

Growing Baldock

Environmental Statement Addendum
Volume 2: Figures & Appendices

Chapter 11: Ecology

Appendix 11.1 Corn Bunting Mitigation Strategy (On-Site)

CORN BUNTING ON-SITE MITIGATION STRATEGY AND MANAGEMENT PLAN: LAND TO THE EAST AND SOUTH OF BALDOCK

Technical Note

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BACKGROUND

This Corn Bunting On-Site Mitigation Strategy and Management Plan has been prepared to consolidate the on-Site component of the mitigation and management approach for corn bunting at Land to the East and South of Baldock. It is intended to be read alongside the Off-Site Corn Bunting Compensation Strategy and Management Plan, the Ecological Mitigation Plan (EMP), the Ecology ES Addendum/Chapter 11, the Phase 2 Further Ecological Assessment, and the Assessment of Corn Bunting Mitigation Sites (TN817).

The purpose of this document is to provide a formal management-plan structure for the on-Site measures. It responds directly to consultee concerns raised by the RSPB, Herts and Middlesex Wildlife Trust (HMWT) and North Hertfordshire Council (NHC), particularly in respect of the role of retained peripheral habitats, habitats within Bygrave Common, domestic cat predation, dog disturbance, public access, long-term management and the need to avoid over-reliance on on-Site areas as compensation for displaced territories.

The on-Site strategy does not show that the Site is capable of fully compensating for the loss of extensive arable habitat. That is a central distinction. The on-Site strategy is designed to retain and enhance habitat continuity where this remains ecologically credible, reduce the functional severance of retained territories, and provide additional nesting, foraging and winter-support resources within the emerging green infrastructure network. The off-Site strategy provides the compensation mechanism for loss and uncertainty affecting part of the existing county-important population.

The Site has supported corn bunting in multiple survey years. The 2019 survey recorded 14 territories, the 2022 survey recorded 20 territories and the 2024 survey recorded 21 territories. These data confirm the Site as being of County-level importance for corn bunting. The principal areas of repeated use can be found within the following report of the assessment of corn bunting at the site: BMD.21.0045.RPE/TN.810.A. These areas include the proposed northern development boundary/Bygrave Common interface, the Bygrave Road/Ashwell Road corridor, arable land north of the railway, and parts of the southern Site including land around Clothall Common and north of the A505. The development will result in a substantial

Declaration of compliance with professional code of ethics or conduct

The information which we have prepared and provided is true and has been prepared and provided in accordance with the Chartered Institute of Ecology and Environmental Management's Code of Professional Conduct. We confirm that the opinions expressed are our true and professional bonafide opinions.

Every reasonable attempt has been made to comply with the relevant best practice guidelines and BS42020:2013 (Biodiversity: Code of practice for planning and development).

contraction in available open arable habitat. Accordingly, this strategy adopts a precautionary approach: retained/peripheral on-Site territories are treated as potentially vulnerable to edge effects and are not used as the sole basis for offsetting corn bunting impacts.

1. INTRODUCTION

1.1 Background and purpose

- 1.1.1 The Proposed Development comprises a large mixed-use urban extension to the east and south of Baldock. The Site is dominated by arable farmland with hedgerows, treelines, rough grassland, scrub and urban-edge habitats. Corn bunting is a key ecological receptor because surveys undertaken across 2017, 2019, 2022 and 2024 have confirmed a persistent breeding population of County importance within and adjacent to the Site.
- 1.1.2 This document has been prepared because consultee dialogue has identified a need to draw together the corn bunting mitigation approach into a dedicated, transparent and enforceable format. It is structured as a management plan rather than a general technical note, with explicit aims, objectives, prescriptions, implementation mechanisms, monitoring and adaptive management triggers.
- 1.1.3 The on-Site strategy is intentionally separated from the off-Site strategy (Ref BMD.21.0045.RPE/TN.819.002) . This reflects the distinction requested by HMWT between on-Site mitigation/retention and off-Site compensation. On-Site measures are not a substitute for off-Site compensation; they are designed to maintain residual ecological function within the Site and reduce the scale of adverse effect as far as practicable within the red line boundary.

1.2 Relationship with the wider ecology package

- 1.2.1 Table 1.1 summarises the relationship between this on-Site Corn Bunting Mitigation Strategy and the wider ecological reporting and delivery framework for the Site. The table clarifies how the on-Site strategy should be read alongside the ES, EMP, off-Site compensation strategy, and future Reserved Matters / phase-specific management documents.

