

16 August 2025

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

Dear Mr Glover

25/01708/OP Outline planning for land opposite Heath Farm, Briary Lane, Royston

I have examined the plans and supporting documents and wish to strongly object to the above planning application. I have lived in the community for many years and know the area well. The principal reasons for objecting are:

Landscape and Visual Impact

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

- 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
- the negative impact on 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**.

The proposed access route will severely impact the character of Echo Hill contrary to the general landscape protection policies of the NPPF (including Paragraph 135), Policies NE1 of the adopted Local Plan.

Highways and Transport

The development site is:

- **Unsustainable** due to poor access to services and reliance on private vehicles
- **Unsafe** due to flawed access design and steep gradients
- **Non-compliant** with current planning and transport policies

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**.

A safety audit by EC Road Safety has been conducted, according to The Transport Assessment by gta (June 2025), supporting the revised site access arrangement. The data used are flawed. It is apparent the access has been contrived with little regard to existing users of Echo Hill, Sun Hill and Briary Lane. The existing roads and junctions are neither suitable nor safe for increased use by cars, vans, lorries let alone construction vehicles. No details have been submitted on gradients and proposed levels of the access road. 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 (far from being a pleasant walk!) associated with the steep topography of Echo Hill, Briary Lane and Sun 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 (well over 400 metres) 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**.

Local Plan (NHDC 2011-2031)

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. This speculative development application does not comply with the adopted local plan (NHDC Local Plan 2011-2031).

Living Conditions

The neighbouring properties (Number 25 and 23) of the house to be demolished (Number 24) and the proposed access road, will have their living standards significantly and detrimentally impacted during both the construction phase and following habitation of the development. NHDC failed to appropriately assess and address this issue during the last planning application. The proposals conflict with **Policies D3 of the adopted Local Plan**.

The elevated location of the development site in relation to the existing surrounding properties, is likely to give rise to existing residents being left with a sense of being overlooked, overshadowed and dominated by new development. This would detrimentally impact on reasonable expectations of residential amenity and privacy. The proposals would be contrary to the **NPPF and Policies D3 of the adopted Local Plan**.

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.

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.

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 with an objection from the Conservators of Therfield Heath and Greens (Conservators), who are key stakeholders for Therfield Heath (SSSI). 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.

Incidentally why are the Conservators of Therfield Heath and Greens omitted from the consultees' list? This is a serious oversight and needs correcting. If necessary, there should be a delay to the process to allow consultation with this body. They are a crucial element of the consultation.

Health Capacity

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**.

Agricultural Land

The development of the site will result in the loss of high-quality agricultural land.

Yet again Gladman has made a speculative application with barely any changes. It is difficult to comment on many aspects as the matters are reserved and therefore likely to change. The exceptions are access to the development and landscape/visual impacts to which I strongly object (as in the previous applications).

For all the above reasons I strongly urge the Council to refuse the application.

Yours sincerely,

Karen Pearson (3 The Dell, Royston, Hertfordshire SG8 9BJ)