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BY EMAIL ONLY

Dear Mr Greaves

Planning consultation: Outline application for the erection of up to 84 dwellings with public open space, landscaping and sustainable drainage system (SuDS) following demolition of No. 24 Echo Hill with all matters reserved save for access.
Location: Land Opposite Heath Farm, Briary Lane, Royston, Hertfordshire.

Thank you for your consultation on the above dated 18 July 2025, which was received by Natural England on the same date.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

SUMMARY OF NATURAL ENGLAND'S ADVICE: NO OBJECTION - SUBJECT TO APPROPRIATE MITIGATION BEING SECURED

We consider that without appropriate mitigation the application has potential to damage or destroy the interest features for which Therfield Heath Site of Special Scientific Interest (SSSI) and Local Nature Reserve (LNR) has been notified.

This application falls within the 5.8km zone of influence (Zol) for recreational pressure impacts to Therfield Heath SSSI/LNR and will therefore be expected to deliver a package of mitigation measures and/or financial contributions in accordance with North Hertfordshire Council's Therfield Heath SSSI Mitigation Strategy. We are broadly satisfied with the proposed mitigation measures outlined in the applicant's PEA, subject to these being detailed in an appropriate strategy to be agreed by the LPA, and delivery secured through a relevant planning mechanism

Natural England will be pleased to advise on the preparation of a draft mitigation plan through our Discretionary Advice Service (DAS).

Recreational Disturbance to Therfield Heath SSSI/LNR

Therfield Heath is a Local Nature Reserve (LNR). It is nationally designated as a Site of Special Scientific Interest (SSSI), regarded to be of international importance for its Chalk Grassland Habitats and presence of Chalkhill Blue butterfly *Lysandra coridon*. The interest features of these habitats are vulnerable to recreational impacts and within recent years there has been increasing concern regarding the significant increases in visitor numbers, linked to nearby residential development.

Natural England and the Conservators of Therfield Heath and Greens have highlighted that current number of visitors appears to be exceeding the carrying capacity of the SSSI /LNR. Further pressure associated with new residential development could cause additional damage to already impacted SSSI features, such as Chalk grassland, which is experiencing detrimental soil nutrient balance impact arising from dog littering.

Prompted by the above concerns Natural England commissioned Footprint Ecology to undertake a Visitor Access Study to identify the range and level of visitor use at Therfield Heath SSSI, in relation to the nature conservation interest, and to make recommendations relating to the management of access at the site. The Study has identified that the majority (75%) of regular visitors to the SSSI travel from within a 5.8km radius of the site; 50% of visitors originate from within 2km of the SSSI. It confirms that new residential development within close proximity to Therfield Heath SSSI is likely to contribute additional visitor pressure which could have a significant adverse effect on notified features. The Study recommends a number of mitigation measures to help address these adverse impacts.

North Hertfordshire Council has used the findings and recommendations of the Footprint Ecology Study to prepare a [Therfield Heath SSSI Mitigation Strategy](#). The Strategy sets out measures that will be used to manage the additional recreational impact of new housing development, including Local Plan allocations, on Therfield Heath SSSI. It identifies a 2km inner Zone of Influence (Zol) and 5.8km wider Zol around the SSSI based upon the findings of the Footprint Ecology visitor survey. The Strategy sets out mitigation principles that new housing development is expected to apply to limit additional pressure on the SSSI, differentiating between housing development with the inner and outer Zols, and also larger housing developments beyond the Zol where evidence clearly indicates that development could adversely impact the SSSI. The Strategy will enable the Council to require that relevant new housing development within (and potentially beyond the Zol) provides appropriate mitigation and / or proportionate financial contributions towards delivery of SSSI access management measures, to protect and enhance the resilience of the SSSI and ensure that development is sustainable.

Natural England's Impact Risk Zones (IRZs) have been amended to reflect the 5.8km Zol for recreational pressure effects on Therfield Heath SSSI. These can be used to ensure that planning applications for 'relevant housing development' are accompanied by a robust assessment of the effects of recreational pressure and a package of mitigation measures to address adverse impacts, in line with the measures set out in the Therfield Heath Mitigation Strategy.