Table 1.1 Relationship with the Wider Ecology Package

Document / mechanism	Role in this strategy
Phase 2 Further Ecological Assessment	Provides the updated breeding bird baseline, including 2024 corn bunting territory information and evaluation of the Site as County importance for corn bunting.
Ecology ES Addendum / Chapter 11	Assesses likely significant effects, embedded mitigation, residual effects and the need for combined on-Site and off-Site measures.
Ecological Mitigation Plan (EMP)	Provides the umbrella ecological management framework for the Site, including retained habitats, created habitats, species-specific measures and long-term management principles.
Assessment of Corn Bunting Mitigation Sites (TN810)	Provides technical justification for off-Site measures and the wider evidence base on corn bunting ecology, territory distribution, nesting preferences and management measures.
Off-Site Corn Bunting Compensation Strategy (TN819.002)	Provides the separate off-Site compensation component, including the Homestead/Plan F land, tenant farmer agreement, detailed agricultural measures and monitoring.

Reserved Matters final design	Will translate these principles into precise layouts, planting mixes, access controls, habitat extents and construction-stage safeguards.
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1.3 Key consultee issues addressed

- 1.3.1 Table 1.2 identifies the principal corn bunting-related consultee comments relevant to the on-Site strategy and summarises how this document responds to them. The purpose of the table is to demonstrate that the strategy has been structured specifically to address concerns regarding Bygrave Common, retained peripheral habitats, domestic cat predation, dog disturbance, public access and long-term management.

Table.1.2 Consultee Issues Addressed by the On-Site Strategy

Consultee	Relevant comment	How this strategy responds
RSPB	Concern that Bygrave Common and on-Site rough grassland adjacent to public open space may not provide productive territories due to domestic cats, dogs and recreation. Requested sufficient off-Site offsetting habitat, legal securing and monitoring.	This on-Site strategy clarifies that Bygrave Common and other retained peripheral areas are not relied upon as the sole compensation mechanism. Their role is retention/enhancement, with uncertainty addressed through the off-Site compensation strategy, and providing clarity on on-site mechanisms and their effectiveness.
HMWT	Requested precautionary treatment of peripheral territories because combined cat predation, human activity and dog disturbance may reduce functionality. Clarified that off-Site provision is compensation, not mitigation.	This strategy explicitly adopts a precautionary position. On-Site retained territories are managed and monitored but any residual uncertainty is addressed by the off-Site compensation requirement.
NHC Ecology	Broadly satisfied following ES/EMP amendments subject to conditions including CEMP, lighting, BNG/HMMP and ecological enhancements.	This strategy aligns with the EMP/HMMP framework and provides species-specific detail for corn bunting to support condition/legal agreement drafting.

2. BASELINE AND IMPACT CONTEXT

2.1 Corn bunting baseline

- 2.1.1 Corn bunting has been repeatedly recorded holding territory within the Site across multiple survey years. The 2019 survey recorded 14 territories, the 2022 survey recorded 20 territories and the 2024 survey recorded 21 territories. The 2024 report also records that the number of singing males observed during survey visits was relatively consistent, indicating that the estimate is reliable within the limits of field survey. The population remains of County importance.
- 2.1.2 The area's most consistently associated with territorial males include the northern boundary/Bygrave Common interface, the Bygrave Road/Ashwell Road corridor, arable compartments north of the railway, land between the railway and Royston Road, and parts of the southern Site around Clothall Common. Corn bunting were recorded using a range of song posts including hedgerows, trees, fence posts, telegraph wires, cereal heads and tall weed stems within crops. The repeated use of similar parts of the Site indicates that territory distribution is strongly linked to a combination of open farmland structure, song posts, crop conditions and adjacent foraging resources.
- 2.1.3 Table 2.1 summarises the recorded corn bunting territories from the principal survey years informing the assessment. These data demonstrate the repeated use of the Site by corn bunting and support the conclusion that the Site is of County-level importance for the species.

Table 2.1 Summary of Corn Bunting Survey Results

Survey year	Recorded corn bunting territories	Interpretation
2019	14 territories	Baseline for earlier application work; territories recorded across north and south-east Site.
2022	20 territories	Broadly comparable to 2017; strong use of northern boundary, Bygrave Road/Ashwell Road and Clothall Common area.
2024	21 territories	Continued County-level population; six singing males along northern boundary and four along Bygrave Road/Ashwell Road.

2.2 Predicted impact pathways

- 2.2.1 The Proposed Development will remove or alter extensive areas of open arable habitat. Central arable compartments will be replaced by built development, infrastructure, drainage, open space and managed green infrastructure. Although the green infrastructure network will provide substantial biodiversity value for a range of species, it will not fully replicate the current large-scale arable habitat mosaic used by corn bunting and other open-farmland specialists. The predicted effect is therefore a substantial contraction in on-Site breeding function for corn bunting.
- 2.2.2 Previous assessment work has anticipated that approximately 50 per cent of the current corn bunting territories are likely to be lost or displaced, principally those associated with interior arable

compartments. Some peripheral territories may remain functional where retained hedgerows, open grassland, rough margins, scrub-edge habitat and adjacent off-Site farmland provide an appropriate spatial structure. However, this strategy recognises the concerns raised by RSPB and HMWT and does not assume that all peripheral territories will necessarily remain productive in the long term.

