

37 Echo Hill
ROYSTON
Hertfordshire
SG8 9BB

15th July, 2025

Ben Glover
Senior Planning Officer
North Hertfordshire District Council
Council Offices
Gernon Road
Letchworth Garden City
Hertfordshire
SG6 3JF
Also by email to ben.glover@north-herts.gov.uk

Dear Mr Glover,

Re Planning Reference 25/01708/OP – Land opposite Heath Farm, Briary Lane, Royston - Objection

I would like to object in the strongest terms to this planning proposal for development on land at Briary Lane opposite Heath Farm. Along with my husband, I have lived in Echo Hill for 25 years. I have examined the plans and (of course) know the site well.

Before I list my specific objections I must start by emphasising the extreme waste of North Herts District Council's (NHDC's) precious time and resources in allowing this application to be made in its current form. It is essentially the same as the proposal made in 2020, particularly with regard to access. The 2020 application was rejected and very many valid objections were made at the time. As well as wasting NHDC's time, the residents of Royston are having to outline the same objections once again, and the stress on those most affected, particular neighbours adjacent to 24 Echo Hill is unimaginable.

The reasons for my objection to this specific application (many of which will be unchanged of course from those made to the similar 2020 application) are as follows:-

1. Adopted Local Plan.

Since the 2020 application at the same site, the former emerging local plan has been adopted (NHDC Local Plan 2011-2031). The proposed development site of the current proposal lies **outside** the settlement boundary identified in the plan and so should be rejected on this basis.

Additionally, with regard to the NHDC five year housing land supply, Royston has already contributed significantly to increasing the housing stock in north Hertfordshire. The current proposal, should it be accepted, would be unlikely to contribute to the housing supply within five years due to the lengthy legal arguments resulting from the Restrictive Covenants in Echo Hill (see section 2 below) and also the technical and engineering challenges resulting from the

restricted access to the proposed site, and the steep nature of the access proposed.

2. Restrictive covenants/no quick fix to rate of housing supply.

I would like to make you aware of restrictive covenants which are in place in Echo Hill and which I (along with my husband) as residents of Echo Hill have the benefit of, and we 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 Sites of Special Scientific Interest (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.

3. Highways and traffic impact.

The proposed site access (with associated traffic impact) appears totally unsuitable for very many reasons, including the following:

- The site has very inadequate access to services, as was noted at the time of the previous applications (18/00747/OP and 20/00744/OP). It lies outside the maximum distance to any public transport (both bus stops and Royston Railway Station).
- The width of the strip of land which would be obtained by the proposed demolition of 24 Echo Hill is inadequate for the access required. A court case resulting from an erroneous Land Registry change to the boundary between 23 Echo Hill and 24 Echo Hill has now been resolved, and 1.19m has been correctly re-registered as belonging to number 23. This means

that demolishing number 24 does not give sufficient width for the proposed new access road. The fact that the Applicant has additionally offered to buy numbers 23 and 25 Echo Hill in addition to 24 (offers which have been refused) would suggest that the Applicant may be aware of this issue.

- Gradients and levels of the proposed access road have not been submitted by the Applicant. However, inspection locally does indicate that this is a very steep site and I would recommend anyone making a decision about this application to visit the area to inspect it themselves, if it is unfamiliar to them.

Contrary to planning policy, the gradients and distances involved are likely to lead residents to use cars extensively rather than walking. According to Hertfordshire County Council (HCC) Local Transport Plan (LTP) 4, “Developers will need to demonstrate how access to their development meets the requirements of LTP4. In particular they shall be clear how the proposals would create more favourable access for walking, cycling, emerging forms of micromobility and passenger transport than for the private car”. I am not aware that this policy requirement has been met.

- The safety assessment conducted in 2025 by GTA Civils and Transport Ltd references EC Road Safety’s safety audit. However, HCC have not given their approval prior to the final design and it would appear that the existing occupants of Echo Hill, Sun Hill, and Briary Lane have been little considered.
- The effect of the proposed change in road layout on the existing occupants of Echo Hill has not been documented. The audit and the Transport Assessment appear to focus on the proposed new residents. A pedestrian navigating Echo Hill (for example from Sun Hill to my house, number 37) taking the ‘desired line’ which one would naturally follow, already has to cross the road several times. Just where the proposed access road would leave Echo Hill (at demolished number 24), the footpath on the other side ends abruptly (outside number 42). This would lead to a difficult and potentially dangerous crossing just where the proposed new road joins Echo Hill at a steep gradient.
- According to the application, traffic from the proposed development would have the right of way at the junction with Echo Hill (front garden of demolished number 24), the bottom of a steep gradient. If for some reason, for example unfamiliarity/misjudgement, icy weather, the driver missed the sweep of the road around to the right, they would crash through the fence into the garden of number 42 Echo Hill. This is occupied by a family with young children who could reasonably be expected to play in the garden of their property.
- According to the Place and Movement Planning and Design Guide for Hertfordshire. Part 2 chapter 4 section 10.8 “Any development of 50 units and above shall include provision for one emergency-only access as well as the one general vehicular access”. The houses in Echo Hill/The Dell

already number more than 50; clearly a further 84 houses would take the development way above 50 and there is no emergency-only access.

