



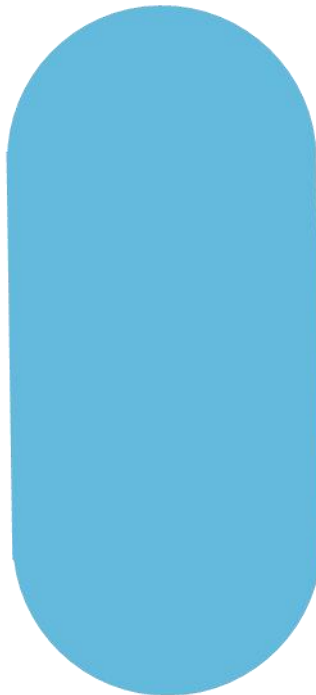
HALLAM LAND

LAND NORTH OF A507, WEST OF A10, BUNTINGFORD

3/24/0966/OUT

PLANNING STATEMENT ADDENDUM

MAY 2025



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1. INTRODUCTION

1.1.1. This Planning Statement Addendum has been prepared by Marrons on behalf of Hallam Land. Hallam Land are the Applicant for current planning application 3/24/0966/OUT for Land North of A507, West of A10, Buntingford.

1.1.2. The Description of Development is as follows:

Outline planning application for development of up to 600 dwellings (C3), elderly accommodation (C3), Mixed Use Local Centre (including flexible use E, F and Sui Generis), First School, informal and formal open space, associated works and infrastructure including a new access from the A507 and pedestrian bridge over the A10, with all matters reserved save for access.

1.1.3. The application was submitted on 20th May 2024 and made valid on 28th May 2024.

1.1.4. There has been significant engagement through the determination period to date. This includes with East Hertfordshire District Council (EHDC) and Hertfordshire County Council (HCC) Officers, facilitated through Planning Performance Agreement with EHDC and formal post-application engagement with HCC, as well as the East Hertfordshire District Council Development Management Forum (held on 24th September 2024) and the Design South East Design Review Panel.

1.1.5. Hallam Land have prepared and hereby submit a suite of revised and new documents to allay concerns raised through engagement on the outline planning application to date, as set out in Chapter 2 of this Planning Statement Addendum.

1.1.6. This Planning Statement Addendum also provides, at Chapter 3, an update on the local and national planning context which has changed since the application was submitted and provides further support for positive determination of the planning application.

2. REVISED AND NEW DOCUMENTS

2.1.1 In response to engagement on current planning application 3/24/0966/OUT received to date, Hallam Land have prepared a series of revised and new documents to respond to issues raised by statutory consultees. These are set out and described below.

Planning

- Planning Statement Addendum – this Document describes the context of the suite of revised and new documents being submitted, considered the current planning context in East Hertfordshire, and summarises that planning permission should be granted without delay.
- Sustainability Strategy – this Document sets out the significant sustainability and connectivity credentials of the proposed development and the commitments being made by Hallam Land to address concerns, and can be conditioned to require future Reserved Matters applications to deliver.

Masterplanning and Urban Design

- Land Use Components Plan – this revised Plan includes a series of amendments dealing with concerns raised, as described in the Design and Access Statement Addendum (pages 10 and 11), and can be conditioned to require future Reserved Matters applications to adhere to.
- Building Heights Parameter Plan – this new Plan has been drawn up to allow for a more thorough Landscape and Visual Impact Assessment to be undertaken, and can be conditioned to require future Reserved Matters applications to adhere to.
- Density Parameter Plan – this new Plan has also been drawn up to allow for a more thorough Landscape and Visual Impact Assessment to be undertaken, and can be conditioned to require future Reserved Matters applications to adhere to.
- Illustrative Masterplan – this revised Plan responds to changes to the Revised Land Use Components Plan and demonstrates one way in which

development could be accommodated on the site.

- Indicative Sports Pitches Layout Plan – this new Plan illustratively demonstrates how sports pitches could be accommodated on the site within the land defined on the Revised Land Use Components Plan.
- Design and Access Statement Addendum – this Document describes the series of revised amendments to submitted Plans and provide further detail with regard to masterplanning and placemaking.
- Design Principles Document – this new Document seeks to establish key Design Principles, with particular reference to Landscape, Movement and Access, and Built Form, and can be conditioned to require future Reserved Matters applications to adhere to.

Transport

- Transport Technical Note – this Note summarises the engagement with HCC as Local Highway Authority to date and the amendments to the development proposal as a result.

Flood Risk and Drainage

- Flood Risk and Drainage Technical Note – this Note summarises the engagement with HCC as Local Lead Flood Authority to date and the amendments to the development proposal as a result.

Landscape

- Landscape Strategy Plan – this revised Plan responds to concerns raised by the Landscape Officer with regard to additional screening and incorporates wider changes to the Land Use Components Plan.
- Landscape and Visual Impact Assessment – this revised Document responds to concerns raised by the Landscape Officer with respect of additional visual assessment and wireframes, and reflects on the design amendments incorporated with respect to landscape.

