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**Ben Glover
Senior Planning Officer
North Hertfordshire District Council
Council Offices
Gernon Road
Letchworth Garden City
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16th 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 technical documents and I know the site well. I wish to object strongly to the development in this location.

This proposal raises serious concerns across multiple areas, including road use, flood risk, ecological impact, legal constraints, and planning policies. It threatens the character and wellbeing of the local community and fails to meet the standards set out in the National Planning Policy Framework and the North Hertfordshire Local Plan. My objection is based on detailed analysis of the site's constraints and the likely consequences of development.

Road Safety of new and existing residents

The site behind Echo Hill is exceedingly unsuitable for development due to the already difficult and conflicted access on the roads, particularly during icy weather the road is very dangerous due to the gradient and tight corners. Additionally, during busy times at the blind corners and blind summit the combination of cars, people, and bikes often conflict. The footpaths are only on one side of the street on Echo Hill and this will force children travelling to school to cross the newly proposed road at a steep and low-visibility corner. The proposed junction design does not adequately address these risks and fails to meet safe access standards for vulnerable users. This conflicts with Chapter 9 of NPPF.

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**.

Further afield, the extra traffic and widening of any footpaths or roads along Sun Hill is likely to cause damage to the existing mature trees in this area and damage the ecology, utility, and character of these streets.

Flood Danger to existing residents

The proposed plans will remove a natural surface important for flood mitigation and replace it with developed land. **NPPF (para. 125) states decisions should “recognise that some undeveloped land can perform many functions, such as for [...], flood risk mitigation, ...”**

The proposed flood attenuation basins will be directly uphill from existing residential properties at the end of Echo Hill and these can become a significant danger to the existing properties should the flood defenses be overwhelmed or fail. Particular consideration should be paid to the uncertainty of future performance (whether due to extreme weather or system degradation). Planning decisions should assume no flood system is infallible, so considering that, new developments should be sited where the impact of such a failure will not endanger life or property for immediate downstream systems.

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. The proposed strategic surface water attenuation and infiltration features are located at elevated levels directly adjacent to properties of Echo Hill. 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. 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**.

Restrictive Covenant Enforcement

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.

Non-Functional Green Space provisions put risks to the local SSSI

The proposed green spaces at the south end of the land appear to be a perfunctory green space allocation, positioned on a remote and steep part of the site, adjacent to existing infrastructure and far from the residential core. Its location and lack of integration suggest it is not intended as a meaningful social amenity or ecological biodiversity asset, but rather a nominal gesture to satisfy minimum green space requirements. New residents would simply walk to the inevitably more attractive local SSSI than to any on-site green space. This undermines the principles of accessible, functional green infrastructure as outlined in the Local Plan (e.g. policy SP12) and National Planning Policy Framework, Chapter 15.

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.

Agricultural Loss / Food Security / Natural Biodiversity

Agricultural land is of strategic importance to the whole country (even if a particular field is currently underutilized) to allow us to make sure future food security needs are met. As a local resident I can also verify that the land in question supports a wide variety of important natural bird and mammal life.

The development of this land will result in the permanent loss of high quality best and versatile agricultural land, see

<https://publications.naturalengland.org.uk/publication/127056?category=5954148537204736>

NPPF (para. 187) states planning decisions should be made “*recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land*”.

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.

Local Plan

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 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).

Living Conditions

The neighbouring properties (Number 25 and 23) of the house to be demolished (Number 24) and the proposed access road, will have their living standards significantly and detrimentally impacted during both the construction and following habitation of the development. NHDC failed to appropriately assess and address this issue during the last planning application. The proposals conflict with Policies D3 of the adopted Local Plan.

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.

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***.

The Transport Assessment by gta (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. 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.

The proposed access 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***.

Water Quality

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. Residents have found evidence to show regular exceedance of the permit in place at the treatment works. There is little evidence provided by Anglian Water which shows they are competent, nationally, at determining the treatment works has sufficient capacity to accept additional flows and therefore significant concerns they are fit to approve any additional flows from development in the area. 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.

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***.

Conclusion

To summarise, in considering all the above points, I strongly urge the Council to reject this damaging and unsustainable planning proposal in accordance with the NPPF and Local Plan. The site presents unacceptable risks in terms of road use, flood vulnerability, ecological harm, and legal uncertainty due to restrictive covenants. It lies outside the settlement boundary, lacks safe and sustainable access, and threatens both protected landscapes and community infrastructure. The significant adverse impacts clearly outweigh any potential benefits, and I urge the Council to give full weight to the strong and well-reasoned objections raised by residents.

Yours Faithfully,
Ben Page