

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

13th August 2025

Dear Mr Glover,

Reference: 25/01708/OP Outline planning for Land opposite Heath Farm, Briary Lane, Royston

I write to register my strong objection regarding the above application. I live adjacent to the site, so I know it well. I have reviewed all the planning documentation produced on behalf of Gladman (hereafter referenced as 'the applicant').

Please see below my concerns and reasons for objecting.

Location and Principle of Development:

The site is located outside the adjusted settlement boundary and has not been allocated by North Hertfordshire District Council (NHDC) in the adopted Local Plan (NHDC Local Plan 2011-2031) (**saved Policy CGB1 (Rural Areas Beyond the Green Belt) and saved Policy 9 (Royston's Development Limits)**).

The recent Local Plan should still be given significant weighting in your assessment despite the applicant's request for you to do otherwise.

The application should also be refused for its location and its failure to comply with the adopted plan. The council has resisted considerable pressure to allocate this site previously and has done so for very coherent and defensible reasons, which includes the impact to the neighbouring Site of Special Scientific Interest (SSSI) of Therfield Heath, the site's prominence on high ground, difficulty of physically accessing the site and because of its poor location in terms of access to public services and public transport. There is no material difference between this application and previous applications, therefore I am surprised it is being considered by NHDC again.

A significant number of sites have already been constructed and allocated within Royston, since 2011 a total of 1,421 has been constructed and a further 500 allocated in this current plan, excluding local villages. Overall Royston and the immediate surrounding villages have contributed significantly to the NHDC housing supply.

Whilst I acknowledge there is a deficit in the 5-year housing supply (recent estimate of 3.9 years) and therefore it triggers a presumption in favour of sustainable development, the site is contrary to what constitutes as sustainable development and should therefore be rejected.

The site would also present a significant engineering challenge due to the constrained access, steep topography and the protective covenants in place (which are to be enforced). The site is therefore unable to reasonably contribute to the NHDC 5-year housing land supply and the weighting should be considered accordingly by NHDC.

Visual and Landscape Impact:

The site is a valued landscape as concluded in previous supporting assessment on behalf of Royston Says No to Gladman (RSNtG) by Jon Etchells Consulting and The Landscape Partnership on behalf of NHDC during the previous 2020 application, with no material change in this application. I also urge the council to carefully consider any further evidence supplied by RSNtG on this matter.

Previous refusal should still apply, due to 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 proposals conflict with the **NPPF (including Paragraph 187) and Policy CGB1, SP5, SP12, NE1 and NE6 of the NHDC Local Plan.**

There has also 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 Transportation:

Fundamentally, the site is very poorly located in relation to access to services and located outside the maximum distance to local public transport facilities (rail station, bus stops). The distances and gradients involved, including gradients within the site itself, makes it highly unlikely residents would walk to local facilities and would thus be car dependent. This is contrary to planning policy (NPPF), the adopted Local Plan and is unsustainable.

Access Road via Demolition of Property 24 in Echo Hill

The access road levels have not been clearly defined and there is little supporting information on the construction of the road. This is likely a deliberate omission by the applicant because the access road is undeliverable and heavily constrained, for the following reasons:

1. Proposed levels need to connect with the existing levels of Echo Hill and neighbouring features, which cannot be reasonably altered,
2. The access road must be designed to prevent any impact to neighbouring properties (Numbers 23 and 25 Echo Hill),
3. The site itself cannot accommodate significant earthworks. Any earthworks would contribute to a wider visual impact, promote the removal of retained/protected hedgerows and woodland, and have further visual impact to the neighbouring SSSI.

I have clearly shown in **Figure 1**, included as an appendix to this letter, the gradient of the access road will be at approximately 1:8.5 (11.76%).

The applicants proposed access road is therefore not compliant with highway standards or accessible for those with disabilities, the proposed site would naturally discriminate in only allowing those without physical disabilities to live there. It is highly unlikely residents who have health and age-related concerns, or those with young children, would be able to cycle or walk, and therefore with no access to bus services they will all be reliant on their cars.

Since the last application the applicant has revised the proposed access arrangement at Echo Hill, due to incorrectly including a neighbours' land. In addition to the steep gradient of the access road there are other potential safety impacts the revised arrangement presents which must be considered as follows (see **Figure 2**, Appendix A of this letter, with each referenced item illustrated):

- The gradient directly onto a sharp bend will cause vehicles to run uncontrollably across it (item 1).
- Vehicles travelling from the development (which would be at an increased risk of speeding due to the steep gradient) will need to navigate a sharp bend, which in icy/wet conditions could result in vehicles sliding uncontrollably across the junction into the garden of No 42 Echo Hill (item 2).
- People walking from the proposed development, towards Echo Hill could potentially see into the bedrooms of Nos 23 and 25 Echo Hill or gain access easily into the gardens of these two properties (item 3).
- The desire line of existing residents, living to the west of Echo Hill, will now have to cross the direct path of vehicles travelling from the development, without any form of control (item 4).
- Existing dropped kerb driveways of Numbers 23 and 25 are likely to have a potential conflict with vehicles travelling from the development or vehicles waiting at the proposed junction (item 5).

The access road 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**.

It is very concerning the safety audit by EC Road Safety was not consulted with the approving authority of Hertfordshire County Council (HCC) Highways, prior to the final design.

Both HCC Highways and the applicant have failed to appropriately access and address the safety risk associated with the proposed access road.

Travel Plan:

The travel plan significantly underestimates the challenge associated with the steep topography of Echo Hill, as the proposed cycle and pedestrian times have been determined using online route mapping software (assuming flat topography and a Mark Cavendish stamina).

The site will be heavily car reliant due to the lack of available public transport and the topographical challenges of the site. The site must therefore 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**.

Wider Access Route – Briary Lane and Sun Hill

Sun Hill/A10 junction is dangerous and the proposals to promote further traffic movements will likely encourage an increase in illegal manoeuvres of “no right turn”.

There is a potential conflict with the increase in traffic movements adjacent to the common land, (located off Sun Hill and designated as an Asset of the Community) with walkers and children who play football here.

Any mitigation which could be promoted by the applicant along Sun Hill will not be feasible, as highlighted in previous applications. This is due to the existing on-street residents parking (permit holders) and the mature trees which limits any changes.

The narrow footpath along Briary Lane (width of 1m at most) is not referenced or addressed within the applicant’s Transport Assessment / Travel Plan. This below-standard route is still being promoted by the applicant as a good walking route for children to the local school.

The existing blind bend on Sun Hill / Briary Lane should be considered for both during construction and future occupation in any safety audit.

