

Cllr Sue Nicholls  
66 Baldock Road  
Buntingford  
Herts  
SG9 9DH  
(by email)

28 August 2023

Dear Amit Patel

**Application Ref:** 3/23/1447/OUT

**Address:** Land East of the A10 Buntingford Hertfordshire

**Proposal:** 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

I write with regard to the above planning proposal to which I would like to strongly object for the following reasons:

The land identified for this proposed development is designated as Rural Area Beyond the Green Belt in the adopted East Herts District Plan 2018 (EHDP). Land which is “a considerable and significant countryside resource” which Policy GBR2 seeks to maintain by concentrating development within existing settlements. This speculative development proposal takes no account of the Council’s policies for the protection of open countryside. The development comprises of a substantial extension to the built-up area of Buntingford and is not required by the District Plan to satisfy the Council’s objectively assessed need for housing.

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.” I do not believe that this proposal will meet those requirements.

**Unsustainable Nature of the Development:**

A Thames Water Report in response to this proposal states that they “object to development due to its inability of the existing FOUL WATER network infrastructure to accommodate the needs of this development proposal.”

Thames Water also identified “an inability of the existing **surface water** network infrastructure to accommodate the needs of this development proposal” and “an inability of the existing **sewage treatment works** infrastructure to accommodate the needs of this development proposal.”

Thames Water state that “Our response reflects our concern that the applicant has failed to demonstrate future occupiers of the proposed development will have adequate amenity including (but not limited to) **odour, noise, lighting and flies**. Given the proposed development's proximity to the Sewage Asset, we object to the planning application.”

Sewage Treatment Upgrades are likely to be required to accommodate the proposed development. Any upgrade works identified will be necessary in order to avoid sewage flooding and/or potential pollution incidents.”

Separate communication from Thames Water received by a Buntingford resident in March 2023 suggests that the planned upgrade to the existing Thames Sewage works, based on projected population figures, will be able to process sewage for 7736 people (2021 population size plus

occupants of the Dandara Estate on Aspenden Road (already partially occupied) and has no capacity or capability to grow beyond this.

### **Flood Risk**

The Environment Agency report associated with this application states that “In accordance with the National Planning Policy Framework (paragraph 162), development in flood risk areas should not be permitted if there are reasonably available alternative sites, appropriate for the proposed development, in areas with a lower risk of flooding. The proposed development falls partially within Flood Zone 2, which is land defined in the planning practice guidance as being at risk of flooding.

### **Effect of the development on the character of the neighbourhood and town**

The proposed development is incongruous due to its scale, building density and overbearing nature on a site next to the A10 bypass. Buntingford has been subject to a very high level of development over recent years. The effect of this has been to change the unique character of this historic market town and the surrounding rural area. This, in turn, has put massive pressure on local infrastructure and amenities such as health care provision (doctors and dentists). Local schools are oversubscribed, there is a lack of adequate leisure facilities, local supermarkets often struggle to keep shelves adequately stocked to meet local demand. The proposals represent an unsustainable form of development and residents would be heavily reliant on the private car to access employment, main food and comparison shopping elsewhere and the harm demonstrably and significantly outweighs the benefits.

### **Unsuitable Site**

The proposed 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 (demonstrated most recently with the continuing war in Ukraine affecting international grain supplies).

There are two existing public rights of way across the proposed site used by local residents as access to green space and countryside on both sides of the A10. Access to such green space is already worryingly low in Buntingford - a deficit that already affects residents’ physical and mental health. There are also concerns that the proposed development would disturb existing nature corridors and have an effect on local biodiversity - including loss of ecological habitats and wildlife.

I support the concerns expressed by the local community who I represent as a Buntingford Ward District Councillor and urge the Council to refuse permission for this application.

Cllr Sue Nicholls  
Buntingford Ward,  
East Herts District Council