

Settlement Appraisal

Buntingford

1. History

- 1.1 The Supporting Document to the Preferred Options District Plan records the various assessment stages that were undertaken as part of the process to inform the Preferred Options version of the Draft District Plan. It therefore provides an essential background to this Settlement Appraisal. In particular, Chapters 4 to 6 of the Supporting Document explained the process of shortlisting or 'sieving' options applied to 'Areas of Search' and their findings.
- 1.2 On the basis of the assessments contained within the Supporting Document, and the rest of the evidence base that was available at that time, the Preferred Options District Plan proposed two sites for allocation in Buntingford; land to the south of the town, on land to the east of London Road (300 dwellings) and land to the north of the town, on land to the west of Ermine Street (180 dwellings). In addition, an element of windfall development was attributed to Buntingford.

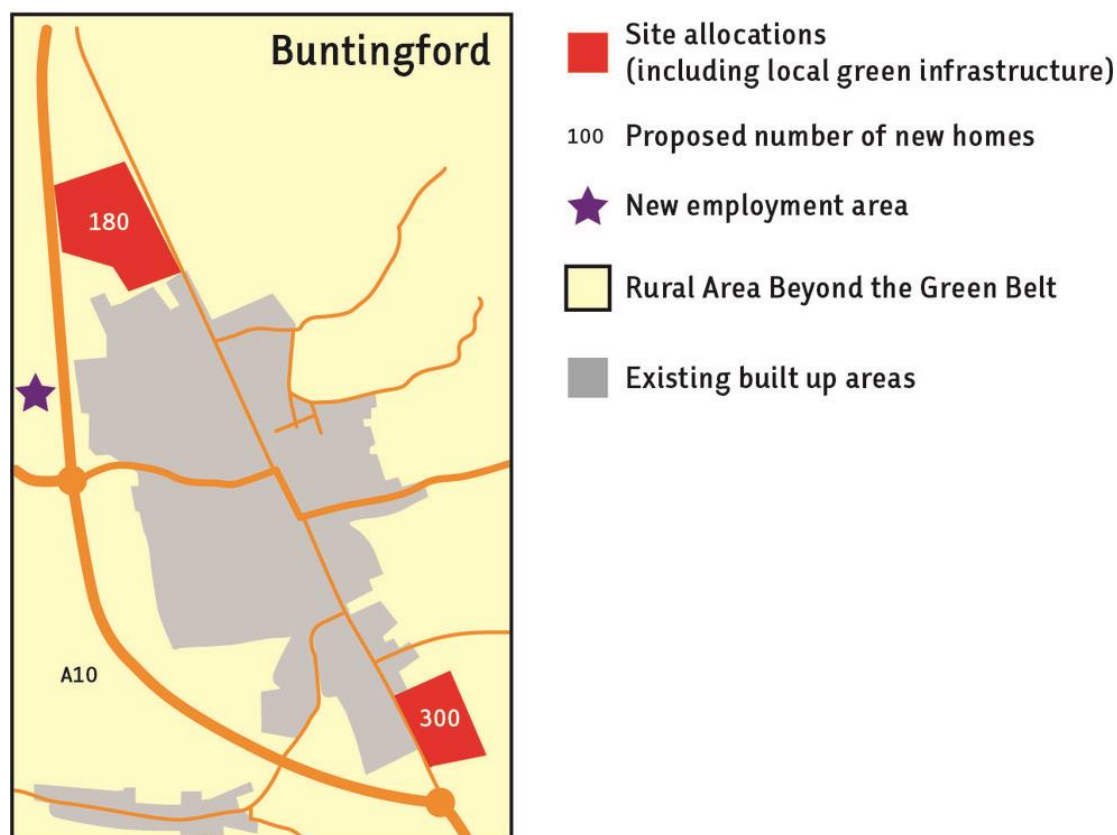


Figure 1: Preferred Options District Plan, Buntingford Key Diagram

2. Consultation Responses – town wide

2.1 The Preferred Options consultation elicited a significant response from members of the local community. While these representations covered a variety of topics, the main areas of concern were:

- Approval of speculative planning applications resulting in overdevelopment of the town and the impact on its overall sustainability;
- Infrastructure capacity (particularly education facilities, healthcare facilities and local road infrastructure);
- Lack of employment opportunities in the town;
- Lack of public transport links;
- Harm to the character of the town.

