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9 August 2025

Ben Glover  
Senior Planning Officer  
North Hertfordshire District Council  
Council Offices  
Gernon Road  
Letchworth Garden City  
Hertfordshire  
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Dear Mr. Glover

Ref. 25/01708/OP Land Opposite Heath Farm Briary Lane Royston Hertfordshire

I am writing to you in connection with the above planning application. I have examined the plans and know the site. I wish to object strongly to the development of houses at this site.

The proposed development site is not identified in the Local Plan for North Hertfordshire District Council and is outside the plan's settlement boundary. It is significant that Royston is already contributing a significant number of dwellings towards the Council's 5 year housing land supply. The site's development would present a serious challenge due to the restricted access, the site's gradient and the protective covenants. The application should also be refused due to its problematic location, its negative impact and failure to comply with the local plan.

The reasons for the refusal of the 2018 and 2020/21 planning applications still fully apply. The prominent position, the topography, the significant localised adverse impacts on the character of the area, the significant change in the character of the immediate locality and nearby valued landscape such as Therfield Heath. There has not been any consideration given to the direct effects of the access proposals to the character of Echo Hill which would be significantly harmed by these arrangements.

The neighbouring properties (25 and 23) to No.24 which is to be demolished and replaced by the access road, will have their living standards significantly and badly impacted during both the construction and following the populating of the development. The proposals conflict with Policies D3 of the adopted Local Plan. The height of the development site in relation to the existing surrounding properties is likely to give rise to existing residents feeling overlooked, overshadowed and dominated by the new development. The proposals would therefore be contrary to the NPPF and Policies D3 of the adopted Local Plan.

The proposed site is basically unsustainable due to the location of the site in relation to services, the limited access route to the local primary school, pathetic site access and the limited nature of the neighbouring roads. This 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.

It appears that access has been contrived with precious little regard to existing users of Echo Hill, Sun Hill and Briary Lane.

No details appear to have been submitted on gradients and proposed levels of the access road. The audit and the Transport Assessment concentrates on the safety of the future pedestrians of the development, without any consideration given to the following key existing users, the existing drop kerbs associated with the driveways of Numbers 25 and 23, the proximity to existing junctions, the blind/sharp bend leading directly from a steep gradient onto Echo Hill, the existing blind bend on Sun Hill / Briary Lane, and the constrained single carriageway width along Sun Hill and Briary Lane. This should be considered for both during construction and future occupation.

The proposed access therefore 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.

The travel plan significantly underestimates the challenge associated with the steep topography of Echo Hill as the proposed cycle and pedestrian times have been determined using online route mapping software. The site will be heavily car reliant due to the lack of available public transport and the topographical challenges of the site. Based on these issues, the site must be judged to be contrary to paragraphs 108, 109 and 110 of the National Planning Policy Framework (NPPF) and Policy T1 of the Local Plan. The proposal is also contrary to local planning guidance of the Roads in Hertfordshire A Design Guide.

This proposed development will have an ecological impact to a variety of at risk species as laid out in the UK's Biodiversity Action Plan and the RSPB Red list as well as other protected species. Records of these have been listed on relevant ecology recording websites but are absent from the ecology report

The appraisal commissioned by the applicant has not undertaken full surveys prior to the Biodiversity Net Gain (BNG) calculations submitted in support of the site at planning. The BNG calculations already show a deficit with the proposals unable to comply to the 10% BNG within the site and is reliant on offsite mitigation. This approach will detrimentally impact the neighbouring SSSI and the designated Local Wildlife Site (LWS) and therefore should not be accepted. A Therfield Heath mitigation strategy was produced in 2022, in support of the adopted Local Plan. However, this should not be seen as a replacement for failure to comply with BNG standards. The impact and effectiveness of this mitigation study is also not yet fully determined. NHDC recommended ongoing monitoring to inform future site allocations and proposals. The site being located directly adjacent to the SSSI means that greenspace provision on the site won't be effective. The NHDC 2022 Therfield Heath mitigation strategy references SANG (suitable alternative natural greenspace), but fails to note that this criteria was allocated for Thames Basin Heaths, for which SANG were originally devised, 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.

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 be likely to have an adverse effect on Therfield Heath SSSI and neighbouring LWS.

Due to the steep slope of the site, overland flows generated from the access road is a flood risk to the existing drainage network of Echo Hill. The existing system is struggling to cope. 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 design 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 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 located 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 excesses 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.

It has not been made clear if an Environmental Impact Assessment screening opinion has been requested or obtained and no Environmental Statement has been submitted. NHDC has previously assumed that this is not an EIA development. But the 2018 Application was considered likely to have a considerable environmental impact, a view shared by the then Planning Officer and Planning Committee. The 2020/21 application raised similar concerns together with an objection by the Conservators of Therfield Heath and Greens (Conservators), a key stakeholder for Therfield Heath. The site was also refused at the Planning Committee for its landscape and visual impact to Therfield Heath. The site therefore poses a risk to the SSSI.

There is no capacity for expansion within the local healthcare system. A recent response from the Cambridge and Peterborough Integrated Care System, Property Service for Land Off Barkway Road and North of Flint Hall, Barkway Road, Royston (Application reference 21/00765/OP) states the “GP practices show a significant health infrastructure deficit, and existing surgeries do not have capacity to absorb any additional residents”. Therefore, this site and other speculative development in Royston and surrounding villages, are likely to significantly and adversely affect health services in the area. Suitable infrastructure to support any expansion, especially speculative, should be considered a significant risk to the health, care and wellbeing of existing

residents of Royston. The site would therefore conflict with Policy SP7 of the NHDC Local Plan and 55 to 58 of the NPPF.

The development of the site will result in the loss of high-quality agricultural land which is clearly unacceptable in the world today.

To sum up, in view of all the above aspects, I deeply and strongly urge the Council to reject this damaging and clearly unsustainable planning proposal.

Yours faithfully

*A Bayley*

Anthony Bayley