

Growing Baldock

Environmental Statement Addendum
Volume 2: Figures & Appendices

Chapter 1: Introduction

Appendix 1.1 North Herts Council Regulation 25 Request

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Our Ref : 25/02571/OP
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Date : 20 February 2026

Dear Helen,

Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) – Request for Information

As per our ongoing discussions regarding the assessment of the above application, North Herts District Council Planning Officers have identified that further information is required in order to progress the assessment of the application.

Please refer to the below table (Table A), which reproduces our shared record keeping and which has informed our ongoing discussions since the submission of the application.

Table A – Regulation 25 Requests for Information

Blue – Amendments to application to take account of consultee comments

Purple – Amendments respond to an EIA issue which will form part of Regulation 25 EIA Request

Consultee Comment	Where Response Can be Found in Submission
HCC Highways	
North Road Signalised Junctions (new access points for BA1) The pedestrian/cycle route to the north currently terminates with no onward connection. An approach to connect this route to PRow (Bygrave 001) either on existing highway or within the site should be provided to better integrate the facilities. Further information around walking/cycling connectivity southward is needed (see shuttle working comments)	Revised Parameter Plan will incorporate minor addition to Greenway adjacent to North Road, and proposed changes to the North Road gateway.
Requested a single phasing plan to fully understand the sites build out and infrastructure delivery timeframes. There are various metrics and proposals within the TA which provide helpful information, but this could be improved for better understanding. Flexibility can be enabled through the monitor and manage approach, but the ability to require specific measures through the planning process are required. Whilst certainty over timings for later phases of delivery can be broader, the requirements for the early phases will need to be better understood to enable suitable conditions. Evidence should be provided in such a way that trigger points	Draft phasing information has been provided by ITP and will feed into updated TA post COMET modelling, to be submitted in second Reg 25 submission.

can be determined based on impacts, not just housing/occupation factors. Currently the phasing for early stages and its associated infrastructure require further refinement and suitable information to enable infrastructure delivery to be secured.	
Active Travel England	
Access to North Road	Revised Parameter Plan will incorporate proposed changes to the North Road gateway. (as above)
BA2 should consider including zebra crossings on all arms of the Clothall Way roundabout. Bygrave Road corridor - unsure how this will work in practice due to existing vehicular access requirements.	To be addressed as part of updated transport work in second Reg 25 submission
Ramblers / British Horse Society	
Specific proposed enhancements suggested.	Revised Parameter Plan will incorporate minor addition to Greenway adjacent to North Road, and proposed changes to the North Road gateway.
NHDC Landscape	
The LVIA understates the magnitude of the effects in relation to the substantial landscape and visual change within the site and its immediate surroundings, particularly along the northern ridgeline, the open slopes above Baldock and the PRowWs that traverse the northern edge. These areas will experience notable loss of openness and rural character during construction and the early operational phases.	ES Addendum to address.
NHDC Urban Design	
Provide the distances to play facilities;	Revised Development Specification

and provide the dimensions and areas of key green links and spaces within Development Specification.	including some updates to the appended Design principles to reflect varying widths of active travel and green links (following meeting held with NHC urban design). Also amendments to the DAS to reflect the amendments to the North Road gateway.
Sport England	
Pitch layouts for the Eastern Park and Urban Open Land are provided on plans to scale.	GI Strategy to be re-submitted to provide scaled plan for illustrative purposes.
Historic England / HCC Archaeology	
Recommend that the Historic Environment Management Plan be provided with the application. This is in order to outline how important assets would be managed, convey towns history to public.	Historic Environment Management Plan (HMP) and Draft Written Scheme of Investigation (WSI) will be appended to ES Addendum.
NHDC Ecology	
Impact of recreational pressure on Weston Hills LNR is underplayed given BA2 proximity.	The ES Addendum (Chapter 11: Ecology) – will include acknowledgement of proximity of BA2 to Weston Hills. However, the residual operational effect remains appropriately assessed as minor adverse at District level and not significant
Clarification requested on species-specific matters. The Ecological Mitigation Plan (EMP) requires clarification and expansion to address a number of species-specific and habitat management matter	BMD are liaising directly with Liz Anderson on species specific requests. Updated Ecological Mitigation Plan to incorporate additional notable species etc. Will be appended to ES Addendum .
The CEMP states in table E8 that	The OCEMP will be updated to include the

“Bygrave Road LWS will be Subject to direct land-take and associated vegetation clearance during the early stages of construction” but the ES says in 11.6.96 “Bygrave Road LWS, which lies partly within the Site boundary, will be wholly retained and buffered as part of the Proposed Development” this is a contradiction.	same approach as the ES regarding Bygrave Road.
LLFA	
Requests CV value of 1 and justification for urban creep uplift if less than 10%.	This is in discussion with the LLFA. Amendments to FRA will be appended to the ES Addendum, if still required.
HCC GIU	
Adult care – comments regarding terminology and land allocated for care home.	Updates to the Development Specification .
Comments on existing baseline (school places etc)	Socio-economic chapter in ES Addendum to address points, where required.

I confirm that Officers concur with its contents (insofar as it relates to information requirements), and that as such, relevant required information is identified within it. Some of the required information is highlighted as further information pursuant to Regulation 25(1) of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended). The table also helpfully describes the form in which the information requirement is intended to be addressed by the applicant (either in an initial or later submission).

From our previous discussions, I note that the applicant intends to prepare two Regulation 25 submissions of Additional Information: the first responding to the issues in this letter; and the second providing an updated Transport Assessment, following completion of the COMET transport modelling.

EIA Regulation 25 Further Information

In addition to the information highlighted in the table, Officers have a number of items of further supplementary information that is required, as follows.

An important aspect of the assessment of Highway impacts is its reliance on COMET modelling, which the table already identifies as anticipated as a Regulation 25 submission item, anticipated as a second supplementary submission. In addition to that, there is a need for the identification of Highways Mitigation Details and in the case of the proposed development, this should comprise mitigation that will definitely be delivered and mitigation that will provide a programme of back-up options in case they should be triggered by a Monitor and Management regime. Specifically of interest will be individual mitigation items and their detailed description (to include design/specification details, cost estimates, phasing and delivery strategy, implementation triggers, etc).

Related, the LPA is in receipt of consultation responses that highlight a potential concern around secondary effects from changes to local Highways (traffic flows and local parking capacity) that may affect the viability of businesses in the town centre of Baldock. There is already a general assessment of impacts on the local economy within the submitted Environmental Statement, but it does not explicitly reflect on this potential concern. Officers require a relevant assessment of this matter, which should consider potentially significant environmental effects (as part of the EIA process), as part of a general supplementary economic statement to inform the officer assessment. This may form part of the second intended Regulation 25 submission, because the transport modelling outputs will then be available to inform it.

On the topic of Archaeology, it has been identified that there is a need for a Heritage Management Plan and Written Scheme of Site Investigation. It is appreciated that both of these will be “living” documents, with parts relevant to the outline planning stage and subsequent parts related to prospective Reserved Matters and/or conditions discharging.

Information necessary for Officers to complete the DM planning assessment

The application scheme has been identified as requiring Viability consideration and as such, the submission of a Financial Viability Appraisal is currently still outstanding.

Finally, as the officer assessment and various negotiations with consultees are currently still ongoing and therefore the planning assessment may as yet be incomplete. As such further requests for information may arise in future, in which case we will be in contact.

I trust that the above has clarified our current information request and we look forward to receiving corresponding supplementary information in response in due course.

Please don't hesitate to contact me for further clarification.

Yours faithfully,

Justin Booij
Senior Projects Officer (Major Sites)