



The countryside charity
Hertfordshire

31a Church Street

Welwyn

HERTS AL6 9LW

www.cpreherts.org.uk

office@cpreherts.org.uk

01438 717587

Standing up for Hertfordshire's countryside

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

Our Ref:

Your Ref:

19th June 2024 (by email)

Dear Steve Fraser-Lim,

Application no. 3/24/0966/OUT

Land North of A507, West of A10, Buntingford

Outline planning application for development of up to 600 dwellings (C3), elderly accommodation (C3), Mixed Use Local Centre (including flexible use E, F and Sui Generis), First School, informal and formal open space, associated works and infrastructure including a new access from the A507 and pedestrian bridge over the A10, with all matters reserved except access.

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) by virtue of Policy GBR2 of the adopted East Herts District Plan. Policy GBR2 states that; "it (RABGB) is a considerable and significant countryside resource which Policy GBR2 seeks to maintain by concentrating development within existing settlements".
2. Policy GBR2 identifies eight types of development which may be permitted in RABGB; "provided they are compatible with the character and appearance of the rural area." The present proposal for 600 houses and associated services, facilities and infrastructure does not satisfy any of the eight criteria noted and introduces a major residential development into the countryside.
3. The Planning Statement prepared by consultants for the developer seeks to argue that, notwithstanding the East Herts District Plan providing for a five year supply of housing land, the previous under supply of land and under delivery of housing should be factors in determining this application. This is self-evidently incorrect as the District Plan makes sufficient provision for housing during the plan period within settlements and specific allocations elsewhere.

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: Allan McNab

Registered Charity 1162419



4. The proposed development lies entirely outside the built-up area of Buntingford and would constitute the first development west of the A507 by-passing the town. The developer's consultants assert that the proposal is a "sustainable development" with no supporting evidence, and the experience of recent development locally is that developments of this nature are almost entirely dependent on private vehicle usage.
5. Buntingford has been subject over recent years to very considerable development without consequent expansion of services and facilities, including public transport provision. The town does not have a railway station and there is limited employment in the town, leading to additional private vehicle use.
6. The East Herts District Plan notes the excessive development which has taken place in Buntingford since 2011 (1,100 units prior to adoption of the District Plan in 2018), the loss of employment, and the importance of the Market Town character (paras 6.1.5 to 6.1.7). A review of the District Plan is now underway and any further development allocations should only take place within the Local Plan preparation process, incorporating local community consultation and participation, and not through unplanned speculative applications.
7. The Planning Statement identifies a series of planning benefits which would be expected as obligations for any large-scale development proposal of this nature. They do not provide any specific justification for this proposal which is inappropriate in policy terms, as noted above.
8. The proposed provision of a policy-compliant proportion of affordable housing is also irrelevant as a justification for development in this location. In any case, the unsustainable nature of the proposals would be particularly inappropriate for lower income households who may not have access to private transport.
9. CPRE Hertfordshire supports fully the significant local community opposition to this proposed development on the basis of pressures on local infrastructure and related matters in addition to its potential impact on the countryside. The location of Buntingford in the River Rib valley is identified in the District Plan and this proposal, which is partly on the ridge to the west of the town, marks an unacceptable intrusion into the "extensive rural hinterland" which has already been detrimentally affected by previous speculative development.



10. The site comprises high grade agricultural land categorised as Best and Most Versatile by the Department for Agriculture and Rural Affairs and this is increasingly regarded as a material consideration in the determination of planning applications due to concerns on food security and related matters.
11. The Council is urged to refuse permission for this unplanned and unnecessary 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.