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Cambridge,
CB22 6RY

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

Dear Mr Glover,

Application Reference 25/01708/OP

Outline Planning for Land opposite Heath Farm, Briary Lane, Royston, Hertfordshire

I am a former resident of Echo Hill, having lived there for 31 years. I have recently moved locally and I still visit Royston several times a week to visit family and go to the town centre and the market.

I **object** to the above application for the following reasons:

Housing Supply and the Local Plan

Royston is already contributing a significant number of dwellings towards the NHDC 5-year housing land supply. 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.

The application should be refused because of its problematic location, in terms of the narrow access to the site and the steep topography. The application fails to comply with the adopted local plan (NHDC Local Plan 2011 – 2031).

Landscape and Visual Impact

Royston is a beautiful town and the proposed development is in a prominent position. Approaches into Royston along the A10 and the A505 offer panoramic views of Therfield Heath and the surrounding countryside. I moved to Royston 30 years ago because I loved the rural character of the town. Over the 30 years I lived in Royston thousands of houses have been built, with a significant amount of development alongside the boundaries of Therfield Heath.

Views from Therfield Heath across the valley and the surrounding countryside are one of the special things about Royston, and should be protected. The development site is proposed for an area of Royston that is of particular historic and archaeological importance.

Any development would have a detrimental impact on The Icknield Way which passes through Royston, and has views across the proposed development site. The Icknield Way Path website gives information about it. It is unique among long distance tracks because it can claim to be “the oldest

road in Britain". Extending from the Dorset coast to Norfolk, the ancient route of the Icknield Way consists of prehistoric pathways, old when the Romans came. Dotted with archaeological remains, The Icknield Way Association looks after the interests of the route as a whole, monitoring any actions that may threaten its integrity. It survives as splendid tracks and green lanes along the chalk "spine" of England. In previous applications the Association advised that the development would be visible from the Icknield Way Path and the concern of the Association was taken into account by planning officers. The 2025 proposal is essentially unchanged and any development would have a significant adverse impact on the character of the area.

The reasons for refusal of the 2018 and 2020/21 planning applications, for landscape and visual impact still applies, 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 reason 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.***

Echo Hill is a narrow, quiet cul de sac, and the roads leading up to Echo Hill are narrow and residential. The road alongside Sun Hill Common at the bottom of Echo Hill is particularly narrow, and large vehicles necessary for construction would encroach on the Common and damage the roadside areas, as well as being a danger for walkers and the children who play here. Sun Hill Common is an asset of community value and the impact on this area has not been considered. Large vehicles already rut the grass edge to the Common when negotiating Sun Hill and the parked cars. The significant engineering challenges required to develop this site, and the effects of the proposed access arrangements would therefore be contrary to the general landscape protection policies of the ***NPPF (including Paragraph 135), Policies NE1 of the adopted Local Plan.***

Highways and Transport

As a former resident of Echo Hill, I am familiar with the steepness of the hills leading up to the proposed development site.

Due to the topography and exposed character of this part of Royston with the elevated surrounding open countryside, roads and paths are significantly more iced up during winter than in lower surrounding areas such as the town centre and roads approaching Royston. Access to the proposed development site would involve additional steep slopes, and walking and cycling times would be significant, and the topography of the area has not been accounted for in the proposal. The proposed development site would also be a considerable distance from local primary schools.

With the narrowness of the roads in the area, sharp bends and blind junctions such as with Sun Hill and Briary Lane, together with the proposed sharp bend for the access road, the proposed development does not give consideration to the safety of pedestrians and road users.

The proposal should be refused, therefore, as no details have been submitted on gradients and proposed levels of the access road. The audit and the Transport Assessment concentrates on the safety of the presumed development "generated" pedestrians, without any consideration given to the existing users.

The proposal 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**.

