

Mr & Mrs G Hill

Mr T Hill

25 Echo Hill

Royston

Herts

SG8 9BB

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

10/08/2025

Dear Mr Glover,

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

We write in connection with the above planning application, as one of the houses directly affected by this proposal we have examined the plans and wish to object in the strongest terms to the site access, the demolition of number 24 Echo Hill and the development of 84 houses in this location.

We believe that this proposed development is unsuitable in this particular area of Royston as we did when the development site was proposed in 2018 and 2020/1. We are extremely disappointed that this application has been received for the third time and that this is placing pressure on NHDC, whilst wasting our valuable council resources again.

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**. There has not been any consideration to the direct effects of the access proposals on the character of Echo Hill which would be significantly and irreversibly harmed by the proposed access arrangements. The proposals would therefore be contrary to the general landscape protection policies of the **NPPF (including Paragraph 135), Policies NE1 of in the adopted Local Plan**. The visual impact that this development will have cannot be quantified - as referred to in the Scarp*

Slopes South of Royston (doc 228) to paraphrase the document - the lack of development and openness make the area unique - and this is absolutely true, once lost this can never be reinstated.

Our objections raised for both of the previous applications still stand for the current application and are updated and set out below:

Primarily the development site is not identified in the adopted existing local plan for North Hertfordshire District Council, and is outside the settlement boundary of Royston as illustrated in the North Herts Local Plan 2011-2031 – **Map F**. Therefore the application should be refused for its failure to comply with this plan.

Royston is already contributing significantly to the NHDC 5 year housing land supply having sustained further significant development from the Ivy Lane and Meridian Gate sites.

This proposed site is in a problematic and awkward location, in order to achieve this development there would be significant engineering and earthworks required just to reach the proposed site due to the steep access and topography, none of which has been addressed in the application as noted in the Royal Haskoning Report commissioned by the Residents Group Royston Say No to Gladman (RSNtG) *'No indication has been made of the substantial structures required to retain the adjacent properties in the design of the access road as part of the current submission'*

Also raising a question over whether in order to achieve this design, land not owned by the applicant would still be required.

This in itself would be incredibly significant and so detrimental to the living conditions to our family at number 25 Echo Hill and Dr & Mrs Munden at number 23 Echo Hill during construction, making living here untenable.

The area's infrastructure around the proposed site is unsuitable for development. The only access route to Echo Hill, is along Briary Lane. The burden already placed on Briary Lane and Sun Hill with the current levels of traffic, to access existing properties, the town, or the A10, is already under strain. The closure of the Princes Mews public car park in Baldock street has caused additional parking pressures, there has been a noticeable increase in parking along not only Briary Lane and Sun Hill, but in all side roads leading off them, including for the first time Echo Hill. (Photos attached) Briary Lane is effectively a single lane that relies on motorists giving way and often used as a 'rat-run' via Coronation Avenue, as a way into the middle of town or to access the A10. Many residents report witnessing near misses at the junction of Coronation Avenue and Sun Hill where cars fail to stop and pull straight out.

We have all witnessed very dangerous manoeuvres where motorists regularly seek to squeeze through to overtake cyclists along Briary Lane, or pedestrians having to walk in the road when the pavement is blocked by bins on collection days or by large delivery vehicles. It is not unusual to wait for a significant amount of time waiting to travel the length of Briary Lane in either direction where cars are often parked nose to tail.

If construction traffic were to be added to the mix it would be chaotic. The additional traffic the new development would create for the long term along Briary Lane and all of the surrounding roads would make the residents lives a misery and gives us great cause for concern over the safety for all users using this road whether by vehicle, bicycle or on foot.

At the top of Briary Lane there is a very tight left hand bend descending into Sun Hill.

Tyre tracks worn into the edge of Sun Hill common, indicate very large vehicles mount the verge regularly to avoid the vehicles parked along the left hand side of Sun Hill. If two vehicles meet at the top of this junction it is already difficult to enter and exit this junction safely, particularly in larger vehicles. (see attached photo)

As you enter Echo Hill, you are forced into the wrong position by the parked vehicles along Sun Hill. There are 2 blind bends along the steep windy road, which is not designed to current standards,

vehicles can be parked on either side of the road or both, and makes navigation dangerous if the correct care is not taken. This is particularly dangerous for cyclists and motorists coming down the hill should they meet a vehicle on its way up, and in poor weather conditions even worse. The proposal to include another narrow access point with a 'blind' entrance up another steep slope to further dwellings indicates a severe lack of care of residents safety.

