

The Conservators of Therfield Heath and Greens

The Therfield Regulation Trust
c/o Royston Golf Club, Baldock Rd, Royston, SG8 5BG
Registered Charity No. 277881
Chair: Clive Hall



**THERFIELD
HEATH
& GREENS**

Wednesday, 3 September 2025

By Email only to Tom.Rea@north-herts.gov.uk

Dear Mr Rea,

Re 25/00104/FP - Residential development to provide 9 flats (Land To The Rear Of Banyers Hotel King James Way Royston Hertfordshire SG8 7BZ)

Thank you for consulting The Conservators of Therfield Heath and Greens regarding Planning matter 25/00104/FP - Residential development to provide 9 flats with associated vehicular parking and access via existing dropped kerb from King James Way with ancillary bike and refuse store - Land to the rear of Banyers Hotel King James Way Royston Hertfordshire SG8 7BZ.

The development is of a size and proximity to Therfield Heath SSSI to trigger the Therfield Heath SSSI Mitigation Strategy from the NHC Local Plan 2022 (being within the inner 1.9km inner zone of influence).

To date we have not had discussions with the developer or seen any proposals they have. If they have made suggestions for onsite mitigation we would like to hear them.

We note the advice you have received from Natural England and echo the need to ensure proportionate measures in support of the Therfield Heath SSSI mitigation strategy.

As we all recognise Therfield Heath SSSI is a very important greenspace both locally and nationally and much needed contributions, via s106, are used by our volunteers and staff to sustain this important reserve.

Therfield Heath SSSI Mitigation Strategy Benchmarks

Under the strategy the developer is expected to fund measures to mitigate the impact on the SSSI of housebuilding. The benchmark (see page 44 of the strategy) focusses on the Ivy Farm 3 development (Feb 2019) which is within the 1.9km inner zone of influence.

In summary the benchmark establishes that a development in this 1.9km zone should provide:

- On-site high quality SANG at or above 8 ha per 1000 population
- £1000 (indexed) per dwelling for “management measures” to mitigate the impact on the SSSI of housebuilding
- A capital contribution towards facilities on or near the Heath, (the benchmark was £100k for the development)

Presently there is no benchmark for the outer 5.8km zone. However the strategy considers the impacts within this zone as being 4/7 of those in the inner zone (the inner zone producing an average of 14 visits as per § 2.2.9 and the outer zone only 8 as per § 2.2.11).

The SSSI mitigation strategy also recognises that, given the more rural nature within this zone, one would not expect the SANG requirement to be driven by the requirements therein. As such in this zone the only contributions are likely to be financial. Using the 4/7 proportion the benchmark figure is £570 per dwelling (indexed).

As at Q1 2025 the indexation has increased the benchmark sums to about £1190 per dwelling for the inner zone and £680 per dwelling for the outer zone. Each agreement should recalculate the indexed figure based on the date of the agreement. Within NHC the team handling these sums (as they are paid) know this calculation.

S106 from this development

Currently the site provides no usable public open greenspace for recreation, and hence there is no loss of amenity caused by this development that might increase footfall on the SSSI or otherwise change patterns of use.

The site has no plan for SANG being of a scale where this is not necessary.

The Conservators view that it is appropriate to request a payment per dwelling at a value that is proportionate to the strategy benchmark (after indexation). No capital or SANG provision is being sought at this scale and location. An indicative figure after indexation to Q1 2025 is £1190 per dwelling.

Reading the comments there is a lack of clarity if this is 9 or 10 dwellings and the Conservators are happy that you apply your discretion when making the calculation, retaining any reasoning.

The strategy also asks that funding be directed at specific projects. This can be tricky to achieve when there is a delay between initiatives on the Heath and payments coming on stream, so the Conservators would like to suggest a project with a fall back should that project for whatever reason not go ahead or should the money not be on stream at the right moment to fund it.

Target Initiative and Fall back

Recently the Conservators have begun a study / review of our dog bin provision with a view to minimising enrichment and maximising the number of people who take their dog waste home with them. The Conservators do not want dog bins, but without some bins, we think enrichment will get out of control. Winning hearts and minds to get all people to always take home will take a big shift in attitudes. Conservators are likely to need to replace a number of bins, and will probably re-locate some. We would like to use the bins to carry messaging about our longer term goal.

Our estimate of the cost of this initiative is between £10k and £15k depending on the recommendations from the study and how much is done by volunteers. We believe this initiative will meet the requirements of NE and NHC in delivering the SSSI Mitigation Strategy and make a useful contribution to minimising enrichment.

In the event that a fall back becomes necessary we would suggest the funds are logged against “Management Measures” which as described in the strategy will fund warden and other activities. To assist our cash flow we would like you to stipulate the funds come on stream when development commences.

In summary our recommendation is:

The developer commits to pay £1190 per dwelling in this development, for the "Dog Bins initiative" via a s106. Payment to be made in full when development commences.

If the development is delayed, or the dog bins initiative does not proceed, or too much time passes such that payment can no longer be linked to the dog bins initiative, then the same amount of S106 will go into the unallocated "Management Measures" fund to be assigned to another initiative via the NHC / NE process and / or to continue to fund the Warden roles as described in the strategy document.

The Conservators hope this meets with your expectation. Should it not, or should you think there are other factors to consider, we suggest a brief meeting involving yourself, ourselves and Natural England to understand what issues or other factors may be in play. The strategy promotes a collaborative and continuous review / improvement style approach and so such a meeting would be appropriate if one is needed.

Finally, these funds are vital for the survival of the SSSI and the Heath. The Heath itself having defined historical; cultural and natural importance to everyone in the neighbourhood.

We are grateful you sought our input.

Your sincerely,



Carol Fossick
Clerk to the Conservators of Therfield Heath
Clerk to the Trustees of the Therfield Regulation Trust