2.2 In responding to the Preferred Options consultation, Hertfordshire County Council indicated that it would be prudent to allocate a site for the provision of a first school to ensure that the long term need for school places can be met.

2.3 A couple of site promoters made representations specific to their sites and further consideration of the need to allocate additional sites for development is covered at appropriate points throughout the remainder of this document.

3. Planning Applications in Buntingford

3.1 Due to its position as the only town in the District that is not constrained by Green Belt, Buntingford has been subject to a number of speculative planning applications that have been submitted prior to the adoption of the District Plan.

3.2 The table below sets out the major planning applications (sites of 10+ dwellings) that have been approved or are awaiting determination since the Preferred Options consultation document was published.

Table 1: Major planning applications approved/submitted since Preferred Options

| Site | Description of development | Number of Dwellings | Status |
|--------------------------------|--|---------------------|--------------------|
| Land north of Hare Street Road | Residential development of 160 dwellings | 160 | Approved on Appeal |

| | | | |
|--|--|-----|--|
| Land south of Hare Street Road (Area 1) | Residential development of 105 dwellings | 105 | Approximately 100 dwellings approved on Appeal; 105 dwellings approved by Council through reserved matters application |
| Land north of Buntingford | Residential development of 180 dwellings | 180 | Approved by Council |
| Land north of Buntingford | Development of 25 retirement bungalows | 25 | Approved by Council |
| Land north of Buntingford | Development of 37 retirement apartments | 37 | Awaiting determination |
| Land south of Buntingford | Residential development of 316 dwellings and provision of 2ha of employment land | 316 | Approved by Council |
| Land north of Park Farm Industrial Estate | Residential development of 13 dwellings | 13 | Approved by Council |
| Land south of Hare Street Road (Areas 2 & 3) | Residential development up to 180 dwellings | 180 | Approved on Appeal |
| Land east of Aspenden Road | Residential development of up to 56 dwellings | 56 | Approved on Appeal |
| Land west of Luynes Rise | Residential development of up to 400 dwellings and site for First School | 400 | Awaiting determination |
| Land north of Park Farm Industrial Estate | Residential development of 43 dwellings | 43 | Awaiting determination |

3.3 The table shows that since the Preferred Options District Plan was published, planning permission has been granted for 1,035 dwellings on sites delivering 10+ units (1,010 for general needs and 25 specialist retirement dwellings). In addition, planning applications totalling an additional 480 dwellings are awaiting determination (of which 37 are for specialist retirement dwellings).

3.4 Therefore the emerging development strategy for Buntingford to be included in the District Plan will need to take account of this updated position.

4. Technical Assessments

- 4.1 A number of technical assessments have been completed since the Preferred Options consultation, primarily to help inform the decision-making process relating to the relevant planning applications, but also to inform the overall plan-making process. Further technical assessments will be commissioned to inform the decision-making process with regard to planning applications as appropriate.

Buntingford Employment Study

- 4.2 The Buntingford Employment Study, June 2014, was commissioned specifically in response to the planning application for the redevelopment of the former Sainsbury's Distribution Depot. In addition to providing specific information and recommendations about development of the site, the study also considered the likely growth in the resident population and workforce of the town until 2031, and considered the need to provide local employment opportunities and how these might be achieved.
- 4.3 The study established that a high proportion (74%) of residents of working age are economically active which suggests that the majority of residents who live in Buntingford, and would want to work, are able to find employment. In terms of the balance of workforce and jobs in the town, the available evidence implies that just 26% of economically active people who live in Buntingford, also work in the town. Whilst this self-containment ratio is low, the study states that it is important to note that the District as a whole has a low level of self-containment (45%), with East Herts being, in many senses, the rural hinterland of the major employment centres in the A1(M) and M11 corridors and in north and central London.
- 4.4 The study identified that there are currently around 1,300 jobs available in Buntingford and that an increase in the employed population of the town due to residential development proposals will increase the level of out-commuting from the town unless additional jobs are created in Buntingford. It is therefore considered desirable to grow the employment base of the town to increase the opportunities for people to live in Buntingford and work locally, which is particularly important for lower income, lower skill groups and for those who wish to work part-time.
- 4.5 The study examined the current supply of employment land in the town and this analysis indicated that there are relatively few vacant units within existing employment sites. In addition, the study assessed the capacity for the delivery of additional jobs through the development of increased

employment floorspace on the existing employment sites within the town and through the extension of the employment area at Buntingford Business Park. The study concluded that there is the potential to create approximately 1,110 jobs on existing employment sites within the town (including the retention of 2ha of employment land at the former Sainsbury's depot), and through the development of an additional 3 hectares of employment land at Buntingford Business Park.

