

5 Mill Hill
The Grange
Royston
Herts.
SG8 9UD

8th August 2025

Ben Glover
Senior Planning Officer
North Hertfordshire District Council
Council Offices
Gernon Road
Letchworth Garden City
Hertfordshire
SG8 3JF

Dear Mr Glover

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

I write in connection with the above planning application. I have examined the plans and know the site very well, as my daughter has lived in Echo Hill for many years. I wish to make an objection in the strongest possible terms on the above application to the development of houses in this location. I state my reasons below.

- Having examined the existing local plan for North Herts District Council (NHDC) this is NOT identified as a site for development.
- It is NOT within the settlement boundary in the plan.

Royston has already contributed a significant number of new builds towards the NHDC 5-year housing plan. This is still to all intense and purposes a COUNTRY TOWN NOT an URBAN SETTLEMENT and already the infrastructure is struggling to cope.

Constrained access, steep topography and PROTECTIVE COVENANTS IN PLACE to be enforced, would result in significant and very expensive engineering challenges to overcome.

Due to its problematic location, negative impact and failure to comply with the adoptive local plan, NHDC LOCAL PLAN 2011-2031, this application should be refused.

All the objections raised previously for refusal in 2018 and 2020/21 re landscape and visual impact still apply. The development, being in a prominent position would have significant impact on the character of the area and a negative impact visually not only in the immediate locality but the wider much valued landscape such as Therfield Heath (SSSI). All of this remains unchanged, and this reasoning applies to the current application.

The Proposals CONFLICT with NPPF and Policy CGB1 SP5 SPIZ NEI and NE6 of the NHDC Local Plan.

As usual NO CONSIDERATION has been given to the existing residents of ECHO HILL and all those inhabiting the direct area of existing roads leading to Echo Hill.

Access proposals would directly affect and harm its character. The proposals are CONTRARY TO THE GENERAL LANDSCAPE PROTECTION POLICIES OF NPPF INCLUDING PARAGRAPH 1350, POLICIES NEI AND THE LOCAL PLAN.

The suggested demolition of 24 Echo Hill to provide access to the proposed site would have a SERIOUS IMPACT on no's 23 and 25. Their living standards would be significantly and detrimentally impacted, not only during demolition and then construction, but also following the habitation of the proposed development.

This issue was NOT appropriately assessed and addressed during the last planning application.... Noise Pollution, Air Pollution, possible damage to properties 23 and 25 due to narrow access just for a start.

The Proposals CONFLICT with POLICIES D3 of the adopted local plan.

Due to the elevated location of the site in relation to the existing surrounding properties, there is a likelihood of loss of privacy through being overlooked, shadowed and dominated by the new builds.

The Proposals are CONTRARY to NPPF and POLICIES D3 of the local adopted plan.

Due to its location, the site is unsustainable in relation to a) services b) access routes to local primary schools c) undeliverable site access d) the constrained nature of the highway network which includes Echo Hill, Sun Hill, Coronation Avenue and Briary Lane. All of these residents will be detrimentally affected.

The proposal CONFLICTS with Paragraphs 108, 109, 110 of the NATIONAL PLANNING POLICY FRAMEWORK (NPPF) and POLICY Ti of the Local Plan and local planning guidance of the ROADS IN HERTFORDSHIRE, A DESIGN GUIDE.

Again there is no consideration to existing house occupiers. People appear not to count when there is money to be made!!! Access to the proposed site has been contrived with little if any regard to existing users of Echo Hill, Sun Hill and Briary Lane. Although stated that the revised site access is supported by a safety audit by E C Road Safety, this supposed safety audit HAS NOT been consulted on with the local approving authority of HERTFORDSHIRE COUNTY COUNCIL (HCC) HIGHWAYS.

Details of gradients and proposed levels of the access road have not been submitted, instead concentrating on 'generated' pedestrians without considering:

- a) existing users b) existing drop kerbs re no's 23 and 25 c) proximity to existing junctions d) blind and sharp bends leading from a sharp gradient leading directly from a steep gradient onto Echo Hill e) conflicting oncoming vehicles f) existing blind bend on SUN Hill/BRIARY LANE) constrained single carriageway along Sun Hill and Briary Lane.

