

# Growing Baldock

Environmental Statement Addendum Volume 1: Text  
Chapter 11: Ecology



February 2026

Urban&Civic

Hertfordshire



## **11.1 INTRODUCTION**

- 11.1.1 No changes to baseline conditions have been identified that were not already accounted for in the submitted ES Chapter 11. The ecological baseline, including the distribution and valuation of habitats and the baseline understanding of key receptors (including designated sites, reptiles and amphibians), remains unchanged for the purposes of this Addendum.

## 11.2 RESPONSE TO REGULATION 25 REQUEST

11.2.1 The table below summarises the Regulation 25 requests for additional information and the key issues raised by consultees in relation to ecology issues and how the chapter responds to them.

**Table 11.1: Regulation 25 Requests Summary**

| Commentary from Reg. 25 Request                                                                                   | Response from Applicant                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|-------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| The ES is considered to underplay potential recreational pressure on Weston Hills LNR given the proximity of BA2. | <p>The Ecology ES Addendum has been updated to explicitly acknowledge the proximity of BA2 to Weston Hills Local Nature Reserve (LNR) (approximately 120 m) and the likelihood that, during the early phases of development, the LNR will represent the closest accessible designated greenspace for new residents. On this basis, the Addendum recognises that an increase in recreational use of Weston Hills LNR (e.g. trampling, disturbance and general visitor activity) cannot be entirely discounted and has therefore been explicitly considered within the operational assessment.</p> <p>The ES Addendum clarifies that, notwithstanding this proximity, the potential effect is substantially mitigated by the scale, quality and accessibility of on-Site green infrastructure (GI) delivered as part of the Proposed Development. The Scheme provides approximately 107.43 ha of open space, significantly exceeding the adopted requirement of 43.38 ha for the anticipated population, including parks and gardens, natural and semi-natural greenspace, amenity space, outdoor sports provision and children's play areas. This extensive and distributed provision is designed to function as the primary resource for day-to-day recreation and to reduce reliance on adjacent designated sites.</p> <p>In addition, the Addendum clarifies that retained open space and structural landscape buffers within BA2, the parcel immediately adjacent to Weston Hills LNR, provide visual separation and ecological buffering at the Site-LNR interface. These areas are intended to reinforce habitat connectivity and ecological function while directing recreational activity towards more robust internal areas of greenspace within the</p> |

|                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                                                                                                                                                                                                                                                                                           | <p>Site. Management of these retained areas will focus on habitat enhancement and controlled permeability, rather than encouraging recreational use towards the LNR boundary.</p> <p>The ES Addendum further explains that, while recreational impacts at Ivel Springs are assessed in greater detail due to its statutory designation and wider catchment, the operational assessment for Weston Hills LNR has now been explicitly expanded and clarified to ensure it is proportionate, transparent and robust. This clarification does not arise from any change in baseline conditions or Scheme design, but responds directly to consultee commentary.</p> <p>Taking into account the acknowledged potential for increased recreational use, the embedded GI and open space provision, and the buffering and management of the BA2 interface, the ES Addendum confirms that the residual operational effect on Weston Hills LNR is minor adverse at the District level and not significant in EIA terms, in accordance with CIEEM guidance. A moderate adverse residual effect is therefore not considered justified.</p> |
| <p>Clarification requested on species-specific matters including a 2022 serotine bat record not reflected in mitigation, potential conflicts between lighting/MUGAs and bat corridors, scope of the Ecological Mitigation Plan (EMP), protection of notable species such as small blue butterfly and lizard orchid, and consistency regarding Bygrave Road Local Wildlife Site (LWS).</p> | <p>A single serotine bat record does not, in isolation, warrant bespoke mitigation in the absence of confirmed roosts or evidence of functional site importance. Survey data from 2022–2025 demonstrate low to moderate bat activity, primarily along boundary features.</p> <p>Nevertheless, a precautionary and enhancement-led approach is embedded, including hedgerow retention, habitat creation, dark corridors and provision of roost features. Potential conflicts between lighting, MUGAs and sensitive corridors will be addressed through detailed lighting design at Reserved Matters stage.</p> <p>The EMP will be refined to incorporate additional notable species, including small blue butterfly and lizard orchid, and to secure long-term management of retained grassland habitats. Bygrave Road LWS will be retained and buffered, and any inconsistencies across documents will be corrected in the final submission.</p>                                                                                                                                                                               |

### **11.3 UPDATE TO BASELINE CONDITIONS / ASSESSMENT METHODOLOGY**

- 11.3.1 No changes to the assessment methodology have been made. The approach to value assignment, impact characterisation, and significance evaluation remains as set out in the submitted ES Chapter 11, with significance determined with reference to the geographic scale of effect (and whether significant in EIA terms).

