



Amit Patel  
Development Management  
East Herts District Council  
Wallfields  
Pegs Lane  
Hertford SG13 8EQ

Our Ref:

Your Ref:

2<sup>nd</sup> September 2022 (by email)

Dear Amit Patel,

**Applications no. 3/22/1551/FUL - Land east of the A10 Buntingford**  
**Hybrid planning application comprising: (i) Full planning for the development of 350 residential dwellings (Use Class C3), a new highway junction from the A10 with associated works including drainage, access roads, allotments, public open space and landscaping; and (ii) Outline planning (with all matters reserved except for access) for up to 4,400 sqm of commercial and services floorspace (Use Class E and B8), and up to 500 sqm of retail floorspace (Use Classes E)**

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

1. The land identified for this proposed development is designated as Rural Area Beyond the Green Belt (RABGB) in Policy GBR2 of the adopted East Herts District Plan 2018 (EHDP). The Local Plan states (para. 4.6.1):  
"It (RABGB) is a considerable and significant countryside resource which Policy GBR2 seeks to maintain by concentrating development within existing settlements."
2. Policy GBR2 continues to list the limited types of development (numbered a) to h) in Policy GBR2) which may be permitted "provided they are compatible with the character and appearance of the rural area." The present proposal is a large-scale speculative residential and commercial development which is clearly outside the scope of the exceptions which may be permitted.
3. Accordingly, the assertion in the Applicant's Planning Statement (PS) that "the Site is not covered by any Local Plan designations but is described as being within the Rural Area outside the Green Belt (sic)" (PS para. 2.5) is incorrect and misleading. Policy GBR2 is a key policy of the Local Plan and the area affected is designated in the Policies Map.



4. As noted above, the proposal takes no account of the Council's policies for the protection of open countryside. The objectives in both the East Herts District Plan and the Buntingford Community Neighbourhood Plan state that such areas will be protected and Policy ES7 in the Neighbourhood Plan requires development "to protect and enhance biodiversity in line with NPPF requirements and must demonstrate a net gain in biodiversity in an ecological report consistent with BS 42020."
5. This speculative application for development comprises a substantial extension of the built up area of Buntingford to the south-west of the town and is not required by the adopted District Plan to satisfy the Council's objectively assessed need for housing.
6. The site is entirely open agricultural land forming a clear and well defined boundary to the built up area of Buntingford. The Agricultural Land Classification is Grades 2 and 3a which comprises "Best and Most Versatile Land" which should be maintained for agriculture to maintain food security; an issue which is gaining in significance due to global trade uncertainties.
7. Scant attention is paid to the provision of affordable housing. In any case, recent research by CPRE Hertfordshire indicates that no average earning household in Hertfordshire can afford even an "affordable house" as presently defined as 80% of market value, so it follows that this development is likely to make no contribution to addressing those in housing need.
8. The Design and Access Statement submitted with the application indicates a banal and unimaginative layout of standard units filling the site with minimal amenity space, despite the extensive supporting material promising "a high quality, innovative and landscape led mixed use sustainable community".
9. The involvement of the Design Review Panel (DRP) is cited as providing an assessment of the design quality of the proposed development. It would be preferable for the Applicant to commission a local design panel such as the Hertfordshire Design Review Service or Design South East to provide an objective assessment of the impact of the proposals.
10. Buntingford has been subject to a very significant quantum of development in recent years which has undoubtedly changed the character of this historic market town and the surrounding rural area putting massive pressure on local infrastructure and amenities. Further development is unsustainable, unnecessary and inappropriate.
11. We support the extensive concerns expressed by the local community and urge the Council to refuse permission for this application.



The countryside charity  
Hertfordshire

Yours sincerely,

Chris Berry  
Planning Manager