

Objection letter from:

Diane Hatton, 3 Echo Hill, Royston, Hertfordshire, SG8 9BB

To:

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

15 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 very well having regularly explored it via the adjacent public footpaths/bridleways over many years. I wish to object strongly to the application to develop houses in this location, commencing with the egregious plan to allow access via demolishing no. 24 Echo Hill.

It is especially unfortunate that you are having to devote valuable time yet again to reviewing the latest incarnation of the Gladman plan. I offer below the following points that summarize my thoughts and that I hope will persuade you and your planning committee council colleagues that outright rejection of the application is the most appropriate action.

Landscape and visual impact:

Most significantly, and mirroring the main reason that the two earlier proposals by the same group to build houses on the site were rejected by NHDC, the current proposal is again of course unable to deal with the fundamental issue that the proposal places the development prominently in the same location in a beautiful relatively 'high-altitude' area adjacent to the Therfield Heath SSSI. It essentially envisions the creation of a large 'cul-de-sac' off from, and towering over, the current cul-de-sac that is Echo Hill. It would therefore strongly negatively impact the local landscape, especially that of the SSSI. The same reason for refusal should therefore still apply to the current application. I understand that the proposal conflicts with the National Planning Policy Framework (NPPF) and policies CGB1, SP5, SP12, NE1 and NE6 of the adopted NHDC Local Plan.

On a related matter, the application does not take into consideration the direct effects of the access proposals on the character of Echo Hill itself, which I believe would be seriously harmed by the proposed access arrangements. I understand that the proposals would therefore be contrary to the general landscape protection policies of the NPPF (including Paragraph 135) and Policies in NE1 of the adopted Local Plan.

Local Plan bypassed:

I note that the area for the proposed development adjacent to no. 24 Echo Hill does not feature in the adopted NHDC Local Plan and is outside the settlement boundary. Doubtless there would have been good reasons for excluding that area from the Plan, including, but not limited to, the difficult terrain and topography, the site's constrained access via a former household (alternatives are apparently impossible off the A10 to the east or from the 'Wicker reservoir bridleway' at the south end of Briary Lane), the very congested road system for access to and

exit from the site, the clearly negative visual impact, the existence of protective Echo Hill covenants (see below) and the area's proximity to the nationally important habitat of the Therfield Heath SSSI.

Based on the above reasons, I would argue that, if the desired fulfilment of the five-year housing land supply for N Herts is proving problematic, then adoption of this area of land high to the south of Echo Hill should be one of the *least* likely candidates to be adopted as an additional part of the Plan for the town and surrounds of Royston.

Negative effects on highways and traffic:

The submitted application is notable for an extremely poor choice of its sole access point to be created by demolishing no. 24 Echo Hill. Leaving aside the clearly very negative effects this would have on the current residents living immediately adjacent to and either side of the access point, this proposed development would lead to many more significant and highly undesirable consequences as residents of the new site will doubtless be heavily reliant on cars. This is because Echo Hill and the development site are some of the steepest, highest and most tiring sites in town to gain access to on foot or by bike and are especially difficult in winter, when they can become frost or snow covered.

The development would lead to an increase in traffic along Echo Hill (certainly doubling, possibly trebling it) and then further negative effects outward along the interconnecting Sun Hill and Briary Lane that discharge their traffic centrally into town via junctions with the A10 and Baldock Road, respectively. These three roads – Echo Hill, Sun Hill and Briary Lane – already operate currently almost like 'country lanes', possessing strong slopes, sharp bends, tight junctions, some lengths of absent pavement, much on-road parking and many zones of restricted width that effectively make them single-carriageway in part, plus Sun Hill is 'one way' at its easternmost end. Thus, these roads offer many highly significant challenges to drivers and pedestrians, frequent congestion, delays and, worryingly, would perform even worse and suffer a predictable likelihood of increased accidents should the development go ahead. Further worsening of the already precarious road situation owing to the extra traffic originating from the site would also increase the likelihood of delays or failures by the emergency services trying to reach residents in the entire local area.

Thus, based on the above issues, plus the lack of suitable nearby access to public transport, I understand that the site should be assessed as being contrary to paragraphs 108–110 of the NPPF and policy T1 of the adopted Local Plan and is likely to be contrary to local planning guidance given in '*Roads in Hertfordshire A Design Guide*'.