The existing on-street parking creates a one-way flow of traffic along Briary Lane, made worse with the recent loss of the Morrisons car park. The road has in the past become blocked, with subsequent restrictions to emergency vehicles. Unfortunately, I have had to in the past abandon my vehicle in town when the road was blocked due to an emergency, which came during a challenging time with my health. When I arrived at home, I unfortunately became ill, in part due to the challenging walk which I should not have made but sadly I had no choice but to do so.

The proposed emergency access is therefore not compliant with design standards and does not meet the requirements of the Roads in Hertfordshire A Design Guide, as it exceeds the maximum number of 300 dwellings for a single point of entry. The assessment of emergency access should be applicable from the junction of Briary Lane/Baldock Road, as this is the single access point for the proposed development and to the wider estate, which already exceeds the 300-dwelling limit. HCC and the applicant have both failed to appropriately assess this risk.

The narrow nature of Briary Lane, Sun Hill and the steep slope of Echo Hill (1:20) do not make it a suitable environment for cyclists, prams, or pedestrians with mobility issues.

During times of icy and snowy conditions I have failed to access Echo Hill, due to its steep topography, and had to abandon my car along Sun Hill or Briary Lane.

The proposed access route therefore 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**.

Living Conditions

Properties No 23 and 25 Echo Hill

Properties Number 25 and 23, located adjacent to the house to be demolished (Number 24), for the purpose of constructing an access road, will have their living standards significantly and detrimentally impacted during both the construction and following habitation of the development. The applicant has also written to the owners of properties of Number 23 and 25 acknowledging they would be significantly and negatively impacted by the development. It is therefore a concern that NHDC failed to acknowledge this during the last planning application and I would ask they address this robustly this time.

The proposals conflict with **Policies D3 of the adopted Local Plan.**

Impact to Neighbouring properties including my own

Due to the elevated location of the site in relation to my property, which directly borders the site, the new dwellings would give rise to my family, and I being overlooked, overshadowed and dominated by the new development. This would detrimentally impact on my reasonable expectations of residential amenity, privacy, and my family's health and wellbeing.

Please see attached photo evidence and a topographical survey review undertaken at my own property, included in the appendix to this letter, reference **Figure 3**.

The planning officer's recommendations for the previous applications was to stipulate a minimum offset of 25m to 30m, as it was considered by the planning officer to mitigate the impact of the development to neighbouring properties. With the topographical level difference between my home and the site I feel this offset is too low and a higher offset should be applied. However, as illustrated in **Figure 4**, even the 25m has not been achieved with this latest masterplan with a reduction in offsets from Echo Hill properties now proposed.

The development plot topography varies across the site, but a large extent has been set to 1:10 gradients (10%) including those backing onto my property. Therefore, even if achieving a minimum 25m offset this would result in the floor levels of the proposed houses being set at a height which is roughly level with the bedrooms of my property.

The elevated nature and steepness of the topography at the site would also likely result in the failure of the 25- degree line test, as stipulated within the relevant BRE Daylight and Sunlight document, which is used by local authorities when assessing impact to daylight. The proposed development will also block uninterrupted skyline which has been visible from the habitable rooms of my property since its construction in the early 1980s and therefore for around 40 years.

Given the constraints of the site, the properties in Echo Hill and Royse Grove should be assessed against the requirements of the BRE Daylight and Sunlight document. A failure of this test by the applicant could result in changes needed to the masterplan and subsequent adverse impact to other receptors as a result.

As illustrated in the attached photo and topographical survey of my home attached (**Figure 3**), my garden steeply slopes towards the field edge and hedgerow (a hedgerow which I part maintain and own). Due to the private setting (no public access currently) and the steep topographical change in levels, I have a low picket fence, which has been adequate for our needs, with the site landowner's installation of a barbed wire boundary on the opposite side of the hedgerow. The fences installed provide a reasonable level of security, as the existing field is not publicly accessible, and prevents shading of our garden or damage to the hedgerow. The applicants' proposed masterplan shows a landscape area with surface drainage conveyance feature, which would be directly accessible to members of the public. The proposals will now place my property at significant risk of anti-social or criminal activity with access now achievable.

To prevent access from members of the public a suitable boundary condition such as a higher fence would therefore be required, this will need to be situated within the applicants redline boundary, set at an offset to prevent root disturbance of the protected hedgerow. This would likely be needed for all properties along the northern and eastern edge of the site. This would not only impact visually on existing neighbouring properties, due to the level difference of the site, but also would impact visually on the wider landscape value which has not been accounted for. It would also need to be designed to allow for me to maintain the hedgerow [REDACTED].

The proposals would therefore be contrary to the **NPPF and Policies D3 of the adopted Local Plan**.

Ecological Impact and SSSI:

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 site is in a high impact risk zone associated with the neighbouring SSSI of Therfield Heath. The site is located approximately 65m from the SSSI of Therfield Heath.

The ecological assessment produced on behalf of the applicant has failed to complete necessary surveys ahead of BNG calculations. I understand BNG calculations can be done early to help inform a masterplan process, prior to the completion of surveys, however, this should not be accepted at the planning application stage or indeed on a site which is in a sensitive ecological area (SSSI high impact risk zone and adjacent to a Local Wildlife site). The BNG calculations, even prior to completed surveys, shows a significant deficit and the minimum requirement of 10% onsite is shown to not to be achievable. This should not be accepted for this site given its sensitive setting.

Biodiversity Action Plan species are found at the site, including hedgehogs, [REDACTED] brown hares and grey partridge. [REDACTED]

[REDACTED]

The site also supports several RSPB Red listed UK farmland birds of conservation concern, bats, reptiles, and varieties of insects. I note other residents have already made you aware of these and records are available up to the present day.

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 any 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 results from any monitoring of the current mitigation strategy for the SSSI should be used to help inform NHDC on any future allocations, outside those within the current adopted local plan and any speculative sites. Without this data the presumption should be there is not a sufficient mitigation strategy currently available and therefore any development should be refused, due to the potential significant harm that could be caused to the SSSI.

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 this criterion 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 steep topography of the landscape and open space areas to be provided at the site (1:8, 1:12 and localised areas at 1:29) will not meet the needs of any new residents and therefore the sheer scale and accessibility of Therfield Heath SSSI would still therefore be a major draw.

The current proposals would therefore be likely to have an adverse effect on the SSSI of Therfield Heath and the neighbouring LWS.

The potential for significant adverse impacts has therefore not been adequately evaluated such that would demonstrate compliance with the provision of **the Local Plan and the NPPF**.