- 4.6 The study calculated an increase in the employed population of the town of 1,236 people, based on the construction of all the development schemes that have received planning permission as of August 2016, indicating that even if the full capacity of 1,110 jobs were to be achieved on the existing employment sites in the town, this would not match the increased demand for employment from new residential development.
- 4.7 The study confirms that further residential development beyond that already committed without an accompanying growth in employment would increase the level of out-commuting from the town, further reducing the self-containment ratio of the town.

Site Search for a Two Form of Entry First School Site in Buntingford

- 4.8 The Site Search for a Two Form of Entry First School Site in Buntingford, June 2015, was undertaken by Herts County Council (HCC) to supplement their representations to the Preferred Options consultation in 2014, where it was suggested that it would be prudent to allocate a site for the provision of a first school to ensure that the long term need for school places can be met in the town.
- 4.9 The paper states how HCC produce pupil forecasts every six months and the forecast produced in mid-2014 identified that the surplus capacity previously identified at first school level had reduced significantly with a growing number of pre-school aged children living in the area identified from GP registration data.
- 4.10 The paper refers to a Buntingford Position Statement prepared in Autumn 2014 which took account of all approved and proposed housing development in the town and the impact that the provision of this amount of housing would have on the demand for school places in the school planning area. Housing growth of approximately 1,470 dwellings indicated a peak in pupil yield at first school level of around 3FE from 2024. The current potential for expansion at the two existing first school sites in the town has been assessed as being 1.5FE, which is equivalent to the development of

approximately 750 dwellings. Therefore the conclusion of the statement was that a new two form of entry (2FE) first school site would be required in the town should all the proposed development come forward.

4.11 The paper shortlisted three potential sites from an initial list of nine sites, which it was suggested should be considered further for the provision of a 2FE first school. These sites were:

- Former Sainsbury's Depot
- Buntingford Cougars FC
- Buntingford West

The study explains the reasons behind the shortlisting of these sites and concludes by requesting that Policy BUNT2 South of Buntingford is amended in the emerging District Plan to allocate a site for a new 2FE first school within the area identified for employment use.

Buntingford Transport Model Report

4.12 The Buntingford Transport Model Report, August 2015, was commissioned to inform the consideration of the submitted planning applications and to inform the Plan-making process of the District Plan.

4.13 The work involved the creation of a VISSIM micro-stimulation model of the existing operation of the road network in and around Buntingford, which was then used to test various development scenarios (including both committed development and development proposals still under consideration), and determine any mitigation measures if required.

4.14 The results of the scenario testing indicated that, in the most part, the network can accommodate the new developments given the network changes that have already been planned through the approval of the various planning applications.

4.15 However, operational issues were identified at the following locations;

- A10/London Road – southbound in the AM peak, and northbound in the PM peak
- High Street/Baldock Road – northbound, principally in the AM peak

4.16 In terms of the A10/London Road roundabout, two mitigation measures were tested. The results showed that local widening of the two A10 exit links at the

roundabout (to provide a two-lane section before merging back to a single lane) provided a significant improvement in operation, particularly in the AM peak. The report suggested that this mitigation measure should be considered in the near future.

- 4.17 The report also highlighted an ongoing issue with the link capacity of the A10 between the London Road roundabout and the dual-carriageway section around 2km south of the town. The modelled scenarios that include the development of 400 dwellings to the west of Buntingford, result in the traffic demand on this section of the A10 being close to the link capacity during peak periods. Therefore, the second mitigation measure identified in the report is a longer term aspiration to extend the dual carriageway section up to the London Road roundabout.
- 4.18 The report highlights that mitigation measures such as junction improvements to address the operational issues identified at the High Street/Baldock Road junction are difficult to implement due to the surrounding streetscape in this location. However, the modelling indicates that if a new roundabout on the A10 is provided as part of the development of 400 homes to the west of Buntingford, traffic levels within the town centre will be reduced which will have a positive impact on the local road network.

