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28 Layston Park
Royston
Herts SG8 9DS

12th August 2025

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

Dear Mr Glover,

Reference : 25/01708/OP Outline planning application for Land opposite Heath Farm, Briary Lane, Royston

I live at the top of Layston Park and am well acquainted with this site. Its border is within 50 metres of my property and I wish strongly to object to the development in this location, on the following grounds -

Housing Supply and Local Plan

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. The application should also be refused for its problematic location; its negative impact and its failure to comply with the adopted local plan (NHDC Local Plan 2011-2031).

Landscape and Visual Impact

The reasons for the refusal of the 2018 (18/00747/OP) and 2020/21 (20/00744/OP) planning applications for the same site by the same applicant are still applicable in that the visual impact, prominent position, adverse impact on the local area's character, its visual impact and impact on the SSSI at Therfield Heath have not changed. The proposals conflict with the **NPPF and Policy CGB1, SP5, SP12, NE1 and NE6 of the NHDC Local Plan**.

Echo Hill's character, through which access to the site is proposed, would be adversely affected. The proposals would therefore be contrary to the general landscape protection policies of the **NPPF (including Paragraph 135), Policies NE1 of the adopted Local Plan**.

Flood Risk and Water Quality

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 from any such development.

The site's topography is very steep and would present a significant flood risk from run-off to any properties below it, specifically properties adjacent to it in 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. 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**

Highways and Transport

The development site is fundamentally unsustainable due to the location of the site in relation to services, constrained access route to the local primary school, undeliverable proposed site access and constrained nature of the highway network including Echo Hill, Sun Hill, Coronation Avenue and Briary Lane.

Residents adjacent to the site will suffer significant disruption to their privacy and the quiet enjoyment of their properties during construction. This, together with the large number of construction vehicle movements, is likely to place an additional burden on the local road infrastructure, particularly, Echo Hill, Sun Hill and Briary Lane.

The width of access to the site via the demolition of 24 Echo Hill is insufficient to accommodate a two way road and pedestrian access.

It is likely that most access to the site will be by car as there is no public transport to it. Pedestrian and cycle timings have been derived without reference to the steep nature of the terrain and are therefore unrealistic.

All of the above points mean that 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 site is directly adjacent to the Therfield Heath SSSI. As such it will have a significant impact on at risk and protected species. Further, the provision of the proposed open spaces on the site is likely to be ignored by potential residents in favour of the much larger open areas of the heath.

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 Biodiversity Net Gain relies on off site mitigation as there is already a deficit with the proposals. This is likely to have a detrimental effect of the adjacent SSSI.

Health Services Capacity

Local health services are already running at, or close to capacity. This site, along with others within the area, will place a further burden on these services. There is limited, if any, ability to expand these services within the confines of their existing physical structures. 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.***

Conclusion

The application's entry on the Planning Portal does not reference the two previous applications for this piece of land by the same applicant (mentioned above), and therefore gives a misleading picture of the attempts to gain permission for a third time. It is disappointing to note that both local residents and NHDC will have to spend further time and irrecoverable expense considering a development which has already been refused twice.

I strongly urge the Council to reject this speculative planning application for all the reasons given above.

Yours sincerely,

Pamela Wright