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Date: 12.08.25

**Ben Glover
Senior Planning Officer
North Hertfordshire District Council
Council Offices
Gernon Road
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Dear Mr Glover,

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

I write in connection with the above planning application, for which we are extremely disappointed to again see another attempt by Gladman to seek planning permission. This has been refused twice previously, and is no different this time with the proposed development remaining unsuitable for numerous reasons. Therefore this matter is again a waste of time, precious resources and effort for both yourselves and the local residents.

I currently reside at 43 Echo Hill with my husband and 2 young children. We have lived in Royston for 11 years, moving to Echo Hill 8 years ago. Part of the reason we moved to Echo Hill was its proximity to the Heath, as well as it being a quiet and peaceful area which would be great for our 2 young children to grow up in the safe surroundings of a cul-de-sac which also benefits from good privacy.

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

We also fear that Echo Hill would become a through road for the new development, and the surrounding road system of Briary Lane, Sun Hill and Coronation Avenue are totally unsuitable to take an increased volume of traffic.

These roads are narrow and difficult to negotiate because of parked cars. In particular, the blind/sharp bend leading directly to a steep gradient onto Echo Hill is very dangerous. Even as you travel up or down Echo Hill, there continues to be sharp corners and parked cars (and frequently also delivery vans and lorries and extra cars that now seem to be parking up our road to access the town, especially due to the closure of the public car park opposite the local Morrisons store which also shut down) on the first two bends in particular.

No details have been submitted on gradients and proposed levels of the access road. The audit and the Transport Assessment concentrates on the safety of the presumed development “generated” pedestrians, without any consideration given to the following key existing users, the existing drop kerbs associated with the driveways of Numbers 25 and 23, the proximity to existing junctions, the blind/sharp bend leading directly from a steep gradient onto Echo Hill, the continued desire line of Echo Hill residents which could lead to a conflict with oncoming vehicles from the development, the existing blind bend on Sun Hill / Briary Lane, and the constrained single carriageway width along Sun Hill and Briary Lane. This should be considered for both during construction and future occupation.

From a personal perspective, on numerous occasions with larger lorries and on one occasion, a fire engine, I have been in the car and turned left out of Echo Hill to then have an oncoming large vehicle turn left off Briary Lane onto Sun Hill at the same time and since this is also a single lane with the kerb onto Sun Hill Common, it has therefore required me to reverse past Echo Hill to allow for oncoming traffic. This is extremely dangerous and difficult and these lorries have needed to mount kerb of Sun Hill Common in order to enter or exit Echo Hill.

The development site is fundamentally unsustainable due to the location of the site in relation to services, constrained access route to the local primary school, undeliverable proposed site access and constrained nature of the highway network including Echo Hill, Sun Hill, Coronation Avenue and Briary Lane. This 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 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. The site will be heavily car reliant due to the lack of available public transport and the topographical challenges of the site. 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.

Our family love to walk around Therfield Heath and its surrounding areas, with our children exploring and discovering all of the fantastic local nature it has to offer. We have serious concerns that the development will have a significant ecological impact to at-risk species, as specified in the UK’s Biodiversity Action Plan and the RSPB Red list, and other protected species. Records of the protected species have been provided on relevant ecology recording websites, up to present day, and are absent from the ecology report. We ourselves have observed regular hedgehogs on our road, along with starlings in our garden and love seeing photos of wildlife of beautiful deer, [REDACTED] foxes, sparrowhawks etc that enter the gardens which back onto the fields

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 therefore 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.

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

The covenants were wrongly dismissed by NHDC planning during the previous determination of planning application 20/00744/OP.

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 are aware from the previously refused applications for this site the strength of feeling against this development from the community of Royston and the significant impact this development will have directly to the residents of Echo Hill. A letter from an Appointed Solicitor was issued to both Gladman and Number 24 Echo Hill during the previous application of 20/00744/OP, regarding the breach of the covenants and the intention for enforcement action, this remains the case for this latest application and Echo Hill residents will pursue this going forward for this latest application.

In addition, 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 therefore the reasons for refusal in the 2018 application associated with the negative impact to the neighbouring SSSI would still stand.

Therefore, due to the protective covenants in place, which residents of Echo Hill will enforce, it cannot be guaranteed that Gladman will be able to deliver this site and therefore this site cannot contribute towards the 5-year NHDC housing supply.

Furthermore, the development site is not identified in the existing Local Plan for North Hertfordshire District Council (NHDC) and is outside the settlement boundary identified in the plan. Royston is already contributing a significant 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 issues raised above - in particular - the constrained access, steep topography and the protective covenants in place (which are to be enforced), the site is therefore unable 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).

To summarise, in considering all the above points, I strongly urge the council to reject this damaging and unsustainable planning proposal.

Yours faithfully

Natalie Graham