

20/00744/OP - Land opposite Heath Farm Briary Lane Royston Hertfordshire.

The Conservators of Therfield Heath and Greens object to this planning application on the following grounds: -

1. Policy 14: Nature Conservation of the North Hertfordshire District Local Plan or Proposed Local Plan Policy SP12 Green Infrastructure, Landscape and Bio diversity, Proposed Local Plan Policy Policy D4: Air quality and Proposed Local Plan Policy NEx: Strategic green infrastructure

The applicant has not satisfactorily identified or assessed the risk and impact of the development on Therfield Heath as a Site of Special Scientific Interest (SSSI) and a Local Nature Reserve (LNR) in their application. Considering the SSSI Impact Risk Zones identified by Natural England at the eastern end of Therfield Heath we have identified risks that need to be assessed. We believe that the proposed development will have a significant detrimental effect and will harm the SSSI and LNR due to the following: -

Emergency Vehicle Access:

The proposed emergency vehicle access is across common land under our management using a bridleway and other land. We believe the proposed emergency vehicle access will encroach over the SSSI and does not take account or show possible improvements to nature conservation. There are significant potential or detrimental impacts on nature conservation by routing emergency vehicle this way. These impacts have not been assessed in the Ecological Appraisal.

The Conservators do not believe the emergency access route is engineered to meet the minimum access required by Herts Fire and Rescue (e.g. weight bearing capacity of 19 tonnes, 3.7m clearance etc). The application does not detail how the minimum required access standards will be met and the Conservators will not accept responsibility to maintain, make good or sustain the suitability of this route. The route will need to have a clearance of 3.7m and this will require a change in the management of trees that overhang the bridleway from the LNR and from the SSSI. These trees form an important buffer to the LNR & SSSI.

Air Pollution:

There will be increased traffic at the Briary Lane - Sun Hill junction accessing and egressing from the proposed development. This constitutes an infrastructure "air pollution" risk to the SSSI. The Air Quality Assessment models an uplift of traffic (both LGV and HGV) on Echo Hill but this uplift is not correspondingly included for the Briary Lane - Sun Hill junction. Traffic simply cannot get to Echo Hill without using Briary Lane and this undermines the credibility of the assessment. This risk is not properly identified, quantified or assessed by the applicant, the proposals do not comply with Policy 14 or the emerging plan policy D4 Air Quality.

Sewer Pipeline:

The proposed sewer pipeline is to be routed below the bridleway. An assessment of the water assets below the bridleway (water supply pipes to Royston), suggests the sewer will need to be routed either under the SSSI and below the tree fringe, or under the LNR which we object to. Either routing is in breach of Policy 14 Nature Conservation as the pipeline will directly impact the trees on the SSSI and will not encourage the potential nature conservation value of the site.

Sustainable Drainage:

The design includes a surface drainage basin. We believe the surface water management methods and its proximity to the LNR, which is at a lower level is likely to harm the nature conservation, which is contradictory to Policy 14 and the emerging local plan Policy NEx, Strategic Green Infrastructure.

Increased Dwellings:

The increase in the number of people living within close proximity of the SSSI and LNR will have a profound negative impact on wildlife. For example the increased numbers of domestic pets, such as cats will have a negative impact on the wildlife in this area. A full assessment of this and similar risks has not been made and their impacts on the SSSI have not been quantified.

Pedestrian route to amenities:

The proposed 'pedestrian route to amenities' (see Transport Assessment p155) is routed across rough ground which seasonally is given to tall grass, wildflowers and nettles. Our management of this space does not recognise the need for such a footpath given there is an adjacent unmade bridleway and we will not be introducing tactile paving or maintaining a path suitable for all users (including those less able) across the nature reserve.

2. Planning Obligations SPD, Policy 51 of the North Hertfordshire District Local Plan No. 2 - with Alterations (Saved Policies 2007) or Proposed Local Plan Policy SP 7 (part e) and HS2 of the Council's Proposed Submission Local Plan (2011-2031)

The submitted planning application has not been accompanied by a valid legal undertaking (in the form of a Section 106 obligation) securing the provision of 40% affordable housing and other necessary obligations as set out in the Council's Planning Obligations Supplementary Planning Document (SPD) (adopted November 2006) and the Planning obligation guidance - toolkit for Hertfordshire: Hertfordshire County Council's requirements January 2008.

The applicant has not worked with the Conservators of Therfield Heath and Greens who are the statutory authority responsible for the general management of the SSSI, the Local Nature Reserve and the land under the bridleway or the Trustees of the Therfield Regulation Trust as a landowner, to seek to overcome known obstacles that affect the SSSI and Nature Reserve which are listed in this objection

3. Built Form and Landscape



Figure 1: Part of Annotated Photograph from Landscape Appraisal

The Conservators object to the development due to the buildings on this site will be visible from the Heath (Lankaster Hill) on the grounds that it breaks up the skyline, which would act to occasion a marked and adverse change in the character of the immediate and intermediate locality and wider valued landscape.

Conclusion

Conservators strongly object to this application on the collective negative impacts outlined above, as they are all in contradiction of saved Policy 14: Nature Conservation and the emerging local plan policies SP12, D4 and NEx, which we believe give significant valid reasons to reject this application.