Delivery Study

- 4.19 The Delivery Study is a technical document which assesses the financial viability and deliverability of the proposals contained in the Preferred Options District Plan. While the study did not specifically assess the two proposed sites in Buntingford, it did test the financial viability of different site typologies. The study concluded that development schemes in the Buntingford area that are predominantly or wholly residential in nature, should be considered financially viable when taking into account the policy requirements of the District Plan as a whole. However, flatted developments and/or development on brownfield sites with abnormal or remediation costs may not be able to meet the full policy requirements of the District Plan and flexibility would be required when negotiating S106 or CIL financial contributions.

5. Duty to Co-operate

- 5.1 Buntingford is located in the northern part of the District and development proposals in the town have limited cross-boundary issues. Nevertheless, the development proposals in the town have been the subject of Duty to Co-operate discussions with North Herts District Council with regard to the

relationship between Buntingford and Royston and the impact of development on traffic flow on the A10. In addition, extensive discussions have been held with Hertfordshire County Council regarding cross-boundary education issues as there is an identified flow of pupils from both North Herts and Stevenage into schools located in Buntingford.

6. Neighbourhood Planning

- 6.1 Buntingford Town Council had an Area Designation approved in July 2014 in order to undertake a Neighbourhood Plan. The Neighbourhood Plan covers the town and five adjoining rural parishes and is referred to collectively as the Buntingford Community Area. The Neighbourhood Plan has been prepared in the context of the Local Plan 2007, although the policies have been drafted with a view to being in general conformity with the policies in the emerging District Plan. The independent examination of the Neighbourhood Plan is due to commence shortly. If the Plan is found to meet the basic conditions, the Plan will be put forward to a referendum and if the majority of voters are in favour of the Plan, the Neighbourhood Plan will be made and will form part of the statutory development plan for the District.
- 6.2 The Buntingford Community Area Neighbourhood Plan does not allocate any sites for development, but defines a settlement boundary for the town within which development will be permitted. In addition, the Plan contains policies relating to Business and Employment, Environment and Sustainability, Housing Development, Infrastructure, Leisure and Recreation and Transport.

7. The Emerging Strategy

- 7.1 The development strategy for Buntingford has been largely shaped through the planning application process, in advance of the adoption of the District Plan. The amount of development proposed in the Preferred Options District Plan was for at least 493 dwellings and development in excess of this level (1,035 dwellings) has already been approved, with planning applications for a further 480 dwellings awaiting determination.
- 7.2 It should be noted that development of up to 2,000 dwellings in Buntingford has been tested through the plan-making process. The conclusion contained within Chapter 4 of the Supporting Document was that development of 2,000 dwellings in Buntingford would be out of scale with the capacity and function of the town, with limited mitigation measures identified, particularly with regard to the High Street/Town Centre, which performs the function of a Minor Town

Centre. Therefore, Chapter 4 stated that a lower level of development would be preferable with further work required to recommend a suitable figure.

- 7.3 Chapters 5 and 6 of the Supporting Document considered further the issue of a suitable figure for the level of development in the town. Assessment of economic development opportunities indicated that it would be necessary to expand both the retail offer and local employment opportunities within the town to meet the needs of an increasing population. Due to its location, businesses within and around Buntingford tend to have local links, serving the local area and rural hinterland around the town. Therefore, it was considered that the best employment strategy would be to seek to expand existing employment sites to provide small and medium units for local businesses, rather than to develop a large employment site, particularly one aimed at a single user. Transport modelling undertaken by the Highway Authority at that point indicated that development of approximately 500 dwellings could be accommodated within the highway network, with further modelling required to determine the impacts of a higher level of development. In addition, an assessment of the urban form of the town concluded that development of approximately 500 dwellings would be the appropriate scale of development to maintain a linear urban form, with development located to the north and south of the town respecting the valley setting of the town.
- 7.4 This evidence provided the justification for the development strategy proposed for the town in the Preferred Options District Plan. However, as stated in Section 3 above, since the Preferred Options District Plan was published, planning permission has been granted for 1,035 dwellings on sites delivering 10+ units, with issues regarding employment provision, highways capacity and urban form being considered through the planning application process.
- 7.5 The development strategy for the town, therefore, needs to reflect the updated position with regard to committed development proposals in Buntingford and, having regard to the evidence presented in the technical assessments, an updated conclusion as to what an appropriate and sustainable level of development would be for the town needs to be reached.
- 7.6 Buntingford is the smallest town in the District and currently has insufficient employment opportunities for the projected increase in the population of the town. The town has no railway station and is not well connected to nearby settlements by bus services. Therefore the town is a less sustainable location for development in comparison to sites in, or on the edge of, larger towns in the District that have a railway station and better public transport provision. Notwithstanding this, Buntingford does have a wide range of services and facilities serving the day-to day needs of both the residents of the town and its large rural hinterland. Therefore, the town is viewed as an appropriate and

