

46 Briary Lane,
Royston,
SG8 9BU
12th August 2025

Ben Glover
Senior Planning Officer
North Hertfordshire District Council
Council Offices
Gernon Road
Letchworth Garden City
Hertfordshire
SG6 3JF

Dear Mr Glover,

Reference: 25/01708/OP Outline planning for Land opposite Heath Farm, Briary Lane, Royston

I am writing to object strongly to the above application. I have read the documents submitted by the applicant. I am a local resident who knows the site, the SSSI and the area well and there are many reasons why this application should be rejected. I lay out my particular concerns below.

Highways and Transport

The site lies at the high point of the town, around 50m of vertical distance above Baldock Street. The generally accepted extra walking time is 10 minutes per 100m of ascent, so this adds around 5 minutes to journey times on the return on foot. Indeed, Google maps adds three to four minutes to times both on foot and by cycle if you calculate the times uphill from the town/station/supermarkets to the entry point on Echo Hill rather than using downhill as they do in the application. There is then a steep (but not disclosed) further climb up the entry road and through the site to follow. It is not clear, even with the modified design, that the entry road complies with required Highway Standards. If it clearly did, then surely they would lay that out very obviously in their application.

While the town centre is reasonably close to the site, contrary to their claims there are no supermarkets there. The supermarket they show closed in 2020 and is currently flattened for a McCarthy and Stone older people residential development, so there is not even a likely site for one. All 3 supermarkets (Tesco, M&S and Aldi) are on the Northern outskirts of the town. This is over 30 minutes on foot or nearly 15 minutes by cycle to the entry of the site coming back uphill, according to Google maps. The food stores in town (Tesco Express, Royston Food Centre) are not big enough for most household's main shopping. It seems likely that the vast majority of food shopping will be done by car.

In a previous application they stressed that it was an easy cycle to the nearest Primary School at Tannery Drift. I and other objectors pointed out that the reality of the route meant that this was not the case. The route involves approaching a busy T junction down a very steep slope at the bottom of Briary Lane and a difficult right turn across a busy road in both directions. Adults often push bikes across the pedestrian crossing and use the pavement to walk rather than attempt the right turns, increasing the time. The walk back from the school at just over 15 minutes might be undertaken by some families, but not all. All the other Primary Schools and the Secondary School are around half an hour walk. It seems likely that most school runs will be by car. The leisure centre is also on the North Eastern Edge of town.

Given these problems accessing crucial amenities, it seems unlikely that they can deliver on their travel plan or achieve only the number of cars that they say in peak hours. New estates often have a fairly homogeneous profile of occupants (eg mostly young families) at the start, so if the travel figures are based on mature estates with a range of household type, their estimates could be a long way out for many years.

As a resident of Briary Lane I can report as lived experience it can already take some time to exit from our drive onto the road and to turn onto Baldock Street, particularly right in the direction of the supermarkets or the station. There are a lot of parked cars at all times on the upper half of Briary Lane and on the lower half except when restrictions apply. If people are reversing into their drives or there is a delivery vehicle then people have to wait for them to complete their manoeuvre. There will be times when lorries delivering materials will not be able to get along the street at all. This is not seriously addressed in their application; indeed in response to a comment in the public consultation they say access is not via Briary Lane. This is simply wrong. Access is not via the Bridleway at FP13 but there is no way of accessing the site other than along the highway section of Briary Lane. Sun Hill is exit only for vehicles including bikes, and is an even more problematic steep approach to a busy Give Way junction than Briary Lane for cycle safety. Briary Lane cannot cope with any significant increase in traffic.

This application conflicts with **paragraphs 108, 109 and 110 of the National Planning Policy Framework (NPPF) and Policy T1 of the Local Plan and local planning guidance of the Roads in Hertfordshire A Design Guide.**

Impact on Nature particularly Therfield Heath SSSI

The application shows a loss of Biodiversity at present. This is without considering the negative impact on Therfield Heath SSSI at all in the calculation. Perhaps how little this has been considered is shown by the Planning Statement (arguably the most important document). In Section 2.5.5, this claims the site is 650m from Therfield Heath SSSI (no point of the site is more than 500m and the nearest point is 60m).

Expansion of housing in this area of town is particularly damaging to the SSSI compared to anywhere else in the town. The vast majority of the town residents access Therfield Heath Common via the North Eastern Edge which is not part of the SSSI. This area is referred to by Gladman as “Royston Recreation Ground”, but there is no such thing. Most of the SSSI and all the “Royston Recreation Ground” form the Therfield Heath Common Land, managed by the Conservators of Therfield Heath and Greens. The fact that the sports area is Common Land constrains the level of sport that can take place as such land cannot be enclosed. Many clubs are unable to expand as they would wish due to the Common Land constraints.