Residents of the proposed site would rely on their cars for travel due to the lack of public transport and the distance from facilities. During heavy snow falls in winter it is often difficult to drive cars up Echo Hill and some residents have to leave their cars parked on Briary Lane or Sun Hill for days at a time. These roads already have parked cars belonging to residents who do not have private drives. Houses on the proposed development would be in an even more exposed altitude, leading to further congestion and restriction for essential services where problems restrict traffic flow. Aside from the impact of hundreds of vehicles belonging to potential residents of any proposed site, the increasing reliance on delivery of online orders to households would also lead to a large increase in traffic on the network of surrounding roads, including Briary Lane, Sun Hill, Echo Hill and Coronation Avenue.

On occasions where unforeseen problems close roads, access for hundreds more vehicles will compromise safety and emergency vehicle access (Sun Hill was closed for weeks in the past due to a collapsed wall, for example).

Travel plans generated by online route mapping software will not incorporate these issues.

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**.

Ecology

The proposed development will have an ecological impact to at-risk species, as specified in the UK's Biodiversity Action Plan and the RSPB Red list, and other protected species. Records of the protected species have been provided on relevant ecology recording websites, up to present day, and are absent from the ecology report.

I personally observed previous ecological surveys which were undertaken during a previous application, when I was a resident in Echo Hill. Bat surveys were conducted by individuals walking along the hedge-line with hand-held bat detectors. This was undertaken too early in the evening before the bats emerged and moved along the hedgerow bordering the proposed development site. The Pipistrelle bats emerged at regular times through their active period and I kept records for years of observed bat activity and forwarded them to the Hertfordshire Bat Group. Several species of bats are active through the night, feeding in this area.

Other protected species include Grey Partridge, and Skylark. There are plentiful records of skylarks which nest in the fields during hay crops or fallow periods, and other Red List farmland birds. Barn owls and Tawny owls hunt and shelter in the area. The meadows and the previous Countryside Stewardship margins around the field are home for small mammals such as Field Voles and reptiles such as the Common Lizard. [REDACTED]

The 2025 proposal includes small woodland and meadow areas within the development proposal which are offered as mitigation for the loss of this farmland. However, because

of the fragmented location of these areas and human and pet access, this will lead to an irreplaceable loss of species. RSPB Red list species such as skylarks need open undisturbed grassland areas, for example. Even if a quarter of the proposed residences have cats for pets, small mammals, birds and reptiles will reduce in numbers significantly. Pet dogs roaming through these areas leave a predator scent which will deter wildlife from settling.

The proposed application would also have a detrimental impact on Bridleway 14 which is a Local Wildlife Site. It is an area of land that is especially important for wildlife, identified and selected locally using scientifically determined criteria and surveys.

They are corridors for wildlife, forming key components of ecological networks and are exceptional areas of land.

They are identified and selected locally, by partnerships of local authorities, nature conservation charities, statutory agencies, ecologists and local nature experts. Bridleway 14 has an exceptional flora and the sheltered hedges provide nesting sites and food and shelter for protected bird species.

As mentioned above, disturbance from building work and then increased human and pet activity would impact wildlife.

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

Flood Risk and Water Quality

Due to the steep topography of the site, the overland flows generated from the access road presents a flood risk to the existing wider highway drainage network of Echo Hill, as the existing system is already struggling to cope with the surface runoff generated.

As a former resident I am familiar with the inability of drains in the local area to cope with surface water during heavy rainstorms. In all the roads in the area large amounts of soil and gravel mix with surface water and create hazards for road users.

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 exceedance of the permit in place at the treatment works.

Environmental Impact Assessment

The previous planning applications submitted for this site concluded that building here would be likely to have a significant environmental impact. Previous applications were refused for their landscape and visual impact on Therfield Heath, a SSSI. **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.**

Access to Health Services

As a resident of Royston for over 30 years, I have experienced the increasing pressure on the health services and increasing difficulty to obtain GP appointments and a complete loss in supporting services. Appointments for preventative treatments by nurses either are no longer available (such as ear syringing) or appointments are often only available in villages as far away as Sawston, for example. Anyone relying on public transport is at a disadvantage.

There is no capacity within the local health providers to accommodate speculative development. 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. Whilst funding is mentioned as mitigation, the GP practices are all land locked and unable to provide the additional space and facilities needed. 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**.

Yours faithfully,

Claire Beale (Mrs)