Worrying ecological impact:

It is alarming that the applicant's submitted Biodiversity Net Gain (BNG) calculations show a deficit that cannot be compensated within the site and therefore the plan would be reliant on offsite mitigation. Furthermore, the fact that parts of the adjacent Therfield Heath SSSI lie less than ~100 m from the proposed site development means that it is highly likely that many of the new residents and their pets would end up regularly using the SSSI land in a way that would doubtless negatively affect it (e.g. through pet fouling, littering, site erosion). The fact that 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” supports the argument that the application should be rejected.

On a related matter, any thoughts that Suitable Alternative Natural Greenspace (SANG) compensatory areas could be used would have to be very carefully evaluated as I believe that, in earlier usage of SANGs, the development sites themselves had to be in excess of 400 m from an SSSI (unlike the Royston case here) in order to avoid harming the SSSI. Thus, I believe that the development site in question here cannot benefit from employment of SANGs.

Lack of Environmental Impact Assessment:

It is concerning that it is unclear whether an EIA Screening Opinion has been requested or obtained and that no Environmental Statement (ES) has seemingly been produced. Given that there is plenty of evidence from the two previous applications (2018, 2020/21) that the site development may exert impacts upon the adjacent Therfield Heath SSSI (and the application received an objection from the heath's Conservators), then it is surely unarguable that a detailed EIA Screening Opinion should be produced and the need for an ES should be unequivocally established.

Risk of flooding and effects on water quality:

The application's employment of a sustainable drainage system (SuDS) does present some concerning matters. Should the drainage system's infiltration/attenuation features fail or be exposed to conditions that exceed their design limits, there could be major downstream implications. The sheer steepness of the site and the tendency of the UK to suffer from some periods of exceptionally heavy rainfall may mean that the northern end of the site backing onto Echo Hill, together with the site's access road, could well become a potential source of flooding to the local Echo Hill properties and beyond, especially those just downstream of the current no. 24 home location. An expert opinion has been expressed that the factor of safety used in the design of the attenuation features and infiltration device has been underestimated and is not in accordance with the SuDS Manual (CIRIA 2015). This I believe would create a conflict with the NPPF and NE7g of the adopted Local Plan.

Even if the above SuDS issue could be resolved, it is concerning that the application involves developing an area lying directly above a major aquifer and that is classed as a Source Protection Zone 1 (SPZ1) owing to the high risk to contamination of groundwater. Although such a risk to water quality may possibly be small, I would argue that much better would be not to entertain such a risk at all and consequently think you should include these matters as a factor in declining the application.

Finally, it is obviously highly desirable to maintain the quality of our local chalk-stream watercourses. There are public concerns that the site's potential sewerage output may well cause problems for Anglian Water and could result in the danger that key limits may be exceeded during the output operations from the town's treatment works. Such issues could result in undesirable water quality in the chalk-stream watercourses downstream of the treatment works – something that should clearly be avoided.

Stress on local NHS health capacity:

Speculative developments such as this one are often unlikely to be successfully accommodated by local health providers and may therefore adversely affect the provision of services to current local residents. The Royston-based GP services of the NHS appear to me to be working at full capacity, are often over-stretched, and may well be unable to take a timely advantage of any mitigation funding offered. Thus, as I understand it, development of the site would therefore conflict with policy SP7 of the adopted NHDC Local Plan and paragraphs 55–58 of the NPPF.

Impact upon neighbouring properties:

Occupiers of many homes adjacent to the site, especially nos 23 and 25 bordering the access road proposed at the site of demolition of no. 24 Echo Hill, would suffer a predictably large erosion of their living standards during the building period and the eventual permanent habitation phase. I believe that this issue, unresolved in the current and the earlier 2020/21 application, produces a conflict with policy D3 of the adopted Local Plan. Furthermore, the elevation of the development site is highly likely to result in many current residents feeling overlooked and ‘dominated’ by the new housing. Thus, I believe the development would be contrary to the NPPF and with policy D3 of the adopted Local Plan.

Effect of restrictive 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, of the strength of feeling against this development from the community of Royston and the significant impact this development will have directly upon the residents of Echo Hill. A letter from an Appointed Solicitor was issued to both Gladman and no. 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 no. 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, owing 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 five-year NHDC housing supply.

Final comment:

To summarise, in considering all the above points, I strongly urge the council to reject this damaging and unsustainable planning application. Far safer, and much better for both the environment and all the people of Royston, would be to leave the site undeveloped! Thank you very much for your attention to this matter and for considering my objection.