

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

Friday, 26 September 2025

By email to planning.control@north-herts.gov.uk
And
sarah.kasparian@north-herts.gov.uk

Dear Ms Kasparian

24/01013/HYA - Hybrid application for residential development of up to 325 dwellings comprising (a) full planning application for Phase 1 comprising 102 dwellings and associated infrastructure including access from Newmarket Road, emergency and pedestrian/cycle access from Burloes Hall Drive, internal highways, public open space, landscaping and drainage and b) outline application for up to 223 dwellings and associated infrastructure with all matters reserved apart from primary means of access and emergency and pedestrian/cycle access from Burloes Hall Drive. (Land Surrounding Burloes Cottages, Newmarket Road, Royston, Hertfordshire)

Thank you for consulting The Conservators of Therfield Heath and Greens regarding the s106 relating to the above planning matter (Land Surrounding Burloes Cottages, Newmarket Road, Royston, Hertfordshire).

This representation outlines what the Conservators believe to be appropriate s106 commitments.

Application and Location Considerations

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 zone of influence.

On behalf of the applicants FPCR have produced a document Recreational Mitigation Strategy – Therfield Heath SSSI (April 2024) (herein termed **RMS**) and CERES Property have issued a Planning Statement Addendum (July 2025) (herein termed **PSA**)

The PSA and RMS indicate an on-site SANG of 3.9 ha / 1000 population and a 2.69 km permissive footpath secured for public use for 80 years.

Neither PSA nor RMS deal with the tiers under the Accessible Natural Greenspace Standards Model (AnGST) (See Therfield Heath SSSI Mitigation Strategy 3.2.4) from which it is clear that Therfield Heath SSSI/LNR are the local choice for a 20ha site within 2km from home; and the 100ha site within 5km.

Natural England's 2nd response dated 13 August 2025 states their expectation:

*“... delivery of >3ha of on-site open space, dog waste bins, signage, on-site management and maintenance plan, a proposed circular 2.7km permissive path to be secured in perpetuity **plus***

an appropriate financial contribution to the onsite mitigation/management on Therfield Heath SSSI/LNR, all of which will be secured through the s106 agreement.” [our emphasis]

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

Therfield Heath SSSI Mitigation Strategy Benchmark

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 also 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)

N.B. As at Q1 2025 the indexation has increased the benchmark to about £1190 per dwelling for the inner 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

The Conservators acknowledge that while on-site high quality SANG at or above 8 ha per 1000 population is not being provided, the provision of on-site SANG of 3.9 ha / 1000 population and a 2.69 km permissive footpath secured for public use for 80 years can be considered equivalent.

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). An indicative figure after indexation to Q1 2025 is £1190 per dwelling. For 325 dwellings that is £386,750 at current indexation.

This sum should be for “Management Measures” which (as described in the strategy) will fund a Warden and other activities.

In addition, and proportional to the strategy benchmark, (after indexation) the Conservators would like to see a £138,600 capital contribution towards Visitor / Education facilities and their related infrastructure (water, power etc.), see page 39 of the strategy document.

To assist our cash flow, we would like you to stipulate the funds come on stream on the occupation of the first dwelling in each phase.

Conclusion

The Conservators hope this submission meets with the LPA's expectation, however should it not, or should you think there are other factors to consider, we suggest a brief meeting involving the LPA, 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.

These funds are vital for the survival of the SSSI and the Heath. The Heath itself having defined historic, cultural and natural importance to everyone in the neighbourhood, and we are grateful you sought our input.

Your sincerely,

A solid black rectangular box used to redact the signature of Carol Fossick.

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