

Land North of the A507, West of A10, Buntingford
LPA ref: 26/00028/REFUSE
Planning Inspectorate Ref: 6008238

Cllr Sue Nicholls, Buntingford Ward, East Herts District Councillor

My name is Sue Nicholls and I am an East Herts Councillor representing residents in Buntingford and surrounding villages including Cottered, Throcking and Aspenden.

I am speaking on behalf of local residents (who are all directly touched by this application) to strongly oppose this proposed development and I fully support East Herts Council's decision to refuse this planning application. I will be speaking about the detrimental impact that this proposed development will have on local residents' quality of life and the harm that it will cause to the local area.

My husband and I relocated to Buntingford from London 28 years ago. Like so many people who live locally, we made a conscious decision to move away from a stressful, urban environment to somewhere with a better work/life balance and quality of life, in a rural setting with close connections with and proximity to the local countryside. There are also a significant number of local families who have lived in the local town and village communities for many generations, such is the appeal of living here.

There is also a deep love of nature and the local countryside amongst residents who have a strong desire to protect the local environment and preserve habitats, especially those of the two globally rare local chalk streams the Rib and the Thistley Vale Brook (which runs through the proposed site).

Local Landscape Character

Things have changed and continue to change rapidly with the local countryside and arable land surrounding Buntingford and the Rib Valley now under threat from all sides. All the land surrounding Buntingford is rural land beyond the Green Belt but over 1,100 homes were built here between 2015 and 2026 which is a massive increase on the approx 1,963 households registered in the 2011 census. In addition to this increase in the last 11 years recent planning decisions have given additional housing in the form of a 200 house development will encroach on the valley setting and Wyddial plateau on land to north of Hare Street Road, 68 houses on land to the east off Owles Lane, and 350 houses on land to the west of the town on the eastern side of the bypass. Full approval has also recently been given for a further 58 houses

on land next to the bypass - a total of 676 houses. The policies within the local plan and our neighbourhood plan designed to protect the setting of Buntingford within the Rib river valley and eastern plateau beyond have not been sufficient to protect the town from a quantum of development. Here we are trying to protect the setting of Buntingford and the individual villages of Throcking and Cottered on the western Cherry Green arable plateau - which will be, if this appeal is refused, the last remaining intact view of Buntingford in the setting of the Rib Valley.

Planning policies designed to protect rural landscapes

This planning application fails to recognise of the intrinsic value of the countryside and the emotional connection people have to it and the local history associated with it.

It ignores specific policy in **Chapter 15 of NPPF** relating to conserving and enhancing the natural environment by: *"protecting and enhancing valued landscapes, and sites of biodiversity"* and *"recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services - including the economic and other benefits of the best and most versatile agricultural land"*.

It also ignores policies and values within the Buntingford Community Area Neighbourhood Plan that seek to preserve the setting of Buntingford in the Rib Valley and local villages within the Wyddial and Cherry Green arable plateaus.

One of the values in the **Buntingford Community Area Neighbourhood Plan** is *"to protect and promote the town and parishes of the Buntingford Community Area, respecting heritage and appreciating the rural nature of the community and being aspirational when planning their future"*.

This proposal for yet more development on land outside of the town's boundary doesn't fit with this vision, or even attempt to meet the further aims of *"respecting and reinforcing the character of the town's setting, pre-empting the affects of climate change or preserving the balance between natural assets and human development"*.

The setting is being eroded from all directions and soon there will be nothing left with people being further disconnected from the local landscape which already has one of the lowest tree canopy covers in East England.

Furthermore, **Appendix 2** of the **Community Area Neighbourhood Plan - Spatial Standards** sums up the situation for local residents:

“The residents of Buntingford are normally accepting of the limited amenities and infrastructure that small towns bring because these are offset by a pleasant and relatively open environment. To remove this latter advantage for new development in the town is quite unreasonable.”

The site of the proposed planning application is best quality agricultural land and it is inappropriate for it to be used for large scale unsustainable development - in effect concreting over it to create artificial landscapes for a Buntingford that has double the number of homes of the Buntingford in the 2011 census.

