Planning Policy Team

Planning Policy Observations

To:	Development Management
From:	Laura Guy
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Land south of A507 and 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 from A507, with all matters reserved except for access.

Proposal:

1.1 This is an outline application for up to 4.71 hectares (up to 27,420 sqm) of employment uses and 6.31 hectares of informal open space alongside associated works and infrastructure. All matters are reserved except for access.

Location:

1.2 The site comprises approximately 11 hectares of agricultural land to the south of the A507 and to the west of the A10. It is adjacent to the town's settlement boundary, although separated by the A10, and located within the Rural Area beyond the Green Belt.

Relevant Policy and Observations:

1.3 Applications for employment generating uses must comply with the provisions of the adopted East Herts District Plan, October 2018. The site

also lies within the designated neighbourhood area of the Buntingford Neighbourhood Plan, which was made in 2017.

1.4 Applications must also accord with current national provisions in both the National Planning Policy Framework (NPPF), December 2024, and National Planning Practice Guidance (PPG).

Principle of development

Employment use

1.5 Policy DPS2 (The Development Strategy 2011-2033) of the East Herts District Plan (2018) outlines that the strategy of the Plan is to deliver sustainable growth in accordance with a hierarchy of development. In this regard, preference is given to sites within the urban areas of Bishop's Stortford, Buntingford, Hertford, Sawbridgeworth and Ware, followed by development at Gilston and urban extensions to all these towns, except Buntingford.

1.6 District Plan Policy ED1 Employment supports the provision of new employment uses in principle where they are sited in suitable, sustainable locations and where they do not conflict with other policies in the Plan. Likewise, Policy ED2 Rural Economy supports proposals that create new employment generating uses in principle where they are appropriately and sustainably located and do not conflict with other policies in the Plan. Likewise Policy BE4 of Buntingford supports a range of employment developments including small scale B1 flexible serviced office accommodation, larger multi-let floor space development and business clusters, provided there is no conflict with other policies in the Plan. In this case, there are, however, other policy constraints that need to be considered in this regard.

1.7 The strategy for employment in the town, informed by a 2014 employment study, and set out in Policy BUNT3, is to protect and enhance the existing employment areas in the town through the development of increased floorspace within the existing designated areas. An additional 3 hectares of land to the north of Buntingford Business Park is allocated as an extension to the existing Employment Area.

1.8 This proposal for significant employment and open space constitutes an urban extension to the west of the town, which represents a clear departure from the development strategy set out in Policy DPS2 and BUNT3 of the adopted District Plan.

1.9 In order to update the employment evidence in the town, the Council has recently commissioned consultants AECOM to undertake an Employment Study, to inform both the District Plan Review and responses to speculative planning applications in the town. The Buntingford Employment Study 2025 is currently at a draft stage until it is endorsed by Executive and Council, but the findings are of relevance to this application. The Study will be reported to Executive on 18 March 2025, for agreement and will be published as part of the Executive agenda in early March.

1.10 The Buntingford Employment Study 2025 includes the following key elements:

- Understanding the existing situation – Analysis of socioeconomic conditions and the commercial property market in Buntingford, and how these have changed following the previous Employment Study, as well as a supply-side assessment of the town's current employment sites;
- Understanding the future requirements –Likely future demand for employment space in the town and what level of employment could be supported on existing vacant land and commitments within approved planning applications; and
- Conclusions and recommendations – Set out evidence-based conclusions and recommendations for supporting employment in Buntingford.

1.11 Following significant residential development in the town over the last ten years, the Study suggests that additional employment space is required in Buntingford, to address a disparity between population and employment growth in the town, suggesting a need for greater balance to support sustainable development. Property market analysis demonstrates that there is currently no known vacant floorspace within Buntingford across office, industrial, and warehousing and storage properties, while vacancy rates across East Herts are also below the regional and national averages for these uses. The analysis identifies that loss of employment land since 2014 and a lack of spare capacity in the property market also support the need for additional employment space in Buntingford. In this regard, the Study explores the employment supply and suggests that the development of vacant land at Buntingford Business Park and land with planning approval to the east of the A10 in Buntingford (Ref 3/23/1447/OUT) could result in the generation of between 275 and 736 Full Time Equivalent (FTE) jobs (depending on the mix of employment use), representing growth of 12-33% on current employment in Buntingford. The landowners of Buntingford Business Park has confirmed

that the land is available, and it is their intention to develop it for employment uses.

1.12 In terms of the type and scale of employment required in Buntingford, the Study concludes that the allocated and committed employment land should be developed and outlines that Buntingford acts as relatively self-contained from a commercial property market perspective, being too far away to gain a bounce/spillover demand from other larger markets. Sectors such as construction, manufacturing and wholesale and retail trades, as well as wider foundational sectors, which deliver the essential goods and services required by the local population, are likely to remain prominent in the local economy. The business base in Buntingford is dominated by microbusinesses (companies employing up to nine employees), which account for 92.4% of local business units.

1.13 Feedback from a local agent highlighted robust demand for industrial floorspace in Buntingford, both at the smaller scale (with small units developed on the Watermill Industrial Estate fully occupied), and at the larger scale, with the town's bigger units (~36,000 sqft) at Buntingford Business Park fully leased. Feedback suggests confidence in the future demand for similar uses in Buntingford, with the flexibility afforded by Use Class E having been beneficial in accommodating a broad range of uses in smaller units at Watermill Industrial Estate. There was viewed to be some potential for warehousing and storage uses in Buntingford, given transport improvements such as the Little Hadham bypass improving access to Bishop's Stortford, Stansted Airport and the M11. However, larger industrial and logistics uses would be expected to come forward in locations with superior access to the strategic road network, such as Bishop's Stortford. Conversely, despite limited spare capacity, there was viewed to be more limited demand for office space in Buntingford due to the impact of Covid-19 on demand, and this type of employment being concentrated in the larger settlements such as Bishop's Stortford and Hertford.