The 'sweep' required to make the turn into the new access road will be at best difficult and at worst dangerous. We cannot see how large vehicles would be able to turn in or out safely and remain on the correct side of the carriageway ie; bin lorry, delivery or emergency vehicle on the proposed new access road.

When turning out of the access road there would be poor visibility at the junction due to location of our vehicles parked on our drives at number 25 and number 23.

Furthermore with poor weather conditions it would add another dimension to the aforementioned issues. Roads are not gritted as they are not part of a bus route and with the current number of residents in Echo Hill, icy conditions make this route difficult and at times impassable due to the gradient, with another 84 residents attempting to access the initial hill, then attempting to navigate a further incline is a catastrophe waiting to happen. (Photos attached)

To summarise this vehicle access design as we see it is undeliverable. 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 access in the proposal submitted by Gladman has been contrived with little regard to existing users of Echo Hill, Sun Hill and Briary Lane. The current submission does not comply with the latest adopted transport policies including the Hertfordshire County Council design Guide.

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.

It should also be noted that the creation of a new access road alongside our property will completely change the aspect and create a significant loss of privacy, safety and security to our property and our vehicles. At present, our properties are secluded, secure and inaccessible to the public. This gives many of us peace of mind, particularly as my husband is a tradesperson reliant on storing tools and equipment at home. Tool, van and car thefts are unfortunately all too common in Royston, and the secluded nature of our homes has so far kept us safe.

We believe that the proposal fails the 'Secure by Design' standard. This was previously overlooked in applications before and appears to have been overlooked again in relation to our properties. Our house will become exposed from 3 sides where it is currently only the front of the house, our vehicles will become more vulnerable with van and car theft on the rise in Hertfordshire, this poses a significant risk. Should this proposal even be given consideration the Secure By Design standard must and should be met. Much more consideration to this standard should be given, not just to the adjoining properties of this access road, but to all of the properties on Echo Hill and Royse Grove that would also suffer a loss of privacy and security due to the increased accessibility of this relatively small cul-de-sac.

Due to the elevated location of the development site in relation to the existing surrounding properties, it is likely that the new dwellings would give rise to existing residents being left with a

sense of being overlooked, overshadowed with a lack of light in habitable rooms and the garden and completely dominated by new development. We believe this detrimentally impacts on our reasonable expectations of residential amenity and privacy.

Currently there is no right of way behind our property therefore we have a safe and secure environment. We do not have the need to erect high fences or barriers and are able to enjoy the natural hedge line and view beyond.

Furthermore it is important to recognise the following documents and the references to creating a sense of place, we believe Echo Hill already has this and to disrupt it and destroy it would be a great loss to the strong community ethic in this cul-de-sac.

Section 1 in "Roads in Hertfordshire: A Design Guide" refers to the Manual for Streets, and in Section 2 states:

"In designing new development, a primary aim should be to create a sense of 'place'. A quality which, whilst difficult to define, is easily recognised by those experiencing environments which possess it. Creating a sense of 'place' should instil a sense of ownership in the residents or occupiers of the development."

Echo Hill would change from a quiet almost silent cul-de-sac to a busy through road. Residents will no longer be able to enjoy the peace and tranquillity of their gardens at any time of day, neither would we be afforded our current level of privacy when we will have traffic and pedestrians travelling along the road and footways alongside our house.

During the demolition of number 24 there would be significant noise, dust and pollutants that could be of significant harm to our families health as well as causing us severe misery and distress. There has as yet been nothing in the proposal to mitigate against this.

A consultee response from Omar Ezzet has also noted there is no mention of how demolition waste will be reused or recycled.

There is no detail concerning the protection of our houses or assurance that we will not suffer damage or losses to our properties or subsidence. How will our boundaries, our trees, shrubs and hedges bordering the proposed access road be protected from harm during construction?

