

36 Layston Park
Royston
Hertfordshire
SD8 9DS

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

14 Aug 2025

Reference: 25/01708/OP Land Opposite Heath Farm Briary Lane Royston Hertfordshire

Dear Mr Glover,

I write to strongly object to planning application 25/01708/OP. My property backs directly onto the site, and I am intimately familiar with the area's characteristics and constraints.

The site is not allocated for development in the North Hertfordshire District Council Local Plan 2011–2031 and lies outside the settlement boundary, contrary to the plan-led approach mandated by Policy SP2. Royston is already contributing significantly to the Council's 5-year housing supply, making this development unnecessary. The proposal conflicts with Policies SP5, SP12, and CGB1, all of which protect the countryside from unsustainable, speculative development.

The landscape impact remains unjustifiably harmful. The environment would suffer a significant and permanent visual change, given the site's elevated and prominent position, particularly from vantage points on Therfield Heath SSSI. These harms precisely mirror those cited in earlier refusals. The development clearly conflicts with Policies NE1, NE6, and Paragraph 135 of the NPPF, which protect valued landscapes and their settings.

The proposed access from Echo Hill is deeply flawed. The Transport Statement (CD1.44) and associated Transport Statement Part 2 (CD1.45) fail to assess gradient, visibility, or the impact on existing driveways at Nos. 23 and 25. The steep topography, tight bends, and constrained carriageway violate the standards set out in Hertfordshire's Roads Design Guide and conflict with Policies T1 and D1, as well as Paragraphs 108–110 of the NPPF. Given the terrain and lack of alternative travel options, car reliance would be inevitable therefore dramatically increasing traffic volumes and hazard risk, especially near the congested A10/Sun Hill junction.

The elevated site likewise threatens residential amenity. Overlooking is unavoidable, and the existing trees bordering the site and Layston Park; many protected under TPO; provide only seasonal screening. Damage during construction could remove this natural barrier, removing screening further and resulting in harm to wildlife habitats, in breach of Policy D3 and Paragraph 130 of the NPPF.

The ecological assessment is inadequate and misleading. The Preliminary Ecology Appraisal (CD2.30) and Biodiversity Impact Assessment (CD2.17) ignore publicly available records of protected and declining species, such as owls, bats, hares, and partridge, as documented on ecological recording websites. The Biodiversity Net Gain calculation shows

a net loss and relies on off-site mitigation, inappropriate in this sensitive context, conflicting with Paragraph 193b of the NPPF, Policies NE1 and NE6, and NHDC's own guidance requiring minimum 10% on-site net gain north-herts.oc2.uk. The 2022 Therfield Heath strategy does not replace site-level compliance.

Flood risk is also understated. The Flood Risk Assessment (CD1.34/CD1.35) lacks modelling of overland flows. The steep terrain places attenuation features upslope of properties, increasing flood risk. The design does not conform to CIRIA's SuDS Manual, breaching Policy NE7g and NPPF flood risk principles.

The site lies over a Major Aquifer within Source Protection Zone 1, posing serious contamination risk and undermining Royston's water supply. In addition to the Anglian Water treatment works' pre-existing discharge permit exceedances, which threatens a chalk stream ecosystem, contravening national environmental policy.

No Environmental Impact Assessment or screening opinion has been submitted despite clear triggers, including proximity to a SSSI and repeated past refusals. The omission of an Environmental Statement is a substantial procedural flaw.

Local health infrastructure is at capacity. As noted in referenced documents for other developments (e.g., ref. 21/00765/OP), local GP surgeries are landlocked and cannot absorb further demand, conflicting with Policy SP7 and Paragraphs 55–58 of the NPPF.

The Soils and Agricultural Land Classification report (CD1.43) confirms parts of the site are Grade 3a BMV land, meriting protection under Paragraph 174 of the NPPF, which emphasizes the need to conserve the best and most versatile agricultural land for future food security.

In summary, this scheme remains fundamentally flawed across policy, environmental, visual, transport, infrastructure, and design grounds. Approving it risks setting a dangerous precedent for further speculative housing expansion.

I strongly urge NHDC to refuse this application.

Yours faithfully,

Victoria Holmes, PhD.