2.3 Precautionary approach

- 2.3.1 The strategy adopts a two-layered precautionary approach. First, retained on-Site habitats are actively designed and managed to maintain or enhance conditions for corn bunting where this is ecologically credible. Secondly, retained/peripheral territories are treated as vulnerable to uncertainty arising from residential edge effects, dog walking, public access and domestic cat predation. That uncertainty is not ignored; it is compensated through the off-Site strategy.
- 2.3.2 This approach is deliberately balanced. It avoids the over-precautionary conclusion that all on-Site territories will certainly fail, which is not supported by the survey evidence or the species' continued use of transitional urban edge/farmland features confirmed in the current bird survey data. It also avoids the under-precautionary position of treating Bygrave Common and retained margins as guaranteed replacement territories. The on-Site strategy is therefore a retention and risk-reduction framework, not the sole compensation mechanism.

3. STRATEGY AIMS AND OBJECTIVES

3.1 The objectives

- 3.1.1 The objectives are to maintain a network of open or semi-open habitats with suitable song posts; provide tall, dense sward structures capable of supporting nesting where suitably separated from high-disturbance areas; provide insect-rich foraging habitat within realistic foraging distances of nesting/territorial habitat; provide seed-rich resources for post-breeding and winter use where practicable; manage public access to avoid direct recreational pressure into the most sensitive compartments; and monitor whether retained/peripheral territories continue to be used.
- 3.1.2 Table 3.1 sets out the overarching aims of the on-Site strategy and the management objective associated with each aim. These aims provide the framework for the habitat, access, disturbance, predation and monitoring measures described in the following sections.

Table 3.1 On-Site Strategy Aims and Management Objectives

Aim	Management objective
Aim 1	Retain and enhance on-Site habitat continuity for corn bunting where this remains compatible with the masterplan and future Reserved Matters design.
Aim 2	Reduce the risk that retained peripheral habitats become ecological sinks by managing disturbance, access, predation pressure and habitat structure.
Aim 3	Ensure the on-Site strategy complements, but does not replace, the off-Site compensation strategy.
Aim 4	Provide a framework capable of being translated into other reports including HMPs, CEMPs, LEMPs and HMMPs.
Aim 5	Establish monitoring and adaptive management so that habitat performance and corn bunting use can be reviewed over time.

4. ON-SITE MANAGEMENT ZONES AND PRINCIPLES

4.1 Management zones

- 4.1.1 Precise boundaries will be fixed through Reserved Matters. At outline stage, this strategy identifies the functional zones that should guide detailed design. The focus is on areas where corn bunting has been recorded consistently or where post-development habitat creation can maintain a suitable open/edge structure close to existing territory clusters.
- 4.1.2 Table 4.1 identifies the principal functional zones within the Site that should guide future detailed design. The precise boundaries and prescriptions for these areas will be confirmed through Reserved Matters and phase-specific management plans, but the table establishes the areas where corn bunting considerations should be treated as a design constraint and management priority.

Table 4.1 Indicative On-Site Corn Bunting Management Zones

Functional zone	Priority	Management purpose
Northern boundary / Bygrave Common interface	High	Repeated territory cluster; existing song posts; adjacency to off-Site arable land; key focus for habitat continuity and access management.
Bygrave Road / Ashwell Road corridor	High	Repeated territory cluster and important linear structure; requires retention of open margins and avoidance of excessive enclosure by tree planting.
Land East of Clothall Common and eastern rough grassland/scrub interface	Moderate to high	Historically used; provides rough grassland/scrub structure; requires management against succession and recreational pressure.
Land between railway and Royston Road / A505	Moderate	Recorded use by corn bunting; design should retain open grassland and seed/invertebrate resources where feasible albeit in this location this is limited.
Wider green corridors and SuDS	Supporting	Primarily benefits wider farmland/edge assemblage but can contribute foraging and winter resources if appropriately managed.

