

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

Tuesday, 28 October 2025

**By Email to
tom.rea@north-herts.gov.uk and
Planning Control**

Dear Mr Rea

**Full Planning Permission 25/01539/FP
Extension and conversion of the existing barn into a five bedroom dwelling**

Thank you for your letter of 1 July 2025 consulting The Conservators of Therfield Heath and Greens regarding planning application 25/01539/FP - Extension and conversion of the existing barn into a five bedroom dwelling (Holborn Farm, Dane End, Therfield, Royston, Hertfordshire, SG89RH).

We note that Natural England have written to you because 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 5.8km outer zone of influence).

Natural England's response confirms that this application falls within the 5.8km zone of influence (ZoI) for recreational pressure impacts to Therfield Heath SSSI/LNR and the developer 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.

Mitigation measures will need to be agreed with Natural England, the Conservators of Therfield Heath and Greens and the LPA and their delivery secured through an appropriate planning mechanism. As we all recognise Therfield Heath SSSI is a very important greenspace both locally and nationally. These much-needed contributions are directed by our volunteers and staff to sustain this important SSSI reserve.

We do note that a report has been written for the planning control committee and at page 18 (paragraph 4.3.45) it is also stated that :

"The Court of Appeal determined in May 2016 that tariff style planning obligations should not be sought from small scale and self-build development and such circumstances included developments of ten units or less."

Nevertheless as Natural England has recommended that we agree mitigation measures in accordance with the Therfield Heath SSSI Mitigation Strategy we are providing these to you.

We presume this is needed because securing mitigation to site-specific harms (such as highways, access arrangements and environmental protection) may still be required; accordingly if these cannot not be dealt with via planning conditions, s106 obligations may be needed.

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 the inner 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. We have suggested, in our comments made in respect of 25/00886/FP ¹, that the correct way to approach this is to consider what is said in the strategy regarding the impacts within this outer zone ² and using the referred to 4/7 proportion we will arrive at the benchmark figure of £570 per dwelling (indexed).

As at Q1 2025 the indexation has increased the benchmark 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 in) know this calculation.

S106 from this development

The Conservators view that it is appropriate to request a payment per dwelling at a value that is proportionate to 4/7 of the inner zone strategy benchmark (after indexation). No capital or SANG provision is being sought from this development based on it being rural and in the outer zone.

An indicative figure after indexation to Q1 2025 is, as we say, £680 per dwelling.

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 feasibility that will lead to a Signage and Website project focussing on increasing visits to our Greens in Therfield. One of the barriers to the general public using the Greens in Therfield (rather than Therfield Heath SSSI) is a lack of understanding of where they are, and what facilities and experiences they offer to visitors.

This project is intended to plan, monitor and drive visitor interest in the Greens as an alternative to Therfield Heath SSSI. In some cases, we expect this project to spin off other funding requirements

¹ Erection of 14 dwellings and associated infrastructure (Reed House Jacksons Lane Reed Royston Hertfordshire SG8 8AB)

² Impacts being 4/7 of those in the inner zone because the inner zone is producing an average of 14 visits as per § 2.2.9 and the outer zone only 8 as per § 2.2.11. The strategy also recognises that given the nature of the outer zone being more rural it would not expect to drive any SANG requirement. In this zone the only contributions are likely to be financial

for car park spaces etc. The focus of this spend will be on Signage and accessible website information so we can build on existing routes set up and waymarked by Therfield Parish Council.

We believe this initiative will meet the requirements of NE and NHC in delivering the SSSI Mitigation Strategy and make a useful contribution to shifting some footfall away from the SSSI.

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 that the funds come on stream when development commences.

In summary our recommendation is that funds are paid to the Conservators/Therfield Regulation Trust as follows :

The developer commits to pay £680 per dwelling in this development, for the "Signage and Web initiative (Greens)" via a s106. Payment to be made in full when development commences.

If the development is delayed, or this initiative does not proceed, or too much time passes such that payment can no longer be linked to the initiative, then the same amount of \$106 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. However, 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.

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.

We are grateful you sought our input.

Yours sincerely,

Your sincerely,



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