

Shardé Fouracres  
10 Briary Lane  
Royston  
SG8 9BZ

I am writing to object to the application 25/01708/OP.

I am dismayed that Gladman are back for a third time to waste valuable council time and resources putting forward a plan that is so clearly inappropriate for consideration. The development of the site will result in the loss of high-quality agricultural land and the location right next to Royston Heath is not fit for purpose for many reasons.

Highways:

As a resident of Briary Lane for the last 8 years I witness daily just how constrained the highways network around the proposed development site is and how the location is completely unsuitable from a highways perspective. The majority of the access to the site is single lane due to the parking up the side of Briary Lane by residents and all the way along Sun Hill, leading to Echo Hill. There are blind bends, extremely sharp turns and steep hills and the roads are already used as a rat run for people wanting to cut through Royston town. The proposal 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 travel plan put forward by Gladman is a complete farce, one that must have been conjured up by someone who has never walked up to Echo Hill – let alone attempted to navigate it on a bike or while pushing a buggy! The steep topography of the location means the 84 houses will be reliant on cars to get around as we have no public transport available. Based on these issues, 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.

Housing supply and local plan:

As was the case with the previous unsuccessful attempts, the development site is not identified in the existing Local Plan for North Hertfordshire District Council (NHDC). It is also outside the settlement boundary identified in the plan. Royston is already contributing a large number of dwellings 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). This all means the site isn't 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).

## Healthcare and local services

Our local healthcare provision is already stretched to breaking point, with it being near impossible to access the doctors surgeries and long waiting times for routine appointments. 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**.

The local schools are also extremely busy and struggling to cope with the additional houses being built in Royston already. Applications must stop being approved until additional local healthcare and schooling settings are created and fully operational.

## Visual impact:

As with the refused 2018 and 2020/21 planning applications, the issues with landscape and visual impact still apply. 1. the prominent position. 2 the topography 3. the significant localised adverse impacts on the character of the area 4. the negative impact to visual receptors (which are unchanged) 5. the marked change in the character of the immediate locality and wider valued landscape, such as Therfield Heath (SSSI). They were all reasons to refuse the last two applications, therefore 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**.

The proposed access also doesn't consider the negative and harmful effect on the character of Echo Hill. 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**.

## Negative impact on Living Conditions:

The elevated location of the development site in relation to the existing surrounding properties, is likely to give rise to existing residents being left being overlooked, overshadowed and dominated by the new development. 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**.

Not to mention to poor souls in neighbouring properties (Number 25 and 23) to the proposed demolition of number 24 for access. Their living standards will be absolutely awful during the construction and the following habitation of the development. NHDC failed to appropriately assess and address this issue during the last planning application and I sincerely hope they do not fail to properly consider this again in 2025. The proposals conflict with **Policies D3 of the adopted Local Plan**.

## Ecology concerns:

The ecology report is missing records of protected species that have been provided on relevant recording websites. This is extremely concerning as 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.

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 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.

#### 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.

Overall there are so many reasons this application is not acceptable and the land should never be considered for anything other than the good quality agricultural land it is today. I urge the council to put this matter to bed for a third and final time and make the decision to reject the proposal. Surely there are only so many times a company like Gladman should be allowed to waste the resources of a council that is struggling in a funding deficit!