5. HABITAT CREATION AND MANAGEMENT PRESCRIPTIONS

5.1 Open grassland and tall dense sward habitat

- 5.1.1 Selected open grassland compartments should be managed to create structurally diverse, low-input grassland with areas of tall, dense sward. This reflects published evidence cited within the Phase 2 assessment that corn bunting can use rough grassland and that sward density may be more important than sward height alone. On-Site grassland should therefore not be managed uniformly as short amenity grassland. The default management objective should be structural heterogeneity: taller nesting/refuge areas, shorter foraging interfaces, and seed/invertebrate-rich margins.
- 5.1.2 Grassland intended to support corn bunting should be located away from intensive recreation, formal play, high-use paths and the immediate residential edge wherever feasible. It should be designed as open habitat rather than enclosed woodland planting. Scattered scrub may be used to provide song posts and shelter, but extensive scrub succession should be prevented where it would reduce open-country structure. As set out in the current GI strategy (BMD.21.0045.RP.004.A Baldock Green Infrastructure Strategy), the northern half of the Site will be more focused on ecology with limited, managed public access, and the southern half will provide more recreational and accessible areas to the public
- 5.1.3 Grassland management within corn bunting-sensitive zones should be designed to avoid uniform amenity management. Areas intended to contribute to the corn bunting strategy should not be subject to frequent short mowing during the breeding season. Instead, they should be managed as a structurally varied mosaic comprising tall dense sward, rough grassland, seed-bearing areas, shorter foraging interfaces and scattered structural features. These areas will be defined by each individual HMMP for the relevant RMA.
- 5.1.4 The detailed mowing prescription should be refined through Reserved Matters and HMPs; however, the default principle should be to retain substantial areas of undisturbed sward through the breeding season. Cutting should generally be avoided between March and August within areas identified for potential nesting or territory support, unless an ecologist confirms that the area is not being used by nesting birds and that the cut is necessary for habitat management. Where cutting is required, it should be undertaken outside the breeding season and on a rotational basis so that not all suitable cover is removed in any one year.
- 5.1.5 The aim should be to maintain a mixture of taller tussocky areas suitable for cover and flower-rich or seed-bearing margins capable of supporting invertebrate prey and seasonal seed resources. Arisings should generally be removed where the objective is to reduce soil fertility and encourage a more diverse sward, although selected uncut areas may be retained where these provide seed resource and winter cover. The final specification should be informed by soil conditions, hydrology, landscape design, BNG habitat targets and ornithological advice at Reserved Matters stage.
- 5.1.6 Where grassland is located close to residential edges or high-use routes, it should be managed carefully to avoid creating a high-risk nesting sink. In such locations, management may prioritise

foraging value and general farmland bird enhancement rather than deliberately creating the densest nesting sward. The most suitable nesting-support areas should be located in more buffered compartments, set back from housing and intensive recreational activity wherever feasible.

5.2 Wild bird seed and seed-rich plots

- 5.2.1 Where feasible, the detailed landscape design should include wild bird seed or cereal-based plots within or adjacent to the principal on-Site corn bunting management areas. These should be positioned to avoid concentrating birds immediately adjacent to high-disturbance public access routes. The purpose is to provide post-breeding and winter foraging resources and to complement off-Site sacrificial cereal/winter-food provision.

5.3 Invertebrate-rich foraging areas

- 5.3.1 Invertebrate availability is a key factor for chick provisioning. The on-Site strategy should therefore maximise low-input grassland, wildflower-rich margins, tussocky areas and rough grassland interfaces within foraging distance of retained or potential territories. Management should avoid routine fertiliser use, excessive mowing and broad-spectrum pesticide inputs within these areas. In suitable chalky areas, species-rich/calcareous grassland creation should be aligned with wider BNG and LNRS objectives.

5.4 Song posts and structural features

- 5.4.1 Territorial males have used hedgerows, trees, fences, telegraph wires, crop stems and tall weed stems as song posts. As new habitats establish, the detailed design should incorporate appropriate song-post opportunities, including timber posts, post-and-rail sections, retained fence lines, selected scrub, and occasional low/medium-height structural features. These should be sited within open compartments, not along high-use paths where they may increase disturbance or predation risk.

5.5 Hedgerow and boundary management

- 5.5.1 Retained hedgerows along the northern boundary and Bygrave Road/Ashwell Road corridor are important for territorial behaviour, but they should not become dense barriers that eliminate open-field character. Management should retain song-post function, support invertebrate resources and maintain connectivity while avoiding excessive shading of adjacent open habitats. Where new hedgerows or scrub belts are used for access control, their location should be planned to avoid enclosing core corn bunting compartments.

5.6 Rare arable plant and open mosaic opportunities

- 5.6.1 The wider ecology package identifies a notable arable plant assemblage and LNRS relevance for rare arable plants. Where compatible with the final landscape design, areas of open disturbed ground, arable-margin style management, seed-bank reuse, or low-competition annual plant

communities may be incorporated. These measures would primarily support botanical objectives but could also provide seed and invertebrate resources for farmland birds.

