

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

15/08/2025

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, I have been an Echo Hill resident for 25 years, I have examined the plans and supporting technical documents, and I know the site well. I wish to **object strongly** to the development in this location, on the following grounds.

Housing Supply and Local Plan

- The development site is not identified in the existing Local Plan for North Hertfordshire District Council (NHDC Local Plan 2011-2031)) and is outside the settlement boundary identified in the plan. This non-compliance was a primary reason for refusal for Gladman's previous 2020 application (20/00744/OP) and the 2018 application and remains as valid now as it did on each of those occasions.
- As residents, we have a right to expect that decisions as to whether to extend the settlement boundary should be made, following due process by the local planning authority, and not by spurious unsolicited planning applications.
- Gladman have attempted to justify their proposal by observing that NHDC is currently unable to demonstrate a five-year housing land supply (**5YHLS**). This, they argue, engages Paragraph 11(d) of the National Planning Policy Framework (NPPF), which creates a "presumption in favour of sustainable development". However, as many of the objections raised in this and other

objection letters will attest, both from consultees and neighbours, this proposal, like the 2 previous proposals submitted by Gladman, does not constitute sustainable development.

- Royston is already contributing a significant number of dwellings towards the NHDC 5-year housing land supply. It is however extremely doubtful that, should this planning application be approved, that it would be able to contribute further to the 5YHLS for the following reason:

We would like to make you aware of restrictive covenants which are in place in Echo Hill and which we as a resident(s) 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 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.

Access, Highways and Transport

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.

Access & Highways

There are many significant issues relating to the design of the proposed access to the site.

- The Transport Assessment by GTA Civils & Transport Ltd (June 2025) states the revised site access arrangement is supported by a safety audit by EC Road Safety. The safety audit however has not been consulted on with the approving authority of Hertfordshire County Council (HCC) Highways, prior to the final design. It is apparent the access has been contrived with little regard to existing users of Echo Hill, Sun Hill and Briary Lane.
- No details have been submitted on gradients and proposed levels of the access road. Without such details it is impossible assess whether the access road meets design or safety standards in relation to gradients. This is potentially a serious issue as Echo Hill does not benefit from being gritted by HCC during adverse winter weather when it is not uncommon for Echo Hill residents returning home to have to abandon their vehicles in the surrounding streets as it is unsafe to attempt to ascend the steep inclines. I have done this myself. There must therefore be some concern that a driver may lose control of their vehicle when descending the proposed access road in adverse conditions and end up sliding into the garden of No.42.
- HCC's Place & Movement Planning and Design Guidance for Hertfordshire states that developments of 50 units and above "shall include provision for one emergency-only access as well as the one general vehicular access". The current proposal is for up to 84 dwellings. Gladman's Transport Assessment notes that for the previous 99-dwelling application on the site (20/00744/OP), a separate emergency access from Briary Lane was not required, based on 'a previous HCC Highway Authority officer response'. However, the current HCC policy explicitly mandates an additional emergency-only access for developments of this scale (50+ units). This represents a direct and significant conflict between the proposed design which relies on a single vehicular access for all purposes, including emergency access, and the latest HCC policy for developments of this size. This is a significant reason for rejecting the application.
- When considering the emergency access route, this should begin at the junction of Briary Lane and Baldock road, as this is the only viable access point for the entire estate comprising of approximately 700 properties.
- Constrained surrounding road network: Steep gradients, blind bends, obstructed vision caused by parked vehicles. I would urge that at least one decision making member of the planning committee visit the site and walk a route from the top of Briary Lane, along Sun Hill to Echo Hill and on to the location of the proposed access route at No 24 and beyond, to the end of the Echo Hill where it joins the Dell, preferably during weekday office hours. I'm sure that such a simple

exercise would leave them in no doubt as to the unsuitability of the proposed access route, not only for local traffic once the development has been completed, but also for the heavy construction traffic that will be required during development.

- When walking up Echo Hill from Sun Hill, the pedestrian footpath that runs along the northern flank of Echo Hill, comes to an abrupt end just before you pass No. 23 (which is on the opposite side of the road) This is followed by a few meters of grassy verge which then narrows to an impassable width just beyond No. 24. Pedestrians wishing to continue along Echo Hill towards the Dell must therefore cross the road to join the footpath on the southern flank, putting them in direct conflict with oncoming vehicles emerging, on a bend with a steep gradient, from the proposed access road. I understand that vehicles travelling on the new access road will be given priority over vehicles travelling east on the existing section of Echo Hill, meaning that they themselves will not have to give way.

This situation is directly addressed by several policies, guidelines, and regulations aimed at ensuring pedestrian safety and accessibility, but to give one example the Place & Movement Planning and Design Guidance for Hertfordshire states: For **uncontrolled pedestrian crossings** in residential streets (P2/M1 and P3/M1 categories), the geometric and streetscape design should enable safe crossing. I would strongly argue that the proposed design is inherently unsafe.