Ecology

- Ecological Impact Assessment – this revised Document incorporates ecology survey results which were outstanding at the time of the submission.
- Biodiversity Net Gain Assessment (including Biodiversity Metric Calculation Tool) – this revised Document reflects the changes to the Land Use Components Plan and concludes that a Net Gain of at least 10% remains achievable.
- Arboricultural Impact Assessment – this revised Document reflects changes to the Land Use Components Plan.

Other

- Local Centre Letter – a Letter of support of the likely demand and viability of the Local Centre which forms part of the proposed development from Henry Davidson Developments.

3. CHANGE IN PLANNING CONTEXT

- 3.1.1 Since the outline planning application was submitted in May 2024, there has been a notable change in planning context in East Hertfordshire and indeed nationally.
- 3.1.2 The Planning Statement (May 2024) submitted with the outline planning application was framed in the context of the Council's assertion at that time that it could demonstrate a positive Five Year Housing Land Supply position. This was further to the Council publishing a new position in March 2024, amended in April 2024 to take account of the latest affordability ratios, where the Council considered they could demonstrate 5.95 years supply of deliverable sites.
- 3.1.3 The Council's Five Year Housing Land Supply position was questioned, but in any case the Planning Statement considered there was a strong case for the granting of planning permission even if the Council could demonstrate a positive Five Year Housing Land Supply given the significant benefits offered by the scheme.
- 3.1.4 In August 2024, an appeal made by Countryside Partnerships Ltd and Wattsdown Developments Ltd at Land East of A10, Buntingford for up to 350 dwellings was allowed¹. The Inspector concluded that a number of sites within the Council's supply were not deliverable, and thus the Council could not demonstrate a positive Five Year Housing Land Supply position, quoting 4.2-4.49 years supply.
- 3.1.5 Indeed, given the changes to the National Planning Policy Framework (NPPF) in December 2024, the Council now have an even less favourable Five Year Housing Land Supply position than reported at the Buntingford appeal.
- 3.1.6 On 6th March 2025, in support of the ongoing Wheatley Group Developments appeal at Land off London Road and Owles Lane, Buntingford², the Council published a Statement regarding Five Year Housing Land Supply (March 2025)³. This recognises that there is a current shortfall in Five Year Housing Land Supply in East Hertfordshire, at circa 3.4 years to 3.7 years supply. This represents a significant

¹ [Reference: APP/J1915/W/24/3340497](#)

² [Reference: APP/J1915/W/24/3353714](#)

³ [3/23/1390/FUL | Demolition of no. 16 London Road and alterations to no. 18, including demolition of garage and amendment to parking arrangements and access. Erection of 68 dwellings with associated parking, landscaping, refuse and ancillary works. | Land Off London Road And Owles Lane Buntingford Hertfordshire](#)

deficit of around 1,500 to 2,000 homes in the District.

- 3.1.7 This position has been further reinforced more recently in the Land Off of London Road, Buntingford appeal decision issued in May 2025⁴, whereby the Council's accepted position of between 3.4 years and 3.7 years supply is quoted. This also aligns with an update on the Council's position published on the Council's website (note the Council's housing requirement has recently marginally reduced to 1,240 dwellings per annum based on the latest affordability ratios published in March 2025)⁵:

"In December 2024, the Government published a new methodology for calculating local housing need. Using this methodology, the Council's housing requirement has increased from 1,041 new homes per annum to 1,265 homes per annum.

For the purpose of calculating Five Year Housing Land Supply (5YHLS), the NPPF also requires a 5% buffer to ensure choice and competition in the market. This means that the Council's overall housing need requirement for 5YHLS purposes is currently $1,265 + 63 = 1,328$ new homes per annum.

The consequence of this increase is a supply deficit. The Council is currently reviewing its land supply trajectory to understand the deliverable supply of homes over the next five years and will publish an updated Five Year Housing Land Supply Position Statement in due course. An interim calculation, based on completions up to late February 2025 and a reassessment of the Council's District Plan allocated sites in the housing trajectory, suggests that the housing land supply calculation is currently between 3.4 and 3.7 years."

- 3.1.8 The most significant implication of the Council's lack of Five Year Housing Land Supply is that the East Herts District Plan is considered out-of-date, and NPPF Paragraph 11 d) is triggered. This sets out that, in such circumstances, planning permission should be granted unless:
- i. the application of policies in the NPPF that protect areas or assets of particular importance provides a strong reason for refusing the development proposed; or
 - ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole, having particular regard to key policies for directing

⁴ [Reference: APP/J1915/W/24/3353714](#)

⁵ [Monitoring and Five Year Land Supply | East Herts District Council](#)

development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.