Water Quality

As noted in the applicant's Flood Risk Assessment (FRA), the site is located within a Source Protection Zone 1 (SPZ 1). The site is also located above a designated Major Aquifer. The Source Protection Zone corresponds to the Therfield Heath Pumping Station. This is a public water supply, comprising of several Chalk boreholes, operated by Affinity Water.

In accordance with the CIRIA SuDS Manual and the Environment Agency's (EA) Groundwater Protection Policy and guidelines document, a groundwater risk assessment should be undertaken for the site. This is to specifically address the risk from highway runoff.

If groundwater is at risk, then an alternative solution for the highway drainage will be required. It should be noted there are no reasonable alternatives to drain this site as there are no watercourses or public surface water sewers in the vicinity of the site.

The existing sewerage treatment for Royston is in South Cambridgeshire District Council land, 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.

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. Anglian Water and the applicant should provide evidence of this.

Flood Risk and Drainage:

Foul

The foul connection shown in the supporting FRA for the applicant, is proposed to discharge to a private foul sewer and manhole, located within the ownership of property Number 23 in Echo Hill (outside of the redline boundary). Public foul connections should not be accepted into a private foul connection and agreement with the landowner of Number 23 should be undertaken. It is most likely that an alternative route should be explored but capacity checks should form part of a robust outline application and not left to detail design, as this is fundamental to determining if the site can be accommodated within the existing infrastructure network. A capacity check will also inform if any significant upgrades could be required, any risks associated with the proposed upgrades and any subsequent impact these works could have for residents living in Echo Hill. This is all necessary to inform the planning balance review during the planning determination.

Surface Water

The impact of the additional surface water runoff, generated by the proposed access road, has not been adequately addressed and with the steep topography and existing overland flows along Echo Hill this could result in a potential flood risk to existing residents. The access road is not a reserved matter and therefore this must be addressed now.

The impact of overland flow routes to offsite areas has also not been adequately addressed at this outline stage. Please refer to **Figures 6,7 8 and 9** in the attached appendices which clearly shows (based on the proposed and existing topography) overland flows are likely to be directed towards existing residents. Therefore, the potential risk to residential properties requires a minimum factor of safety of 10 to be applied to the surface water drainage attenuation calculations, the applicant has only used 2, significantly below national and recommended best practice guidance (CIRIA Guidance R157 and the National SuDS Standards 2025).

The potential subsidence, because of concentrated surface water inflows (when discharging to the existing chalk at the site, which was recorded during previous intrusive investigations) has also not been considered and density testing of the chalk should be undertaken. In accordance with the CIRIA 574 Guidance of Engineering in Chalk, there is a possibility infiltration basin cannot be supported closer than 10m and further distance between infiltration features, as was the case for another site in Royston, Newmarket Road (application reference ref 17/00110), should be applied.

The Newmarket Road development is now proposing deep bore-soakaways for the discharge of surface water runoff; however, this solution would not be possible at this site due to the SPZ1 classification (the FRA on behalf of the applicant states the EA will not accept deep infiltration features at this site).

The applicants' proposals show the distance between infiltration features and attenuation drainage features are also significantly less than 10m, which presents a high risk from dissolution and subsidence (refer to **Figures 7 and 9**). This should be rejected by the Lead Local Flood Authority (LLFA).

For a site solely relying on infiltration in chalk, infiltration rates and density tests should be undertaken at this outline stage and not left for detail planning. The stages of planning at which Infiltration testing is supplied is determined on a site-by-site basis and justifiable reasons should be given for its omission. Given the sensitive setting of this site, the high risk from dissolution, risk from overland flow to existing residents and the risk to local water supply, density testing of the chalk and infiltration tests must be provided, with infiltration test in full accordance with DG 365 (by BRE).

The construction of the proposed SuDS, as shown within the applicants FRA, will result in extensive embankments showing total depth of the attenuation and infiltration basins as being 3.5m to 4.5m depth, at 1:3 side slopes from top of bank. These features will be challenging to maintain and access, contributing very little positive aspects to the ecology, landscape or community in which they should serve. This is contrary to best practice and the SuDS Hierarchy.

The site therefore does not meet the requirements of **the National Planning Policy Framework (NPPF) and its supporting technical guidance document**. In addition, the Flood Risk Assessment (FRA) fails to conform to the **Hertfordshire County Council (HCC) SuDS Design Guidance document, National Standards for Sustainable Drainage Systems** and is contrary to the **Environment Agency's Groundwater Protection Policy and Guidelines**.

EIA

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 previous 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 the SSSI of 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 Services

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 must be provided and any speculative development 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

The development of the site will result in the loss of high-quality agricultural land.

Covenants at Echo Hill

I would like to make you aware of restrictive covenants which are in place in Echo Hill and which as a resident of Echo Hill I have the benefit of, and I reserve the right to take enforcement action if these covenants are breached.

Whilst the covenants themselves may not be a direct planning consideration for NHDC, 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 must be aware of the strength of feeling from the community of Royston and the significant impact from this development directly to the residents of Echo Hill. As such, a letter from an Appointed Solicitor was issued to both Gladman and Number 24 Echo Hill regarding the breach of the covenants and the intention for enforcement action.

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 the reasons for refusal in the 2018 application would still stand.

Given the above it cannot be guaranteed that the applicant will be able to deliver this site, nor should it be considered by NHDC to help towards the 5-year housing supply.

Other matters

NHDC must consult with the Conservators of Therfield Heath and Greens (Conservators) in respect to this site. Within the Therfield Heath SSSI Mitigation Strategy, produced by NHDC, the Conservators are listed as a key stakeholder and their views given weighting to the same level as Natural England.

HCC Highways have failed, in my opinion, in their assessment on addressing safety regarding the site access, which cannot be delivered. I respectfully ask for this is to be re-examined by HCC. Please note it took me 15mins to convert and scale the applicants' drawings in AutoCAD to determine the gradient would be 1:8.5 approximately and therefore not compliant. The access road is not a reserved matter and must be looked at in detail, including construction and retaining works, as this is fundamental to the living conditions of the neighbouring properties and safety of existing and end users. Fear of appeal should not a justifiable reason for HCC to fail in delivering their statutory duty.

The cul-de-sac of Echo Hill is already an established quiet community, with street parties occurring since its construction in the early 80's to present day. The demolition of a habitable property and the negative impact the access road for the development will have should not be ignored. The applicant has already acknowledged in writing the significant negative impact this site will have to the neighbouring properties.