sustainable location for a proportion of the development required to meet the District's housing requirement.

- 7.7 The NPPF (paragraphs 34) states that new development should be located where the need to travel can be minimised and the use of sustainable transport modes can be maximised. Despite the quality and range of services and facilities in Buntingford, they are not sufficient to sustain the local population, and it is inevitable that current and future residents of the town will travel to nearby larger towns, primarily by car, which is not viewed as an environmentally sustainable outcome.
- 7.8 Likewise, in terms of sustainable development it is, in principle, desirable that people should be able to live and work locally to minimise the time, cost and environmental impacts of their journey to work. However, opportunities for employment are currently lacking in the town. 2 hectares of employment land have been retained as part of the planning permission approved at land south of Buntingford and an allocation for 3 hectares of new employment land has been made at the Buntingford Business Park. The Buntingford Employment Study indicates that there is the potential to create approximately 1,110 jobs on these sites and through the development of increased employment floorspace on the other existing employment sites in the town (Park Farm and Watermill Industrial Estates).
- 7.9 The study calculated an increase in the employed population of the town of 1,236 people, based on the construction of all the development schemes that have received planning permission as of August 2016, indicating that even if the full capacity of 1,110 jobs were to be achieved on the existing employment sites in the town, this would not match the increased demand for employment from new residential development. It is considered that further residential development beyond that already approved without an accompanying growth in employment provision would lead to an increase in out-commuting from the town by car, given the current provision of public transport in Buntingford, and this is not considered to be an environmentally sustainable outcome. Buntingford already has a low self-containment ratio of just 26% and it is considered that the development strategy for the town should seek to maintain and, if possible, improve this, with any growth in dwellings being matched by growth in employment opportunities.
- 7.10 Therefore, it is the view of Officers that significant development in excess of the figure already committed for development in the town would be out of scale with the form and function of the town, and cannot be viewed as being sustainable development.

- 7.11 Consequently, it is not proposed to allocate any additional sites in the Plan for residential development. The emerging strategy for the town in the District Plan is now concerned with ensuring the cumulative impacts of development are managed appropriately, particularly through the provision of additional employment opportunities and education infrastructure to ensure that the impacts of development in Buntingford are appropriately mitigated.
- 7.12 It is proposed to make amendments to the policies contained in the Preferred Options District Plan as set out below.

Policy BUNT2 South of Buntingford

- 7.13 This site was included in the District Plan Preferred Options Consultation for the proposed delivery of 300 dwellings and the setting aside of a proportion of land for employment uses and to facilitate improvements to the Bury Football Club.
- 7.14 Since the 2014 Preferred Options consultation, planning permission for 316 dwellings has been approved and development has commenced on site. As part of the planning application process, outline planning permission has also been granted for 2 hectares of employment land on the southern part of the site, for development that falls within the Use Classes B1(a), B1(c) and/or D1.
- 7.15 As a result of the implementation of this planning permission, the majority of Policy BUNT2 becomes redundant and should be deleted from the District Plan. It is proposed that the 2 hectares of employment land retained on the site should be designated as an Employment Area, and referenced in Policy BUNT3 (previously numbered as BUNT4) Employment in Buntingford. The Bury Football Club grounds will remain outside the settlement boundary of the town and will continue to be protected by an 'Open Space, Sport and Recreation' policy designation (CFLR1).