The current application falls within the 5.8km Zol for Therfield Heath SSSI/LNR and is therefore required to assess and mitigate any adverse recreational pressure impacts on the SSSI in accordance with the North Hertfordshire Council Therfield Heath SSSI Mitigation Strategy, as described above. We would expect mitigation measures, or financial contributions, to be proportionate to those already provided for similar new residential development. The measures should be designed in consultation with the Conservators of Therfield Heath and Greens, Natural England and the LPA and their delivery secured through an appropriate planning mechanism.

The Preliminary Ecological Appraisal (CSA Environmental, June 2025) (PEA) acknowledges the above and indicates that the proposed development will deliver c. 5.89ha of green infrastructure, significantly in excess of Natural England's recommended SANG 8ha/1000 population standard. This will potentially include a community orchard, circular walking routes and areas of amenity grassland and grassland restoration. The PEA concludes that subject to securing this open greenspace, and financial contributions to Therfield Heath SSSI mitigation strategy, through an appropriately worded condition, no significant adverse effects are anticipated on Therfield Heath SSSI/LNR. Natural England broadly agrees that subject to these mitigation measures, and arrangements for their long-term management, being set out in a detailed strategy to be agreed by the LPA, and delivery secured through a relevant planning mechanism, proposed development is unlikely to have an adverse impact on the SSSI and we have no objection. The applicant's strategy should take heed of Natural England's detailed advice on appropriate measures to minimise recreational pressure impacts on the SSSI, provided at the pre-application stage.

Natural England advises that permission should not be granted until such time as these mitigation measures and their long-term management have been detailed in an appropriate strategy and delivery secured through the appropriate means. We will be pleased to review the applicant's draft strategy through Natural England's [Discretionary Advice Service](#).

Other advice

Natural England agrees with the findings of the applicant's PEA that other statutorily designated sites, including Holland Hall (Melbourn) Railway Cutting SSSI, are unlikely to be adversely impacted by the proposed development.

Further general advice on the consideration of protected species and other natural environment issues is provided at Annex A.

Please note that if your authority is minded to grant planning permission contrary to the advice in this letter, you are required under Section 281 (6) of the Wildlife and Countryside Act 1981 (as amended) to notify Natural England of the permission, the terms on which it is proposed to grant it and how, if at all, your authority has taken account of Natural England's advice. You must also allow a further period of 21 days before the operation can commence.

This concludes Natural England's advice at this stage which we hope you will find helpful.

Please consult us again once the information requested above, has been provided.

If you have any queries relating to the advice in this letter please contact Betsy Brown via consultations@naturalengland.org.uk.

Should the proposal change, please consult us again.

Yours sincerely

Betsy Brown

Sustainable Development – West Anglia Team

Annex A – Natural England’s general advice

Wider landscapes

Paragraph 187 of the NPPF highlights the need to protect and enhance valued landscapes through the planning system. This application may present opportunities to protect and enhance locally valued landscapes, including any local landscape designations. You may want to consider whether any local landscape features or characteristics (such as ponds, woodland, or dry-stone walls) could be incorporated into the development to respond to and enhance local landscape character and distinctiveness, in line with any local landscape character assessments. Where the impacts of development are likely to be significant, a Landscape and Visual Impact Assessment should be provided with the proposal to inform decision making. We refer you to the [Guidelines for Landscape and Visual Impact Assessment \(GLVIA3\) - Landscape Institute](#) for further guidance.

Biodiversity duty

Section 40 of the [Natural Environment and Rural Communities Act 2006 \(legislation.gov.uk\)](#) places a duty on the local planning authority to conserve and enhance biodiversity as part of its decision making. We refer you to the [Complying with the biodiversity duty - GOV.UK \(www.gov.uk\)](#) for further information.

Protected Species

Natural England has produced [Protected species and development: advice for local planning authorities - GOV.UK](#) (standing advice) to help planning authorities understand the impact of particular developments on protected species.

Natural England will only provide bespoke advice on protected species where they form part of a Site of Special Scientific Interest or in exceptional circumstances. A protected species licence may be required in certain cases. We refer you to [Wildlife licences: when you need to apply \(www.gov.uk\)](#) for more information.

