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

Dear Mr Glover,

I am writing to formally object to planning application 25/01708/OP. As a resident whose property directly borders the proposed development site, I am very familiar with the location and its characteristics. I have reviewed the submitted documents and believe this application is deeply flawed, with wide-ranging negative implications.

Firstly, the site lies outside the defined settlement boundary and is not allocated for housing in the adopted NHDC Local Plan 2011–2031. Under Policy SP2, development must be planned and directed to appropriate, sustainable sites. Royston has already contributed significantly toward the district's housing supply. This speculative application directly undermines the spatial strategy and breaches Policies SP5, SP12, and CGB1, which are intended to safeguard open countryside from unplanned development.

From a landscape perspective, the harm would be substantial. The site occupies a high and visible position, and the proposals would result in a highly intrusive and urbanising effect on an otherwise rural edge. These visual impacts, particularly in views from and around Therfield Heath SSSI, were key reasons for refusal in earlier applications and remain unresolved. The proposal is clearly at odds with Policies NE1 and NE6, and Paragraph 135 of the NPPF, all of which stress the need to protect and enhance valued landscapes.

The transport proposals are inadequate and raise serious safety concerns. The steep gradient of Echo Hill has not been properly assessed in the applicant's Transport Statement (CD1.44), nor have the risks at the tight bend or the conflict with the driveways of existing properties (Nos. 23 and 25) been addressed. The road layout falls short of the design standards outlined in the Hertfordshire Roads Design Guide and conflicts with Policies T1 and D1. The development would increase traffic on already congested roads, and its distance from schools and shops, coupled with the severe topography, means future residents would be heavily reliant on cars, further undermining sustainability objectives under Paragraphs 108–110 of the NPPF.

As someone whose home directly backs onto the proposed site, I am also extremely concerned about loss of privacy and the potential degradation of residential amenity. The elevated nature of the land means that any new dwellings will overlook neighbouring homes. While there are some mature trees along the boundary with Layston Park, these are deciduous, and therefore ineffective for large parts of the year. Moreover, several of these trees are protected by Tree Preservation Orders, and construction works could damage their

root systems, leading to their decline. This would not only harm privacy but also reduce biodiversity, breaching Policy D3 and Paragraph 130 of the NPPF.

In terms of ecology, the submission is inadequate. The applicant's Ecological Assessment (CD2.30) and Biodiversity Impact Assessment (CD2.17) fail to reference species that are known, through national recording schemes to be present on and around the site. These include bats, owls, partridges, and hares, among other species. The Biodiversity Net Gain assessment shows a net loss and depends on off-site mitigation, which is inappropriate so close to a Site of Special Scientific Interest. The application breaches Paragraph 193b of the NPPF, and Policies NE1 and NE6. The 2022 Therfield Heath mitigation strategy should not be seen as an excuse to overlook proper on-site mitigation.

The Flood Risk Assessment (CD1.34/1.35) is also lacking. The site's slope means that attenuation features would sit directly above existing homes on Echo Hill, with no clear modelling of overland flow routes. If these drainage systems were to fail or be overwhelmed, it could result in localised flooding. The proposals do not meet the standards in the SuDS Manual (CIRIA 2015) and breach Policy NE7g of the Local Plan.

There are additional environmental risks. The site sits over a Major Aquifer and lies within a Source Protection Zone 1. The risk to groundwater quality is high, especially from residential use and drainage infrastructure. The Anglian Water facility serving Royston is already under pressure and has reportedly exceeded its discharge limits into a chalk stream, a rare and sensitive ecosystem. This raises serious concerns under the NPPF's principles for environmental protection.

It is also unclear whether an Environmental Impact Assessment (EIA) screening opinion has been issued. Given the site's proximity to a SSSI, its prominent topography, and previous planning refusals, a full EIA should be required. The lack of an Environmental Statement further undermines the credibility and transparency of the application process.

Healthcare infrastructure is another major concern. According to a formal submission from the Cambridge and Peterborough Integrated Care System, GP surgeries in Royston have no capacity to accommodate more patients and are physically constrained from expanding. This application therefore contradicts Policy SP7 and Paragraphs 55–58 of the NPPF, which require new development to be supported by adequate infrastructure.

Lastly, it is important to note that this development would result in the loss of Best and Most Versatile (BMV) agricultural land. The applicant's Soil and ALC Report (CD1.43) confirms parts of the site are Grade 3a, which is classified as BMV. Government policy, reiterated by the Minister for Planning in January 2025, places strong emphasis on protecting such land. Under Paragraph 174 of the NPPF, the planning system should recognise the value of this resource, particularly in the context of future food security and climate resilience.

In summary, this is a speculative application that has been refused on multiple occasions, with the core reasons for refusal remaining. Approving it now would undermine the Local Plan and potentially open the door to future large-scale development in adjacent fields. It would also consume significant council time and resources on a scheme that clearly fails on policy, technical, and sustainability grounds.

I respectfully urge NHDC to refuse this application in full.

Yours faithfully,

Adam Watkins, PhD.