



The countryside charity  
Hertfordshire

31a Church Street

Welwyn

HERTS AL6 9LW

[www.cpreherts.org.uk](http://www.cpreherts.org.uk)

[office@cpreherts.org.uk](mailto:office@cpreherts.org.uk)

01438 717587

Standing up for Hertfordshire's countryside

**Land off London Road Buntingford SG9 9JN**

**Ref: APP/J1915/W/24/3353714**

**PUBLIC HEARING**

**Interested Party Statement**

**by Chris Berry BA(Hons), Dip TP, MRTPI**

**on behalf of**

**CPRE Hertfordshire – the countryside charity**

February 2025

## **INTRODUCTION**

1. My name is Chris Berry. I am a Member of the Royal Town Planning Institute, hold a Bachelor of Arts with Honours degree in Geography from the University of London and a post-graduate Diploma in Town and Country Planning from the University of Newcastle-upon-Tyne.
2. I have practised in both the public and private sectors for over 45 years and been employed by a wide range of organisations including local government, development corporations, planning consultancies and development agencies. Latterly I have acted as interim Chief Planning Officer and Assistant Director for a number of London and Hertfordshire Boroughs and am presently employed as Planning Manager for CPRE Hertfordshire – the countryside charity.
3. I am presenting this statement for the Hearing on behalf of CPRE Hertfordshire. CPRE Hertfordshire acts to protect countryside in the County and is active in supporting local organisations and communities to protect open spaces and rural activity from inappropriate development and environmental degradation.
4. CPRE Hertfordshire supports fully the decision of East Hertfordshire District Council with respect to the refusal of permission for the planning application which is the subject of this Inquiry. We also support fully the very considerable local community opposition to this proposed development and the concerns of Buntingford Town Council.

## **BACKGROUND TO THE APPEAL**

5. The application (reference 3/23/1390/FUL) is for full planning permission for the development of 68 dwellings and associated works to the south-east of the town. The relevant development plan is the adopted East Herts District Plan 2018 together with the Buntingford Community Area Neighbourhood Plan . The District Plan is presently being reviewed by the Council.

## **RURAL AREA BEYOND THE GREEN BELT**

6. 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 District 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.”*

7. 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 relatively large-scale speculative residential development which is both outside the settlement boundary as defined in both the District and Neighbourhood Plans, and the scope of the exceptions which may be permitted through this policy.

#### **FURTHER DISTRICT AND NEIGHBOURHOOD PLAN POLICY**

8. CPRE Hertfordshire notes further policy objections in the East Herts District Plan in addition to Policy GBR2; including Policies DPS2, DPS3 regarding the exclusion of Buntingford from urban extensions, and Policy DES2 in the East Herts District Plan. Policies DPS2 and DPS3 allow development within the urban area, but excludes Buntingford from urban extensions as set out in Policy DPS3, and we do not regard this policy as “out-of date”, as noted by the Appellant (paragraph 4.20 Woods Hardwick Statement of Case Part 1).
9. The proposed development also conflicts with Policy DES2 that specifies that development should seek to “conserve, enhance or strengthen the character of the district’s landscape (Policy DES2)”. The proposals represent an unsustainable form of development with an inevitable heavy reliance on the private car to access employment, main shopping, leisure and recreation activities which are many miles away (Buntingford has no railway station) in larger towns and cities to which public transport is poor or non-existent.
10. Further policy relates to the requirements for development in Buntingford, namely East Herts District Plan Policies BUNT1 and 2 which do not include an allocation for the proposed development. The Buntingford Community Area Neighbourhood Plan includes well balanced policies for the local community area which specifically seek to maintain the rural character of the town and its surroundings. Policies ES1 to 9 provide a comprehensive demonstration of local community requirements in terms of future development which are not provided by this proposal.

## **HOUSING NEED**

11. This speculative application for development comprises a substantial addition to the built-up area of Buntingford to the east of the town. Notwithstanding that the Council notes a modest failure to provide for a full five year housing land supply in the District area, the Local Plan Review underway will seek to provide such a supply in the near future.
12. The housing need information provided in the Draft Statement of Common Ground between the Council and the Appellant (November 2024) applies to the District Council area and takes no account of the specific local circumstances of Buntingford. Very significant recent development has taken place both within and on the edges of Buntingford since 2011 and this should be taken into account. Good planning should take account of the 550 dwellings which have been consented just since the planning application which is the subject of this hearing was refused permission.

## **CUMULATIVE IMPACT**

13. The very significant quantum of development in recent years in Buntingford has undoubtedly changed the character of this small historic market town and the surrounding rural area, putting massive pressure on local infrastructure and amenities. I believe there is a limit to how much development a small historic settlement should take, particularly of a speculative and unplanned nature.
14. This limit has undoubtedly been reached in Buntingford and the constant non-compliance with District Council and Neighbourhood Plan policy in permitting speculative development is rendering the statutory planning process impotent. Buntingford has limited employment, no railway station and the proliferation of car-oriented housing estates exacerbates the pressure on local infrastructure leading to unsustainable and unnecessary development.

## **LANDSCAPE CHARACTER**

15. A key characteristic of the designated open land affected by the proposal is the quality of the rural landscape and specifically the Rib Valley setting in which Buntingford sits. The harm arising from the proposed development to landscape and visual qualities is substantial including the contribution it makes to the countryside in the area affected, providing space for long established agriculture and countryside recreation including walking.
16. There is a particular loss of open countryside character at the eastern part of the 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.

## **SUMMARY AND CONCLUSION**

17. In summary, CPRE Hertfordshire supports fully the District Council in its rejection of the proposed development which is the subject of this appeal. The quantum of development proposed means that there would be substantial harm caused to highly valued open countryside which is designated as Rural Area Beyond the Green Belt specifically to prevent the type and magnitude of development proposed.
18. For the reasons set out in this statement, the Inspector is respectfully urged to dismiss this appeal.