Local sites and priority habitats and species

The local planning authority should consider the impacts of the proposed development on any local wildlife or geodiversity site, in line with paragraphs 187, 188 and 192 of the NPPF and any relevant development plan policy. There may also be opportunities to enhance local sites and improve their connectivity to help nature’s recovery. Natural England does not hold locally specific information on local sites and recommends further information is obtained from appropriate bodies such as the local environmental records centre, wildlife trust, geoconservation groups or recording societies. Emerging [Local nature recovery strategies - GOV.UK \(www.gov.uk\)](#) may also provide further useful information.

Those habitats and species which are of particular importance for nature conservation are included as ‘priority habitats and species’ in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest on the Magic website or as Local Wildlife Sites. We refer you to [Habitats and species of principal importance in England \(gov.uk\)](#) for a list of priority habitats and species in England. You should consider priority habitats and species when applying your ‘biodiversity duty’ to your policy or decision making

Natural England does not routinely hold priority species data. Such data should be collected when impacts on priority habitats or species are considered likely.

Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land. We refer you to the [Brownfield Hub - Buglife](#) for more information and Natural England’s [Open Mosaic Habitat \(Draft\) - data.gov.uk](#) (Open Mosaic Habitat inventory), which can be used as the starting point for detailed brownfield land assessments.

Biodiversity and wider environmental gains

Development should provide net gains for biodiversity in line with the NPPF paragraphs 187(d), 192 and 193. Major development (defined in the [National Planning Policy Framework](#)

(publishing.service.gov.uk) glossary) is required by law to deliver a biodiversity gain of at least 10% from 12 February 2024 and this requirement is also applies extended to small scale development from April 2024. For nationally significant infrastructure projects (NSIPs), it is anticipated that the requirement for biodiversity net gain will be implemented from 2025.

[Biodiversity Net Gain](https://www.gov.uk/guidance/biodiversity-net-gain) guidance (gov.uk) provides more information on biodiversity net gain and includes a link to the [Biodiversity Net Gain Planning Practice Guidance](https://www.gov.uk/guidance/biodiversity-net-gain-planning-practice-guidance) (gov.uk).

The statutory biodiversity metric should be used to calculate biodiversity losses and gains for terrestrial and intertidal habitats and can be used to inform any development project. We refer you to [Calculate biodiversity value with the statutory biodiversity metric](https://www.gov.uk/guidance/calculate-biodiversity-value-with-the-statutory-biodiversity-metric) for more information. For small development sites, [The Small Sites Metric](https://www.gov.uk/guidance/the-small-sites-metric) may be used. This is a simplified version of the statutory biodiversity metric and is designed for use where certain criteria are met.

The mitigation hierarchy as set out in paragraph 193 of the NPPF should be followed to firstly consider what existing habitats within the site can be retained or enhanced. Where on-site measures are not possible, provision off-site will need to be considered.

Where off-site delivery of biodiversity gain is proposed on a special site designated for nature (e.g. a SSSI or habitats site) prior consent or assent may be required from Natural England. More information is available on [Sites of Special Scientific Interest: managing your land](https://www.gov.uk/guidance/sites-of-special-scientific-interest-managing-your-land)

Development also provides opportunities to secure wider biodiversity enhancements and environmental gains, as outlined in the NPPF (paragraphs 8, 77, 109, 125, 187, 188, 192 and 193). Opportunities for enhancement might include incorporating features to support specific species within the design of new buildings such as swift or bat boxes or designing lighting to encourage wildlife.

[The Environmental Benefits from Nature Tool - Beta Test Version - JP038 \(naturalengland.org.uk\)](https://www.naturalengland.org.uk/Tools/Environmental-Benefits-from-Nature-Tool-Beta-Test-Version-JP038) may be used to identify opportunities to enhance wider benefits from nature and to avoid and minimise any negative impacts. It is designed to work alongside the statutory biodiversity metric.

[Natural environment - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/natural-environment) provides further information on biodiversity net gain, the mitigation hierarchy and wider environmental net gain.