## **11.4 ASSESSMENT OF SCHEME AMENDMENTS**

11.4.1 The only amendments/clarifications relevant to this Ecology Addendum are:

11.4.2 Operational effects on Weston Hills LNR (Non-Statutory Designated Site):

- The assessment has been expanded and clarified to explicitly acknowledge the proximity of BA2 to Weston Hills LNR and the potential for increased recreational pressure, particularly in early phases, and to explain in more detail how embedded green infrastructure (GI) and open space provision will function to absorb recreation internally and reduce reliance on Weston Hills LNR.

11.4.3 Operational effects on reptiles and amphibians (domestic cat predation):

- The assessment has been expanded and clarified to confirm that potential indirect effects associated with domestic cat predation have been considered for reptiles and amphibians in the operational phase, and to explain the embedded mitigation approach secured through the EMP and future phase-specific HMPs (e.g. siting of sensitive features away from key desire lines and residential interfaces, and use of structurally complex vegetation for cover).

11.4.4 These clarifications do not arise from changes to the Scheme design parameters that would materially alter the ecology baseline. They are provided to respond to consultee commentary and to ensure the operational assessment narrative is suitably transparent and robust.

### **Weston Hills LNR – operational effects (clarified assessment text for this Addendum)**

11.4.5 Weston Hills Local Nature Reserve (LNR) lies to the south-west of the Site. Although there is no direct hydrological connection, the LNR is ecologically connected to the Site through adjacent habitats and boundary features. In particular, the BA2 parcel lies immediately adjacent to Weston Hills, and the interface between the Site and the LNR is currently characterised by fringe habitats comprising dense scrub, neutral grassland and arable land. Given this proximity, and the introduction of a green link connecting BA2 to the wider Site, there is potential for increased recreational use of Weston Hills arising from new residents, particularly as the LNR will be within close walking distance of the earliest phase of development. Accordingly, an increase in recreational pressure (e.g. trampling, disturbance and general visitor activity) cannot be entirely discounted.

11.4.6 Embedded mitigation within the masterplan has been designed to reduce this potential pressure by providing a comprehensive and high-quality network of internal greenspaces capable of meeting the majority of recreational needs within the development itself. This network will comprise a hierarchy of formal open spaces, naturalised habitat corridors, amenity greenspace, and high-quality walking and cycling routes, thereby encouraging everyday recreation to be absorbed within the Site rather than displaced onto adjacent sensitive receptors. In addition, new planting, hedgerow reinforcement and habitat

connectivity enhancements across the southern part of the Site will strengthen ecological linkages with Weston Hills and improve its functional integration within the wider sub-regional habitat network.

- 11.4.7 Importantly, a proportion of this greenspace is delivered within retained open space in BA2, the parcel immediately adjacent to Weston Hills. This includes the retention of grassland margins and structural landscape buffers along the Site–LNR interface, providing both visual separation and ecological buffering, whilst maintaining permeability for wildlife movement. The management of these retained areas will focus on enhancing existing habitats and reinforcing ecological connectivity, whilst directing recreational activity towards more robust areas of greenspace within the Site.
- 11.4.8 At the Site-wide scale, the Proposed Development provides a quantum of open space that substantially exceeds minimum standards. For a population of approximately 7,680 people, the adopted standards indicate a requirement of 43.38 ha of open space; however, the Proposed Development delivers 107.43 ha in total, including Parks and Gardens, Natural and Semi-Natural Greenspace, Amenity Greenspace, Outdoor Sports Facilities, and children’s and young people’s play provision. This extensive, distributed provision of accessible greenspace is intended to function as the primary recreational resource for new residents, thereby materially reducing reliance on Weston Hills LNR for everyday walking, exercise and informal recreation.
- 11.4.9 Furthermore, the current interface between the Site and Weston Hills comprises fringe habitats of dense scrub, neutral grassland and arable land, some of which are of limited ecological functionality in their present form. The proposals include targeted habitat management and enhancement within these transitional areas to improve structural diversity, connectivity and permeability for fauna and flora moving between Weston Hills and the wider landscape. This will result in better management of existing habitats and a net improvement in ecological connectivity between the LNR and the surrounding countryside, supporting long-term ecological resilience.
- 11.4.10 Taking these measures into account, while a degree of increased recreational use of Weston Hills LNR is acknowledged as a potential effect of the development, this is substantially mitigated by the scale, quality and accessibility of on-Site greenspace, the retention of buffer areas within BA2, and the enhancement of habitat connectivity at the Site boundary. On this basis, the residual operational effect on Weston Hills LNR is assessed as minor adverse at the District level and not significant in EIA terms.

**Reptiles – operational effects (clarified domestic cat consideration for this Addendum)**

- 11.4.11 The Proposed Development retains and integrates key reptile-supporting habitats within the green infrastructure network and delivers new species-rich grassland, native scrub and edge habitats. Over time, these habitats will increase structural heterogeneity, improve connectivity between refugia and foraging areas, and enhance dispersal potential across the

south-eastern compartments and adjacent green corridors. Collectively, these measures are expected to result in a net increase in the extent and quality of suitable reptile habitat, together with improved functional connectivity.