6. ACCESS, DISTURBANCE AND PREDATION MANAGEMENT

6.1 Design response to RSPB and HMWT concerns

- 6.1.1 The RSPB and HMWT concerns relate not simply to habitat provision, but to the risk that habitat adjacent to public open space or residential edges may fail to produce successful territories because of dog disturbance, human activity and domestic cat predation. This strategy accepts that risk and addresses it directly through design, management and monitoring. The strategy does not treat public open space grassland as automatically equivalent to productive corn bunting habitat.
- 6.1.2 The management response to domestic cat predation, dog disturbance and recreational pressure is based on a hierarchy of avoidance, spatial separation, habitat design, access control and monitoring-led adaptive management. It is acknowledged that the risk of domestic cat predation and dog disturbance cannot be removed entirely from a large urban extension. However, the relevant ecological test is not whether such risks can be eliminated, but whether the detailed design can reduce the likelihood of sustained overlap between sensitive nesting habitat and the principal sources of disturbance, and whether residual uncertainty is appropriately addressed through the separate off-Site compensation strategy.
- 6.1.3 Accordingly, the on-Site strategy will not treat all grassland within the green infrastructure network as equivalent corn bunting habitat. Areas intended to function primarily as recreational open space, dog-walking routes, active travel corridors, formal play, sports provision or high-use amenity space will not be relied upon as core corn bunting nesting habitat. The corn bunting function of the on-Site network will instead be focused on selected retained and created peripheral compartments where open or semi-open habitat structure can be maintained, where there is continuity with existing territory clusters and/or adjacent farmland, and where detailed design can reduce the interface with residential curtilages and intensive public access.
- 6.1.4 This approach is particularly relevant to the northern boundary / Bygrave Common interface, the Bygrave Road / Ashwell Road corridor and the Clothall Common edge, where the survey evidence indicates repeated use by territorial corn buntings. These areas will be treated as corn bunting-sensitive design zones at Reserved Matters stage. Within these zones, the detailed layout will be required to demonstrate how access, planting, path alignment, mowing regimes, boundary treatments and habitat creation have been coordinated to reduce disturbance and predation risk while maintaining an open farmland-edge character.
- 6.1.5 The strategy therefore avoids two extremes. It does not assume that all retained peripheral habitats will automatically remain productive for corn bunting following development. Equally, it does not assume that all peripheral habitats will necessarily fail. Instead, these areas are treated as potentially functional but sensitive habitats, requiring careful design, long-term management and monitoring. Any uncertainty regarding their long-term productivity is addressed through the separate off-Site compensation strategy, which remains the primary mechanism for compensating for displaced territories and residual risk.

6.2 Access routing

- 6.2.1 Primary pedestrian and cycle routes should be routed to provide attractive access through robust public green infrastructure while avoiding desire lines through the most sensitive corn bunting habitat compartments. Where paths pass near retained/potential territories, they should be routed along robust edges with buffer planting, fencing, shallow bunds, hedgerows or other landscape devices used to discourage informal access into sensitive areas.

6.3 Dog disturbance controls

- 6.3.1 The strategy should not rely solely on signage. Physical design should make sensitive areas unattractive or difficult for dog access without creating a heavily engineered appearance. Such measures may include post-and-wire fencing, dead hedging, thorny scrub buffers, ditch/bund features, path alignment away from core habitat, and provision of alternative dog-walking loops in less sensitive green infrastructure. Seasonal signage may be used during the breeding season but should be supplementary to physical layout, and there is an opportunity for education sessions with on Site primary schools. Information is provided in the welcome pack.
- 6.3.2 Dog disturbance will be managed through design-led access control rather than signage alone. The primary objective is to provide attractive and legible dog-walking routes within robust parts of the green infrastructure network, while discouraging informal access into the most sensitive corn bunting habitat compartments. This is particularly important where retained or created rough grassland lies close to public open space, informal recreation areas or desire lines between residential parcels and the wider countryside.
- 6.3.3 At Reserved Matters stage, footpath and cycleway alignments should be reviewed against the corn bunting-sensitive zones identified in this strategy. Where routes pass close to retained or potential corn bunting territories, paths should be aligned along robust edges rather than through the centre of habitat compartments. The design should use a combination of path placement, buffer planting, low fencing, ditches, shallow bunds, dead hedging and thorny scrub to make sensitive areas visually and physically less attractive for informal access.
- 6.3.4 Alternative access provision is also important. Where sensitive corn bunting habitat is being protected from dog access, the wider green infrastructure network should provide suitable alternative circular walking routes, open amenity areas and robust grassland routes elsewhere. This will reduce pressure on sensitive areas by giving residents convenient alternatives rather than relying solely on restriction. This approach should be coordinated with the Green Infrastructure Strategy and detailed landscape design.
- 6.3.5 Seasonal signage may be used during the breeding season to explain the purpose of restricted access and to encourage responsible dog control. However, signage should be treated as a supporting measure only, as stated in paragraph 6.3.1. The long-term management body should be responsible for inspecting access-control features, repairing damaged fencing or dead hedging, responding to new desire lines and implementing additional measures where monitoring identifies repeated dog access into sensitive areas.