Policy BUNT3 North of Buntingford

- 7.16 This site was included in the District Plan Preferred Options Consultation for the proposed delivery of 180 dwellings and the setting aside of a proportion of land for employment and education uses and to facilitate improvements to Freman College.
- 7.17 Since the 2014 Preferred Options consultation, planning permission for 180 dwellings has been approved on the majority of the site and it is anticipated that a major housebuilder will commence development shortly. In addition, a

specialist retirement housing provider is seeking to bring forward the southern part of the site for the provision of retirement housing; 25 retirement bungalows have been approved and a planning application for 37 retirement apartments is awaiting determination.

- 7.18 Given that the planning position of this site is largely resolved and development is due to commence shortly, it is considered that there is no longer a need to include Policy BUNT3 in the Plan. The residential development areas of the site will be included in the settlement boundary of the town and the open space contained within the western part of the site will remain outside the settlement boundary of the town and be protected by an 'Open Space, Sport and Recreation' policy designation (CFLR1).

New Policy BUNT2 First School Site Allocation

- 7.19 The Preferred Options version of the District Plan proposed a level of development in Buntingford where the pupil yield generated from new development could be met through the expansion of existing schools in the town. HCC have confirmed that the expansion potential of the existing first schools is 1.5FE which is equivalent to the development of approximately 750 dwellings. The appeal decisions received earlier in 2016 that granted approval to 236 dwellings at land south of Hare Street Road (Areas 2 and 3) and land to the east of Aspenden Road have resulted in the projected pupil yield from new developments exceeding the expansion capacity of the existing first schools in the town. Therefore, it is essential that a new first school is delivered within the first five years of the Plan to meet the increasing demand for school places.
- 7.20 As stated in paragraph 4.10 above, HCC have carried out a site search for a two form entry first school and have requested that Policy BUNT2 be amended in the emerging District Plan to allocate a site for a new school within the area identified for employment use. However, as stated in paragraph 7.9 above it is the view of Officers that this Policy be deleted in the forthcoming version of the Plan. As part of the approved planning application on this site, 2 hectares of employment land has been approved for B1(a)/B1(c) and/or D1 uses. It is Officer's understanding that the employment land (which is split across both sites of an access road into the site) has been/is in the process of being sold to two separate developers. One developer is proposing to build a care home on 0.62ha of the site and a planning application is awaiting determination, with the remainder of the site being proposed for mixed employment uses. Whilst the planning permission granted on the site permits D1 use (which includes education provision) on the land identified for employment uses, it is the view of Officers that

delivering a school on this site would now be unlikely given the value of the land with the extant planning permission for commercial development, and the landowner's intention to develop it for commercial purposes. In addition, provision of a school on the designated employment land would result in the full employment potential of the land not being maximised.

- 7.21 The site search paper identified two other potential sites for a new first school. The first of these sites is land at Buntingford West, which is currently the subject of a planning application for up to 400 dwellings and a first school site. However, the current application is proposed to be developed in phases with the first school to be delivered in Phase 2, which would not meet the timeline set out by HCC for when they need the new school to be opening.
- 7.22 The developer has indicated that it may be possible for the first school to be developed as part of Phase 1 but there are significant outstanding issues relating to this proposal with regard to accessing the school site (which is located at a distance from Phase 1 of the development and the proposed access route) and how the access to the school would be financed. In addition, there is an outstanding objection from the Highway Authority to accessing the school through the existing residential development (from Luynes Rise). Therefore, the current position is that vehicular access to the proposed school site would need to be provided by the construction of a new roundabout on the A10 and Officers have significant concerns about the viability of delivering this roundabout as part of Phase 1 of the development. Even if these issues were to be resolved, HCC would, to some extent, be dependent upon the developer for delivery of the school, with regard to the timetable of implementation of the scheme.
- 7.23 The proposed school site at Buntingford West is also located in close proximity to one of the town's existing first schools, Millfield First & Nursery School, so delivery of a new school in this location would create a concentration of places in this area of the town. It is therefore not the preferred location of HCC for delivery of a first school. Given the outstanding issues relating to the planning application, the delivery of a first school within the timescale identified by HCC remains uncertain.
- 7.24 The final potential site identified by HCC for a new first school is the Buntingford Cougars FC site located to the west of London Road. The full extent of the land identified to the west of London Road (approximately 3 hectares) is understood to be in the ownership of three landowners, one of whom leases their land (approximately 1 hectare) to Buntingford Cougars FC. This part of the site, located on the southern boundary, is currently in use as a football pitch and is designated as a protected open space and recreation facility. The remainder of the site is partially covered by matures trees, with

hedgerows to the boundaries.

