



23 Echo Hill
Royston
Herts
SG8 9BB

August 8th 2025

To:

**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 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 as I have lived at number 23 Echo Hill for 40 years. I wish to object strongly to the development of houses in this location.

First I want to condemn Gladman for the cynical timing of the submission of this application to coincide with the school summer holidays. Many families are away from home and have a very short time to submit their comments.

Not enough consideration is given to the harmful mental health impact of proposals like this, especially when the speculators come back again and again. Anyone at the Royston Town Council Planning Meeting on Monday 4th August could have witnessed the distress caused to residents when our homes, neighbourhood and security have been under threat constantly since 2018.

Just because a land agent has found a field on a town border doesn't mean it should be developed. Just because one house can be demolished doesn't mean it should. The land in this proposal cannot be accessed easily or safely, and the proposed access though number 24 Echo Hill is totally unsuitable and undeliverable because it is narrow, steep and would create a dangerous sharp bend.

My objections are grouped under ten headings as follows.

Housing Supply and 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. The failure to comply with this alone should lead to the refusal of the application. 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 be refused for its problematic location; its

negative impact and its failure to comply with the adopted local plan (NHDC Local Plan 2011-2031).

Landscape and Visual Impact

The reasons for refusal of the 2018 and 2020/21 planning applications, for landscape and visual impact still apply, 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 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 the adopted Local Plan.**

Ecology

Approximately a quarter of UK mammals are at risk of extinction. Prof Fiona Mathews from the Mammal Society said: "What this is clearly saying is that we have to act now - we can't continue on this same trajectory. While we bemoan the demise of wildlife in other parts of the world, here in Britain we are managing to send even rodents towards extinction. "Things have to change rapidly if we want our children and grandchildren to enjoy the wildlife we take for granted." Something most conservation scientists agree on is that we need to leave more wild space across the landscape for these species to recover. We must save this land, next to the SSSI Therfield Heath, and do our bit here in North Hertfordshire to protect these animals and help them to recover and thrive.

The proposed development will have an ecological impact to at-risk species, as specified in the UK's Biodiversity Action Plan, 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, the residents bordering the proposed site, have photographic evidence of the animals and birds living, nesting and foraging here.

The Natural Environment and Rural Communities (NERC) Act 2006 states local authorities are required to take measures to "*promote the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species.*" Priority species listed under Section 41 (S41) as being of principal importance found at the site include the Brown Hare, Grey Partridge, Skylark, Corn Bunting, Yellowhammer, Starling, Song Thrush and Small Heath butterfly. All of these species plus Hedgehogs, Badgers, Foxes, Deer, Woodpeckers, Bats, etc., have been recorded over many years by residents bordering the site which is adjacent to Therfield Heath, an SSSI, and we have the evidence that the site has provided a quiet refuge for these animals for the past 15 years.

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 application poses a real threat to the SSSI. From the new houses it is estimated that there could be as many as 35 additional cats which are natural predators of birds and small mammals. Therfield Heath and the surrounding landscape is chalk grassland, 80% of which has been lost to the UK since WWII. Many species of plants that grow here grow nowhere else, and in turn attract many insects and butterflies such as the rare Chalkhill Blue which lays its eggs on the Horseshoe Vetch.

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 when 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 be likely to have an adverse effect on Therfield Heath SSSI and neighbouring LWS.

Instead of allowing more encroachment on the grassland we should be proactively using adjacent fields such as these to conserve and expand it. We should be thinking big like the Tees-Swale Naturally Connected project (https://www.northpennines.org.uk/what_we_do/tees-swale-naturally-connected/).

Living Conditions

My husband and I live at number 23 Echo Hill, one of the two neighbouring properties of the house to be demolished (Number 24) and the proposed access road, will have our living standards significantly and detrimentally impacted during both the construction and following habitation of the development. The same is true of Mr & Mrs Hill at number 25. 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.**

I am seriously alarmed by the prospect of a road inches from the side of my house and garden. I understand that developers would have to use piles to create and support such a road and would have to build a concrete wall to retain our garden and stop it collapsing into the road. I am deeply worried that these works will vibrate and damage the foundations of our house, and that the integrity of our garden will be destroyed. I am horribly concerned about living on an embankment.

I am very anxious about details of boundary treatment which have not been submitted or available as part of this outline application. The proximity of the road and footpath to the side of my house, our secondary fire exit route, and garden would be dangerous and there would be a massive increase in pollution from passing traffic. The legitimate parking of our vehicles on the drive at the front of my house would impede good forward visibility for turning vehicles at the new junction, and reversing off my drive into traffic coming directly from the site at a right angle could be dangerous. There would have to be a high retaining wall which,

if not of a high standard, could lead to collapse and damage to the garden and the house foundations. The construction works for the retaining wall would require the excavation of land within my back gardens with significant impact on my amenities and upon existing hedges and landscaping. I and my husband are not willing to allow access to or seizure from either front or back areas. Parking restrictions on the new junction would remove several on-street parking spaces which residents and visitors have been able to use for 35 years. A mature beech hedge on the boundary of numbers 23 and 24 which is used by many birds in the nesting season, and which is also of visual value to residents would probably be destroyed. New street lighting would destroy the much valued dark environment to the south.