6.4 Domestic cat predation

- 6.4.1 Domestic cat predation cannot be wholly prevented in a residential urban extension. The appropriate response is to reduce spatial overlap between residential edges and the most sensitive retained/potential corn bunting habitats, and to avoid designing attractive nesting habitat immediately adjacent to rear gardens or high-use green corridors. Defensive planting, thorny buffers and structural separation should be used around sensitive areas. Habitat intended primarily for nesting should be set back from housing wherever feasible; habitat closer to housing should preferentially function as general biodiversity/foraging habitat rather than core nesting habitat.
- 6.4.2 Domestic cat predation will be addressed primarily through spatial planning and habitat placement rather than through reliance on behavioural controls. The detailed design should avoid creating the most attractive nesting habitat for corn bunting immediately adjacent to rear gardens, residential streets, high-use pedestrian routes or enclosed green corridors likely to be used regularly by cats. Where habitat occurs close to residential edges, it should generally be designed to provide supporting biodiversity value, foraging resource and structural connectivity, rather than being deliberately managed as core nesting habitat for corn bunting.
- 6.4.3 Core on-Site nesting and territory-support habitat should, where practicable, be set back from residential parcels and located within more open peripheral compartments, especially where these connect with retained farmland, rough grassland, arable margins or low-intensity green infrastructure. This will be tested and refined through Reserved Matters applications, once the detailed position of housing, gardens, streets, footpaths, play areas, drainage features and landscape buffers is known.
- 6.4.4 Where sensitive corn bunting habitat lies within potential cat-roaming influence from proposed dwellings, the detailed design should incorporate risk-reduction measures. These may include native thorny scrub buffers, dense hedgerow planting, dead hedging, post-and-wire fencing, shallow ditches, bunding, changes in level, or other landscape features that discourage direct movement from residential edges into sensitive nesting areas. Such features should be designed to reduce predator and recreational permeability without enclosing the habitat so heavily that its open farmland-edge character is lost.
- 6.4.5 Planting used for predation-risk reduction should be carefully specified. Dense thorny scrub may be appropriate as a defensive edge treatment, but extensive scrub expansion into the core management area should be avoided, as this would reduce the open structure required by corn bunting. The objective should be to create a protective edge and controlled access structure, while retaining open grassland, rough sward, scattered song posts and low-intensity foraging areas within the interior of the management zone.
- 6.4.6 Reserved Matters submissions for phases adjacent to corn bunting-sensitive areas should therefore include a brief Corn Bunting Design Compliance Statement, or equivalent section within the phase-specific HMP/LEMP, explaining how the layout has avoided placing core nesting habitat in the highest-risk locations and how any residual cat predation risk has been reduced through habitat design and boundary treatment.

6.5 Avoidance of ecological sink effects

- 6.5.1 A central objective is to avoid creating apparently suitable habitat that consistently attracts corn bunting into areas where productivity is poor because of predation or disturbance. Monitoring should therefore record not only singing males but, where possible, evidence of breeding behaviour such as carrying food, fledged young or repeated occupancy. If monitoring identifies repeated occupation of areas with high disturbance and indications of limited productivity, management should be reviewed. Responses could include changing sward structure, relocating seed resources, increasing access control, or shifting emphasis towards less disturbed compartments and the off-Site compensation area.
- 6.5.2 A key principle of this strategy is to avoid creating ecological sink habitat. In this context, a sink would comprise habitat that appears structurally suitable and attracts territorial corn buntings, but where breeding productivity is compromised by repeated disturbance, dog access, domestic cat predation or inappropriate management. The strategy therefore focuses not only on creating habitat resources, but also on ensuring that those resources are located and managed in places where successful breeding is more likely.
- 6.5.3 This will be addressed through three linked mechanisms. First, detailed design will seek to place the highest-value nesting-support habitats in the least disturbed locations available within the masterplan. Secondly, habitats closer to residential parcels and high-use public open space will be managed primarily as supporting foraging, movement and wider biodiversity habitat rather than as core corn bunting nesting habitat. Thirdly, monitoring will record not only presence of singing males, but also, where practicable, evidence of breeding behaviour and habitat functionality.
- 6.5.4 Where monitoring indicates that corn bunting are repeatedly occupying high-risk areas with indications of low productivity, the management response will be reviewed. This may include reducing the attractiveness of that specific area for nesting, relocating seed-rich resources away from high-risk edges, strengthening access-control measures, altering mowing regimes, increasing screening or defensive planting, or increasing reliance on more suitable retained areas and the off-Site compensation package. This adaptive approach directly responds to the consultee concern that on-Site habitats should not be assumed to be productive simply because they are present.