The likely earthworks being proposed by the applicant would result in significant construction movements within the site and along the narrow routes of Briary Lane, Sun Hill and Echo Hill. Whilst a Construction Management Plan (CMP) would look at managing this, there would still be a significant adverse impact imposed upon existing residents and the SSSI, regardless of the provision of a CMP (air quality, dust and traffic movements). I would ask NHDC makes reference to the significant detrimental impact this would have to residents and SSSI of Therfield Heath during construction.

Previous strong objections were issued from the current owners of Number 24 Echo Hill (house to be demolished) for planning application reference 18/00747/OP (prior application at this site), and the owners of Heath Farm (landowner of the site) for the proposed Royston Cemetery 12/01246/1. Objections from the owners of the site and Number 24 Echo Hill varied, with impact to ecology (SSSI), highway concerns, safety of pedestrians and users of the bridleway and flood risk provided. I have attached a copy of these (**Appendix B**) for your ease of reference. The objections from the landowner and current residents of Number 24 justifies and gives further weighting with regard to the concerns raised by residents in regard to the speculative development of this site.

Conclusion:

I would respectfully ask NHDC carefully consider the sound reasons provided from residents for refusal and those listed in my letter. The omissions by NHDC during the previous application I hope will not be repeated this time. Transparency and communication is important in this regard and would ask you contact the owners of 23 and 25 Echo Hill as it is they who will be the most adversely impacted by this speculative development. My hope is

by doing so will re-establish trust with the planning process, which is so democratically important.

As you know there is a call for sites process currently being undertaken and the Local Plan only recently adopted. The adopted plan should still be afforded significant weight.

Overall, there are substantially more negatives than positives for the development of this site. The benefits afforded through housing supply in this location **does not clearly outweigh** the impacts which it will have to the SSSI of Therfield Heath, the existing residents of Echo Hill, Briary Lane, Sun Hill and the wider community.

Whilst I fully acknowledge the importance of delivering sustainable development and contributing to the 5-year supply, this site should not be considered as being sustainable or will it be delivered in a timeframe which enables it to contribute to the 5-year supply.

In conclusion I strongly urge NHDC to object to this application.

I thank you for allowing me to be consulted on this development and should you have any queries then please do not hesitate to contact me.

Yours sincerely,

Mrs S Sale

19 Echo Hill, Royston, Hertfordshire, SG8 9BB

FIGURES - APPENDIX A

Figure 1: Access Road (taken from drawing gta civls and transport drawing ref 13378-1100 P3 dated 08/05/2025)

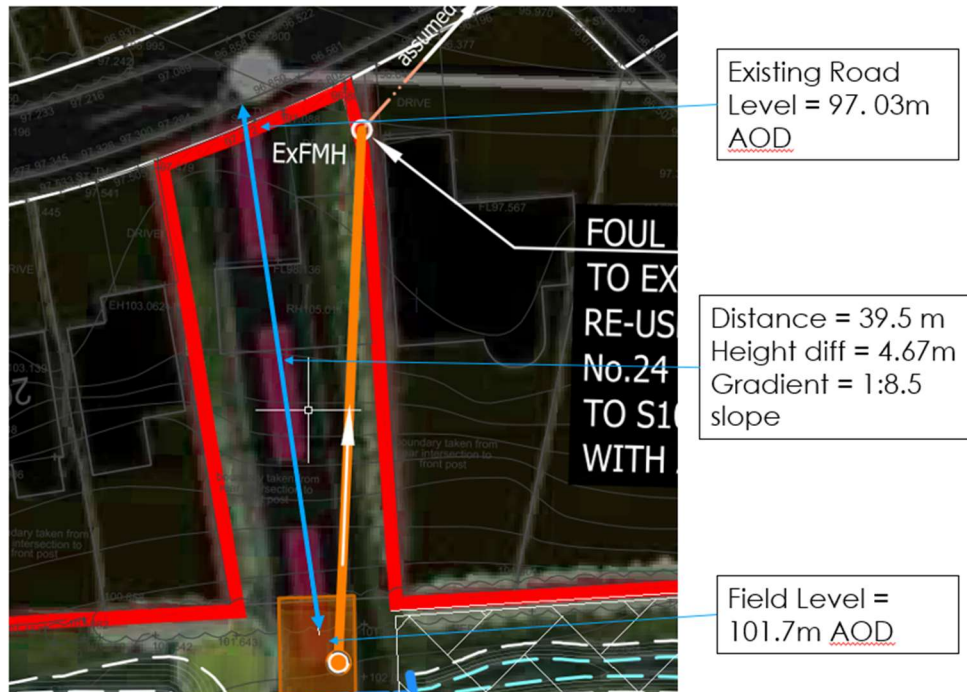


Figure 2: Highway Safety (refer to page 3 of this letter)



Ground level of 100.74m AOD

The map shows a residential plot with various ground level contours. A red circle highlights the '100.74' contour line, which is labeled 'Ground level of 100.74m AOD'. Another red circle highlights the '102.07' contour line, which is labeled 'Rear Garden level of 102.07m AOD'. The map includes features such as 'Grass', 'Decking', 'Stand', 'Paved Fence Ht 1.5m', 'Paved Fence Ht 2.1m', 'Tree Ht 4m', and 'AL01'. A scale bar indicates 10m.

Rear Garden level of 102.07m AOD

The photograph shows a garden area viewed through a window. A green plastic slide is visible in the foreground. The garden contains trees and a fence. The sun is visible in the sky, creating a bright glare.

Distance between Properties = Less than 25m and 30m

Highway turning is shown directly located on hedgerow.

Echo Hill properties

TO EXISTING FOUL SEWER IN ECHO HILL, RE-USE OF NO. 24 SUBSTATION AND SUBJECT TO S106 CONSENT AND CAPACITY CHECKS WITH ANGLIAN WATER.

25m

30m

104.5m Contour

Previous officer report -25m-30m distance.