Best and most versatile agricultural land and soils

Local planning authorities are responsible for ensuring that they have sufficient detailed agricultural land classification (ALC) information to apply NPPF policies (Paragraphs 187, 188). This is the case regardless of whether the proposed development is sufficiently large to consult Natural England. Further information is contained in the [Guide to assessing development proposals on agricultural land - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/guide-to-assessing-development-proposals-on-agricultural-land). [Find open data - data.gov.uk](https://data.gov.uk/dataset/open-data) on Agricultural Land Classification or use the information available on [MAGIC \(defra.gov.uk\)](https://www.defra.gov.uk/magic).

The Defra [Construction Code of Practice for the Sustainable Use of Soils on Construction Sites \(publishing.service.gov.uk\)](https://www.gov.uk/guidance/construction-code-of-practice-for-the-sustainable-use-of-soils-on-construction-sites) provides guidance on soil protection, and we recommend its use in the design and construction of development, including any planning conditions. For mineral working and landfilling, we refer you to [Reclaim minerals extraction and landfill sites to agriculture - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/reclaim-minerals-extraction-and-landfill-sites-to-agriculture), which provides guidance on soil protection for site restoration and aftercare. The [Soils Guidance \(quarrying.org\)](https://www.gov.uk/guidance/soils-guidance) provides detailed guidance on soil handling for mineral sites.

Should the development proceed, we advise that the developer uses an appropriately experienced soil specialist to advise on, and supervise soil handling, including identifying when soils are dry enough to be handled and how to make the best use of soils on site.

Green Infrastructure

For evidence-based advice and tools on how to design, deliver and manage green and blue

infrastructure (GI) we refer you to [Green Infrastructure Home \(naturalengland.org.uk\)](https://naturalengland.org.uk) (the Green Infrastructure Framework). GI should create and maintain green liveable places that enable people to experience and connect with nature, and that offer everyone, wherever they live, access to good quality parks, greenspaces, recreational, walking and cycling routes that are inclusive, safe, welcoming, well-managed and accessible for all. GI provision should enhance ecological networks, support ecosystems services and connect as a living network at local, regional and national scales.

Development should be designed to meet the 15 [GI How Principles \(naturalengland.org.uk\)](https://naturalengland.org.uk). The GI Standards can be used to inform the quality, quantity and type of GI to be provided. Major development should have a GI plan including a long-term delivery and management plan. Relevant aspects of local authority GI strategies should be delivered where appropriate.

The [Green Infrastructure Map \(naturalengland.org.uk\)](https://naturalengland.org.uk) and [GI Mapping Analysis \(naturalengland.org.uk\)](https://naturalengland.org.uk) are GI mapping resources that can be used to help assess deficiencies in greenspace provision and identify priority locations for new GI provision.

Access and Recreation:

Natural England encourages any proposal to incorporate measures to help improve people's access to the natural environment. Measures such as reinstating existing footpaths, together with the creation of new footpaths and bridleways should be considered. Links to urban fringe areas should also be explored to strengthen access networks, reduce fragmentation, and promote wider green infrastructure.

Rights of Way, Access land, Coastal access and National Trails:

Paragraphs 105, 185, 187 and 193 of the NPPF highlight the important of public rights of way and access. Development should consider potential impacts on access land, common land, rights of way and coastal access routes in the vicinity of the development.

Consideration should also be given to the potential impacts on any nearby National Trails. We refer you to [Find your perfect trail, and discover the land of myths and legend - National Trails](#) for information including contact details for the National Trail Officer.

The King Charles III England Coast Path (KCIIIECP) is a National Trail around the whole of the English Coast. It has an associated coastal margin subject to public access rights. Parts of the KCIIIECP are not on Public Rights of Way but are subject to public access rights. Consideration should be given to the impact of any development on the KCIIIECP and the benefits of maintaining a continuous coastal route.

Appropriate mitigation measures should be incorporated for any adverse impacts on Rights of Way, Access land, Coastal access, and National Trails.

Further information is set out in the Planning Practice Guidance on the [Natural environment - GOV.UK \(www.gov.uk\)](https://www.gov.uk).