



Mr Tom Allington
Planning and Building Control
North Hertfordshire District Council
Council Offices
Gernon Road
Letchworth Garden City
Herts SG6 3JF

Our Ref:

Your Ref:

14th April 2021 (by email)
V2 with corrected app. ref. no.

Dear Mr Allington,

Application No. 21/00765/OP

Outline Planning Application for Residential Development of up to 280 dwellings (including affordable housing) with all matters reserved except for access which is to be taken from Barkway Road, green infrastructure including public open space, landscape boundaries and SUDS at Land off Barkway Road and north of Flint Hall, Barkway Road, Royston

I write with reference to the above application for a speculative development of up to 280 houses, to which CPRE Hertfordshire objects strongly for the following reasons.

1. It is noted that the applicant has not sought a screening opinion relating to the need for an Environmental Impact Assessment within the requirements of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. The criteria in Schedule 2 of the EIA regulations indicate that an Environmental Statement is required if a proposed development exceeds the following thresholds:
 - i) Urban development projects
 - ii) development includes more than 150 dwellings
 - iii) overall area of the development exceeds 5 hectares.
2. Further, we suggest that the proposal satisfies the criteria for EIA in Schedule 3 with regard to the size of the proposal (up to 280 units on 18 hectares), the location in a protected area, and the potential impact by virtue of the area of agricultural land affected.
3. The land identified for this proposed development is designated as Rural Area beyond the Green Belt in Policy 6 of the adopted North Herts Local Plan (NHLP) and Policy SP5 of the submission NHLP and afforded protection by the National Planning Policy Framework (NPPF). Adopted Local Plan Policy 6 requires "maintaining the existing countryside and villages and their character". Submission Local Plan Policy SP5 notes that the Council "will operate a general policy of restraint in Rural Areas Beyond the Green Belt".



4. This speculative application for development is not required by the submission Local Plan to satisfy the Council's objectively assessed need for housing and takes no account of the Council's policies for the protection of open countryside and agricultural land. There is no basis for the consideration of this proposal other than according to both adopted and emerging Council and national policy guidance regarding protected countryside.
5. The site is entirely open agricultural land forming the clear and well defined southern boundary to the built up area of Royston. This application is wholly without merit and we urge the Council to reject it.

Yours sincerely,

Chris Berry
Planning Manager