There are no details as to how the access road is to be constructed. In the previous application the plan was to provide the foundations for the retaining walls to the access road by piling. This represents a serious threat to properties number 23 and 25 due to the closeness of the pile to the property boundaries. Therefore a highly qualified and experienced Structural Engineer was commissioned by us to comment upon these plans. The Engineer was, however, unable to comment as the plans were missing vital information that is required in order to be able to judge whether it is achievable without affecting nos. 23 and 25. The engineer commented as follows:

- i. It is not clear from the drawings the extent of the proposed piled retaining wall. This should be clearly marked on the plan
- ii. What is the maximum and minimum height of the retaining wall at the maximum and minimum height of the retaining wall above the road level?
- iii. What is the maximum deflection of the cantilevered pile wall?

No approval should be possible without answers to these questions.

The elevated location of the development site in relation to the existing surrounding properties, is likely to give rise to us 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.**

Highways and Transport

In 'Manual for Streets' (referred to in 'Roads in Hertfordshire: A Design Guide') it 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.*" "...to provide an environment which is accessible and safe for all, and one that improves the quality of life". Echo Hill does indeed have a 'sense of place', is a quiet residential **cul-de-sac** providing a safe environment for families, and has lent itself to a strong neighbourly friendliness. By carving a new road randomly right through the middle of two houses would destroy these qualities.

Because of the location of the site on high ground, more car use must be expected leading to more pollution and therefore more deaths associated with respiratory diseases such as Covid19.

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 my house, number 23, and that of number 25, 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.

Briary Lane is already difficult to negotiate as there are cars parked legitimately on long stretches of it rendering it effectively one-way, and drivers have to wait for long periods to get up or down. Emergency access is an issue already, recent incidents in Briary Lane saw emergency vehicles blocking the road for several hours, with the police not allowing residents temporary access via Sun Hill. On bin collection days pedestrians often have to step into the road as the narrow pavements are blocked by bins, and this dangerous situation would be made far worse by the proposed development. This is the main pedestrian route for children going to Tannery Drift First School. The amount of construction traffic would also become intolerable to residents and road users alike on this narrow road.

The junctions of Briary Lane, Sun Hill and Echo Hill are narrow sharp bends with poor visibility. From my own experience parked vehicles make it difficult to negotiate and a large increase in car numbers would make this whole area dangerous. Echo Hill itself is narrow, winding and steep. In conditions of snow the hill is not routinely gritted by the council (there are neighbourhood bins of grit), and access up and down is impossible, leading to people not getting to work or having to abandon cars lower down in Briary Lane or Sun Hill.

I believe it is hard for Councillors to understand how steep these hills are without visiting the neighbourhood.

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 applicant assumes that people living in the proposed development would walk or cycle into town, to schools, and to get to public transport access points. For a site that is on a steep gradient and an unacceptable distance from these facilities this is an unrealistic expectation. They cite incorrect distances to incorrect bus routes, and they also cite impossible journey times for cycle riders as proven by Echo Hill residents.

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**.

Flood Risk and Water Quality

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. Already in heavy rain excess water from the hill flows down Briary Lane like a river, more than the drains there can cope with.

The proposed strategic surface water attenuation and infiltration features are located at elevated levels directly adjacent to properties of Echo Hill. The proposed SuDS are roughly outlined on the plan as if they were on level ground, but they will be on steeply rising land, so will either have lethally steep sides, or will have to extend much further than indicated, undermining the road and protected hedges. 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**

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. Drinking water for Royston would be put at risk from development here as it is vulnerable to contamination from highway drainage and sewage.

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 to show they are competent, nationally, at determining that the treatment works has sufficient capacity to accept additional flows, and therefore I have 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.

Environmental Impact Assessment

I am an active member of the group The Friends of Therfield Heath, and am passionate about its conservation and protection. The proposed site would be visible from The Heath and create yet another concrete and brick barrier to the wildlife found there.

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.

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"***. I personally have been obliged to travel to other towns and villages for blood tests and other procedures. I am unable to access breast screening in Royston. It is deplorable and ironic that we have to put ourselves in danger on the roads in order to get basic health care.

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***.

Agricultural Land

The development of the site will result in the loss of high-quality agricultural land. This very week crops have been harvested and straw bales gathered. The UK is in danger of becoming over reliant on imported and low quality food.

Restrictive Covenants

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

Yours faithfully,

Joan Munden

Appendix – Photographs

1. View up garden of no. 23 (note the steep rise)



2. View from no. 23 bedroom window



3 Street views



Exit from Echo Hill into Sun Hill



Fire Engine in Briary Lane



Entrance from Sun Hill into Echo Hill



Sun Hill towards Briary Lane



Blockage in Briary Lane



Echo Hill, looking upwards towards nos. 23 and 24