

Ms Amelia Whittaker
39 King James Way
Royston, SG8 7EF
15 August 2025

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

Dear Sirs,

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

I refer to application 25/01708/OP submitted by Gladman and object to this application.

NE6: New and Improved Open Space, and Paragraph 8.4 (Open Spaces) of the Developer Contributions: Supplementary Planning Document ("SPD")¹

I refer to the Council's adoption of NE6 with regard to open green space as both an allotment gardener and the previous chair of the Royston Allotments and Gardens Association. Councillors may not be aware that Royston has the lowest provision of allotments in North Hertfordshire, which was identified in the North Herts Open Space Review & Standards (2016) document² as being less than 0.11 hectares per 1000 people. This allotment provision has since been further eroded to 0.10 hectares per 1000 people using the 2021 census figures of a population of 17,448, and is in stark contrast to the allotment provision for Baldock, Letchworth, and Hitchin all of which in 2016 maintained allotment space of not less than 0.23 hectares per 1000 people.

The national planning standard set out in NE6 calls for 0.3 hectares of allotment space per 1000 people. This is not feasibly met via a "community orchard", the proposal of which entirely ignores the land on which it is proposed to be planted on, the nature of the wildlife in the area and which does not ostensibly meet any of the categories for amenity space set out in NE6.

The SPD sets out the expectations in respect of Open Space at 8.4.17 and states that:

Each application (using the relevant evidence base documents) will be considered on its individual merits taking account of the:

- *Future demands for open space arising from the development*
- *Current quantity deficiencies in the area*
- *The quality of existing open spaces in the area*
- *Accessibility (distance) to existing open space provision*

(my emphasis added).

It is entirely clear that there is material deficiency in Royston for allotment space, which will not be remedied by any existing proposals to increase provision, and which requires additional provision to be

¹ <https://www.north-herts.gov.uk/sites/default/files/OSC4%20North%20Hertfordshire%20Open%20Space%20Review%20%26%20Standards%202016.pdf>

² <https://www.north-herts.gov.uk/sites/default/files/OSC4%20North%20Hertfordshire%20Open%20Space%20Review%20%26%20Standards%202016.pdf>

made. The fact that this development is less than 1000 people ought not be reason to exempt any further housing development from being required to increase provision to partially meet policy standard. I draw your attention to Royston's current waiting list for allotments which is greater than 5 years, and that all plots in Royston are currently half the size of the national standard of 10 poles or smaller, masking the fundamental problem of lack of provision.

I refer further to the guidelines relating to sports pitch provision within paragraphs 8.4.10 and 8.4.11 of the SPD. Sports provision within Royston currently relies heavily upon the open space made available by the Conservators of Therfield Heath and Greens³ (in which NHDC's consultants incorrectly refer to the privately owned land as "Royston Heath", and fail to properly identify the owners of the land in three instances), and it is recognised that there is insufficient municipal provision for sports facilities for sports which currently overwhelm the heath on certain days of the week. North Herts Council cannot continue to rely upon privately owned common land to provide these facilities, where NE6 requires that they take into account sports provision, and particularly where the majority of such common land is a designated local nature reserve and SSSI.

Councillors may not be aware that the topography of the land being proposed to be built on is chalk. This has limited use in the cultivation of fruit trees, and currently sits within an area frequented by a large number of deer. Broadly, this means that without the establishment of appropriate deer fencing of at least 2.43m in height, any attempts at establishing an orchard is guaranteed to fail. This fencing has also been necessary to adopt in neighbouring Therfield's allotment site, as well as in areas of land marked for biodiversity net gain. This pre-existing net-gain fencing also means that it is more likely to encourage greater migration of deer into urban areas and particularly onto the Therfield Heath SSSI land, which may have further detrimental impact on that chalk grassland.

Urban Sprawl

Finally, where urban infill may be appropriate and entirely justifiable, such as building on vacant land on King James Way, urban sprawl is widely recognised to have an overwhelmingly detrimental impact on the infrastructure of towns. In particular, this will have a material impact upon car movements, as residential behaviour from the Ivy Farm developments demonstrate that access to the train station and parts of the town will be overwhelmingly by vehicle, particularly given the planning permission to replace the supermarket site (though I note this supermarket still exists according to the Gladman application) in town with further assisted living. It will also have a detrimental impact upon the SSSI land on the heath, as this land will be the main access point for people on foot and will result in increased movements across sensitive land.

As the planning committee has already made material planning decisions on land within the local plan which has yet to be realised, the majority of which have materially failed to recognise the deficiencies re: NE6, it would not be prudent to make any further planning decisions on land outside of the adopted Local Plan until such a time as the impact of those developments can be assessed, and appropriate provision identified for future development.

It is on this basis that the application should be rejected.

Yours sincerely



Amelia Whittaker

³ <https://www.north-herts.gov.uk/sites/default/files/North%20Hertfordshire%20PPS%20Strategy%20%26%20Action%20Plan.pdf>