

7 Echo Hill
Royston
Herts
SG8 9BB

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 well. I wish to object strongly to the development of houses in this location.

While I believe there are multiple reasons why the application should be rejected – as it has been, notably, on multiple occasions in the past – my strongest personal objection is based on the impractical and downright dangerous impact it will have on the highways and traffic in the area. Already, parking on Sun Hill and Briary Lane makes travelling on these roads extremely tight – they are essentially single-lane roads – and the situation has recently worsened by the closure of the old Morrisons car park in town, meaning more cars are choosing to park on these roads and on Echo Hill itself. On the latter, it is already a common sight to see cars parked on both sides of Echo Hill, making access and a safe throughway very difficult and at times impassable. The idea of making these roads the access roads firstly for the construction vehicles required for the development and secondly for the c. 168 vehicles owned by the 84 new homes is absolutely mind-boggling.

Please also note that Echo Hill has significant bends in it, not least outside our own home, 7 Echo Hill. It is impossible to see around the corners and the increase of traffic, combined with the danger created by the increasing number of parked cars, makes accidents very likely. I believe there have already been near misses if not actual accidents on the blind bends in the past.

Additionally, Echo Hill is currently home to many families with children. I am very concerned that the increase of through traffic will make this formerly safe cul-de-sac a very dangerous place for children to be. The parked cars, blind bends and increased traffic will make it significantly dangerous for local children simply to cross the road to their own homes. Frankly, 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.

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.

Beyond my concerns about the dangerous traffic, I am additionally concerned about the increased flood risk should the development go ahead. Already, it is common to see high levels of water racing down Echo Hill when there is heavy rain. 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.

The development site also 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.

As an Echo Hill resident, I also wish to place on record my intention, along with my neighbours, to pursue all legal means to enforce the covenants in place on the street. In case you are not yet aware, Echo Hill has restrictive covenants in place which I as a resident of Echo Hill have the benefit of, and I, along with my neighbours, reserve the right to take enforcement action should these covenants be 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.

As part of my objection, I would also like to remind you that applications to develop this land have been rejected previously and that the reasons for their rejection have not changed. For example, 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.

Finally, I am also concerned about the significant environmental impact of the proposed development, on multiple fronts. The impact on Therfield Heath. The loss of high-quality farmland. The impact on biodiversity, including at-risk species – we as residents have

evidence that, for example, badgers populate the land. 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.

As for the Heath, 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.

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

Yours sincerely,

Duncan Moore
Resident, 7 Echo Hill