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Standing up for Hertfordshire's countryside

David Lamb
Development Management
East Herts Council
Wallfields
Pegs Lane
Hertford SG13 8EQ

Our Ref:

Your Ref:

4th September 2024 (by email)

Dear David Lamb,

Application no. 3/24/1255/OUT
Land South of A507, West of A10 Buntingford
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.

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

1. 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."

2. 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 commercial and industrial development of over 27,000 square metres on over thirteen hectares, which is clearly outside the scope of the exceptions which may be permitted and unrelated to existing services and facilities in Buntingford and beyond the A10 which was planned and envisaged as a by-pass to the town and not an arterial road.

3. Accordingly, the assertion in the Applicant's Planning Statement (PS) that "the site is not designated for its landscape or environmental value" (paragraph 2.1.1, page 8) is incorrect and misleading. Policy GBR2 is a key policy of the adopted District Plan and the area affected is designated in the Policies Map.

4. 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 Area 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."

5. The site is not allocated in the East Herts District Plan for development of any kind, and as a relatively isolated development on the edge of town, the proposal cannot be regarded as being in a sustainable location as required by National Planning Policy Framework. It would inevitably be dependent on private vehicle use for employees; there is no railway station in Buntingford and bus services are limited.

6. 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 categorised as "Best and Most Versatile Land" which should be maintained for agriculture to maintain food security, that is gaining in significance due to global trade uncertainties and related issues.

7. CPRE Hertfordshire is most concerned about the visual and landscape impacts of the proposed development on the open countryside. We note the proposed development type that may be up to three storeys in height which will inevitably have a major detrimental impact on the setting of the town in the River Rib valley.

8. We support representations that refer to the Council's Landscape Character Assessment which identifies the high quality of the area and the high sensitivity of the landscape which would be affected by the proposed development. The impact is further increased by the present lack of buildings south of the A507 and west of the A10 and proposals for the removal of hedgerows for highways provision,

9. 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. As noted above, we believe development is inappropriate west of the A10.

10. We note the recent decision by the Inspector on the Inquiry regarding Land East of A10 Buntingford where she states: "I am satisfied that the A10 would provide a buffer and defensible boundary between the urban edge and the countryside" (para 20 APP/J1915/W/24/3340497). We support this view that the A10 provides a defensible boundary and believe that the proposed development is unsustainable and inappropriate.

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11. We support the extensive concerns expressed by Buntingford Town Council, Cottered and Throcking and Aspenden Parish Councils and continually by the local community, and urge the Council to refuse planning permission for this unnecessary and damaging proposed development.

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.