

100
YEARS



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Hertfordshire**

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Standing up for Hertfordshire's countryside

Land South of A507, West of A10

Buntingford

Planning Appeal ref: 6009644

East Herts DC planning ref: 3/24/1255/OUT

PUBLIC INQUIRY

Interested Party Statement

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

on behalf of CPRE Hertfordshire

July 2026

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 50 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.
3. I am presenting this statement for the Inquiry on behalf of CPRE Hertfordshire. CPRE Hertfordshire acts to protect countryside in Hertfordshire 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 considerable local community opposition to this proposed development, the concerns of Buntingford Town Council and identify further concerns relating to the relevance of affordable housing, and natural environmental matters.

BACKGROUND TO THE APPEAL

5. The application (East Herts District Council planning reference 3/24/1255/OUT) is for full planning permission for the development of employment land, informal open space, associated works and infrastructure on the western edge of Buntingford beyond the A10 and south of the A507.
6. The relevant development plan is the adopted East Herts District Plan 2018. A new Local Plan is presently being prepared by the Council and a Call for Sites has been published.

RURAL AREA BEYOND THE GREEN BELT

7. 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.”

8. 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 large-scale speculative commercial 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.
9. The site lies outside the Buntingford Settlement Boundary and the Buntingford Town Council Area which is subject to the Buntingford Community Area Neighbourhood Plan. The proposed development conflicts fundamentally with Policy GBR2.

FURTHER DISTRICT AND NEIGHBOURHOOD PLAN POLICY

10. CPRE Hertfordshire supports fully the further policy objections raised by the Council and others to the proposed development. In addition to Policy GBR2 referred to above, additional policies in the East Herts District Plan, namely Policies DES2, 3 and 4. These policies seek to “conserve, enhance or strengthen the character of the district’s landscape (Policy DES2)”, and make further provision for the quality of any proposed development in keeping with the local rural character.
11. CPRE Hertfordshire also notes District Plan Policy DPS2 which sets out policy for employment land in settlements and extensions to towns which do not include Buntingford. The site is not accessible by sustainable transport modes and thus in conflict with District Plan Policy ED1.
12. Further policy relates to the requirements for development in Buntingford, namely Policies BUNT1 and 2 which do not include an allocation for the proposed development. The proposals represent an unsustainable form of development with an inevitable heavy reliance on the private car to access employment.
13. 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.

SUSTAINABILITY AND ACCESSIBILITY

14. Concerns may also be raised with regard to the sustainability of the site and its physical isolation from the remainder of Buntingford. CPRE Hertfordshire supports the position of the Council with regard the likely dependence of the proposed development on private vehicles for staff and visitors and the inability of achieving sustainability through alternative modes of transport.
15. It is noteworthy that a vehicle weight restriction was imposed on the A507 less than two years ago to stop HGV vehicles using the road between Buntingford and Baldock because of its poor geometry and safety record as well as environmental impact. It would be perverse

to allow a use which would inevitably permit and encourage such traffic back onto such an unsuitable route.

16. CPRE Hertfordshire also notes the presence of the A10 as the western boundary of Buntingford and supports the Inspector's view in recent appeal reference number APP/J1915/24/3340497 that: "the A10 would provide a buffer and defensible boundary between the urban edge and the countryside".

EMPLOYMENT LAND

17. This speculative application for development comprises a substantial expansion beyond the built-up area of Buntingford to the west of the town and is not required by the adopted East Herts District Plan to satisfy the Council's objectively assessed need for employment land. The District Plan allocates sufficient land for employment land in the local authority area during the plan period and any further land for this purpose should be allocated through the Local Plan process and not by speculative applications.
18. Recent Council studies identify that the commercial property market in Buntingford is relatively self-contained and related to small businesses which do not require the scale and type of units proposed. Employment of this scale is better located in larger settlements with better public transport and less dependence on a single highway access.

CUMULATIVE IMPACT

19. 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. The population of Buntingford has expanded from 4,820 in 2002 to 7,879 in 2021 without a significant increase in the town's services and facilities during that period and the town has no railway station and public transport of all types is limited.
20. Together with the substantial proposed residential development north of the A507 (Ref 3/24/0966/OUT), also currently subject to appeal, the resulting impact on the character of the rural area to the west of Buntingford would be severe.

INFRASTRUCTURE CAPACITY

21. Concerns may also be raised with reference to the impact on local infrastructure and specifically water supply and water borne waste systems. Thames Water has indicated that the existing foul water network does not have the capacity to support the proposed development.
22. It appears that there has been no response from Affinity Water regarding water supply to the proposed development and there was significant water supply outage in May 2026 which required the substantial provision of bottled water to residents. Notwithstanding the legal requirement from statutory undertakers to supply water to proposed

development, there is growing concern that the existing networks and supplies are inadequate to water supply in East Herts. This is likely to become more significant as further development proposals are submitted in the area.

LANDSCAPE CHARACTER

23. 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, wildlife and countryside recreation.
24. The site presently constitutes a significant expansion outside the town beyond the A10 which acts as an important transition from the town to the countryside setting beyond. Building beyond the A10 in this location will set a precedent for future development up to and beyond the road corridor, with further detrimental impacts on the countryside around Buntingford.
25. CPRE Hertfordshire notes and supports the EHDC Landscape Officer's comments regarding the significant and adverse landscape and visual effects of the proposed development especially from the east which would be unmitigated by proposed planting. Particularly important is the impact on the existing ridgeline of the Rib Valley which will severely affect the rural character of the area.

AGRICULTURAL LAND

26. The site comprises approximately 13 hectares of undeveloped land in agricultural use, over 90% of which is assessed by the Department of Agriculture as Grades 2 and 3a Best and Most Versatile land. It is increasingly recognised that such land should be maintained in agricultural use for reasons of food security and the rural economy.

SUMMARY AND CONCLUSION

27. 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 very 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.
28. For the reasons set out in this statement, the Inspector is respectfully urged to dismiss this appeal.

31st July 2026