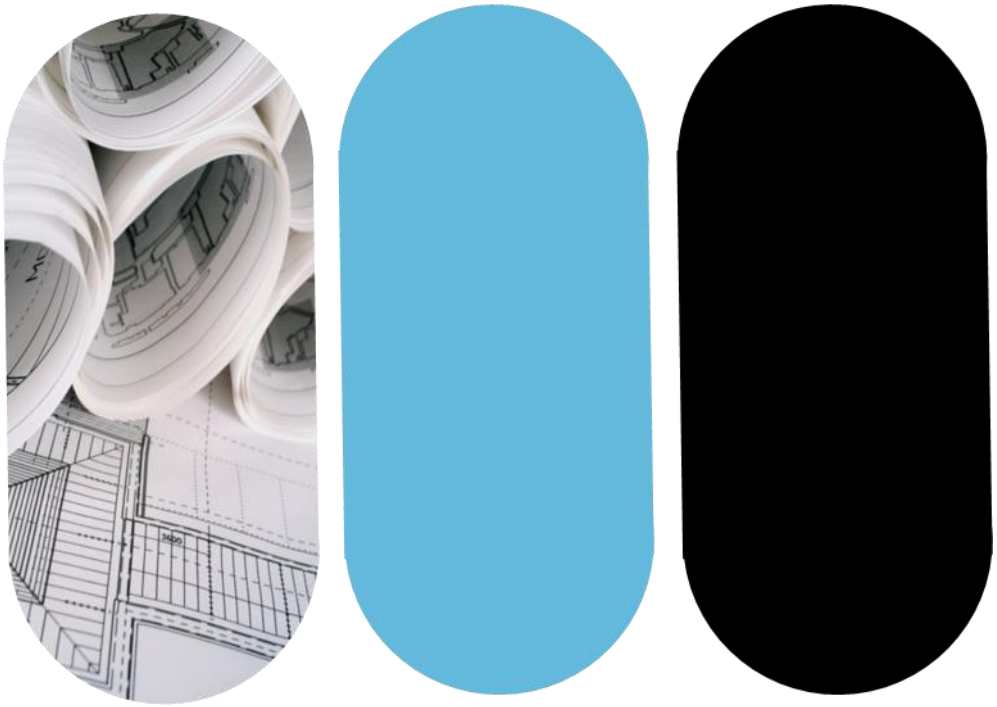
HALLAM LAND

LAND SOUTH OF A507, WEST OF A10, BUNTINGFORD

3/24/1255/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 3/24/1255/OUT for Land South of A507, West of A10, Buntingford.

1.1.2. The Description of Development is as follows:

Outline planning application for development of employment land (flexible use B2, B8, E(c) and E(g)), informal open space, associated works and infrastructure including a new access from A507, with all matters reserved except for access.

1.1.3. The application was submitted on 4th July 2024 and made valid on 11th July 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, as well as 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, a response to the Planning Policy Observations from the Planning Policy Team, dated 19th February 2025, with reference to the Buntingford Employment Study (2025).

2. REVISED AND NEW DOCUMENTS

2.1.1 In response to engagement on current planning application 3/24/1255/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, considers the Planning Policy Observations and emerging Buntingford Employment Study, 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 (page 8), 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.

- 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.

- Design and Access Statement Addendum – this Document describes the series of revised amendments to submitted Plans and provides further detail

with regard to masterplanning and placemaking.

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 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

- Employment Land Supply and Demand Report (Bidwells) – this new Document reviews current local supply and demand of light industrial and warehouse premises, identifying a lack of supply in Buntingford and the

wider A10 corridor and a demonstrated demand which means delivery of the site is expected to be well-received by the market and could deliver much-needed space for local and regional businesses and positively impact the economy in East Hertfordshire.

3. PLANNING POLICY OBSERVATIONS

3.1.1 Planning Policy Observations relating to application 3/24/1255/OUT were published on 21st February 2025, dated 19th February 2025[1]. The Planning Policy team do not support the principle of the proposed development due to the scale and location of the proposal.

3.1.2 The Planning Policy Team identify that the evidence base, namely the Buntingford Employment Study, suggests employment development in Buntingford should focus on local provision to meet the town's need, with Buntingford not identified as an optimal location for a strategic employment site. It is suggested that development of this scale should be planned strategically through the update of the District Plan, informed by a robust evidence base and a holistic consideration of housing, employment and infrastructure requirements.

3.1.3 Furthermore, concerns are raised with regard to the sustainability of the location of the Site and resultant high dependency on cars, which will have a negative impact on the local road network.

3.1.4 These conclusions are contended by Hallam Land.

3.1.5 The East Hertfordshire District Plan (October 2018) recognises the role of Buntingford an ideal base for small businesses. Paragraph 6.4.1 identifies that "the relative isolation of Buntingford makes it an attractive place for new small scale employment allocations in order to provide opportunities for local businesses to serve the town and nearby settlements in the rural area".

3.1.6 The more recent Buntingford Employment Study advises that there is no vacant employment floorspace in the town and that provision should be made for a range of unit sizes to support the growth aspirations of local businesses. The evidence also advises there is a need for greater balance between population and employment growth to address the current disparity.

