

Chandra Chapman
38 Echo Hill
Royston
SG8 9BB

16th August 2025

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

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 examined the plans and supporting technical documents, and I know the site well.

I live with my young family on Echo Hill and travel by foot often. I am deeply concerned that the additional traffic will be unsafe and detrimental to all those living along Sun Hill, Briary Lane and Echo Hill. It is already tight and difficult to navigate by car and foot and additional pressure on these routes will lead to dangerous conditions for both drivers and pedestrians. Not only is this a concern, but the living conditions of my family and neighbours, flood risk, pressure on the SSSI are also key points in my objection as outlined in the rest of this letter.

Whilst I have predominantly followed a template when drafting this objection, I wish to make clear that I have reviewed the proposal thoroughly and my concerns have been carefully considered.

Highways and Transport

I push a buggy up and down Echo Hill on a regular basis and it is narrow and steep. Sections of Briary Lane are already difficult to navigate. Doing this alongside the extra traffic both residential and construction will prove difficult and leave me deeply concerned about keeping my children safe. The proposed new junction puts a busy road crossing with poor visibility due to steepness and tightness at a location where there is no alternative foot path on the other side of the road.

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. 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.

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 those in my household being left with a sense of being overlooked, overshadowed and dominated by new development. This would detrimentally impact on our reasonable expectations of residential amenity and privacy. The proposals would be contrary to the NPPF and Policies D3 of the adopted Local Plan.

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 LWS.

Covenant

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.

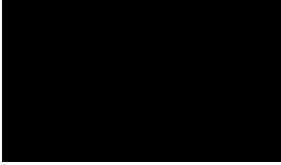
Flood Risk

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

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 significant impacts this site has outweighs any potential benefits and I urge the Council to consider the strong and well-reasoned objections from residents.

Yours Sincerely



Chandra Chapman