7. RESERVED MATTERS DESIGN CONTROLS

- 7.1.1 The on-Site strategy is necessarily strategic at outline stage. The precise configuration of housing parcels, access routes, drainage infrastructure, open space typologies, landscape planting and management boundaries will be fixed through future Reserved Matters applications. For that reason, the prescriptions in this document establish mandatory design principles rather than final parcel-level layouts.
- 7.1.2 Each Reserved Matters application that includes or lies adjacent to a corn bunting-sensitive zone, should demonstrate how the submitted layout has responded to this strategy. This should be provided either through a Reserved Matter specific Habitat Management Plan, Landscape and Ecological Management Plan, Reserved Matters ecological compliance note, or similar document agreed with the Local Planning Authority.
- 7.1.3 The Reserved Matters submission containing retained or proposed corn bunting habitats should identify: retained and created habitats relevant to corn bunting; the location of public access routes; the relationship between sensitive habitats and residential edges; proposed mowing and cutting regimes; dog access management; boundary treatments; defensive planting; song-post provision; seed-rich or invertebrate-rich habitat; cat predation risks, and monitoring requirements. The submission should also confirm whether any retained or potential territories within or adjacent to the phase are likely to remain functional, whether additional risk-reduction measures are required, and how the phase fits with the wider on-Site and off-Site corn bunting strategy. This report provides the principles to the corn bunting approach, however the specific RMA's will provide specifics for the corn bunting sensitive zones.
- 7.1.4 This staged approach is appropriate because it allows the corn bunting strategy to be applied with precision once detailed design information is available, while ensuring that the principles are secured at outline stage. It also ensures that the strategy can respond to updated survey information, final phasing, habitat establishment, recreational patterns and any changes in the distribution of corn bunting before each relevant phase comes forward.

8. IMPLEMENTATION SCHEDULE

- 8.1.1 Table 8.1 provides an indicative implementation schedule for the on-Site corn bunting mitigation measures. The schedule identifies the key actions required from condition discharge through Reserved Matters, construction, habitat establishment and long-term management.

Table 8.1 On-Site Implementation Schedule

Stage	Required action
Reserved Matters for relevant parcels containing corn bunting habitat	Fix detailed habitat layout, path routing, access controls, buffer planting, song-post locations, grassland prescriptions, seed-rich plots and monitoring locations.
Pre-construction	Undertake nesting bird checks where required; identify retained sensitive areas; install protection fencing/signage; brief contractors.
Construction	Maintain exclusion zones; avoid unnecessary lighting/noise spill into retained habitats; monitor any works adjacent to sensitive areas during breeding season. Identify opportunities for temporary fallow land to be made available for bird nesting during breeding season.
Habitat establishment years 1-3	Establish grasslands, seed-rich plots, scrub buffers and song posts; monitor establishment and public-access behaviour; undertake remedial planting/sowing if necessary.
Long-term management	Manage sward structure, scrub extent, seed resources, access controls and habitat interfaces; continue monitoring and adaptive management.

9. MONITORING AND ADAPTIVE MANAGEMENT

9.1 Monitoring purpose

- 9.1.1 Monitoring is required to test whether on-Site habitats are establishing as intended, whether public access and disturbance controls are functioning, and whether corn bunting continue to use retained/peripheral areas. Monitoring should not be framed as proving that on-Site habitat alone replaces displaced arable territories. Its purpose is to manage residual on-Site function and trigger adaptive measures where habitat or access performance is poor.

9.2 Monitoring scope

- 9.2.1 Table 9.1 sets out the proposed monitoring scope for the on-Site strategy. The purpose of monitoring is to test habitat establishment, public access management, disturbance controls, predation-risk management and the continued use of retained / peripheral habitats by corn bunting.

Table 9.1 Monitoring Scope for On-Site Corn Bunting Measures

Monitoring element	Method / purpose
Breeding corn bunting survey	Territory mapping of singing males and evidence of breeding activity within retained/potential on-Site areas. Minimum three visits between May and July in suitable conditions, refined by ornithologist.
Habitat establishment survey	Assessment of sward height/density, wildflower/seed resources, scrub encroachment, bare ground, song-post provision and condition of buffers/access-control measures.
Access and disturbance audit	Review path use, dog incursion, informal desire lines, damage to fencing/planting, and any evidence of repeated human/dog use within sensitive areas.
Predation-risk review	Qualitative review of proximity to residential edges, observed cat presence, habitat design and whether nesting resources are positioned in high-risk locations.
Reporting	Annual report during establishment and early occupation phases, then at agreed intervals, summarising data, interpretation and required remedial actions.

9.3 Suggested monitoring years

- 9.3.1 Monitoring should be linked to habitat delivery and occupation rather than only calendar years from outline consent. A suitable framework would comprise baseline/pre-works survey, annual monitoring for the first five years following establishment of each principal on-Site corn bunting management area, then years 10 and 15, or as otherwise agreed through the condition/legal agreement. More frequent monitoring may be required if early monitoring identifies underperformance or persistent disturbance.

9.4 Adaptive management triggers

- 9.4.1 Table 9.2 identifies the principal adaptive management triggers for the on-Site strategy and the potential remedial responses that may be required. This ensures that monitoring leads to active management intervention where habitat condition, disturbance pressure or corn bunting use indicates underperformance.

