

Growing Baldock

Environmental Statement Addendum
Volume 2: Figures & Appendices

Chapter 11: Ecology

Appendix 11.2 Corn Bunting Mitigation Strategy (Off-Site)

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

Technical Note

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BACKGROUND

This Corn Bunting Off-Site Compensation Strategy and Management Plan has been prepared to consolidate the off-Site component of the corn bunting response for Land to the East and South of Baldock. It is intended to be read alongside the separate On-Site Corn Bunting Mitigation Strategy and Management Plan, the Ecological Mitigation Plan, the Phase 2 Further Ecological Assessment.

The document responds directly to the principal outstanding matters raised by RSPB and HMWT: the need for clarity on off-Site extent and prescriptions, the distinction between mitigation and compensation, the need for legal and financial securing, and the need for monitoring and adaptive management. The off-Site measures are described as compensation because they are intended to address loss and uncertainty affecting part of the existing breeding population within the development Site.

The off-Site compensation land considered in this document is the Homestead, Clothall, Baldock. The supplied HCC mitigation plan identifies a mitigation area of 78.84 acres / 31.907 hectares, to be referenced in the final issue as Plan F - Mitigation Area.

The compensation approach is to increase the breeding productivity, seasonal carrying capacity and winter survival prospects of the local corn bunting population within nearby working farmland. It does not require the off-Site land to be removed from agriculture. Instead, management is integrated into ongoing farming through targeted measures including 6 m tussocky grassland strips, 12 m double-sown cereal strips in fields sown with autumn or spring cereals, retention/management of existing suitable grassland and scrub features, and use or continuation of suitable agri-environmental options where present.

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).

1. INTRODUCTION

1.1 Background and purpose

- 1.1.1 This document sets out the off-Site compensation strategy for corn bunting associated with the Proposed Development at Land to the East and South of Baldock. It has been prepared as a formal management plan, rather than as a technical note, because the consultee comments require a clear, enforceable and monitorable package capable of being secured by condition and/or legal agreement.
- 1.1.2 The strategy is designed to respond to a predicted loss/displacement of corn bunting territories from the development Site, particularly those associated with central arable compartments that will be replaced by built development, infrastructure and managed green infrastructure. The off-Site strategy is also designed to address uncertainty affecting retained/peripheral on-Site territories, including possible disturbance and predation effects identified by consultees.
- 1.1.3 The purpose of this off-Site strategy is to provide certainty that the loss and displacement of corn bunting territories from the development Site will be addressed through a dedicated, deliverable and monitorable compensation package. This is a separate function from the on-Site mitigation strategy (see Report Ref BMD.21.0045.RPE.TN.819.001 - Onsite Corn Bunting Mitigation). The on-Site strategy seeks to retain residual habitat function within the red line boundary where this remains ecologically credible; this off-Site strategy provides the compensatory mechanism for those territories that are lost, displaced or subject to residual uncertainty because of future edge effects, recreational pressure, dog disturbance and domestic cat predation.
- 1.1.4 The strategy has been prepared specifically in response to consultee concerns that the previous application material did not set out the off-Site package in a sufficiently consolidated and secured form. The RSPB raised concern regarding the absence of clear detail on the extent and efficacy of offsetting measures, and HMWT requested that off-Site provision be clearly treated as compensation and secured legally and financially. This document therefore draws together the extent of the compensation land, the agreed agricultural management prescriptions, the monitoring requirements, the adaptive management process and the intended mechanism for securing implementation.
- 1.1.5 The strategy is intentionally based on working farmland management rather than habitat creation in isolation from agriculture. Corn bunting is a farmland species and this compensation package is therefore designed to increase the carrying capacity, breeding productivity and seasonal resource availability of a working arable landscape in close proximity to the Proposed Development. This approach is ecologically preferable to creating isolated non-agricultural habitat that may not replicate the functional conditions used by corn bunting. The measures are also designed to be practical for the tenant farmer, thereby improving deliverability and reducing the risk that the compensation package becomes theoretical or difficult to maintain.

1.2 Distinction from the on-site strategy

- 1.2.1 The on-Site strategy deals with retention, risk reduction and habitat continuity within the red line boundary of the Proposed Development. This off-Site strategy deals with compensation. The distinction is important and responds directly to HMWT's comment that off-Site measures should be described as compensation rather than mitigation. The off-Site package is therefore intended to compensate for loss and uncertainty by improving conditions for corn bunting in nearby farmland already capable of supporting the species.

1.3 Source documents

- 1.3.1 The off-Site compensation strategy is informed by the documents listed in Table 1.1. These documents provide the ecological baseline, consultee context, off-Site management prescriptions, land-area information and wider planning framework that underpin the strategy.