Note: Echo Hill levels approx 100m AOD

Figure 6: Overland flows (taken from drawing gta civils and transport drawing ref 13378-1100 P3 dated 08/05/2025)

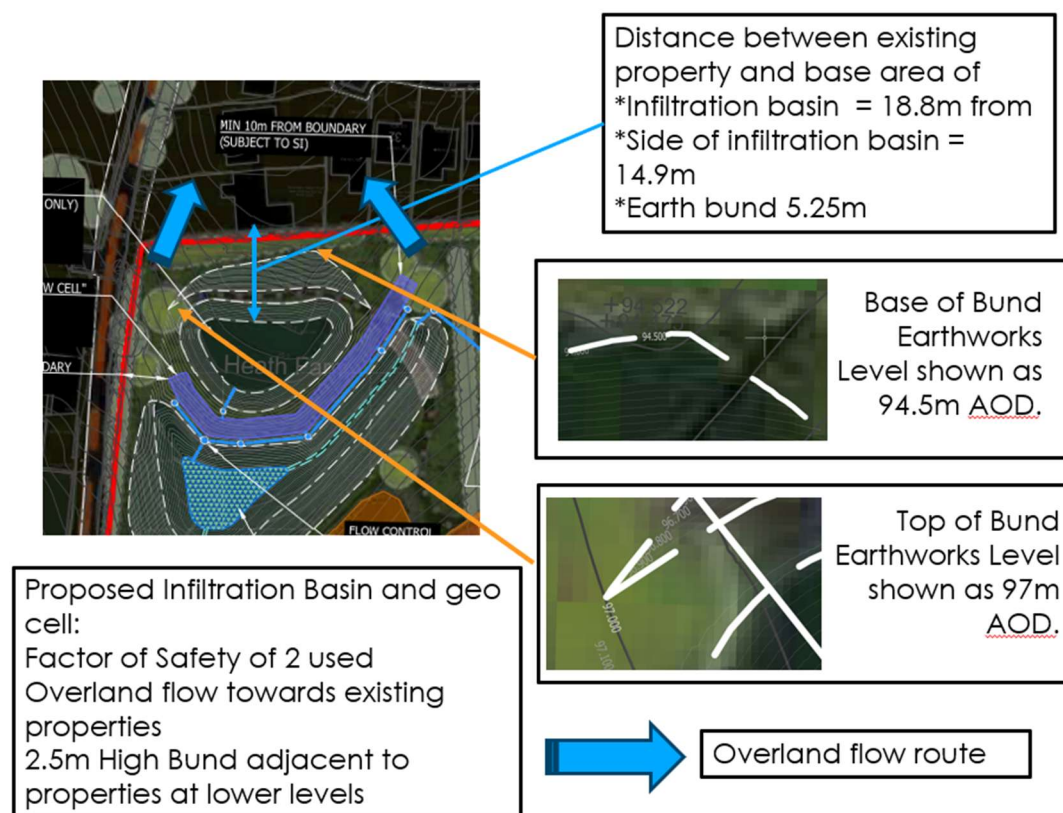


Figure 7: Overland flows (taken from drawing gta civils and transport drawing ref 13378-1100 P3 dated 08/05/2025)

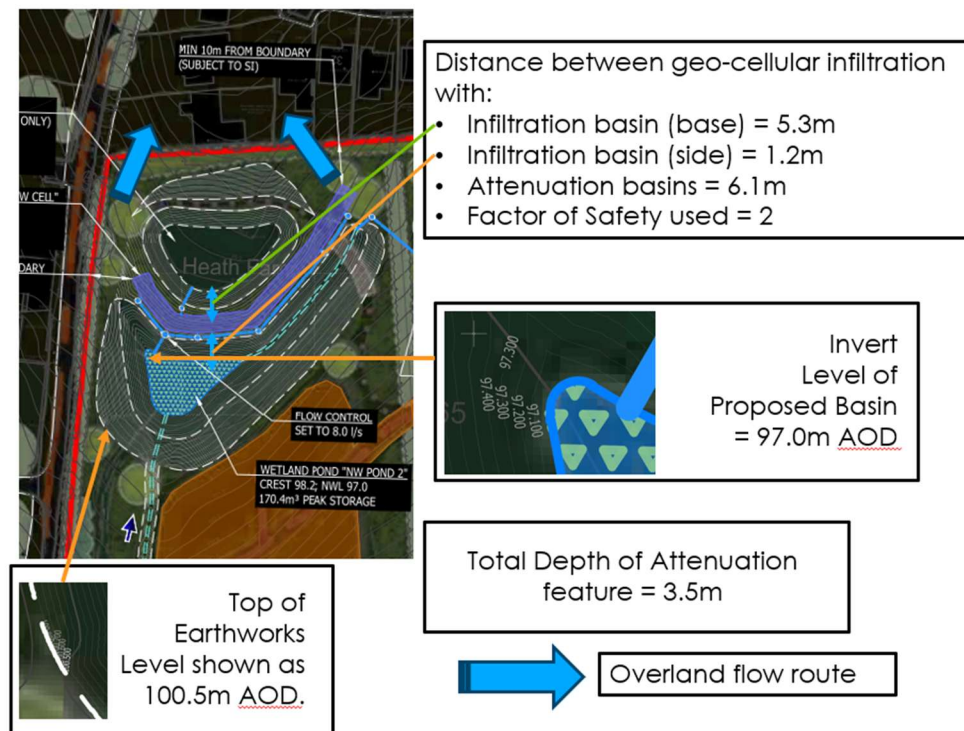


Figure 8: Overland flows (taken from drawing gta civils and transport drawing ref 13378-1100 P3 dated 08/05/2025)