Any proposal to utilise Bridleway 13 as a secondary access to the site (for emergency vehicles, plus cyclists and pedestrians; as was suggested as a mitigation as part of a previous proposal) would be untenable. The surface is rough, the way is unlit and it is too narrow to accommodate the proposed traffic safely. Additionally the ownership of the Bridleway is unclear; it is unknown whether the Applicant would have the right to make such improvements to safety for its use in this capacity. As this is a bridleway, further vehicular use would contravene section 34 (1) of the Road Traffic Act (1988). This bridleway status gives protection to neighbouring Therfield Heath, a Special Site of Scientific Interest (SSSI).

- Should families with children residing in the proposed housing, decide to walk to the nearest primary school (despite the not inconsiderable distance), once they have descended Echo Hill to the junction with Sun Hill, they will struggle to cross Sun Hill safely due to parked cars (including several vans which habitually park there). The same issue will occur when walking in the reverse direction. This issue has been exacerbated by the demolition of the former Morrison's supermarket in Royston and closure of the associated car park (for redevelopment as Supported Living housing), as greater levels of on-street parking are now observed in neighbouring streets including Echo Hill/Sun Hill/Briary Lane during daytime hours.
- Again, as was noted at the time of the previous applications, the footpath along Briary Lane (the walking route to the nearest primary school) is narrow (approximately 1m at most), placing pedestrians at risk. Traffic flow along Briary Lane is already restricted due to permanently parked cars along its length (the majority of residents do not have their own driveway). Further householders from the proposed development using this as the (only) access to their property can only exacerbate this issue.
- During winter weather, the steep portion of Echo Hill close to the junction with Sun Hill is treacherous and often impassable. This problem would be exacerbated by the building of 84 further properties with this approach as their sole access, and which could be expected to have at least an average of one vehicle per household. Due to the likely gradient, the proposed access route through the current number 24 Echo Hill is likely to be subject to the same bad weather issue and also become impassable.

In conclusion, the site must be judged to be contrary to **paragraphs 108, 109 and 110 of the National Planning Policy Framework (NPPF)**. The proposal is also contrary to local planning guidance of the Roads in Hertfordshire A Design Guide.

4. Visual and Landscape impact.

This was a key reason for the rejection of the 2018 and 2020 proposals; there has been no change in the current proposal which would justify a reversal of that decision in 2025. Key points include firstly the prominent site and topography

which are unacceptable and unchanged from 2018/2020, secondly the localised adverse impacts on the character of the area which are also largely unchanged (from 2018/2020), and thirdly the marked change in the character of the area immediately adjacent to the site and the wider landscape (also unchanged).

This above view is supported by the report produced by Jon Etchell's Consulting entitled 'Landscape Comments including review of the Landscape and Visual appraisal' submitted with the application.

The same reason for refusal should therefore still apply to the current application. In terms of the prominent site and topography, the proposals conflict with the ***NPPF and Policy CGB1, SP5, SP12, NE1 and NE6 of the NHDC Local Plan.***

The Applicant has given no consideration to the complete change of character to Echo Hill that would result from their 2025 proposal. The feel of a quiet and peaceful residential cul-de-sac would be entirely lost by implementing this proposal. Echo Hill is a narrow roadway with on-street parking in many areas, and was never intended to be a thoroughfare to a housing estate. The current proposal includes provision for a 'Give Way' for drivers from the far end of Echo hill (numbers 26 to 41 inclusive approximately) at the point where they reach the proposed access road. Again, the 'look and feel' of a quiet development would completely disappear.

In my own case, lack of amenity would be caused by any change to the use of bridleway 13 (with which my property has its longest boundary) and which is currently a quiet track.

Similar 2020 proposals included widening the footpath on Sun Hill (to improve pedestrian access) which would have caused damage to the mature trees there, and also locating the new sewage structure (required to serve the proposed new housing) on Bridleway 13, causing damage to the trees on the bridleway. Both of these actions would result in further visual and landscape impact, should they be included in the 2025 plans.

In terms of policy, the proposals would be contrary to the general landscape protection policies of the ***NPPF (including Paragraph 135), Policies NE1 of the adopted Local Plan.***

Impact on the local environment would also include the loss of high quality agricultural land.