If this access road were to be built going forward having the access road alongside our houses will mean we will then suffer further ongoing light, noise and traffic pollution, and dust. We are also assuming there would also be additional streetlighting creating further light pollution and disruption around the neighbouring properties.

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. We believe that the properties bordering the site would be at significant risk of flood and subsidence should the area be disturbed for development.

The impact of the additional volume of surface water generated by proposed access road to the existing highway drainage infrastructure within Echo Hill has not been adequately addressed and could be a potential flood risk to existing residents.

The new access road will create a natural run off point and the proposed attenuation basins are not mitigation for this, indeed due to the topography and their placement, these basins could very well themselves flood the back gardens of those bordering the site. The impact from the proposed development to surface water overland flow routes to offsite areas and the potential subsidence as a result of concentrated surface water inflows (when discharging to chalk) are also not considered to be adequately addressed.

This needs to be resolved before any application can be granted. The Council has a duty of care to its residents to ensure that existing properties will not be affected by any development and we would

like this given in writing with a full risk assessment and guarantee of no such flood or subsidence. We would like to see a detailed assessment which details the run off and drainage proposals in full for Echo Hill. Currently even with open fields Briary Lane, Sun Hill and Echo Hill can be like a running river when the rainfall is significant. The drains are often full and overflowing as they are not maintained adequately, therefore should there be further development of the area how will this run off be controlled so as not to impact on residents further down the hill and adjoining roads? Photos attached show the run off currently during heavy rainfall.

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.

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.

We are fortunate to live in harmony and respectfully of the flora and fauna found on the proposed site it is a haven for the wildlife looking for respite from the already well used neighbouring SSSI – The Therfield Heath. Brown Hares, muntjac deer, foxes, badgers and hedgehogs (red-listed) regularly visit back gardens of the houses bordering this site. The site also supports a number of RSPB Red listed UK farmland birds of conservation concern, including Skylark, Yellowhammer, Corn Bunting, Mistle Thrush and Field Fare and the small heath butterfly.

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.

It has not been made clear if an EIA screening Opinion has been requested or obtained for this application and no Environmental Statement (ES) has been submitted. NHDC has previously proceeded on the assumption that this is not EIA development. However, 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.

There is no capacity within the local health providers to accommodate speculative development such as this. Our family have tried just this week to secure a doctor's appointment, this in itself is a lottery with appointments only 'released' twice a day via an app. If you are working it is almost impossible to get an appointment. When we attempted to book the one and only appointment released at 8.00am on Friday morning – not in Royston - it had already gone. This supports 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) that states the ***“GP practices show a significant health infrastructure deficit, and existing surgeries do not have capacity to absorb any additional residents”***.

Current GP practices in Royston are landlocked and unable to provide additional facilities. Gladman states Royston has a hospital, which shows a distinct lack of proper research into this application. Royston Hospital does not have an A & E department. Currently only a Physiotherapy outpatient service, some adult social care services and the voluntary organisation Royston District Community Transport operate from there.

The site would therefore conflict with ***Policy SP7 of the NHDC Local Plan and 55 to 58 of the NPPF***.

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.

To live with this hanging over our heads for the third time continues to be intolerable, the undue stress and distress this has caused our families during this time should not be underestimated and should this proposal go ahead would be further exacerbated and potentially cause even further damage to our health and well-being. Whilst we appreciate our 'feelings' are not a planning matter we truly hope that the correct use of policy and common sense will prevail.

We urge the council in the strongest terms to reject this damaging and unsustainable planning proposal for the third and final time.

Yours faithfully,

Melanie Hill, Graham Hill & Thomas Hill

Supporting Photos Attached Below.

Echo Hill in Snow and Ice – not gritted other than by hand by residents.



In poor conditions the road becomes a single lane track.



After snow or heavy rain water pools at the bottom of Sun Hill and junction of Echo Hill



Surface water running down Echo Hill during heavy rain.



Sun Hill Common - verge worn where large vehicles mount the kerb edges due to parking along Sun Hill.



Parking along Sun Hill taken on a Thursday afternoon, August 2025 since the closure of Morrisons Car park.



Looking into Echo Hill – more cars parked inside turning, or vans – on double yellow lines!

