed development is affected by the adopted North Herts Council Local Plan: Policy CGB1 (Rural Areas beyond the Green Belt) which is identified on the Proposals Map. Paragraph 6.1 of the Local Plan CGB1 states: "These areas do not meet the necessary criteria to be designated as Green Belt, but it is still necessary to impose restraints on development to prevent inappropriate schemes".
2. Policy CGB1 identifies six categories of development where:
"planning permission will be granted where the development:
 - a. is infill within the built core of a Category B village;
 - b. meets a proven local need for community facilities and services or rural housing;
 - c. is strictly necessary for the needs of agriculture or forestry;
 - d. relates to an existing rural building;
 - e. is a modest proposal for rural development or diversification; or
 - f. would provide land or facilities for outdoor sport, outdoor recreation and cemeteries that respect the generally open nature of the rural area."

CPRE is working nationally and locally for a beautiful and living countryside

CPRE Hertfordshire is a Charitable Incorporated Organisation

President: Sir Simon Bowes Lyon, KCVO

Chairman: Peter Waine, OBE

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3. Clearly, the proposed speculative residential development satisfies none of the above criteria and should be regarded as inappropriate. There is very significant local community opposition to this proposed development in the Rural Area in open countryside which is in agricultural use and widely used by local people for walking and informal recreation.
4. The Applicant quotes a housing land supply of 3.9 years as a reason to involve the 'tilted balance' toward sustainable development and this is a serious misinterpretation of Government guidance. Notwithstanding the revised National Planning Policy Framework (NPPF) regarding maintaining a five year supply, the North Herts Local Plan is presently being reviewed and any further allocations of land for development in the Rural Area should be made following robust application of criteria rather than through speculative development applications.
5. The agricultural land comprising the site is graded as 2 by DEFRA and this constitutes Best and Most Versatile land. There is increasing concern regarding national food security and the use of productive agricultural should only take place in exceptional circumstances. CPRE Hertfordshire believes that the present use of the land for agriculture should be maintained in line with NPPF paragraph 187 b) and footnote 65 whereby planning decisions should recognise the 'economic and other benefits of the best and most versatile agricultural land'.
6. The Applicant's assertion that the context has changed with regard to the pressure for development is refuted. To the extent that the context has changed, it is to recognise the growing concerns of local rural communities in the continuing use of the open countryside for inappropriate and unsustainable development.
7. The close proximity of the boundary of the Chilterns National Landscape (CNL) means that the proposal lies within the setting of this designated protected land. The development of up to 130 dwellings in this location will clearly negatively impact the CNL. Paragraph 189 of the NPPF requires that development "within the (ir) setting" (of National Landscapes) should be: "designed to avoid or minimise adverse effects on the designated areas".
8. CPRE Hertfordshire has responded twice previously to proposed development on this site and supports fully the Council's previous refusals of planning permission, and the dismissal of an appeal in 2017 (ref. APP/X2925/W/7/318486). Amongst other findings, the Inspector noted:

"The Proposal would be contrary to national policy that development should be sympathetic to local character, including landscape setting and should recognise the intrinsic character and beauty of the countryside" (Inspector's report paragraph 42).



9. Nothing in the present application has affected the basic principles established in the reasons for refusal to both applications and the appeal dismissal on this site. As noted above, CPRE Hertfordshire supports fully the Council in their opposition to this application and deplores the Applicant's continued attempts to promote this damaging proposed development.
10. CPRE Hertfordshire notes and supports the extensive community response to this application and specifically the detailed submissions by Lord Michael Campbell and Pirton Parish Council. Hertfordshire is under unrelenting pressure for development and the value of the high quality open countryside that remains increases for local communities and visitors, together with the wider environmental benefits relating to the amelioration of the effects of climate change, maintenance and enhancement of biodiversity, and physical and mental health.
11. We deplore the renewed application on this site and urge the Council to continue to refuse permission for this highly inappropriate speculative development.

Yours sincerely,

Chris Berry
Planning Manager

NOTE: We would request that this letter is published on the Council's website as a document relating to this application and should be grateful if you would notify us of the date of the appropriate meeting if it is to be determined by planning committee.