- Gladman's access plan drawings, show a carriageway width of 5.5 metres flanked by 2.0m wide footways on both sides for the access route, which includes the access through the (demolished) No. 24 Echo Hill. This width aligns with "Manual for Streets" standards for minimum carriageway width.

This plan is however undeliverable since it does not take account of a recent correction to the boundary position between No 23 Echo Hill and No 24 Echo Hill, which has now been accepted by the Land Registry and which has resulted in a loss of 1.19m of available width. It would appear that Gladman know that this is a problem as they have subsequently (and unsuccessfully) made offers to buy both 23 Echo Hill and 25 Echo Hill.

Transport

- Essentially, the site is poorly sited for accessing local amenities and lies outside the acceptable catchment for public transport (rail station and bus stops). The challenging distances and gradients, both around and within the site, make walking impractical and will ensure that future occupants will be dependent on their cars. This would be especially true for elderly or disabled occupants, or those with young children. That runs counter to the NPPF, the adopted Local Plan, and sustainable development principles.

- A previous application by Gladman for a substantially similar development at the same location (18/00747/OP) was refused By NHDC on the grounds that it exceeded a 400m walking distance from a local bus stop. The current application acknowledges that the main bus station at Barkway St. is 750m away.

LTP4, in its "Policy Context" section, explicitly states that CIHT guidance (cited in the previous refusal) indicates "development layouts should be designed such that all occupied areas are no more than 400m walking distance from a bus stop".

HCC Highways, in their consultee response to the current application have, again, recommended refusal of the application on these grounds. To grant planning permission for the current application would directly challenge a specific criterion used for a previous refusal. Therefore, this point alone, should be sufficient grounds to refuse the application.

Flood Risk and Water Quality

- Due to the steep topography of the site, the overland flows generated from the access road presents a flood risk to the existing wider highway drainage network of Echo Hill, as the existing system is already struggling to cope with the surface runoff generated. Access is not a reserved matter.
- As a result of climate change and urban development, intense rainfall events leading to flash flooding are becoming more and more common in the UK. However, an assessment on overland flow routes has not been considered within the submitted Flood Risk Assessment.

Should the infiltration features or attenuation features fail, or exceed their design criteria, this presents a potential flood risk to properties located directly downstream of the site, with my own property being one such property.

Due to the topography of the site, with residential properties located directly downstream from the SuDS, 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 **SuDS Manual (CIRIA 2015)**. Therefore, this is a conflict of the ***NPPF and NE7g of the Local Plan***

- The development site lies above a Major Aquifer, this area is also classified as a "Source Protection Zone 1" due to the high risk to groundwater contamination, making the site far less suitable for development.

Landscape and Visual Impact

- The reasons for refusal of the 2018 and 2020/21 planning applications, for landscape and visual impact still applies, as follows; 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 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.

To grant planning permission for the current application would directly challenge a specific criterion used for a previous refusal. Therefore, this point alone, should be sufficient grounds to refuse the application.

- As can clearly be seen from Fig.7 page 21 of the Design and Access Statement, the existing Echo Hill development largely lies within a natural dip in the landscape. From Therfield Heath SSSI only the tips of the roofs of the nearest houses are visible above the hedgerow, with many of the remaining houses are effectively screened by mature trees. The proposed new development however would lie at a considerably elevated position. Whilst Gladman does acknowledge that **‘there will be some effect on views from Therfield Heath’** their assertion that **‘The proposal does not materially affect a valued landscape’** is clearly untrue.
- There has 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 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.

Paragraph 135 of the NPPF states that developments **‘Are visually attractive as a result of good architecture, layout, and effective landscaping’**.

Currently, the layout of Echo Hill gives the impression of having been deliberately planned and designed with consideration being given to providing an aesthetically pleasing living environment for its residents. The grouping of individual dwellings, the sweep of the road, the absence of unnecessary street furniture and the fact that the road is a cul-de-sac all contribute to this impression. If planning permission is granted for this application, none of these would continue to apply.

By demolishing No. 24 Echo Hill, and shoe-horning in a new access road, steep in gradient and bounded by retaining walls, No.23 would effectively become an ‘island’ property, bounded on 3 sides by roadway and visually disconnected from its neighbours. This would significantly impair the visual aesthetic of the road, which would no longer be the result of good planning and design, but by blatant financial opportunism, resulting in the proverbial ‘Camelephant’.

The addition of road markings, tactile paving and Give-Way signage, all of which would be necessary

for safety reasons, would destroy the current impression of a quiet, contiguous residential neighbourhood. Echo Hill would feel like it has been split in two by the creation of the new access road which, over time, would undoubtedly have an adverse impact on the strong sense of community currently enjoyed by its residents.

Ecology

- 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. Records of the protected species have been provided on relevant ecology recording websites, up to present day, and are absent from the ecology report.

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 designated LWS.

Health Capacity

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, 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.

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

Yours Sincerely,

Gordon Chambers