At a time when the Government’s Environment Secretary is urging the population to stock pile food in the likely event of an emergency causing disruption to food supplies, it is more important than ever that productive farm land is preserved, maintained and put to good productive use, employing regenerative farming techniques to improve biodiversity and habitats in the natural landscape. Food security, extreme heat and water shortages are no longer existential threats, they are prescient dangers and we need to employ every available local resource to help mitigate the harm that they are causing now and in the future.

In fact, land adjacent to the proposed site features in the Herts Local Nature Recovery Strategy with a species targeted action plan to restore the local nightingale population - which thrive in an open agricultural, scrub landscape - not on housing estates and manmade parkland. Also this is an area identified as having the potential to become of particular importance for Biodiversity - based on its current land use and status and there are plans to restore and renaturalise the Thistley Vale Brook and River Rib.

Water supply and sewage treatment

The River Rib, in particular, already suffers from over abstraction and contamination from the quantum of development that has already taken place in the town. Earlier this year there was a loss of water supply for several days to homes in Buntingford and Throcking due to supply out stripping demand. Villages further afield such as Anstey often suffer from low water pressure leaving people without shower and other facilities. Local sewage treatment capacity is also under pressure with the current population level even after a multi million pound upgrade to the Buntingford sewage treatment works. It is still regular practice for tanker loads of sewage to be removed by road to cope with current demand and there are often leaks from

manhole covers, flooding and sewage infiltration into people's homes and discharge into the Rib, particularly after heavy rain. In fact, I was contacted yesterday by a local High Street resident whose home has been infiltrated by sewage many times over the last 11 years and three times in one single day last week after heavy rain. These are clear signs of a system unable to cope even before the next phase of mass house building starts which will see Buntingford tipping from a rural to urban community with none of the benefits and all of the problems that brings with it.

Sustainability, Traffic and Active Travel

It is suggested that there will be no adverse impact on the local road network from increased traffic generated by an extra 600 houses. The impact of traffic volume and car dominance is already considerable in Buntingford and in Cottered and every additional vehicle on local roads adds to the worrying level of road danger, air and noise pollution and further diminishes residents' quality of life, particularly those of us who live on the busiest through roads. I have been so concerned about this that we installed a *Telraam* app at our house to track the volume and speed of traffic travelling through Buntingford on Baldock Road. Over the last 18 months we have seen car journeys increase from an average of 5000 on a weekday to nearer 7500 and around 500 HGVs a day. These traffic volumes are already having a serious impact on people's physical and mental health. I suspect that traffic volume through Cottered is at a much higher level.

It is important to note that these traffic increases are not just a result of traffic generated by local population growth and the higher than average level of car ownership that goes with living in a rural community with inadequate local bus services and no train station. It is also due to the heavy increases in traffic that come from outside of the town in the form of drivers using local roads as a short cut for their commuter and leisure journeys. This puts additional traffic on local roads every day of the week from very early in the morning until late at night. The cumulative effect has been to cause serious increases in road danger, pavement parking and car dominance (especially on town centre residential roads and the High Street) and brought with it the associated increases in air and noise pollution that is having a serious detrimental effect on residents' physical and mental health. Data from Imperial College for pollution levels at my address show that NO₂, PM₁₀ and PM_{2.5} exceed World Health Organisation safe limits.¹

¹ PM_{2.5} levels 10.4mcg/m³ - WHO limit is 5mcg/m³

PM₁₀ levels 17.34mcg/m³ - WHO limit is 15mcg/m³

NO₂ levels 21.89mc/m³ - WHO limit is 10mcg/m³

Data for Baldock Road, Buntingford from Imperial College/addresspollution.org (2022)

In Buntingford, we already see people who live on the existing outlying estates on the eastern side of the A10 mostly drive into town rather than choose other active travel options, so how is it assumed that people living on an estate separated from the main settlement area by the physical and mental barrier of an extremely busy trunk road will choose to walk into town to make use of local shops and service? It is highly likely that if they come into town they will drive **or** that they will not come into the town centre at all and drive to other larger centres for comparison shopping, leisure and of course work.