- 7.25 As part of the site search work, HCC contacted one of the landowners who indicated that they had no interest in bringing the site forward for development. However, two of the landowners have promoted their sites for development to the Council (through the Call for Sites and through representations to the Buntingford Community Area Neighbourhood Plan). Therefore it is considered that the site is available for development and given that the site is in a preferable location for the delivery of a new first school, due to its proximity to the new residential development being constructed to the east and south of the town, it is the view of Officers that the site should be allocated for the provision of a new first school in the District Plan, with dual use of recreation facilities for wider community activities. It is acknowledged that there remains a degree of uncertainty surrounding the delivery of a first school on this site, but it is felt that a site allocation within the District Plan provides HCC with a policy position to work with going forward to engage in further discussions with the relevant landowners. The entirety of the land to the west of London Road will be allocated for the provision of the school, despite the full extent of the site not being required, as HCC need to undertake further technical assessments and feasibility work to ascertain the exact amount of land required for the school and the preferred location within the site. The site will not be included in the settlement boundary of the town.

8. Consideration of Alternative Sites

- 8.1 As part of the Plan-making process it would usually be necessary to consider whether any available and suitable alternative options would be better placed to meet the level of development proposed to be delivered within a particular settlement. However, as explained in this appraisal, it is the view of Officers that the level of development for Buntingford proposed in the District Plan should be equal to that already committed in the town through the approval of recent planning applications. Therefore, it is not proposed to allocate any additional sites for development in Buntingford in the District Plan; as such, there is not the requirement to consider whether alternative sites would be better placed to meet the proposed level of development as this has already been reached.
- 8.2 However, it is important to make the distinction between the plan-making process and the decision-making process relating to the consideration of planning applications, in relation to alternative sites. The discussion and conclusions reached in this settlement appraisal with regard to Buntingford relate to the formulation of a sustainable development strategy for the District as a whole, through the plan-making process.

- 8.3 In an ideal situation, all the potential development sites around the town would have been considered through the process of preparing the District Plan, where the cumulative impacts of development could be properly assessed and mitigated where appropriate. However, this has not been the case and each planning application submitted in advance of the District Plan has been considered on its merits in accordance with the saved policies of the Local Plan 2007 and the NPPF. There are still outstanding planning applications awaiting determination that will also be considered in this context and potentially with regard to the policies contained in the emerging District Plan as they gain more weight in the decision-making process.

9. SA Objectives

- 9.1 The Sustainability Appraisal is an integral part of Plan-making. As no further sites are being allocated for residential development in the town in addition to those which have already gained planning permission, the development strategy for Buntingford has been largely shaped in advance of the adoption of the District Plan and the impacts arising from development have been considered through the planning application process. Therefore, the development strategy for Buntingford will be assessed through the District-Wide Sustainability Appraisal.

10. Conclusion

- 10.1 The Settlement Appraisal for Buntingford has demonstrated that, given the level of development already committed in Buntingford through the approval of speculative planning applications submitted in advance of the adoption of the District Plan, no further sites should be allocated for residential development in the town.
- 10.2 The Appraisal identifies that development in excess of the level already permitted cannot be viewed as being sustainable due to the likely increase in out-commuting from the town by car to access services, facilities and employment opportunities in nearby towns.
- 10.3 The emerging strategy for the town in the District Plan is now concerned with ensuring the cumulative impacts of development are managed appropriately, particularly through the provision of additional employment opportunities and education infrastructure to ensure that the impacts of development in Buntingford are appropriately mitigated. The 2ha of employment land retained

on the site south of Buntingford will be designated as an employment area and a site allocation has been made on land west of London Road for the provision of a new first school to meet the growing demand for places forecast in the town.

- 10.4 It is considered that this presents a positive and sustainable development strategy for Buntingford.