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OBJECTION: to [Application Reference 25/01708/OP](#), Land Opposite Heath Farm Briary Lane
Royston Hertfordshire

Housing Supply and Local Plan

I am aware that the planned 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. With so many recent building projects, Royston is already contributing a considerable number of houses towards the NHDC 5-year housing land supply. The development of this site would present a significant engineering challenge due to the constrained access, steep topography and the protective covenants in place (which are to be enforced, please see my commentary on Restrictive Covenants (Echo Hill Resident) below), I do not believe that the site is practically able to contribute to 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

I am surprised that NHDC is considering a third attempt at this application by Gladman. 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.***

There has not been any consideration to the direct effects of the access proposals on the character of Echo Hill which would be harmed by the proposed access arrangements. 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.**

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. This 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 incline and bends in Echo Hill make it difficult at times for vehicles to pass – especially if there are cars parked on the street. Even the refuse collection trucks have issues at times. It is already a rat run up Briary Lane to Sun Hill and at times a bit of playing chicken is involved. The turning from Briary Lane to Sun Hill is extremely sharp and again, usually has cars parked there. Then you have the turning to Echo Hill – again a sharp turning. The area Gladmans are stating they will demolish the house for access is on the narrowest part of Echo Hill.

Since Morrisons site was sold (together with the car park) the overflow to Briary Lane / Sun Hill and now Echo Hill are at an all time high. Even if you can afford to pay for parking – you try and find a space ! !!!

Health Capacity

I have had multiple issues with trying to get appointments with GPs , only to be met with a severe shortage of appointments and exceptionally long waiting lists, even to receive a simple referral letter for private consultations. The current GP provision in Royston does not function, and this is exacerbated by the population growth of the town.

There is simply no capacity within the local health providers to accommodate speculative development.

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.

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. The proposed strategic surface water attenuation and infiltration features are located at elevated levels directly adjacent to properties of 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. Due to the topography of the site the factor of safety used in 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***

The development site lies above a Major Aquifer, this area is also classified as a “Source Protection Zone 1” due to the substantial 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. There is little evidence provided by Anglian Water which shows they are competent, nationally, at determining the treatment works has sufficient capacity to accept additional flows and therefore significant concerns they are fit to approve any additional flows from development in the area. Further evidence must be supplied to reassure residents there is sufficient capacity and water quality will be kept to within the existing permit levels, without detriment to the watercourse and local chalk stream catchment.

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 is a key stakeholder 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.

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***.

Restrictive Covenants (Echo Hill Residents)

Finally, and on behalf of the residents of Echo Hill, we would like to make you aware of restrictive covenants which are in place in Echo Hill and which we as a resident(s) of Echo Hill have the benefit of, and we reserve the right to take enforcement action if these covenants are breached.

The covenants were wrongly dismissed by NHDC planning during the previous determination of planning application 20/00744/OP.

The enforcement of the covenants would be a lengthy legal process possibly taking several years to be resolved. A tribunal action would therefore significantly delay the deliverability of the development. This factor therefore means that the possibility of a lengthy delay to implementation will become a material planning consideration in the decision-making process.

You are aware from the previously refused applications for this site the strength of feeling against this development from the community of Royston and the significant impact this development will have directly to the residents of Echo Hill. A letter from an Appointed Solicitor was issued to both Gladman and Number 24 Echo Hill during the previous application of 20/00744/OP, regarding the breach of the covenants and the intention for enforcement action, this remains the case for this latest application and Echo Hill residents will pursue this going forward for this latest application.

In addition, if the community is successful with enforcing the covenants and preventing the demolition of Number 24, both the construction traffic and main site access would not be able to enter the site via Echo Hill, the alternative would be to use the bridleway and therefore the reasons for refusal in the 2018 application associated with the negative impact to the neighbouring SSSI would still stand.

Therefore, due to the protective covenants in place, which residents of Echo Hill will enforce, it cannot be guaranteed that Gladman will be able to deliver this site and therefore this site cannot contribute towards the 5-year NHDC housing supply.

Conclusion

This is the third time that this application has been made to NHDC. The first two attempts were rejected, and this third attempt seems speculative at most, as none of the objections cited in the previous applications have been addressed (nor I believe would they be able to be addressed). Royston has seen significant development in the past few years, including land developed for Ivy Lane, Hampshire Road, and Meridian Gate, with further developments planned off Newmarket Road (Burloes) and the Barkway Road. Whilst I support appropriate development, and the need to ensure that the housing stock available meets the needs of the population, there is a limit to which the infrastructure and services of one town can support – I firmly believe that this limit has been exceeded, as is demonstrated by my commentary above on Heath Provision and Highways and Transport. Further, as mentioned in my opening statements, the planned 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.

Regardless of excessive and inappropriate development within Royston, and particularly this site, we should not forget the catastrophic impact this development would have on the local ecology, not to mention the landscape and visual impact – this damage would be irreparable and irrecoverable.

I urge you, as senior planning officer, to reject this planning application, such that we can protect the community, ecology and landscape of Royston.

With best regards,

Joanne Davidson