

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

Date : Wednesday, 12 November 2025
By Email only to Teena Lawrence

Cc Betsy Brown (Natural England)
Cc Tom Rea (NHC)

Dear Teena Lawrence

25/01539/FP : Holborn Farm Dane End Therfield Royston

The above planning application was presented to the NHC Planning Control Committee on Thursday 6 November 2025. By your letter dated 6 August 2025 (your letter reference 519994) Natural England submitted its advice (I attach your letter in full).

I draw your attention to the words in the summary box:

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 (Zoi) 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. 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.

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

The Conservators also provided input to North Hertfordshire Council (the LPA) aligned to the case study in the Therfield Heath SSSI Mitigation Strategy and accounted for the 5.8km Zone of Influence¹. We requested £680 for a signage project (as aligned with the Strategy). You can watch online the reasons Mr Rea gave for why no contribution was needed.

Mr Rea said it was disproportionate to enter a s106; he proposed no alternative suitable mechanism. Mr Rea then discarded the need to gather **any** funding for mitigation measures. Mitigation measures have therefore not been agreed with Natural England, the Conservators and the LPA as required by Natural England in your advice letter. Consequently the harm identified by Natural England in respect of Therfield Heath SSSI (namely the "*potential to damage or destroy*") has not been mitigated.

¹ 4/7 (the reduced visitation rate) x £1,000 per dwelling x relevant indexation rate amounts to £680.

NPPF 193 tells us that Mr Rea should recommend refusal as there are un-mitigated impacts to the SSSI, he did not. He recommended the application be granted.

Mr Rea also stated the tilted balance in favour of sustainable development was activated via NPPF 11(d) but in our view he has ignored NPPF 195 and Circular 06/2005. The expert opinion of Natural England has been overridden without an appropriate assessment. We therefore draw into question if Mr Rea has acted within the spirit of the Wildlife and Countryside Act 1981.

The Conservators and I note that Natural England advises that permission should not be granted until such time as these mitigation measures have been assessed and secured through the appropriate means. It would appear that the LPA has not followed your advice and has already granted permission.

It is again notable that since the signature of this 'agreed' Therfield Heath SSSI Mitigation Strategy in 2022, and despite the significant number of houses (hundreds) for which NHC has approved planning permission across the inner and outer zones, **no contributions at all** (from s106 or otherwise) have been secured by NHC to mitigate impacts to Therfield Heath SSSI.

And this is yet another such one.

Kind regards



Clerk to the Conservators of Therfield Heath and Greens
Clerk to the Trustees of the Therfield Regulation Trust

Encl: NE letter dated 6 August 2025