



Steve Fraser-Lim  
Development Management  
East Herts District Council  
Wallfields  
Pegs Lane  
Hertford SG13 8EQ

Our Ref:

Your Ref:

27<sup>th</sup> March 2024 (by email)

Dear Steve Fraser-Lim,

**Application no. 3/24/0294/OUT**

**Land North of Hare Street Road, Buntingford**

**a) Outline approval for a residential development for around 200 new market and affordable homes, including self-build and custom build homes, new public open space, new ecological areas and other public realm, new pedestrian, cycle and vehicular networks within the site, potential pedestrian connections to The Causeway and Aldridge Way, and associated drainage and SuDs infrastructure. With all matters reserved for later approval.**

**b) Full planning approval for the construction of new Medical Centre, car parking area, related drainage and SuDs infrastructure, with associated access to Hare Street Road and enabling works to the existing highway, as defined on the Land Use Parameter and Detailed Access Plans.**

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

1. The land for this proposed development is identified as Rural Area Beyond the Green Belt (RABGB) in the adopted East Herts District Plan (EHDP) where the rural character is to be maintained. Policy GBR2 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 (lettered a) to h)) 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 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 statutory landscape or environmental designations" gives the incorrect and misleading impression that no policies apply to the land in question other



than a minor references in paras 4.9 and 4.10 which dismiss its significance. Para 4.6.1 of the EHDP notes “(Outside the Green Belt) The remaining two thirds of the District are located in the ‘Rural Area beyond the Green Belt’. This Rural Area is highly valued by the District’s residents and visitors alike, particularly for its open and largely undeveloped nature. As such it forms an important part of the character of the District.

4. This speculative application for development comprises land that is not required by the adopted District Plan to satisfy the Council’s objectively assessed need for housing. Buntingford has been subject to very considerable speculative residential development in recent years which has changed the character of the town.
5. A particular concern is the substantial extension of the built-up area of Buntingford to the east of the town which should not be breached by urban development. This principle has been established by the adopted District Plan and supported by the Planning Inspector who granted permission for housing on the adjacent site in 2013.
6. Further, the Inspector attached a condition to limit the ridge height of proposed dwellings to reduce the impact on the wider landscape to the east and retain the land for agricultural use. The site is entirely open agricultural land and the tree belt forms a clear and well-defined boundary to the built up area of Buntingford.
7. The PS notes that the site is “intensively managed arable land” but no indication is provided of the grade of land by the Applicant. However, the land on both the adjacent and present site is Grade 2 according to DEFRA criteria, constituting “Best and Most Versatile Land“. This land should be maintained for agriculture to maintain food security; an issue which is gaining in significance due to global trade uncertainties.
8. The Applicant gives very great attention to the provision of a Medical Centre on the site as effectively providing justification for the proposed development. Notwithstanding the potential uncertainty surrounding any such provision in the absence of legal agreement to ensure its delivery, such provision would appear to be highly inappropriate in this marginal location on the edge of Buntingford.
9. The Planning Statement notes in paragraph 5.5 that a five year housing supply (5YHLS) is “a national mandatory policy requirement” and this is incorrect. The Applicant will be aware that Paragraph 11 and footnote 7 introduce policy constraints leading to the provision of housing targets in Local Plans and that there is significant ongoing debate regarding the provision which Local Plans should make to satisfy housing need.
10. EHDC is about to embark shortly on the review of its District Plan and we believe that decisions on future housing allocations should follow this review process, rather than be



subject to proposals for speculative development in an area which has already been subject to considerable expansion beyond Local Plan allocations.

11. CPRE Hertfordshire supports fully the pre-application advice provided by the Council with regard to the unsuitability of the proposed development in policy terms, as indicated in the PS paragraph 4.3 seq. We note that “Officers accepted that the planning balance of any future planning application will be a finely balanced judgement (sic)”.
12. We also believe that previous planning history is relevant to the consideration of this application and for the current Planning Statement (para 2.20) to say that there is ‘limited relevant planning history’ for the new site is inaccurate. I have noted above the significance of previous decisions (planning application number 3/12/1657/FP) and the subsequent planning appeal.
13. The Illustrative Layout submitted with the application indicates a banal and unimaginative layout of standard units which will clearly be entirely dependent on private vehicle use. Buntingford has been subject to a very significant quantum of similar 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.
14. The proposed site is suitable for neither a substantial medical centre nor further large scale housing where residents and visitors would inevitably be heavily reliant on private vehicle trips for all purposes. There is no train station in Buntingford and public transport is limited and further development is unsustainable, unnecessary and inappropriate. We support the extensive concerns expressed by the local community and urge the Council to refuse permission for this speculative 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.