



Part 2

East Herts District Plan

Examination Hearing Statements

Matters and Issues: Part 2

Chapter 6: Buntingford

Matters and Issues, Part 2: Chapter 6 - Buntingford

Issues:

Question 1

Will there be sufficient housing to meet the needs of Buntingford over the plan period?

Question 3

Is the plan flexible enough to ensure that sustainable housing development, in addition to that already allowed, can come forward in Buntingford over the plan period?

The Council considers that these two issues are linked and can therefore be covered by a single response.

1. The Buntingford Settlement Appraisal (**SSS/003**) sets out that, given the level of development already committed in Buntingford through the approval of speculative planning applications submitted in advance of the adoption of the District Plan, no further sites should be allocated for residential development in the town.
2. The Settlement Appraisal sets out the Council's position that significant development in excess of the level already granted planning permission cannot be viewed as sustainable given the likely increase in out-commuting from the town to access services, facilities and employment opportunities.
3. The Preferred Options District Plan, 2014 (**PDP/001**) proposed that Buntingford should accommodate at least 493 dwellings over the plan period. However, at the time that the Pre-Submission District Plan (**SUB/001**) was prepared, planning permission had already been granted for over 1,000 dwellings. This represents a very substantial addition to the housing stock of Buntingford, with the population set to increase significantly over the Plan-period.
4. As development is underway on most of the main sites it is acknowledged that a substantial proportion of this increase is likely to take place in the early part of the Plan-period. Importantly though, the District Plan does not set a numerical cap on the scale of development in Buntingford over the Plan-period. There is some flexibility for the provision of additional dwellings through windfall development and change of use within the proposed boundary for the town. Whilst it is acknowledged that the proposed development boundary has been

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drawn quite tightly round the town, there are strong arguments in terms of containment of Buntingford within the Rib Valley for the boundary which has been chosen.

- The scale of development which has already been granted planning permission is such that the town will make a significant contribution to new housing development over the Plan-period and the Council's emerging strategy is therefore concerned with ensuring that the cumulative impacts of development are managed appropriately.

Question 2

Sites with planning permission which have not been commenced should be included as allocations?

- The table below sets out planning approvals for residential development in Buntingford since 2011.

Reference	Location	Units	Status
3/10/2040/OP 3/13/0737/RP	Land off Longmead	26	Outline approved October 2011 Reserved matters July 2011 Complete and occupied
3/1131000/FP	Land north of Hare Street Road	160	Allowed on appeal January 2014 Under construction, part occupied
3/13/0118/OP	Land south of Hare Street Road (Area 1)	100	Allowed on appeal January 2014 Under construction, part occupied
3/13/1399/OP	Land off Aspenden Road	56	Allowed on appeal November 2015 Development not commenced
3/13/1379/OP	Land north of Park Farm Industrial Estate	180	Approved October 2015 Under construction
3/14/0528/OP	Land south of Hare Street Road (Area 2)	100	Allowed on appeal March 2016 Development not commenced
3/14/0531/OP	Land south of Hare Street Road (Area 3)	80	Allowed on appeal March 2016 Development not commenced

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3/15/0300/OUT	Former Sainsbury's Depot	316	Approved March 2016
3/14/1717/FP	Phase 1	82	Approved September 2015 Under construction, part occupied
3/13/0823/OP 3/16/1392/REM	Land north of Hare Street Road	13	Approved March 2017 Development not commenced
3/16/1391/FUL	Land north of Park Farm Industrial Estate	43	Allowed on appeal August 2017 Development not commenced
Total		1,074	

2. Whilst it is not considered necessary to include site specific policies for the smaller sites, a main modification to Policy BUNT1 is proposed to reflect the fact that a substantial level of development has been granted planning permission in the town since 2011:

Policy BUNT1 Development in Buntingford

~~In accordance with Policy DPS3 (Housing Supply 2011-2033), development proposals will be permitted within the town boundary as defined on the Policies Map~~ **Buntingford will accommodate a minimum of 1,074 homes**, which will include:

~~(a) a proportion of the overall windfall allowance for the District.~~

(a) At least 26 homes on land off Longmead;

(b) At least 173 homes on land north of Hare Street Road;

(c) At least 280 homes on land south of Hare Street Road;

(d) At least 56 homes on land off Aspenden Road;

(e) At least 316 homes on land to the east of London Road;

(f) At least 223 homes on land north of Park Farm Industrial Estate; and

(g) A proportion of the overall windfall allowance for the District.

3. Consequential amendments will also be required to paragraph 6.2.2 to acknowledge that decisions on individual applications have, to an extent, overtaken the plan making process, and to recognise that development is already underway on a number of these sites.

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Question 4

Is BUNT2 the best site for a new school and is it deliverable?