Table 1.1 Source Documents Informing the Off-Site Compensation Strategy

SOURCE	RELEVANCE
TN810 - Assessment of Corn Bunting Mitigation Sites	Provides the wider evidence base for off-Site compensation, including previous surveys, territory data, management rationale and literature-supported measures.
Plan F - Mitigation Area	Identifies the Homestead mitigation area at 78.84 acres / 31.907 hectares. To be appended/confirmed in final issue.
RSPB representation	Raises objection based on uncertainty over extent and efficacy of offsetting, concern over reliance on on-Site Bygrave Common, and need for legal securing and monitoring.
HMWT response	Requests precautionary treatment of peripheral territories and legally/financially secured off-Site compensation.
On-Site Corn Bunting Mitigation Strategy – TN819.001	Sets out complementary on-Site retention/enhancement and explains residual uncertainty addressed by this off-Site plan.

2. BASELINE AND COMPENSATION NEED

2.1 Development site population

- 2.1.1 The development Site supports a county-important corn bunting population. The 2019 survey recorded 14 territories, the 2022 survey recorded 20 territories and the 2024 survey recorded 21 territories. Survey data demonstrate repeated use of northern arable land, the northern boundary/Bygrave Common interface, the Bygrave Road/Ashwell Road corridor and parts of the southern Site. The Site also supports a wider farmland bird assemblage including skylark, yellowhammer, linnet, grey partridge and yellow wagtail.
- 2.1.2 The Proposed Development will result in the loss or functional alteration of extensive arable habitat. Existing assessment material anticipates that approximately 50 per cent of corn bunting territories will be displaced, with uncertainty also applying to some peripheral territories. This strategy therefore treats the off-Site compensation requirement as covering both direct loss from central arable compartments and residual uncertainty associated with retained edge/peripheral habitats.

2.2 Off-site landscape context

- 2.2.1 The off-Site compensation approach focuses on nearby farmland within the ecological range of the Site population. TN810 concluded that off-Site measures should be located close to the Site, with ringing data suggesting that mitigation areas within approximately 5 km of the Site are sufficiently close to be reached by corn bunting. The strategy therefore seeks to strengthen the local population rather than relying on distant, ecologically disconnected land.
- 2.2.2 The Homestead land is appropriate for this purpose because it forms part of the same farmland landscape context and can be managed while remaining in agricultural use. The measures have been discussed with the tenant farmer, which materially improves deliverability compared with speculative off-Site land where agricultural compatibility and long-term management are unresolved.
- 2.2.3 The Homestead / Plan F land is considered suitable because it lies within the local farmland landscape supporting the Baldock corn bunting population and is sufficiently close to the development Site to contribute to the same functional population. The purpose of the off-Site package is not to translocate birds, nor to assume that displaced individuals will necessarily move directly from the development Site into a specific field. Rather, the purpose is to strengthen the local population by increasing the quality and productivity of nearby farmland already capable of supporting the species.
- 2.2.4 This is important in responding to the RSPB's concern regarding compensation efficacy. The off-Site strategy does not rely on an untested landscape remote from the impact area. It is based on nearby farmland where management can be implemented alongside existing agricultural practice. The wider TN810 evidence base demonstrates that nearby candidate mitigation areas already support breeding corn bunting, with 2023 surveys recording 5 territories at Potential Park, 8 at Ashwell End and 6 at Hinxworth, and numbers across the three mitigation sites broadly

comparable to the 2019 baseline. The Plan F / Homestead package should therefore be understood as part of a wider local farmland compensation approach, targeted at maintaining the North Hertfordshire corn bunting population in the same ecological landscape.

- 2.2.5 The use of a defined land parcel is also central to deliverability. The Plan F land provides a mapped compensation area of 78.84 acres / 31.907 ha, and the final issued strategy should ensure that this plan reference is carried consistently into the planning condition, any legal agreement and the long-term management documents.

2.3 Precautionary approach

- 2.3.1 The TN810 provides important evidence that nearby candidate compensation landscapes already support breeding corn bunting and other farmland birds. The 2023 surveys recorded 5 corn bunting territories at Potential Park, 8 at Ashwell End and 6 at Hinxworth. Numbers across these three mitigation sites were virtually unchanged between the 2019 and 2023 surveys, demonstrating continuing use of nearby working farmland by corn bunting.
- 2.3.2 The Homestead/Plan F package should be read in this wider evidence context. The strategy is not predicated on creating corn bunting habitat from an ecologically blank baseline. It is designed to improve the quality, carrying capacity and productivity of farmland within the local corn bunting landscape.
- 2.3.3 Table 2.1 summarises the relevant evidence for nearby farmland areas that have been considered in relation to corn bunting compensation. This demonstrates that the strategy is being developed within a local farmland landscape already known to support breeding corn bunting, rather than relying on ecologically untested or remote compensation land.