- 3.1.9 The proposed development would not have an impact on any protected area or asset of particular importance as identified in Footnote 7 of the NPPF.
- 3.1.10 Furthermore, it is not considered that there would be adverse impacts of granting planning permission which would significantly and demonstrably outweigh the benefits. Indeed, as set out in the submitted Planning Statement (May 2024), it is considered that there are significant social, environmental and economic benefits arising from the scheme.
- 3.1.11 Social benefits include provision of up to 600 new homes, of which up to 40% will be delivered as affordable homes, which should be afforded significant weight in the context of the shortfall in housing land supply and documented acute local need for affordable housing. Community infrastructure, significant new Green Infrastructure, and improved active travel and public transport provision will also benefit new and existing residents alike.
- 3.1.12 Environmental benefits include the creation of multi-functional green infrastructure incorporating sustainable urban development features, and retention of existing vegetation where possible supplemented with additional planting across the Site, resulting in an anticipated net gain in biodiversity of 13.85%.
- 3.1.13 Economic benefits include significant job creation and economic output during the construction and operational phases of the development, as well as additional expenditure which will boost the local economy.
- 3.1.14 Moreover, taking the key policies set out in NPPF Paragraph 11 d) ii. which the decision-taker should have particular regard to, granting planning permission would:
- direct development to a sustainable location, namely adjacent to the urban edge of the market town of Buntingford which has a range of services and facilities which would be accessible by active travel modes;
 - make effective use of land through delivery of housing at an appropriate density, supported by complementary uses and with environmental

constraints in mind;

- set the framework for a well-designed place to be delivered, including through the submitted Design Principles Document which sets out a number of detailed design requirements and would be conditioned, requiring any future Reserved Matters applications to demonstrate compliance with it; and
- make a substantial contribution of up to 240 affordable homes, as required by Policy HOU3 of the East Herts District Plan (EHDP, October 2018), in an area with significant affordability issues.

3.1.15 As such, it is asserted that planning permission should be granted in accordance with NPPF Paragraph 11 d).

4. DESIGN REVIEW PANEL COMMENTARY

- 4.1.1 In addition to commentary on the design principles and credentials of the proposed development, as responded to through changes to the proposed development described in the Design and Access Statement Addendum and enshrined through the Design Principles Document, the Design Review Panel also raised concerns with the of sustainability of development in this location, with particular reference to accessibility and connectivity and, in their view, the resultant high level of car dependency.
- 4.1.2 Whilst the Design Review Panel's position is noted, it is important to reflect that Buntingford is a market town recognised in the EHDP as an "important rural service centre" with an "extensive range of services and facilities that serve the day-to-day needs of residents" (Paragraph 6.1.2).
- 4.1.3 It is recognised that Buntingford is not served by a railway unlike other towns in East Hertfordshire, however access to a railway station is not the determining factor when considering sustainability of a location for development. Indeed, this approach would render the majority of East Hertfordshire as unsustainable, contrary to the principles of the EHDP, and is not reflected in the NPPF.
- 4.1.4 Marrons have prepared a Sustainability Strategy which accompanies this submission. This sets out the significant sustainability and connectivity commitments being made by Hallam Land through the development proposal to address concerns raised in that regard, including but not limited to, enhanced Public Rights of Way connectivity and the establishment of an extended bus route through the Site.
- 4.1.5 Thus, the Design Review Panel's comments on the principle of development in this location based on sustainability concerns are strongly rebutted, particularly in the context of the Council's current lack of Five Year Housing Land Supply whereby NPPF Paragraph 11 d) is clear that planning permission should be granted unless the application of policies in the NPPF that protect areas or assets of particular importance provides a strong reason for refusing the development proposed, or any adverse impacts of doing so would significantly and demonstrably outweigh the benefits.

5. CONCLUSION

- 5.1.1 Hallam Land are seeking to positively respond to statutory consultee engagement through the submission of a suite of revised and new documents in support of the current planning application for Land North of A507, West of A10, Buntingford. To that end, a series of revised and new documents have been prepared and are submitted to East Hertfordshire District Council for consideration under planning application 3/24/0966/OUT.
- 5.1.2 As described in Chapter 2 of this Planning Statement Addendum, these revised and new documents have responded to concerns raised in relation to Highways, Flood Risk and Drainage, Design, Landscape and Ecology, and Hallam Land consider these issues to have been overcome through amendments to the scheme and further information being provided.
- 5.1.3 Furthermore, given the change in planning context described in Chapter 3 of the Planning Statement Addendum and specifically East Hertfordshire District Council's lack of Five Year Housing Land Supply, it is asserted that the scheme should be positively considered, and planning permission granted without delay.
- 5.1.4 Hallam Land welcome further positive engagement with statutory consultees on the revised and new information being submitted, and for East Hertfordshire District Council to determine the application thereafter.