

6 Royse Grove
Royston
Herts
SG8 9EP

Ben Glover
Senior Planning Officer
NHDC
Council Offices
Gernon Road
Letchworth Garden City
Herts
SG6 3JF

Thursday 14 August 2025

Dear Mr Glover

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

I write in connection with the above planning application. I have examined the plans and know the site well as my property shares a boundary with the proposed site. For the I wish to object strongly to the development of houses in this location.

Landscape and Visual Impact

The current planning application should be refused for the same reasons as the 2018 and 2020/21 applications, due to significant landscape and visual impacts. These include the site's prominent location, topography, and adverse effects on the character of the area and views, particularly around Therfield Heath (SSSI). The proposals conflict with national and local planning policies (NPPF and NHDC Local Plan Policies CGB1, SP5, SP12, NE1, and NE6). Additionally, the proposed access would harm the character of Echo Hill, further breaching landscape protection policies, including NPPF Paragraph 135 and Policy NE1.

Overlooked, overshadowed and dominated by new development – the proposed development site neighbours our property. The gradient of the site (see image 1) means that occupants of the new dwellings will be able to see directly into the second floor of our property and into our garden. The loss of privacy will be compounded by the loss of daylight and sunlight into our home and garden as the sun moves from east to west, and will be particularly bad in late afternoon and early evening. 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.

Image 1 Aerial view of our property October 2024 you can see the topography and steepness of the site



Image 2 View from second floor window of field – you can see that the field is at the same height so we will be over looked and overshadowed



Image 3 View from boundary fence into our garden – showing how overlooked we will be



Highways and Transport

The development site is fundamentally unsustainable due to its poor location relative to essential services, a constrained access route to the local primary school, and an undeliverable site access. The surrounding highway network, including Echo Hill, Sun Hill, Coronation Avenue, and Briary Lane, is also significantly limited. Briary Lane is already a 'rat run' for traffic wishing to avoid congestion along Melbourn Street to the A10, and it will compound access difficulties which already exist for emergency vehicles. Since the Morrison car park closed the surrounding roads are even more congested. I am also concerned that there will be many more vehicles undertaking an illegal right turn at the bottom of Sun Hill onto the A10. These issues conflict with Paragraphs 108, 109, and 110 of the National Planning Policy Framework (NPPF), Policy T1 of the Local Plan, and the Roads in Hertfordshire Design Guide.

The Transport Assessment (June 2025) claims the revised site access is supported by a safety audit from EC Road Safety. However, this audit has not been reviewed by Hertfordshire County Council Highways, the approving authority, prior to finalising the design. The access is reckless as best, and fails to consider the needs of existing users of Echo Hill, Sun Hill, and Briary Lane.

No details have been provided regarding the gradients and levels of the proposed access road. The audit and assessment focus solely on safety for future development-generated pedestrians, neglecting key existing users. These include residents at Nos. 23 and 25, nearby junctions, blind bends, steep gradients, and narrow carriageways. These factors pose risks during both construction and future occupation under normal conditions let alone in cold wet and icy conditions.

The proposed access arrangements therefore conflict again with NPPF Paragraphs 108–110, Policy T1 of the Local Plan, and the Roads in Hertfordshire Design Guide. Additionally, the travel plan underestimates the impact of Echo Hill's steep topography. Cycle and pedestrian times are based on online mapping tools, which do not reflect real-world conditions. The site will be heavily car-dependent due to limited public transport and terrain challenges, reinforcing its conflict with the same planning policies and guidance.

Ecology

The proposed development is likely to cause ecological harm to at-risk and protected species listed in the UK Biodiversity Action Plan and the RSPB Red List. Although records of these species exist on recognised ecology databases, they are not reflected in the applicant's ecology report. The Biodiversity Net Gain (BNG) calculations submitted lack credibility, as full ecological surveys were not conducted beforehand. These calculations already show a deficit, relying on offsite mitigation that could negatively affect the adjacent Site of Special Scientific Interest (SSSI) and Local Wildlife Site (LWS). The 2022 Therfield Heath mitigation strategy, while referenced, cannot substitute for meeting BNG standards, and its effectiveness remains unproven. NHDC has recommended ongoing monitoring to guide future site allocations. Given the site's proximity to the SSSI, any on-site greenspace would be ineffective, as residents are more likely to be drawn to the more attractive Therfield Heath. The NHDC strategy's reference to Suitable Alternative Natural Greenspace (SANG) is also misapplied, as SANG was designed for the Thames Basin Heaths, where development within 400m of SSSIs was prohibited.

My family and I use Bridleway 13 and 14 to get to the Heath and sports facilities. We also use them to access the local paths whilst walking our dog. I often see horseshoe prints along these Bridleways. We have seen many species, some of which are endangered, in the field and in our garden including Great Spotted Woodpecker, Brown Hare, Starling, Song Thrush (always sounds amazing!) and Hedgehog. We have also seen increasing number of Bats this summer, and Barn Owls flying overhead as they nest in the trees on Royse Grove, and there are Red Kite and Buzzards in the trees on the Hospital site. [REDACTED]

[REDACTED]. The proposed site will likely be a foraging area, and we regularly see Kestrels hovering over the field. The effect of pet dogs and cats from the new development will also be significant not just to the wildlife but the Heath. I believe that this development will have a detrimental effect on Therfield Heath and the SSSI that borders the access route and the site.

According to Paragraph 193b of the NPPF, development that adversely affects an SSSI should not normally be permitted unless the benefits clearly outweigh the ecological harm. In this case, the proposals are likely to have a detrimental impact on Therfield Heath SSSI and the neighbouring LWS.

Flood Risk and Water Quality

The proposed development poses significant flood and water management risks due to the site's steep topography. Overland flows from the access road threaten the already strained highway drainage network on Echo Hill, and the elevated placement of attenuation and infiltration features near residential properties increases the risk of flooding if these systems fail or exceed their design limits. The Flood Risk Assessment lacks analysis of overland flow routes, and the design does not meet the safety standards outlined in the SuDS Manual (CIRIA 2015), conflicting with the NPPF and Policy NE7g of the Local Plan. Additionally, the site lies above a Major Aquifer and within a Source Protection Zone 1, making it highly vulnerable to groundwater contamination. The existing sewerage treatment facility, operated by Anglian Water in South Cambridgeshire, discharges into a chalk stream catchment—a nationally protected ecosystem. Evidence of regular permit exceedances raises doubts about the facility's capacity to handle additional flows, and insufficient data has been provided to assure residents that water quality will remain within permitted levels without harming the local environment.

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.

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

We have lived in Royse Grove for 11 years now and lived on Layston Park between 2006-2014 (100m away as the crow flies) which also borders the proposed development site. This part of Royston is truly stunning, the views of the Heath and beyond are breath taking and it is part of the reason why we decided to stay in the area. To lose this land and countryside would be a travesty for future generations. This development is purely about money and I do not believe that affordable housing whether it is for existing Royston residents or others, will end up being part of this development. I also suspect that it will be the gateway to other neighbouring fields that could lead to a much larger number than 84 houses being built, it is extremely important that we protect this haven for wildlife. The site is not poor quality, but high-quality agricultural land as evidenced by the owner harvesting hay last weekend (9 & 10 August 2025).

Finally, I do not oppose the building of new homes, in fact more affordable and accessible carefully planned new housing is needed across North Herts. However given all of the information and evidence plus the number of houses already built in the last 5 years across Royston, I strongly object to this proposal and hope that planning officers and committee will reject this application.

Please let me know if you need any further information.

Yours sincerely

A black rectangular box redacting the signature of Mrs Clare Swarbrick.

Mrs Clare Swarbrick