Table 2.1 Evidence Supporting the Off-Site Compensation Context

Area	Relevant evidence / scale	Interpretation
Ashwell End	8 territories	Breeding confirmed; territories concentrated near Love Lane/New Barn in 2023.
Hinxworth	6 territories	Territory distribution broadly similar to 2019.
Homestead / Plan F (Previously labelled as Potential Park in 2019 studies)	5 territories Management area 31.907 ha	Breeding confirmed; distribution similar to 2019.

3. OFF-SITE COMPENSATION AREA

3.1 Homestead / Plan F mitigation land

- 3.1.1 The principal and agreed off-Site compensation area covered by this plan is the Homestead, Clothall, Baldock, shown on Plan F - Mitigation Area. The supplied HCC plan identifies the mitigation area as 78.84 acres / 31.907 hectares. The final issued document should append Plan F and ensure that the plan reference is consistent across the planning response, legal agreement and condition-discharge package.
- 3.1.2 The strategy applies to three existing arable fields farmed by the tenant farmer, together with associated areas currently uncultivated or entered into agri-environmental schemes.

3.2 Compensation Principles

- 3.2.1 The off-Site strategy is based on six core principles.
- 3.2.2 First, the compensation land will remain in active agricultural management. The objective is not to remove the land from farming, but to modify selected parts of the farmed system so that it provides improved nesting structure, foraging habitat, winter food and song-post resources for corn bunting.
- 3.2.3 Secondly, the compensation measures will be delivered in locations that can operate together as a functional habitat package. Double-sown cereal strips provide potential nesting structure within the field; tussocky grassland strips provide invertebrate-rich foraging habitat and structural diversity; existing grassland/scrub areas provide song posts and additional cover; and agri-environment or winter bird seed areas provide seasonal food resources.
- 3.2.4 Thirdly, the measures will avoid reliance on field-edge nesting where this would increase ecological risk. TN810 identifies that operational double-drilling close to field margins can attract corn bunting nesting attempts, but that nest survival may be subject to a strong crop-edge effect. The compensation package therefore focuses on double-sown cereal strips positioned towards the field centre or away from high-risk edges, with associated grassland resources positioned within typical foraging distances.
- 3.2.5 Fourthly, the strategy will provide both breeding-season and non-breeding-season resources. Breeding success depends on suitable nesting structure and invertebrate availability for chick provisioning, while winter survival depends on the availability of seed and grain resources. TN810 identifies that grassy field margins, spring-sown barley, unintensified grassland and set-aside are preferentially selected for foraging and that invertebrate densities are high in unintensified grassland and field margins. It also identifies the importance of winter food sources, including cereal grains and other seeds.
- 3.2.6 Fifthly, the strategy will be secured and funded so that the tenant farmer is not required to absorb the reasonable costs of delivery.

- 3.2.7 Sixthly, the strategy will be monitored and adjusted. TN810 recognises that, although the proposed measures are underpinned by published research, monitoring is required to evaluate the success of the package in practice. The strategy therefore includes adaptive management triggers so that the location, extent or management of measures can be modified if monitoring identifies underperformance.

3.3 Delivery principles

- 3.3.1 The compensation area will remain in agricultural use. This is a strength of the strategy because corn bunting is a farmland species and the objective is not to create an artificial reserve isolated from the working landscape. The objective is to layer targeted management onto normal farming operations in order to improve nesting conditions, chick-food availability, post-breeding resources and winter food availability while maintaining practical deliverability for the farmer.
- 3.3.2 The delivery principles set out in Table 3.1 explain why the Homestead / Plan F land is considered a suitable off-Site compensation area. The table summarises the relationship between ecological suitability, practical farming deliverability, legal / financial security and adaptive management.

Table 3.1 Core Delivery Principles for the Homestead / Plan F Compensation Area

Principle	Application to Homestead / Plan F
Ecological suitability	The land sits within the wider local farmland landscape used by corn bunting and other arable/farmland species.
Practical deliverability	Measures have been discussed with the tenant farmer and are designed to operate alongside normal agriculture.
Legal/funding clarity	Tenant reasonable costs are to be reimbursed subject to evidence of expenditure or agreed standard industry rates.
Adaptive management	Existing agri-environment areas can remain where suitable; fallback prescriptions are provided if land is withdrawn from those schemes.