5. Living Conditions

I consider that significant damage would be caused to the amenity of the residents of numbers 23 and 25 Echo Hill by the demolition of number 24, the proposed construction of the access road (including the required piling), the noise during the development phase and subsequently the disruption when all forms of traffic to and from the proposed housing, pass extremely close to their properties. In addition, number 23, which already has a cul-de-sac to one side, would have an additional access road on its other side, resulting in an unnatural looking

position spoiling the current 'flow' of the housing layout. The proposals conflict with **Policies D3 of the adopted Local Plan**.

As discussed, the proposed development site is significantly elevated with respect to the surrounding area. Such a development would lead to a lack of privacy and feeling amongst existing residents of being overlooked and living in a cramped and more urban environment. The proposal would be contrary to the **NPPF and Policies D3 of the adopted local plan**.

6. Water supply and Sewage

The proposed development site lies above a major aquifer within a Source Protection Zone 1. Affinity Water control these bore holes, which constitute the local residents' water supply. It is unclear whether existing ground water is at risk of overflow as a result of the proposed development. However should this indeed be found to be the case, there are no watercourses nor public surface water sewers nearby with which to drain surface water.

The proposed public access road off Echo Hill, due to its significant gradient, will also generate additional surface water (risk of flooding) and this has not been addressed in the submitted flood risk assessment. The existing system already appears at capacity. Due to the topography of the site the factor of safety used in the design of the attenuation features and infiltration device has been underestimated and are not in accordance with the **Sustainable Drainage Systems (SuDS) Manual (Construction Industry Research & Information Association (CIRIA) 2015)**. Therefore, this is a conflict of the **NPPF and NE7g of the Local Plan**.

Should the SuDS be unable to cope, the projected overland flow of water from the proposed site appears likely to directly impact numbers 34 to 38 Echo Hill, which includes my own property.

Sewerage for Royston is maintained by Anglian Water. This discharges to a watercourse associated with a chalk stream catchment which is a protected ecosystem. There is evidence that there is regular exceedance of the current permit for discharge, and conversely little evidence nationally that Anglian Water are competent in accurately determining and managing capacity. Further evidence is required that the Applicant's plans will not be damaging in this regard.

7. Ecology

My husband and I regularly watch wildlife in the area of the site and the Therfield Heath Site of Special Scientific Interest (SSSI), and have personally seen all the following RSPB red list UK farmland birds of conservation concern: Skylark, Yellowhammer, Corn Bunting, Mistle Thrush and Field Fare there regularly over the last several years. Yellowhammer in particular have been both regularly and frequently seen and heard in the area of the site, especially at the end adjacent to the Wicker Hall pumping station. Brown Hare are also regularly seen and there is significant evidence of Badgers. I believe that the Biodiversity report submitted by

the Applicant has failed to include a number of the UK Biodiversity Action Plan species found here.

The Natural Environment and Rural Communities (NERC) Act 2006 states local authorities are required to take measures to “*promote the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species.*” Priority species listed under Section 41 (S41) as being of principal importance found at the site do include the Brown Hare, Grey Partridge, Skylark, Corn Bunting, Yellowhammer, Starling, Song Thrush, Hedgehog and Small Heath butterfly.

The Applicant has failed to acknowledge considerable damage to the site which will be caused during the construction phase, by the new residents of the proposed properties, and also by their pets, some of which will predate on the wildlife. Dog ownership has increased markedly in recent years, and while many dog owners are entirely responsible, a number still allow their pets to foul public places. This is already evident on the SSSI and would not be helped by the additional pet ownership which would no doubt accompany a further adjacent 84 houses.

Regarding greenspace provision on the site within the Applicant's plans, intended to alleviate pressure on the SSSI, the site of the proposed 84 houses is adjacent to the SSSI which means that this provision is unlikely to be utilised as anticipated; the residents would visit (and overburden) the existing SSSI instead.

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 Local Wildlife Site (LWS).

8. Inadequate healthcare capacity

As the population of Royston has grown due to the significant development of the housing stock in recent years, I know from personal experience it is now very difficult to get a quick enough response from General Practice. There is no further capacity which would accommodate new families from further additional housing stock. 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 further housing developments such as this one, without increased health provision, are likely to result in a significantly reduced healthcare service for Royston residents. Further funding of healthcare in of itself is not adequate mitigation as services cannot

expand unless they have space in which to do so, representing a risk to existing Royston residents. This proposal would therefore conflict with ***Policy SP7 of the NHDC Local Plan and 55 to 58 of the NPPF***.

In summary I have presented a comprehensive set of objections to 25/01708/OP. I have particularly addressed the areas of inconsistency with the adopted local plan, restrictive local covenants, highways and traffic impact, visual and landscape impact, living conditions, water supply and sewage, ecology and inadequate healthcare capacity.

I sincerely hope you will take note of my views and reject this damaging application. Thank you for your consideration.

Yours sincerely,

Julia Chambers