

100
YEARS



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Standing up for Hertfordshire's countryside

Land North of A507, West of A10

Buntingford

Planning Appeal ref: 6008238

East Herts DC planning ref: 3/24/0966/OUT

PUBLIC INQUIRY

Interested Party Statement

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

on behalf of CPRE Hertfordshire

8th September 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, Cottered and Throcking Parish Council and Westmill Parish Council and identify further concerns relating to the relevance of affordable housing and natural environmental matters.

BACKGROUND TO THE APPEAL

5. The application (reference 3/24/0966/OUT) is for outline planning permission for the development of up to 600 residential units, 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 except access.
6. The relevant development plan is the adopted East Herts District Plan 2018. The District Plan is presently being reviewed by the Council.

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 residential and 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 on keeping with the local rural character.
11. The proposed development, by promoting through the illustrative plan an unimaginative and car-oriented layout of standard units filling the site with limited amenity space fails to achieve the requirements of Policies DES3 and 4 in this respect. Further District Plan policy relates to the requirements for development in Buntingford, namely Policies BUNT1 and 2 which do not include an allocation for the proposed development.
12. 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

13. The proposals represent an unsustainable form of development with an inevitable heavy reliance on the private car to access employment, main shopping, leisure and recreation activities which are many miles away (Buntingford has no railway station) in larger towns and cities to which public transport is poor or non-existent. Concerns may also be raised with regard to the sustainability of the site and its physical isolation from the remainder of Buntingford.
14. CPRE Hertfordshire supports the position of the Council with regard the likely dependence of the proposed development on private vehicles and the inability of achieving sustainability through alternative modes of transport.

HOUSING NEED AND CUMULATIVE IMPACT

15. This speculative application for development comprises a very substantial extension of the built-up area of Buntingford to the west of the town and is not allocated by the adopted East Herts District Plan to satisfy the Council's objectively assessed need for housing. It is also appropriate to note that housing need is not related to conditions in Buntingford.
16. 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.
17. The town has no railway station and public transport of all types is limited. The proliferation of car-oriented housing estates has already exacerbated the pressure on local infrastructure which is identified by other submissions.

LANDSCAPE CHARACTER

18. CPRE Hertfordshire notes and supports the representation made by the EHDC Landscape Officer to the application which indicates that the impact of the site and surrounding would be 'major adverse' in contrast to the findings of the Applicant's Landscape Value Impact Analysis. 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.
19. The harm arising from the proposed development to landscape and visual qualities is substantial including the contribution the site makes to the countryside in the area affected, providing space for long established agriculture, wildlife and countryside recreation. Building beyond the A10 to the west will mark a major departure for the town with further detrimental impacts on the both the countryside and existing infrastructure in Buntingford. Together with the proposed commercial development south of the A507, also presently subject to appeal, the resulting impact on the character of the rural area to the west of Buntingford would be severe.
20. CPRE Hertfordshire also notes the presence of the A10 as the western boundary of Buntingford and supports the Inspector's view in the 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". The separation of the proposed development from the town physically and in terms of accessibility are key problems with the proposed development.

AGRICULTURAL LAND

21. The site comprises nearly fifty hectares of undeveloped agricultural land, split between Grades 2 and 3a which constitute 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 and not used for speculative residential and commercial development.

INFRASTRUCTURE CAPACITY

22. 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 in a consultation representation that the existing foul water network does not have the capacity to support the proposed development.
23. It appears that there has been no response from Affinity Water regarding water supply to the proposed development and there was a 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.

AFFORDABLE HOUSING

24. The provision of affordable housing is cited as justifying the provision of housing in this location. Given that the definition of affordable housing has become effectively irrelevant with regard to house purchase by an average earning household in Hertfordshire, it is inappropriate to promote affordable housing as providing justification for the use of Rural Area Beyond the Green Belt for development.
25. Whilst accepting that a proportion of households can find ways of affording the slightly reduced “affordable housing” prices offered, this is a general factor relating to housing provision. It is not appropriate to use proportions of affordable housing as supporting the case for unnecessary housing which is not supported by District Plan policy.

SUMMARY AND CONCLUSION

26. 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.
27. For the reasons set out in this statement, the Inspector is respectfully urged to dismiss this appeal.