Whilst proposed Active Travel improvements for Baldock Road are welcome, why should they come at the expense of another massive increase in local population and the associated problems that will bring to the existing community?. Much of the plans for Baldock Road already form part of the East Herts LCWIP. I do note with concern the extra proposal to replace the mini roundabout on Baldock Road at the junction with Bowling Green Lane with a T-junction. This will mean that Baldock Road will become a continuous through road, with the potential to cause grid lock on Bowling Green Lane as traffic, including school coaches, queueing to join the main flow of traffic at morning and afternoon school pick up times. It will also encourage increased through traffic and rat running.

There is no doubt that this proposed development would urbanise a rural landscape and subsume Throcking. Increased traffic and road danger already pose **a** threat to residents' safety as Throcking Lane now serves as a cut through for residents from the Redrow estate on the opposite side of the bypass. This is set to increase when the 58 homes that now have planning permission are built on the land next to the Redrow estate, fronting onto the bypass.

I see no road safety improvements planned for Cottered within whose parish this proposed development would sit. The village already suffers from the effects of HGVs (even with the A507 weight limit in place) and increasingly heavy traffic volumes which threaten road safety and people's physical and mental health. The request for a crossing point in the village was turned down because it was deemed to be too dangerous to install one.

Other travel options

It is suggested in the Highways report that there are options for alternatives to private car journeys to places like Royston. The No 18 bus route has just 6 timetabled journeys a day at roughly 2 hourly intervals with the last weekday bus returning from Royston to Buntingford at around 5pm and no service on a Sunday.

A proposal to add additional buses to the 331 timetable is of course welcome, but increasing the frequency of just one bus service is going to do little to reduce car reliance. Harlow and Cheshunt are two of the popular destinations for local people identified as part of surveys carried out for the new East Herts District Plan. A trip to Harlow by bus would take between 1 hour and 30 and 1 hour and 50 minutes (compared to around 25 minutes by car). A trip to the Brookfield Centre in Cheshunt would take between 1 hour 50 and two hours with the last bus back at 3.10pm.

Active Travel into Buntingford

Herts County do not support the proposal to include a first school as part of this proposed development. So to access existing local first schools on foot this would mean a single journey time to Layston School of around 28 minutes and to Buntingford First School of 46 minutes. These are long journey times to make twice a day with young children.

If this development is approved, it will burden our local community with so many more problems and provide no substantial benefits or solve any of the issues that we are already facing - including ever increasing traffic volume, poor public transport, inadequate and over stretched local utilities and amenities. We are at a constant deficit between the continuing growth of the town - 1100 homes built between 2015 and 2026 and a further 676 with permission given in the last three years totalling 1176. If the 600 homes in this application were granted permission it would mean that Buntingford will have DOUBLED in size in the less than 20 years since the 2011 census.

The massive erosion of the local 'pleasant and relatively open environment' by the quantum of speculative development that already has and continues to eat up the countryside outside of the town's boundary, and the continued decline in the town's limited amenities and infrastructure means that the function of the countryside in mitigating harm has been massively diminished and the community is suffering hugely as a result.

There is surely an urgent need for investment in the town's crumbling infrastructure, the restoration of local amenities, and protection of the precious green space both within and outside the town boundary without the burden of further damaging population growth. This is vital in order to return a proper quality of life for local residents both now and in the future. Without a pause in growth a deficit will always remain and increase over time.

For this reason alone the appeal for this proposed speculative development should be refused.

The fact that the Local Planning Authority doesn't currently have enough housing to meet the five year land supply for the district as a whole should not be a reason to justify the building of even more houses in Buntingford and ignore the inevitable harm that this development will cause through the increased burden it will place on a town with already poor transport links, little local employment, over subscribed senior school, crumbling infrastructure and a lack of local amenities.