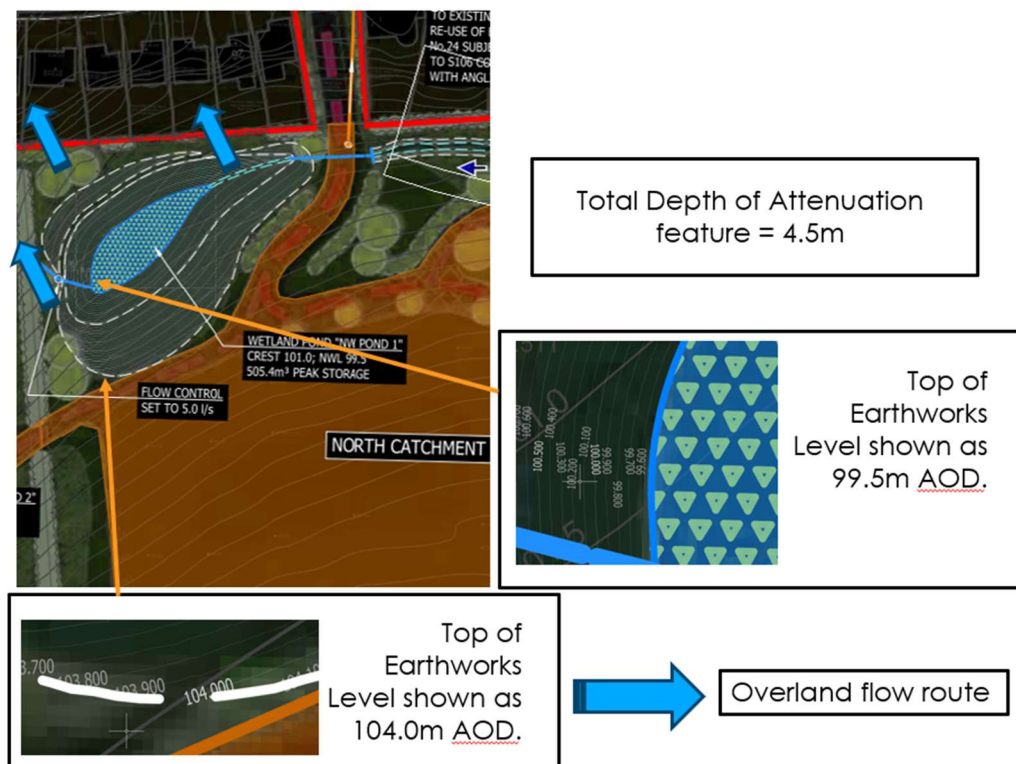
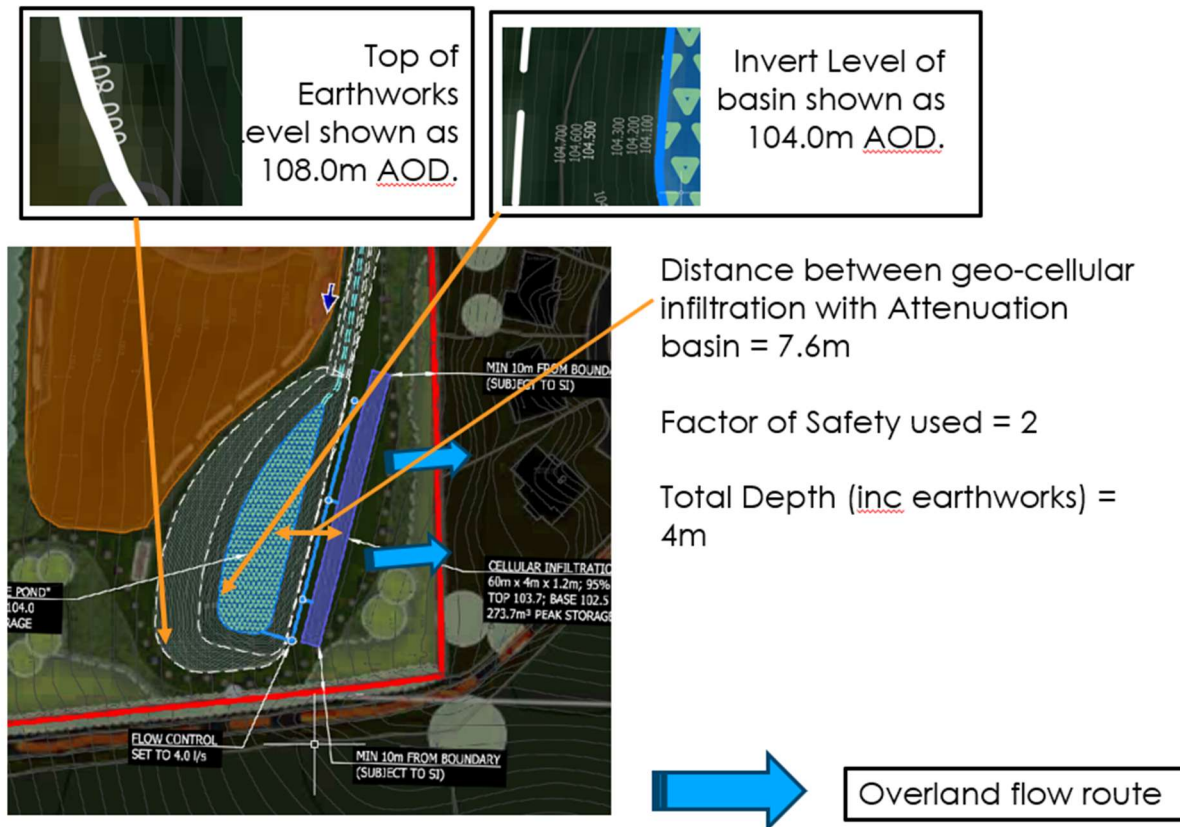


Figure 9: Overland flows (taken from drawing gta civils and transport drawing ref 13378-1100 P3 dated 08/05/2025)



APPENDIX B – Letters of Objection

18/00747/OP | Outline planning application for the erection of up to 107 dwellings with public open space, landscaping and sustainable drainage system (SuDS) and vehicular access point from Briary Lane. All matters reserved except for means of main site access.

Ms Margaret Turrell 24 Echo Hill Royston Hertfordshire SG8 9BB
(Objects)

Comment submitted date: Wed 30 May 2018

I wish to object strongly to the development of houses in this location.

Local Planning

The development site is not identified in either the existing or emerging Local Plan for Royston as a site for development and is outside the settlement boundary identified in both of these plans.

The development will have a major impact to the immediate surrounding area; the houses would rise up the hill and be visible from the surrounding area both within and outside the town of Royston.

Traffic and Safety

The proposed access to the site breaches county council design guidelines and would lead to significant traffic problems at the Baldock Road junction, Briary Lane, Sun Hill and the A10 junction. It would also likely lead to the loss of a short stretch of the well-used Bridleway 13, loss of car parking for visitors to Therfield Heath, and safety concerns for pedestrians entering and leaving Therfield Heath. There is already significant traffic congestion in Briary Lane which is, in effect, a single track road and the development of this site would further exacerbate this problem. The safety of pedestrians - particularly those with mobility aids, prams and young children - would be compromised as the pavement is sometimes impassable, especially on refuse collection days.

Flood Risk and Drainage

The development site lies above a Major Aquifer, and this area has been classified in "Source Protection Zone 1" due to the high risk to groundwater contamination, making the site far less suitable for development.

There exists a flood risk due to further concentrated water flows as storm water travels from the site down the (current) Bridleway and on to Briary Lane and Sun Hill. Concerns have been raised with the Lead Local Flood Authority as these points have not been addressed.

Loss of privacy

The proposed site of development is at such an angle and height that future occupants of dwellings on this site would overlook our property, resulting in an invasion of our privacy. This is contrary to the District Wide Local Plan, Policy 6.8 which states: "New developments will be expected to provide a high standard of layout and design that ensures adequate privacy for the occupants of the building and of adjacent residential

properties."

Ecological Impact

I urge the council to consider the strong and well-reasoned objections submitted by the Campaign to Protect Rural England (CPRE) in their letter dated 20th April. The proposed development will have significant ecological impact to a number of at risk species as specified in the UK's Biodiversity Action Plan and the RSPB Red list.