Table 9.2 Adaptive Management Triggers and Potential Remedial Responses

Trigger	Potential remedial response
Grassland too short / uniform	Reduce mowing frequency, introduce rotational cutting, create no-cut refuge zones, review contractor specification.
Grassland too rank / scrub encroaching	Introduce autumn/winter cutting, targeted scrub control, removal of bramble patches where open structure is being lost.
Dog/public access into sensitive areas	Re-route paths where feasible, repair/upgrade fencing, increase thorny planting, add temporary seasonal controls, revise signage and management patrols.
Seed-rich plots fail	Re-sow, alter seed mix, adjust soil preparation/timing, consider alternative location away from high disturbance.
Corn bunting using high-risk edge habitat with poor productivity	Reduce attractiveness of high-risk area for nesting; shift resources to more buffered compartments and ensure off-Site compensation is fully implemented.
No use of retained habitats over repeated years	Review habitat suitability and disturbance; consider whether on-Site objective should shift towards general farmland bird enhancement while relying on off-Site compensation for corn bunting population support.

- 9.4.2 Monitoring should be sufficiently detailed to test the specific concerns raised by consultees. It should therefore record habitat establishment and corn bunting presence, but also the operation of access controls and the likelihood that retained territories are functioning productively. Where appropriate, monitoring should include territory mapping, observation of singing males, evidence of repeated territory occupancy, evidence of food carrying or fledged young, condition of grassland structure, scrub encroachment, informal path creation, dog access, damage to fencing or buffers, and any observed domestic cat activity.
- 9.4.3 The monitoring regime should be linked to the delivery and occupation of each relevant phase of corn bunting habitat. Monitoring should commence before or during the first phase affecting corn bunting-sensitive habitat specific to the phase, continue annually through the establishment period, and then continue at agreed intervals for the long-term management period. The results should be reported to the Local Planning Authority, with recommendations for any remedial or adaptive management required.
- 9.4.4 Adaptive management should be capable of responding to both habitat failure and disturbance pressure. If habitat fails to establish, remedial seeding, changes to cutting regimes, soil preparation or vegetation management should be implemented. If access pressure is higher than predicted, additional fencing, dead hedging, thorny planting, path realignment, signage or management patrols may be required. If cat predation risk is judged to be elevated because sensitive habitat is too close to residential edges, the management objective for that habitat may

be adjusted away from nesting support and towards foraging / general biodiversity function, with nesting-support emphasis shifted to better-buffered on-Site areas and the off-Site compensation land.

- 9.4.5 This monitoring-led approach is important because it recognises uncertainty transparently. It does not overstate the ability of on-Site habitats to compensate for lost arable territories, but it ensures that retained habitats are actively managed and reviewed rather than simply assumed to function.

10. CONCLUSION

- 10.1.1 This on-Site strategy provides a robust, precautionary and management-led framework for corn bunting within the red line boundary. It recognises the County-level importance of the population and the substantial change that will occur to the arable baseline. It does not rely on retained on-Site habitats as the sole solution. Instead, it defines the on-Site role as retention, risk reduction, habitat continuity and enhancement, with residual loss and uncertainty addressed by the separate off-Site compensation strategy.
- 10.1.2 By separating on-Site mitigation from off-Site compensation and by embedding access, disturbance, predation, monitoring and adaptive management controls, this document responds directly to the principal concerns raised by RSPB, HMWT and NHC.
- 10.1.3 The on-Site strategy therefore provides a realistic and precautionary framework for retaining residual corn bunting function within the Site. It does not rely on Bygrave Common, retained margins or newly created public open space as a guaranteed replacement for lost arable territories. Instead, these areas are treated as managed, monitored and risk-reduced components of a wider strategy, with any residual uncertainty addressed through the separate off-Site compensation package.
- 10.1.4 The detailed design of the on-Site measures will necessarily be refined through Reserved Matters applications and any requires management plans. This is appropriate given the outline nature of the current application. However, the principles set out in this strategy will guide those later submissions and require each relevant phase to demonstrate how corn bunting habitat, public access, domestic cat predation risk, dog disturbance, mowing regimes, seed resources, structural habitat and long-term monitoring have been addressed in an integrated manner.
- 10.1.5 On that basis, it is considered that this strategy provides a robust mechanism for responding to RSPB, HMWT and NHC concerns, while retaining appropriate flexibility for detailed design evolution.

11. REFERENCES

- BMD.21.0045.RPE-P2.814.Eco Assessment - Phase 2 Further Ecological Assessment (BMD, 2025).
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- BMD.21.0045.LET.818.001 - Response to RSPB and HMWT representations regarding corn bunting (BMD, April 2026).
- BMD.21.0045.RPE.TN.819.002 – Corn Bunting Off-Site Compensation Strategy and Management Plan: Land to the East and South of Baldock
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- NHC Ecology response (2 April 2026).