11.4.12 Potential indirect effects associated with domestic cat predation have been considered. Reptiles may be vulnerable in publicly accessible greenspace, particularly where basking, foraging and refugia occur close to residential interfaces. However, embedded mitigation is secured through the Ecological Mitigation Plan (EMP) and will be refined through phase-specific Habitat Management Plans (HMPs). This includes: (i) siting of hibernacula, refugia and key habitat features away from areas of highest residential activity and primary desire lines; (ii) use of structurally complex vegetation and edge habitats to provide cover; and (iii) integration of sensitive features within more robust, semi-natural habitat blocks. Where features occur within accessible areas, they will be buffered through planting and layout to minimise disturbance and predation risk.

11.4.13 Taking into account the retention and enhancement of reptile habitats, improved connectivity, and the EMP-secured measures to reduce potential predation pressure (including from domestic cats), the operational phase is assessed to result in a minor beneficial effect at the Local level. While a low residual risk associated with cat predation cannot be entirely eliminated within a residential setting, this risk is expected to be localised and does not give rise to a significant effect in EIA terms.

**Amphibians – operational effects (clarified domestic cat consideration for this Addendum)**

11.4.14 Baseline surveys determined that the Site currently supports no breeding habitat for amphibians and only low-quality, fragmented terrestrial habitat. Consequently, baseline value for amphibians is negligible.

11.4.15 As part of the green infrastructure strategy, the Scheme will introduce new aquatic features (e.g. attenuation ponds and SuDS basins). Where designed to retain water seasonally or permanently and managed to exclude fish, these features will provide suitable breeding habitat for widespread species such as smooth newt, common frog and common toad. Proposed enhancements to hedgerow connectivity, field margins and grassland mosaics will also improve terrestrial habitat by increasing structural complexity and reducing disturbance relative to the arable-dominated baseline.

11.4.16 Potential indirect effects associated with domestic cat predation have been considered. Amphibians may be vulnerable in proximity to newly created aquatic features and along accessible wetland margins and corridors near residential areas. However, the EMP secures proportionate mitigation to reduce predation risk where practicable, including the siting of sensitive habitat features (e.g. refugia, log piles, wetland margins and connecting corridors) away from areas of highest residential activity and primary desire lines, and the use of structurally complex vegetation to provide cover. These measures will be refined and implemented through phase-specific HMPs in accordance with the detailed layout.

11.4.17 Given the negligible baseline value of the Site for amphibians, the creation of new aquatic and terrestrial habitats, and the EMP-secured mitigation to reduce potential predation pressure (including from domestic cats), the operational phase is assessed to result in a minor beneficial effect at the Site level. Any residual predation risk is expected to be localised and not significant in EIA terms, and the overall conservation status of widespread amphibians will be maintained and enhanced relative to baseline

## **11.5 MITIGATION MEASURES**

11.5.1 The Ecological Mitigation and Management Strategy does not propose additional mitigation measures beyond those considered in the submitted ES Chapter 11. However, for clarity (and consistent with the EMP/HMMP framework already secured at outline stage), the following embedded measures are relied upon in the operational assessment narrative where relevant to the above clarifications:

- Weston Hills LNR: provision of extensive, high-quality internal GI and open space to absorb day-to-day recreation within the Site; retention of structural buffers and grassland margins within BA2 at the Site–LNR interface; and habitat connectivity enhancements (e.g. planting and hedgerow reinforcement) across the southern part of the Site.
- Reptiles and amphibians (domestic cats): siting of sensitive habitat features away from areas of highest residential activity and primary desire lines; use of structurally complex vegetation for cover; and refinement through phase-specific HMPs at Reserved Matters stage to secure appropriate micro-siting, buffering and management.

11.5.2 These measures are secured through the EMP and HMMP mechanism already set out within the ES Chapter 11 and do not constitute new categories of mitigation

## **11.6 RESIDUAL EFFECTS**

### **Construction Stage**

11.6.1 No changes to the effects reported in the original outline ES Chapter 11 are anticipated as a result of the clarifications set out in this Addendum. The matters addressed above relate to operational considerations (Weston Hills recreation pressure; domestic cat predation for reptiles and amphibians) and do not alter the construction-stage assessment conclusions.

### **Post-Completion Stage**

11.6.2 Overall, the Post-Completion Stage residual effects reported in the original outline ES Chapter 11 remain not significant in EIA terms. The clarifications provided in this Addendum ensure the operational assessment narrative is proportionate and transparent, in particular:

- Weston Hills LNR: the operational assessment explicitly acknowledges potential for increased recreational pressure due to proximity of BA2, and confirms that with embedded GI/open space and buffering the residual operational effect is **minor adverse** at District level and not significant.
- Reptiles and amphibians: the operational assessment explicitly confirms that domestic cat predation risk has been considered and is mitigated through embedded design measures and EMP/HMP controls; with these measures in place, the operational residual effects remain **minor beneficial** (not significant).