

**3 Hillside
Royston
Herts SG8 9AY**

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

17th August 2025

Dear Mr Glover,

Reference: 25/01708/OP Land Opposite Heath Farm Briary Lane Royston Hertfordshire

I write in connection with the above planning application, I have examined the plans and I know the site well. I wish to object strongly to the development of houses in this location.

As you will be aware, development on this site is not supported by the Local Plan, which was raised and confirmed by NHDC at previous planning applications. It is not required to meet current housing supply demand.

Development of the site would have a significant negative visual impact on the landscape, disrupting the skyline of the area. Again, this was raised and confirmed at the previous planning review. Nothing has changed with this new application – the number of proposed houses has reduced by a small degree but the negative impact and the sprawl of development across the site will still have the same negative impact.

Traffic flow along Briary Lane is also a major issue for the area. With one side of Briary Lane used for parking, as a local resident driving on Briary Lane regularly, I experience delays and congestion where I have to wait at the top of Briary Lane while cars come up the hill (they have right of way). This can take several minutes and is worse at peak traffic flow times. If the development were permitted, there would be a likely 100-150 vehicles using Briary Lane exacerbating the current situation.

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**. Also 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 the NPPF, Policy T1 and the design guide mentioned above.

I am also concerned about the potential ecological impact with wildlife being negatively impacted too. I have seen owls and bats in the Briary Lane area and am concerned that 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.

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.

You are no doubt aware of the steep topography of the site and if any flood prevention measures were to exceed their design criteria or fail, this presents a potential flood risk to properties located directly downstream of the site. 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 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.

The existing sewerage treatment for Royston, is located in South Cambridgeshire District Council, 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, and like many areas, the site exceeds permitted levels of discharge of partially treated sewage.

The 2018 Application was concluded to likely have a significant environmental impact; a view which was agreed by the then Planning Officer and the Planning Committee. The 2020/21 Application also had concerns raised regarding potential impact with an objection from the Conservators of Therfield Heath and Greens (Conservators), who is a key stakeholder for Therfield Heath (SSSI). The site was also refused at Planning Committee for its landscape and visual impact to Therfield Heath. Therefore, the site poses a risk to the SSSI and should be subject to a detailed EIA Screening Opinion, with justification provided on any omission of an ES.

Local health capacity in the town is already poor, with insufficient GPs to support the current population. 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. The planned 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**.

At a time of national concern about the country’s ability to be food self-sufficient, the loss of good quality agricultural land should not be allowed.

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

Yours faithfully,

Christine Brown