I strongly urge the council to reject this damaging and unsustainable planning proposal.

Mr Paul Gill 24 Echo Hill Royston Hertfordshire SG8 9BB (Objects)

Comment submitted date: Wed 30 May 2018

I object to the application for reasons given below.

The access to the new development along Briary Lane would be very congested. There are already issues with the amount of traffic using Briary Lane as it is not wide enough and due to parked cars it's very difficult to make your way up and down the road.

The proposed development plan includes a green space bordering the site and Echo Hill in some places only but not all around the development which would be needed to improve the appearance and help prevent flooding.

I am very concerned about the risk of flooding to properties below the proposed development as there is already a large run off of water from land above Briary Lane with which the drainage system is unable to cope.

The water pressure is already poor in this area and greater demand on the system would further reduce this.

The proposed site of development is at such an angle and height that future occupants of dwellings on this site would overlook our property, resulting in an invasion of our privacy and this would also blight the landscape. This is contrary to the District Wide Local Plan, Policy 6.8.

jb planning associates

Our ref: JB/1182/SM

Your ref: 12/01246/1

5 July 2012

Ms Naomi Reynard
North Hertfordshire District Council
PO Box 480
M33 0DE

Dear Ms Reynard

Land South of Wicker Hall, Royston, SG8 9DP

We are writing on behalf of Mr Andrew Uttridge, owner of the adjacent property, Heathside and Alan Baddeley of Heath Farm. Our clients strongly object to the proposed cemetery with associated car parking and modified access way.

Their specific objections and concerns to the above application are as follows:

Unsafe and unsuitable vehicular access

The proposed access route would use an unmade track that is designated on the Definitive Map as a bridleway (Bridleway 13), also known as Wicker Hall. We note that few details relating to alteration of the access track have been submitted with the application. The Design and Access Statement explains that the existing track will be resurfaced with macadam in order to support the additional traffic generated, with a cross fall to allow surface drainage. We wish to highlight the unsuitability of such work in relation to the route's status as a public bridleway, where pedestrians, cyclists and horses have priority. The macadam surface and drainage arrangements would be likely to force horses onto the verges, as stated in section 3.1.2 of the Design and Access Statement. The existing track is approximately 3 metres wide and along much of its length the width of the verges would appear to be insufficient to allow reasonable space for horses and other bridleway users to pass along safely (please refer to Appendix 1). Briary Lane would remain single track, with several additional passing places. The precise position and number of passing places is not specified, but it seems likely that these will involve widening the track in several locations, thus reducing the amount of verge available to horses and other users.

We also question the principle of combining an access road with the existing bridleway use; the proposed cemetery is likely to cause a detrimental increase in traffic along Briary Lane. Whilst no precise information has been submitted regarding the likely levels of traffic created, the proposal includes 20 car parking spaces to the north west of the site. The proposal also includes the possibility of a second car park on the north side of the site. Such a level of parking provision anticipates a significant amount of traffic. We believe that the interaction of bridleway users with this increased level of traffic will have serious safety implications, as pedestrians, cyclists and horses will be sharing the same confined space as motor vehicles, with no specific safety measures to protect bridleway users. Mr Uttridge currently uses the track to Royston. An increase in traffic along the bridleway



and the access to Heathside would increase the risk of an accident, especially with no footpath provision. We understand that Bridleway 13 is particularly popular with bicyclists, who use the route frequently. Furthermore, there is the potential for vehicular traffic to use the resurfaced access road at a speed that would be inappropriate considering the presence of bridleway users along the route. Meanwhile there is a sports recreation area located adjacent to the northern end of Bridleway 13. Any increase in local traffic would have safety implications for users of this recreation area.

Mr Baddeley regularly uses the track to move farming vehicles and machinery between his fields located adjacent to the bridleway. In his opinion an increase in vehicular traffic will result in conflicts with this activity and will have safety implications, as the access road would not be sufficiently wide to allow vehicles to turn around.

In our opinion the proposed cemetery is not in a sustainable location, being located outside the settlement and not served by any main road or public transport.

Location and landscape impact

The application site is located in an area subject to the Landscape and Open Space designation and therefore saved Policy 21 applies. The policy states that proposals which would have a significantly detrimental effect on the character, form, extent and structure of the pattern of landscape features and on encouraging recreation and amenity and nature conservation will normally be refused. The proposed development would significantly alter the landscape through removal of trees and ecological habitats and would limit the accessibility of the bridleway to horses, cyclists and pedestrians, as described above. We therefore believe that the proposals are contrary to Policy 21 of the Local Plan.

Trees and ecology

The applicants describe the current land use as scrub woodland. However, we believe that this description somewhat downplays the wooded nature of the site, which is entirely covered by trees, some of which are substantial (please refer to Appendix 1). The extent of the tree coverage is highlighted in section 3.2 of the Design and Access Statement, where it is stated that the site is impenetrable for adequate tree surveys to be undertaken. The lack of an arboricultural survey to assess the ecological value and coverage of the trees is in our view unsatisfactory and leaves the LPA unable to accurately assess the impact of the proposed development on the existing trees. The Design and Access Statement states that where practical established and mature trees will be preserved once clearing has started. We believe that such an approach is likely to lead to the widespread removal of a number of mature and healthy trees. Whilst some new trees are planned, ultimately the proposed development would result in a significant net loss of trees on the site.

The submitted Ecological Scoping Report states that a survey of the site identified signs of a variety of breeding birds, trees that were capable of supporting roosting bats and a potential badger sett. Meanwhile there have been local sightings of a pair of nesting Hen Harriers. The site is described in paragraph 4.7 as being "of some local biodiversity value", whilst paragraph 4.19 states that "it is very likely that a wide variety of common farmland/woodland bird species are associated with the site throughout the year, utilising the habitat for nesting, roosting and feeding". The site also contains habitats and features that would support wintering birds and is linked to the nearby Therfield Heath SSSI by two hedgerows that could provide a wildlife corridor between the two sites. Given the potential presence of bats and badgers, the report recommends that a bat inspection/ activity survey and a badger survey are carried out. We have seen no evidence that the applicant has carried out these surveys and therefore there is a possibility that any potential development of the site might have an unacceptable impact on protected species.



Whilst the applicants state that the existing boundary trees and hedges would act as a buffer strip and green corridor, the extent of preserved vegetation illustrated on the submitted landscape plan appears to be insufficient to create any meaningful "conservation area" or to preserve the site's biodiversity to any reasonable degree.

