

Date: 25 July 2025
Our ref: 519413
Your ref: 25/00104/FP



North Hertfordshire District Council
Greater Cambridge Shared Planning

Customer Services
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

BY EMAIL ONLY

Dear Sir or Madam,

Planning consultation: 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.

Location: Land To The Rear Of Banyers Hotel King James Way Royston Hertfordshire SG8 7BZ

Thank you for your consultation on the above dated 15 July 2025 which was received by Natural England on 15 July 2025.

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

This application is within the zone of influence (Zol) for recreational pressure impacts to Therfield Heath Site of Special Scientific Interest (SSSI). We consider that without appropriate mitigation the application has potential to damage or destroy the interest features for which Therfield Heath SSSI has been notified.

The proposal will need to deliver a package of mitigation measures (and/or financial contributions towards the implementation of measures) to minimise recreational pressure impacts and ensure no adverse effect on the notified features of the SSSI. A mitigation plan will need to be agreed with Natural England, the Conservators of Therfield Heath and Greens and the LPA and delivery secured through an appropriate planning mechanism. Reference should be made to the guidance provided in North Hertfordshire Council's Therfield Heath SSSI Mitigation Strategy.

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 national 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](#) in consultation with Natural England and has approved this as a material consideration for the purposes of determining planning applications in Royston and the surrounding area. 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 1.9km inner Zone of Influence (Zoi) and 5.8km wider Zoi 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 Zois, and also larger housing developments beyond the Zoi 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 Zoi) 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.

The Study has identified a 5.8km Zone of Influence for recreational pressure effects on Therfield Heath SSSI. This application should therefore include an assessment of the recreational effects of the proposed development on the SSSI and provide details of mitigation measures to address any adverse impacts, in accordance with the North Hertfordshire Council Therfield Heath SSSI Mitigation Strategy, as described above. We would expect mitigation measures and/or 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.

Whilst the North Hertfordshire Council THMS is not a material consideration in Greater Cambridge Council's determination of planning applications, Natural England advocates THMS as best available guidance for robust assessment and mitigation of recreational pressure impacts for Therfield Heath SSSI.

Natural England advises that permission should not be granted until such time as these mitigation measures have been assessed and secured through the appropriate mechanism. In the meantime, we will be pleased to discuss the applicant's draft assessment and mitigation proposals through Natural England's [Discretionary Advice Service](#).

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.

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

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

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

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

Yours faithfully

Loz Burrige
Consultations Team