The normal access route to Therfield Heath means that many people coming for sport, the café or to picnic or sunbathe do not enter the SSSI at all. In contrast the access for this development will be directly onto the SSSI. They will then have to walk down a steep slope on the SSSI to access the café and sport. In wet weather this will lead to erosion and the widening of the paths, as people avoid the most slippery and eroded areas. This will reduce the area of chalk grassland for the distinctive flora and create an eyesore. Pets from the proposed development will also have a detrimental impact on the SSSI. Both dogs and cats will disturb and kill the mammals and birds and leave faeces and urine which will enrich the soil. Chalk grassland flora is dependent on very poor soil (and grazing or expensive cut and collect annual mowing). This rare flora will be replaced by thistles, nettles and cow parsley if the soil is enriched. These negative indicator species are particularly evident on areas close to housing. No grazing now takes place on the SSSI due to disturbance by dogs; more houses close by will further dissuade the stint holders from exerting their grazing rights.

At present, the site provides quiet dispersal areas for mammals and birds from the Heath when disturbed and a wider foraging area. [REDACTED]

[REDACTED] I have observed the ground nesting birds seen on the Heath (skylark, meadow pipit, grey partridge) on the proposed development site. These will nest both on the Heath and in the arable fields including the site. There are also hedgerow and arable species (corn bunting, yellowhammer, greater and lesser whitethroat) that are regularly seen on the hedges on the site. It is very unlikely that, even maintaining the hedges, these species will nest in such numbers much closer to humans and their pets. The ecology report is phrased to imply that most records relate to the Heath rather than the site. In the case of Lapwings, I have only seen Lapwings in the local area on the ground (both in and out of the nesting season) on arable fields including the proposed site and not on the Heath. The hedgerow species above are much more common on the lanes than the Heath. Hen Harrier, Pallid Harrier and Woodcock can be added to the rare species seen on the site. The biodiversity loss is already significant before the bird survey has been done. There are significant species such as yellowhammer and greater and lesser whitethroat nesting in the hedges of this site and a very vociferous colony of the Red Listed House Sparrow. All these will have reduced breeding success in closer proximity to more people and pets.

While Butterfly banks can be a good idea for some butterfly species, planting with horseshoe vetch will not help the Chalk Hill Blue. The Chalk Hill Blue life cycle involves interaction with Meadow Ants, thus they are only able to reproduce where

these ants are. This would have been clear to the people preparing the ecology report if they had read chapter 20 of the Hertfordshire Diversity Action Plan which can be downloaded from the North Herts Council Website. New colonisation by Chalk Hill Blue does take place within the District. Since the Action Plan was written small colonies have arisen/been found at Ashwell Chalk Pit and Clothall Common, probably by spread from Therfield Heath. However, these are both areas that have been undisturbed chalk grassland for many, many years, which is required for the Meadow Ants to be an established species. It is unlikely that anything other than a very large scale and decades long commitment would spread Chalk Hill Blue butterfly reproduction to former arable land. The Butterfly Bank is indicative of the generic solutions offered in the ecology report, which lack the claimed site specificity.

The lack of mention of Swift Bricks is surprising and is a clear indication of the lack of commitment to ecology of the developer. This is a straightforward adaptation to new build houses at relatively low cost to the developer. Anyone with the slightest knowledge of ecology in Royston from May to July would note that there are at present good numbers of these threatened birds in Royston, which could be helped with this simple intervention.

The on-site grassland is unlikely to be good for chalk grassland species. Proximity to houses with no restriction on fertiliser, manure etc used in the gardens will keep the soil enriched. Residual agricultural fertiliser is likely to last some time as well. It will act as a very partial mitigation of the enrichment of the Heath as some pet owners will not stray as far as the Heath for some of their pets toilet needs, but this will further enrich the on-site grassland. The NHDC 2022 Therfield Heath mitigation strategy (referred to in the ecology report) references SANG (suitable alternative natural greenspace) but fails to note that this mitigation was devised originally for Thames Basin Heaths. In this scheme, no new homes were allowed within 400m of any of the constituent SSSIs, because new residents would simply walk to the inevitably more attractive SSSI than to any on-site greenspace. The sheer scale and accessibility of Therfield Heath SSSI would still therefore be a major draw for residents and their pets.

Paragraph 193b of the NPPF states “development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest” The current proposals would therefore have an adverse effect on Therfield Heath SSSI and neighbouring LWS. The Biodiversity report is poor without consideration of the factors above.

