

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**

FAO: Ben Glover
Senior Planning Officer
North Hertfordshire District Council
Council Offices
Gernon Road
Letchworth Garden City
Hertfordshire
SG6 3JF
11 August 2025

Re: 25/01708/OP Land opposite Heath Farm, Briary Lane, Royston, Hertfordshire

Dear Mr Glover,

I write as Chair of the Conservators of Therfield Heath and Greens and on behalf of the Trustees of The Therfield Regulation Trust in the absence of our Clerk who is on holiday.

Background

The Conservators are a statutory body created by an 1888 Act of Parliament and a subsequent 1893 Award to manage and regulate the common land now known as Therfield Heath and Greens. The Therfield Regulation Trust are recorded at HMLR as the landowners of Therfield Heath and Greens.

The Heath and Greens, their regulation, and rights of use are a rare and early example of land provided for public wellbeing as well as for rights of common. The common, now 132 years old, has played a significant role in the culture and history of Therfield, Royston and the neighbourhood. The common also has national historical significance from its scheduled monuments, the time of King James 1, as well as recreational significance being host to one of the oldest golf courses outside Scotland. Its cultural impact on Royston is significant and well documented.

For these reasons Therfield Heath and Greens in its entirety should be considered a non-designated heritage asset requiring protection under planning legislation as described in the NPPF.

Lack of Consultation

The Conservators are disappointed not to have been consulted about this application by NHC as it is for multiple dwellings and will have an impact on Therfield Heath. The Therfield Heath SSSI Mitigation Strategy – Nov 2022, which is part of the North Hertfordshire Local Plan, should have ensured the Conservators were consulted as this development is within the 1.9km inner Zone of Influence as defined in that document,

Landscape Impact on Therfield Heath

Two previous applications, (2018 and 2021), were refused because of the adverse effects on the character of the area and views, particularly around Therfield Heath (SSSI). This application does not address those legitimate grounds for refusal and should similarly be refused.

The Royston Urban Design Assessment (2007) quoted by the applicant states: “A low-density boundary around Royston will transition into the countryside, protecting scenic views, especially from Therfield Heath, and preserving the prominence of St. John’s Church as a landmark”. This application gets rid of the current countryside zone and fills it with additional low density housing without protecting the scenic views from Therfield Heath.

The photograph below shows the countryside view from the Heath that will become housing.

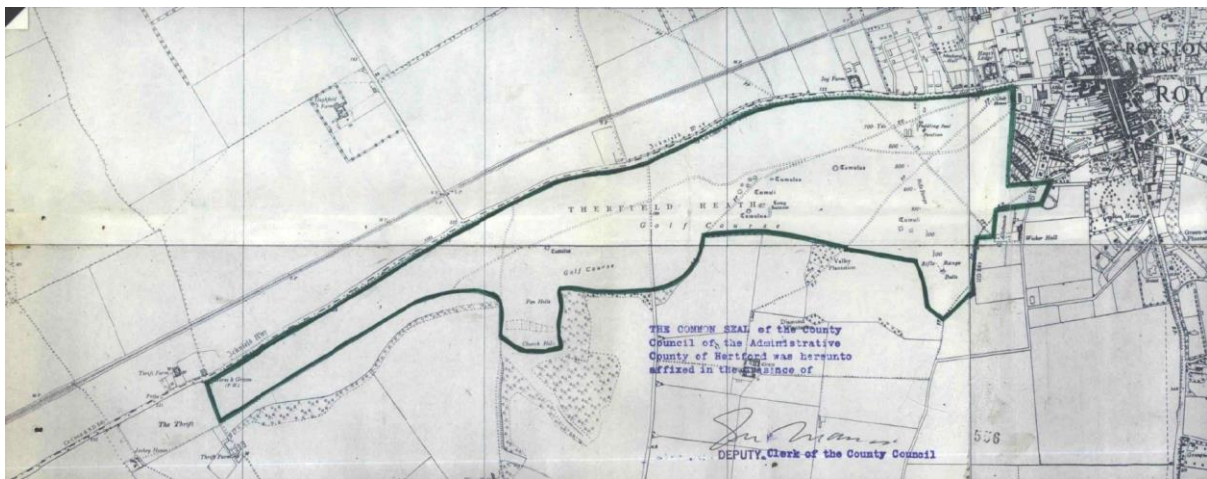


Significant Errors and Inaccuracies

The applicant has also included various documents in support of their plans. Unfortunately had the Conservators been consulted we would have clarified far earlier that there are fundamental factual flaws in the application documents. For example the extents of the Local Nature Reserve and Therfield Heath itself are repeatedly incorrectly stated.

Hertfordshire County Council's Commons Team are the Commons Registration Authority locally and are responsible to maintain maps of registered common land. Had the applicant done basic research they could have accurately shown the extent of CL92 – Therfield Heath.

Similarly had the applicant asked the Conservators or Hertfordshire County Council for a map of the Local Nature Reserve they would have been provided with the map below which is the map from when the LNR was created in 1973.



If the applicant is unable to replicate accurately the designations within its own documents then it seems impossible that they can claim that the development can be sensitively integrated with those designations.

The designations and/or their relationship with the development's red line boundary are shown incorrectly or omitted entirely in the Development Framework Plan, the Design and Access Statement, the PEA, the Phase 1 Desk Study, the Arboricultural Assessment, the Air Quality Assessment, and the Heritage Statement.

These errors are so frequent and significant that we would suggest the applicant seek advice from the Conservators and other bodies to correct these errors before progressing the application further. If they do not correct these errors then the potential is that the applicant will have mislead other consultees and ultimately will mislead the council.

Community Involvement

It is noted that the applicant did not include the democratically elected Conservators, or the association who hold the common land directly north of the development as an Area of

Community Value, or the Friends of Therfield Heath and Greens, or the landowners, or any occupiers of the Heath in their community involvement initiative.

Access

The Conservators would be grateful to see the access section of any Construction Management Plan. This is because we understand the proposed access for construction vehicles and later the residents will be via Briary Lane to Sun Hill, then via Sun Hill and Echo Hill. In places this route is very narrow (for example at the disabled parking space on Sun Hill) it is 2.86m from inside the disabled marking to the roadside kerb edge. I understand that including mirrors an HGV can be 3.1m and without mirrors 2.6m.



We also note this section of Sun Hill is across the Heath, (as can be seen from accurate mapping of the common). Unfortunately there is already damage to the Heath, (which at this point is a local nature reserve), by HGVs and other vehicles including the refuge collection service who, (as has been reported), mount the curb and drive over the common.

To respect the nature and use of this area for recreation (including the traditional play space for children) the Conservators would require an alternative route be mandated for construction traffic and other large vehicles (removal lorries, delivery lorries, HGVs etc.) accessing to and from this development that avoids using routes that cross the Heath.

The extent to which the Conservators can directly limit access via this route under their bylaws, and by other statutes (that prohibit driving on common land), should be considered by the council as it may make this development undeliverable.

S106 or S278 contributions

There is no clear indication of what S106 or S278 contributions would be secured. Permission was refused on these grounds previously, and therefore must also be refused again.

Conclusions

The Conservators view this application as having a negative impact on Therfield Heath and would like to see it refused.

If the Conservators can be of help further help to NHC with this application then please do get in contact.

Yours sincerely,

Clive Hall

Chair of the Conservators of Therfield Heath and Greens