



Amit Patel
Development Management
East Herts District Council
Wallfields
Pegs Lane
Hertford SG13 8EQ

Our Ref:

Your Ref:

22nd September 2023 (by email)

Dear Amit Patel,

**Application no. 3/23/1447/OUT - Land east of the A10, Buntingford
Outline planning for the development of 350 dwellings, with up to 4,400 sqm of
commercial and services floorspace (Use Class E and B8) and up to 500 sqm of
retail floorspace (Use Classes E) and other associated works including drainage,
access into the site from the A10 and Luynes Rise (but not access within the site),
allotments, public open space and landscaping**

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

1. We have previously objected to application number 3/22/1551/FUL which is effectively the same proposal previously refused permission. The Council's position has been clearly stated in principle and supports the very considerable local community opposition to this proposal. In the light of the effective resubmission of the previous application which is clearly being done to provoke a planning appeal, we believe it is reasonable for us to restate our previous concerns.
2. 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 Local 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."
3. 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 residential and commercial development which is clearly outside the scope of the exceptions which may be permitted.

4. Accordingly, the assertion in the Applicant's Planning Statement (PS) that "the Site is not covered by any Local Plan designations but is described as being within the Rural Area outside the Green Belt (sic)" (Planning Statement paragraph 2.5) is incorrect and misleading. Policy GBR2 is a key policy of the adopted Local Plan and the area affected is designated in the Policies Map.
5. As noted above, the proposal takes no account of the Council's policies for the protection of open countryside. The objectives in both the East Herts District Plan and the Buntingford Community Neighbourhood Plan state that such areas will be protected and Policy ES7 in the Neighbourhood Plan requires development "to protect and enhance biodiversity in line with NPPF requirements and must demonstrate a net gain in biodiversity in an ecological report consistent with BS 42020."
6. This speculative application for development comprises a substantial extension of the built-up area of Buntingford to the south-west of the town and is not required by the adopted District Plan to satisfy the Council's objectively assessed need for housing.
7. The site is entirely open agricultural land forming a clear and well-defined boundary to the built-up area of Buntingford. The Agricultural Land Classification is Grades 2 and 3a which comprises "Best and Most Versatile Land" which should be maintained for agriculture to maintain food security; an issue which is gaining in significance due to global trade uncertainties.
8. With regard to the provision of affordable housing, the developer indicates that Council policy will be followed and suggest that this is a reason for granting permission. Notwithstanding that recent informal research by CPRE Hertfordshire indicates that no average earning household in Hertfordshire can afford an average priced house, there must be some doubt that 40% affordability will be achieved. In any case, the proportion is irrelevant to the principle that housing is inappropriate in this location.
9. The Design and Access Statement submitted with the application indicates a banal and unimaginative layout of standard units filling the site with minimal amenity space, despite the extensive supporting material promising "a high quality, innovative and landscape led mixed use sustainable community".
10. The Planning Statement notes that an "independent design review was secured with The Design Review Panel East" (paragraph 3.4). We previously noted it would be preferable for the Applicant to commission a local design panel such as the Hertfordshire Design Review Service or Design South East to provide a truly objective assessment of the impact of the proposals.



11. 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. Further development is unsustainable, unnecessary and inappropriate.
12. We support the extensive concerns expressed continually by the local community and the previous refusals on this site, and urge the Council to maintain its position and refuse permission for this 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.