All these aspects should be a MAJOR CONSIDERATION when considering this application.

Proposed access conflicts with PARAGRAPH 108 109 110 of the NATIONAL PLANNING POLICY FRAMEWORK (NPPF) and POLICY TI of the LOCAL PLAN AND PLANNING GUIDANCE: ROADS IN HERTFORDSHIRE, A DESIGN GUIDE.

The TRAVEL PLAN significantly underestimates the challenge of the steep topography of Echo Hill. Because of this the site will be heavily car reliant due to lack of public transport, putting a further strain on car parking in the town, having already lost valued parking at the bus station.

Based on these issues the site must be judged contrary to PARAGRAPHS 108 109 110 of the NATIONAL PLANNING POLICY FRAMEWORK (NPPF) AND POLICY T1 OF LOCAL planning also contrary to ROADS in HERTFORDSHIRE A DESIGN PLAN.

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 be likely to have an adverse effect on Therfield Heath SSSI and neighbouring LWS.

The proposed development will have an ecological impact to at-risk species, as specified in the UK's Biodiversity Action Plan and RSPB red list. Records of protected species are available but are absent from the ecology report. The applicant has not undertaken full surveys prior to the Biodiversity Net Gain (BNG) calculations submitted in support of the site at planning. The sheer scale and accessibility of Therfield Heath would make the provision of green spaces mostly ineffective.

Due to the steep topography of the site, overland water flow from the proposed access site presents a flood risk to the existing wider highways drainage network of Echo Hill which are already struggling to cope with current surface runoff. An assessment of overland flow routes has not been considered within the Flood Risk Assessment, failing to realise the potential flood risk to properties downstream of the site. The design of infiltration etc devices is underestimated and NOT in accordance with SUDS MANUAL (CIRCA 2015) AND IS THEREFORE IN CONFLICT WITH NPPF AND NE7G OF THE LOCAL PLAN.

The site also lies above a Major Aquifer---an area classified as a Source of Protection Zone 1 due to a high risk of groundwater contamination making the site far less suitable for development.

“Chalk streams in England are a rare and precious ecosystem, characterized by their unique geological and hydrological features. These streams are fed by natural underground aquifers in chalk hills, resulting in clear, mineral-rich, and consistently cool water. This provides ideal conditions for diverse aquatic life, making them havens for wildlife and a globally significant habitat.”

The existing sewerage treatment for Royston, is located in South Cambridgeshire District Council. The treatment works discharges into a local water course associated with a chalk stream catchment, a nationally important and protected ecosystem. Additional flows from development in the area has raised concerns about retaining sufficient capacity and water quality within existing permit levels without detriment to the water course and local chalk stream.

The Environmental Impact Assessment comments remain relevant, as noted during the 2018 application and the 2020/21 application. No Environmental Statement(ES) has been submitted for this application. Nor is it clear whether an EIA screening has been requested or obtained for this application.

It goes without saying that there is no capacity within the local health providers to accommodate speculative development. Application reference 21/00765/op states:

“GP practices show a significant health infrastructure deficit and existing surgeries do not have capacity to absorb any additional residents”.

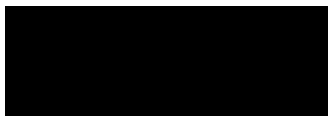
There have already been several housing developments since then around the town with obvious consequences to the health services in Royston. There is significant risk to the health, care and wellbeing of the existing residents of Royston. As an example: I have personally found that for a routine yearly blood test, appointments are rare as hen's teeth not to mention distance travelled as there were no appointments anywhere near Royston. Fortunately I drive, many don't.

Last but not least: The development of this site would cause the loss of high quality agricultural land. In this day and age we need to become more self sufficient where producing food is concerned. We cannot afford to become complacent and build on prime land.

I am pretty sure that not one of the planners looking at this application would like to be personally affected by these issues. Neither would those who submitted the application, but the latter unlike the former don't care.

I urge the council in the strongest possible terms to reject this unsustainable planning proposal.

Yours most sincerely



Maureen Gisby BA (Hons)+