1.14 The Study anticipates that microbusinesses will continue to drive demand for floorspace in Buntingford.However, reflecting the presence of some small and medium sized businesses in the town and demand for larger units remaining robust over the past 15 years, the provision of a range of unit sizes that provide some flexibility and can support the growth aspirations of local businesses is recommended. In general, the majority of demand is anticipated in the 0-250 sqm bracket for E(g) uses and 0-1,000 sqm for B class uses.

1.15 In considering the findings of this Study, in relation to this proposed application, the evidence suggests there is a need for new employment development in the town. However, the location and type of employment in the town, means new provision is needed to support the local, self-contained market for a range of unit sizes, but predominately small units for microbusinesses. More strategic provision is better suited to the larger towns in the district and beyond. Notwithstanding wider concerns about the location of this development, addressed below, this proposal for 4.71 hectares (approximately 27,420 sqm) of mixed- employment floor is of a strategic scale. Although detailed proposals are limited at this outline stage, the scale, alongside indicative massing and business unit/ workshop design outlined in the Design and Access Statement, suggest a strategic employment park serving wider district needs, rather than employment land needed to meet local employment demand in the town. It is considered the scale of this proposal is more appropriate for the employment markets in the larger towns in the district, where there is better access to the strategic road network and public transport.

1.16 Beyond existing allocations and commitments, the Study does not specifically explore the need and location for additional employment areas. It is important to recognise that this Study acknowledges it is part of a wider evidence base for the District Plan Review, and the strategy for supporting employment in Buntingford will be informed by wider employment market and land supply assessments at the East Herts level, which will determine the overall quantity of employment land that is required over the District Plan period, alongside consideration of housing, infrastructure and environmental needs and constraints in the town and wider district. If this wider evidence base supports the need for additional employment land at the district level, the Study outlines a number of criteria that should be considered for additional employment land, or whether the existing supply of employment land is fit for purpose, these include:

- Accessibility and sustainable transport needs;
- The provision of essential infrastructure e.g. access to utilities;
- Segregation from sensitive neighbouring uses (e.g. residential);
- Site size, access, shape and topography; and
- Deliverability and/or ownership.

1.17 In this context, given the scale of the proposed development, the planning policy team consider it would be more beneficial to consider this development strategically as part of the District Plan Review process to

assess the suitability of new employment designations in Buntingford holistically as part of wider strategy considerations, taking into account strategic district employment needs evidence alongside sustainability and infrastructure requirements.

Location of development

1.18 The site is located in the Rural Area Beyond the Green Belt. The rural area is highly valued in the District for its open and undeveloped nature. District Plan Policy GBR2 acknowledges that some types of development are acceptable, provided they comply with policy criteria a-h and are compatible with the character and appearance of the rural area. Policy criteria b relates to outdoor sport and recreation and criteria c refers to employment generating uses where they are sustainably located, in accordance with Policy ED2 (Rural Economy). The employment uses and open space may comply with the principle of criteria b and c but the proposed development is incompatible with the character and appearance of the rural area. It comprises a significant urban extension of Buntingford into the open rural countryside to the west of the town. The site is segregated from Buntingford by the A10 and development in this location will have a significant urbanising impact upon the site's rural character, including the small village of Aspenden to the south.

1.19 It would also result in a loss of good quality (grade 2) agricultural land, which is resisted by policy ED2 in rural areas, without justification that agricultural use is no longer viable. As such, the proposals would be contrary to both policy GBR2 and ED2 which form important policies in the consideration of the proposed development.

1.20 The proposal is also contrary to the Buntingford Community Area Neighbourhood Plan (2017), which is part of the development plan for the town. The site is located outside the settlement boundary identified in Policy HD1. Policy HD1 identifies three criteria where residential development outside settlement boundaries will be permitted: small scale infill, affordable housing on rural exception sites and development for which there is a demonstrable need for a location in the countryside. The proposed development does not comply with these criteria so is contrary to Policy HD1.

1.21 The sustainability of the proposed development is an important consideration. The application site is located on the edge of Buntingford, separated from Buntingford's local facilities and services by the A10.

There is no railway station in Buntingford, and the existing bus stops are located to the east of the A10. While some potential proposals for public transport connections have been indicated including new bus stops, this is subject to discussions with Arriva Group so not yet confirmed. Likewise cycling and pedestrian links to Buntingford are proposed, but as noted in the Transport Assessment, these are indicative and subject to further discussion with Herts County Council. It is noted that the County Council currently have concerns about the access arrangements on to the A507 and the delivery of the sustainable infrastructure and travel plan that would be needed to ensure the site can be unlocked sustainably and avoid an unacceptable impact on the road network. This is contrary to District Plan Policy TRA1 Sustainable Transport, which seeks to locate development in the most sustainable locations.

Conclusion:

1.22 The planning policy team does not support the principle of this proposed development because the scale and location of the proposal is a clear departure from policies in the District Plan (2018) and Buntingford Neighbourhood Plan (2017). The evidence suggests employment development in Buntingford should focus on local provision to meet the town's need, but does not identify Buntingford as an optimal location for a strategic employment site. There is concern that the location is unsustainable and will result in high dependency on cars, which will have a negative impact on the local road network.

1.23 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.