



David Lamb
Development Management
East Herts District Council
Wallfields
Pegs Lane
Hertford SG13 8EQ

Our Ref:

Your Ref:

22nd September 2023 (by email)

Dear David Lamb,

Application no. 3/23/1390/FUL
Land off London Road and Owles Lane, Buntingford
Demolition of no. 16 London Road and alterations to No. 18 including demolition of
garage and amendment to parking arrangements and access. Erection of 68 dwellings
with associated parking, landscaping, refuse and ancillary works

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 which may be permitted "provided they are compatible with the character and appearance of the rural area." The present proposal is a substantial speculative residential development which is clearly outside the scope of the exceptions which may be permitted.
3. This speculative application for development comprises a substantial extension of the built-up area of Buntingford to the south-east of the town and is not required by the adopted District Plan to satisfy the Council's objectively assessed need for housing. The site sits outside the settlement boundary defined in both the Buntingford Community Area Neighbourhood Plan and the EHDP, except for the access through 16 London Road which is to be demolished.
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 Area 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. The site is described in the Applicant’s consultant’s Planning Statement (PS) as “an undeveloped tract of land” without reference to the above policies. It is later described as “agricultural land” and as well as forming a clear and well defined boundary to the built up area of Buntingford, this is high quality agricultural land from which a cereal crop has recently been harvested.
6. There is a particular loss of open countryside character at the eastern part of site where it opens out with long distance views to east and south east from the start of the established woodland belt along the north side of Owles Lane. Misleading claims are made with regard to the proximity of development to ridge-lines which have been regarded by Planning Inspectors as significant.
7. Much attention is given in the PS to the proposed proportions of bungalows (40%) and affordable housing (40%). 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. 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.
9. We support the extensive concerns expressed by the local community and urge the Council to refuse permission for this application.

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.