3.1.7 The delivery of employment development will clearly contribute towards improving the balance between jobs and workers in Buntingford.

[1] 3_24_1255_OUT-PLANNING_POLICY_TEAM-2221565.pdf

3.1.8 The 2011 Census provides a pre-Covid baseline of travel to work flows of those living within Buntingford. Drawing upon the same study area as referenced in the Buntingford Employment Study (Figure 4.1), some 34% of the resident population either worked from home or travelled less than 10km to work (14% WHM plus 20% less than 10km).

3.1.9 The latest 2021 Census was undertaken during the Covid pandemic and as such it is reasonable to assume that travel to work flows recorded through the Census were skewed towards working from home. Nonetheless, the 2021 Census shows that a total of 46% of Buntingford residents either worked from home (35%) or travelled less than 10km to work (11%).

3.1.10 The working environment post-Covid has evolved with employees afforded greater flexibility to work from home either on a full time or hybrid basis. It is therefore likely that those Buntingford residents either working from home or travelling less than 10km amounts to between 34% and 46% of the economically active population.

3.1.11 The Buntingford Employment Study confirms that, as of the 2021 Census, there were 4,796 economically active residents within Buntingford. The Study confirms there to be 2,095 jobs within Buntingford in 2022. This would suggest a job density within Buntingford of 0.44 (jobs per economically active resident). It also confirms at Paragraph 4.2.6 there to be a further 608 homes permitted in the intervening period, which it equates to an additional 706 economically active residents. Paragraph 8.2.10 advises that development of vacant land at Buntingford Business Park, and land to the east of the A10 (ref 3/23/1447/OUT) will deliver between 275 and 707 FTE jobs.

3.1.12 The effect of both residential and employment permissions would be to increase the economically active population of Buntingford to 5,502 people, whilst also increasing local employment to between 2,370 and 2,802 jobs. The resultant job density, following the build-out of these permissions would change from the above stated figure of 0.44 to between 0.43 and 0.51.

3.1.13 The Economic Benefit Statement submitted with the planning application considers that the proposal will deliver in the region of 467 on site jobs (plus additional indirect jobs through the wider supply chain). This would have a significant positive effect on job density to between 0.52 and 0.59 considered in isolation.

3.1.14 Taking this development proposal in combination with Hallam Land's residential-led development proposed north of the A507 (ref 3/24/0966/OUT), which is expected to provide for 687 economically active residents and approximately 122 on-site jobs (plus further indirect jobs through the wider supply chain), there would still be an increased job density of between 0.48 and 0.55.

3.1.15 The significant positive impact of the development proposal on employment opportunities in Buntingford, and the resultant decrease in out-commuting from the town, in support of the shortfall identified in the evidence base cannot be disputed.

3.1.16 Indeed, there has been support from existing local businesses in the town who are seeking to expand within the town but have very limited choice currently. This includes discussions directly with Hallam Land but also supportive comments on the planning application portal[2].

3.1.17 Turning to scale, Hallam Land dispute that the development proposed is strategic in nature. There is flexibility within the parameters of this outline planning application to allow for smaller units to be delivered through Reserved Matters, as supported by the evidence base and the Employment Market Messaging Paper submitted with the planning application. This is visualised in the Illustrative Masterplan which shows a range of potential unit sizes, all of which will be limited in height to a maximum of 12.5m as defined in the Building Heights Parameters Plan.

3.1.18 With regard to the sustainability of the location of the Site and the perceived resultant high dependency on cars, as described above the development proposal will have a significantly positive impact on the job density in the town and will decrease out-commuting as a result. In addition, the development proposal incorporates significant active travel improvements to promote walking and cycling, and Hallam Land have committed to a contribution to improving public transport provision.

3.1.19 Indeed, taking a common sense approach, the Site is directly opposite the existing Buntingford Business Park where additional growth is promoted in the District Plan through allocation BUNT3, at a scale which is not dissimilar to the development

[2] Comments for Planning Application 3/24/1255/OUT

proposed by Hallam Land. Hallam Land understand that the land associated with BUNT3 is within the ownership of an existing local business who is likely to be seeking to expand on to the site at the appropriate time, rather than owned by a developer, which would explain why BUNT3 has yet to come forward.

3.1.20 Furthermore, Hallam Land note that preparation of the new District Plan has only recently commenced, despite the current District Plan being adopted in October 2018. This is contrary to the National Planning Policy Framework (NPPF, December 2024) which is clear at Paragraph 34 and Footnote 19 that Local Plan reviews should be completed no later than five years from the adoption date of the Local Plan, taking into account changing circumstances affecting the area. This is appropriately reflected in Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012.

3.1.21 Therefore, whilst the desire for development of this kind to be planned strategically is recognised, Hallam Land consider that the Council's failure to proactively progress the new District Plan contrary to the NPPF should not be a barrier to sustainable employment development, particularly in the context of a clear and increased identified shortfall in employment in the town.

4. CONCLUSION

4.1.1 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 South 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 3/24/1255/OUT.

4.1.2 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.

4.1.3 Commentary has also been provided in Chapter 3 with regard to the evidenced need for additional employment provision in Buntingford, which delivery of this development proposal would make a positive contribution towards, with clear and significant social, environmental and economic benefits arising.

4.1.4 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.