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Ware
SG12 7JB

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

04/08/2025

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 know the site well. I wish to object strongly to the development in this location, on the following grounds:

Landscape and Visual Impact

The reasons for refusal of the 2018 and 2020/21 planning applications, regarding 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 reasons for refusal should therefore still apply to the current application. 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.

Living Conditions

The residents of the neighbouring properties (Number 25 and 23) of the house to be demolished (Number 24) will have their living standards significantly and detrimentally impacted during both the construction of the proposed access road, and the following habitation of the development. NHDC failed to appropriately assess and address this issue during the last planning application. The elevated location of the development site in relation to the existing surrounding properties, is likely to give rise to existing residents being left with a sense of being overlooked, overshadowed and dominated by new development. This would detrimentally impact on reasonable expectations of residential amenity and privacy.

Highways and Transport

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. 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 gives no consideration to the existing users' 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 driving 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 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. But the site will be heavily car reliant due to the lack of available public transport and the topographical challenges of the site.

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 will not 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 be likely to have an adverse effect on Therfield Heath SSSI and neighbouring LWS.

Agricultural Land

The development of the site will result in the loss of high-quality agricultural land.

To summarise, in consideration of 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.

I urge the Council to consider the strong and well-reasoned objections from residents.

Thank you for your attention,

Yours sincerely

A black rectangular box redacting the signature of Mark and Valerie Wadsworth.

Mark and Valerie Wadsworth