Housing Supply and Local Plan

The development site is not identified in the existing Local Plan for North Hertfordshire District Council (NHDC) and is outside the settlement boundary

identified in the plan. Royston is already contributing a significant number of dwellings towards the NHDC 5-year housing land supply. The development of this site would present a significant engineering challenge due to the constrained access, steep topography and the protective covenants in place (which are to be enforced); the site is therefore unable to contribute to the NHDC 5-year housing land supply. The application should also be refused for its problematic location; its negative impact and its failure to comply with the adopted local plan (NHDC Local Plan 2011-2031).

Landscape and Visual Impact

Ely Cathedral can be seen on a clear day from FP13 (Bridleway section of Briary Lane), for example in the area of the field gate on the Western Side of the Bridleway just North of the reservoir. This view will be lost with any increase in obstructing height. Reducing the height of the properties higher on the site will only have any lasting effect with strict covenants preventing further extensions/loft conversions increasing the height.

The reasons for refusal of the 2018 and 2020/21 planning applications for landscape and visual impact still apply, as follows: The prominent position, the topography, the significant localised adverse impacts on the character of the area, the negative impact to visual receptors (which are unchanged), the marked change in the character of the immediate locality and wider valued landscape, such as Therfield Heath (SSSI). The same reasons for refusal should therefore still apply to the current application. **The proposals conflict with the NPPF and Policy CGB1, SP5, SP12, NE1 and NE6 of the NHDC Local Plan**

Flood Risk and Water Quality

Due to the steep topography of the site, the overland flows generated from the access road present a flood risk to the existing wider highway drainage network of Echo Hill; the existing system is already struggling to cope with the surface runoff generated. Despite fairly recent improvements to the drainage on Briary Lane improving the situation, the road resembles a river several times a year in the heaviest rain. The effect of the recent change to tarmac of the surface of a considerable part of FP13 by the water company has not been stress tested severely yet. Any further increase in run off from hard surfaces onto FP13 and thence the highway section of Briary Lane will be problematic.

The proposed strategic surface water attenuation and infiltration features are located at elevated levels directly adjacent to properties of Echo Hill. An assessment on overland flow routes has not been considered within the submitted Flood Risk Assessment. Should the infiltration features or attenuation features fail, or exceed their design criteria, this presents a potential flood risk to properties located directly downstream of the site. Due to the topography of the site the factor of safety used in the of the attenuation features and infiltration device has been underestimated and are not in accordance with the SuDS Manual (CIRIA 2015). **Therefore, this is a conflict of the NPPF and NE7g of the Local Plan.**

The biodiversity contribution of these features, particularly on chalk, are minimal. They flood too often for plants to grow and they are dry for much of the year, preventing pond life developing. Essentially, they are mud pits for most of the time. Unless detailed calculations indicate that there is to be a stable water body throughout they should be regarded as necessary eyesores not any kind of biodiversity feature. Even then they would have to be much more graded to allow species in and out to work.

The development site lies above a Major Aquifer; this area is also classified as a "Source Protection Zone 1" due to the high risk to groundwater contamination, making the site far less suitable for development. The existing sewerage treatment for Royston is in South Cambridgeshire District Council, operated and maintained by Anglian Water. The treatment works discharges into a local watercourse, which is associated with a chalk stream catchment, a nationally important and protected ecosystem. Residents have found evidence to show regular exceedance of the permit in place at the treatment works. There is little evidence provided by Anglian Water which shows they are competent, nationally, at determining the treatment works has sufficient capacity to accept additional flows and therefore significant concerns they are fit to approve any additional flows from development in the area. Further evidence must be supplied to reassure residents there is sufficient capacity and water quality will be kept to within the existing permit levels, without detriment to the watercourse and local chalk stream catchment.

EIA (Environmental Impact Assessment)

It has not been made clear if an EIA screening Opinion has been requested or obtained for this application and no Environmental Statement (ES) has been submitted. NHDC has previously proceeded on the assumption that this is not EIA development. However, the 2018 Application was concluded to likely have a significant environmental impact; a view which was agreed by the then Planning Officer and the Planning Committee. The 2020/21 Application also had concerns raised regarding potential impact. The site was also refused at Planning Committee for its landscape and visual impact to Therfield Heath. Therefore, the site poses a risk to the SSSI and should be subject to a detailed EIA Screening Opinion, with justification provided on any omission of an ES. The fact that NHDC Therfield Heath Mitigation Strategy was developed using a methodology that had a presumption of no building within 400m also means that the impact on the SSSI will be severe.

In summary, this application should be refused.

Yours Faithfully

Prof Nicholas Keep