Therefore in our view the proposals are contrary to saved Local Plan Policy 14, which states that the Council will expect development proposals to take account of, and where possible, to show improvements to the nature conservation value of the site and its surroundings.

Groundwater contamination

The submitted Environmental Report states that the site poses a moderate to high risk to controlled waters as assessed under Environment Agency current guidelines as it lies within 250 metres of a suspected well, above a principal aquifer and within SPZ1 and SPZ2 zones. The assessment of the general hazards in Table 3 also highlights a potentially significant landslide hazard due to unstable ground. The report suggests possible mitigation options, but there is no guarantee that these measures will be implemented and little detailed discussion of the effectiveness of such measures. Furthermore, the assessment is based on the assumption that 8 burials will take place per year, but there is no justification for this assumption in the report and it does not consider the risks should the number of burials exceed this figure.

Residential amenity and privacy

In our opinion, the proposed development will have a significantly detrimental impact on the residential amenity of Mr Uttridge. In addition to the traffic generated by the new cemetery, there will be potential for noise and disturbance resulting from the proposed increase in activity caused by visitors, burial services and regular on-going landscape maintenance. The proposed boundary treatment and screening, consisting of existing deciduous vegetation and new post and rail fencing, (as detailed in the submitted drawings) is insufficient to provide adequate mitigation with regard to visual impact and increased noise. Therefore the privacy and amenity of the occupants of Heathside will in our opinion be unacceptably reduced, and additional landscape screening would be required to make the application acceptable.

Without suitable screening and secure fencing the dogs are likely to react to the presence of cemetery users, causing an undesirable level of disturbance for both our clients and the cemetery users.

In our opinion the proposed car park adjacent to Heathside would create a security risk, attracting undesirable activity at unsociable hours. The police often patrol the lane looking for people in parked cars involved in inappropriate activities.

Furthermore, the applicants have not specified opening hours for the proposed cemetery. There is the possibility that it would have an impact in terms of increased activity at unacceptable hours on all days of the week from burials, visitors and maintenance staff.

Mr Uttridge has offered several times to meet with the Town Council to discuss the proposed development and possible modifications to the proposals to reduce their impact on local residents. However, unfortunately the Town Council have declined to meet or consider input from Mr Uttridge during the formulation of the planning application. Further comments from Mr Uttridge are included at Appendix 2.



Summary

Given the above considerations, Mr Uttridge and Mr Baddeley strongly object to the proposals on the grounds that in our opinion:

- 1) The proposed access is unsuitable and the upgrading of the bridleway to a surfaced road would limit bridleway access and have highway safety implications. Detailed proposals have not been submitted and it would appear that the shared access solution is not workable.
- 2) The proposed cemetery is in an inappropriate location and contrary to saved Local Plan policy designed to protect the landscape character of the area.
- 3) The proposed development would have a significantly detrimental impact on the ecology and trees present on the site. Further work is required to assess the potential presence of protected species.
- 4) There is a risk of potential groundwater contamination from burials.
- 5) There will be a significantly and unacceptably detrimental impact on the residential amenity of the adjacent residential property.

Whilst there may be a local need to provide additional cemetery space, this need should not override key planning considerations and policies to favour an unsuitable site such this.

Please ensure these objections are fully taken into account by your Council in the consideration of this planning application. Furthermore, given the lack of information submitted regarding detailed access proposals and the current situation regarding ecology and trees, we question whether the Council have been provided with sufficient information to adequately assess the potential impacts of the proposed development. In the event that the application is amended, we request that we are informed of those amendments so that we can make further comments if necessary.

Yours sincerely

Stuart Mills
Assistant Planner



Photo 1: Photograph showing width of proposed access route and lack of adequate verge space.

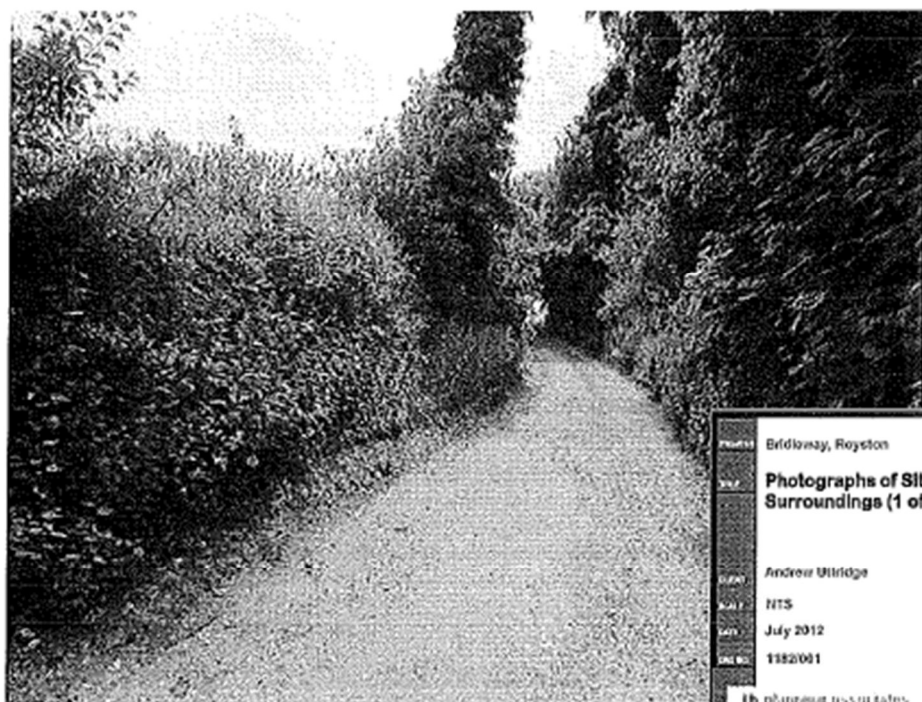


Photo 2: Bridleway 13 adjacent to the application site.





Photo 3: Access road leading to Heathside, with proposed cemetery entrance on left hand side.



Photo 4: Photograph illustrating the wooded nature of the site.

PROJECT	Bridleway, Royston
SITE	Photographs of Site and Surroundings (2 of 2)
CLIENT	Andrew Uthridge
SCALE	NTS
DATE	July 2012
PROJECT NO.	1182/001
jb planning associates 44/45 The Old Rectory, Royston, Cambs, CB8 7JN 01462 751111 / 01462 751112 / 01462 751113 4-5 The Old Rectory, Royston, Cambs, CB8 7JN 01462 751111 / 01462 751112 / 01462 751113	