1. The Buntingford Settlement Appraisal (**SSS/003**) summarises the work that has been undertaken by Hertfordshire County Council (HCC) to identify a suitable site for the provision of a first school to ensure that the long term need for school places can be met in the town.
2. The Buntingford Position Statement prepared by the County Council in 2014 took account of all the approved and proposed housing development in the town at that time and considered the impact that this would have on the demand for school places in the school planning area. A copy of the Position Statement is attached at Appendix A.
3. In June 2015 HCC undertook a search for a suitable site for a first school. The Study shortlisted three potential sites from an initial list of nine sites. These sites were:
 - Former Sainsbury's Deport (land east of London Road)
 - Buntingford Cougars FC (land west of London Road)
 - Buntingford West
4. The Study explains the reasons behind the shortlisting of these sites and concludes by requesting that that a site is allocated in the emerging District Plan for a new 2FE first school on land east of London Road. A copy of the Study is attached at Appendix B.
5. Taking account of the work undertaken by the County Council, the Buntingford Settlement Appraisal (**SSS/003**), paragraphs 7.19 – 7.25, sets out the District Council's concern at that time about the deliverability of a first school on land to the east of London Road. It was also acknowledged that there was a degree of uncertainty surrounding the delivery of a first school on the Buntingford Cougars FC site; however, it was considered that a site allocation within the District Plan provided the County Council with a policy position to work with going forward to engage in further discussions with the relevant landowners.
6. In June 2017 the County Council presented a report to their 'Resources, Property and the Economy Panel' which sought Cabinet authorisation to acquire two areas of land to the east of London Road, for the purposes of securing a new 2FE first school site. A copy of the Report is attached at Appendix C.

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7. A non-binding conditional offer, subject to contract, has now been made on behalf of the County Council for two pieces of land extending to approximately 4.44 hectares, following detailed discussions between Fairview, the Bury Football Club and the County Council. The County Council has been advised that the vendor is minded to accept the offer.
8. The Statement of Common Ground signed in September 2017 between HCC and East Herts Council (**ED134**) summarises that the County Council's preference is to locate the first school on the land to the east of London Road and that negotiations are currently ongoing between themselves and the developers.
9. Whilst it is acknowledged that significant progress has been made towards securing the land to the east of London Road for a first school, the District Council considers that until the sale of the land to the County Council has been agreed then it would be prudent to retain Policy BUNT2 and to continue to safeguard land west of London Road for a 2FE first school. As set out in the District Plan (paragraph 6.2.8) the site will remain outside of the settlement boundary of the town and development of the site for anything other than education use and/or recreation facilities will not be permitted.

Question 5

Will the overall amount of employment floor space in BUNT3 be sufficient to meet the need of the district? Are the employment sites identified in BUNT3 the best options to meet this need?

1. The Buntingford Employment Study (**EER/006**) sets out an overall vision and objectives for employment growth in Buntingford. The District Plan reflects the recommendations set out in this Study and seeks to ensure that there is sufficient capacity to support job growth in Buntingford.
2. Large numbers of residents currently travel to work outside the town and it is estimated that Buntingford has a self-containment ratio of just 26%. In terms of sustainable development it is, in principle, desirable that people should be able to live and work locally. It is therefore important to maximise opportunities in the town to capture employment generating growth.
3. Policy BUNT3 identifies three existing employment areas (Park Farm, Buntingford Business Park and Watermill Industrial Estate). It also retains part of an existing employment area to the south of the town known as the former Sainsbury's Distribution Depot (referred to in the District Plan as The London

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Road Employment Area). While this is not a new allocation, new employment opportunities will be delivered on this former vacant site through the redevelopment of this site for mixed uses (including potentially a first school as set in the Council's response to Question 4).

4. The Buntingford Employment Study recommends that a variety of spaces are made available to support different uses. The extension to the Buntingford Business Park is considered appropriate for larger units suitable for B2 or B8 uses, however, office uses are not precluded. The London Road Employment Area is allocated for B1(a), B1(c) uses and / or D1 uses to reflect the location of the site adjacent to residential development and to provide opportunities for service businesses. While the ability to expand Park Farm Industrial Estate has been lost through a recent appeal (3/16/1391/FUL), an application has recently been received for the expansion of the Watermill Industrial Estate through the construction of 17 B1 units (3/17/1861/FUL).
5. It is also important to note that as Buntingford lies within and serves a large rural hinterland, other employment areas and job opportunities exist within nearby settlements that complement the overall offer of the town. Silkmead Farm in nearby Hare Street is allocated in Policy VILL5. Other agricultural complexes also provide vital job opportunities. These sites are identified and protected via the Business and Employment policies in the Buntingford Community Area Neighbourhood Plan. These rural employment areas make a vital contribution to providing job opportunities compatible with the rural nature of the northern part of the district, which will complement the overall offer of existing and proposed new employment areas in Bishop's Stortford, Hertford, Ware and the Gilston Area.

Question 6

Is there a conflict between the Plan settlement boundary for Buntingford and that of the neighbourhood plan?

1. Yes, the settlement boundary for the Buntingford Community Area Neighbourhood Plan is inconsistent with the settlement boundary shown on the District Plan Policies Map.
2. The Buntingford Neighbourhood Plan has been subject to consultation, has been through examination and referendum and was subsequently 'made' by the Council in May 2017.

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3. It is therefore proposed that a main modification is made to the Policies Map to ensure a consistent approach across both Plans. The revised boundary is shown below.