4. MANAGEMENT PRESCRIPTIONS

4.1 Tussocky grassland strips

- 4.1.1 Tussocky grassland strips will be established through autumn sowing. Strips will be 6 m wide. The seed mix should contain a high proportion of tussock-forming grass species, with suitable examples including Emorsgate EG10 Tussock Grassland Mixture or Cotswold Grass Seeds Beetle Bank and Tussocky Grass Margin Mixture. The purpose is to provide structurally suitable foraging and refuge habitat, support invertebrate prey availability, and complement field-centre cereal nesting measures.
- 4.1.2 During the first summer following sowing, the strips will be topped regularly every four to six weeks between April and September to control annual weeds and undesirable species. The grassland strips will then be reviewed by BMD ecologists at the end of the first summer to confirm successful establishment. If resowing is required due to establishment failure, this will be undertaken following that inspection.
- 4.1.3 Once established, grassland strips should require minimal management. Cutting may be required every two to three years to prevent scrub or bramble establishment. No cutting will be undertaken during the first two years following successful establishment. Where management cutting is required, no more than one third of the total area of grassland strips should be cut in any one year, and cutting should be undertaken between October and December. This maintains a mosaic of standing structure and avoids removal of the full habitat resource in any single season.
- 4.1.4 The function of the tussocky grassland strips is not solely to create a visual field margin. Their purpose is to provide structurally diverse, low-input habitat capable of supporting invertebrate prey, seed resources, cover and movement opportunities within the working arable landscape. These strips should therefore be managed as ecological compensation features rather than as conventional agricultural margins or amenity grassland.
- 4.1.5 The grassland strips should be established in autumn to maximise successful germination and allow establishment ahead of the following breeding season. The seed mix should be dominated by tussock-forming grasses, with an appropriate component of species capable of supporting structural diversity and invertebrate abundance. The mix should not be overly fine or amenity-led; it should be selected to create a robust sward capable of providing rough grass structure over the long term.
- 4.1.6 First-year topping is intended to secure establishment rather than to create short grass. The every four-to-six-week topping regime during the first summer should therefore be reviewed by the project ecologist to ensure that it is controlling annual weeds without preventing the development of the intended tussocky structure. If establishment is poor, the cause should be identified before reseeding, including review of soil preparation, weed burden, drought conditions, seed rate and timing.
- 4.1.7 Once the strips are established, the management objective should shift from establishment control to structural continuity. No cutting should occur during the first two years following successful establishment. Thereafter, cutting should be limited and rotational, with no more than

one third of the total tussocky strip resource cut in any one year, and cutting should occur between October and December. This ensures that there is always retained standing structure across the compensation area, avoiding sudden loss of the full resource and maintaining continuity for farmland birds and invertebrates.

- 4.1.8 Where bramble or scrub begins to colonise the strips, management should be targeted rather than wholesale. Small amounts of scattered scrub may provide ecological structure, but the strips should not be allowed to become dense scrub corridors. The management objective is rough, open, tussocky grassland associated with the arable system, not closed scrub.

4.2 Double-sown cereal strips

- 4.2.1 All fields sown with autumn or spring cereals will include a 12 m strip of double-sown crop. There are no specific double-sown strip requirements for fields sown with non-cereal crops or left fallow over summer, although such fields may still provide wider farmland bird benefits depending on management. Double-sown strips will be provided every year in which cereal crops are sown.
- 4.2.2 During drilling, two strips equivalent to the current drill width of 6 m will be double-sown to create a combined 12 m strip. The strip will be positioned between 60 m and 100 m from the tussocky grass margins and aligned with the usual tramline direction used for drilling, either east-west or north-south depending on field characteristics. The ecological rationale is to provide denser cereal structure away from field edges, reducing the risk of attracting nesting attempts into high-risk edge locations while maintaining access to nearby foraging resources.
- 4.2.3 TN810 identifies potential ecological benefit from treating double-sown strips as sacrificial areas with reduced or omitted post-sowing herbicide, allowing weeds to establish and increasing seed/invertebrate resources. This plan therefore treats reduced input within selected strips as a desirable enhancement and adaptive-management option, but the minimum agreed tenant-farmer commitment is the annual provision of the 12 m double-sown cereal strips in cereal years.
- 4.2.4 The double-sown cereal strips are the core breeding-season intervention within the arable compartments. Their purpose is to create higher-density cereal structure within the field, thereby increasing the availability of suitable nesting conditions in locations less exposed to field-edge effects. The strips should be provided in all fields sown with autumn or spring cereals, with the 12 m strip created through two drill widths of 6 m.
- 4.2.5 The positioning of the strips is critical to their ecological function. They should be located between 60 m and 100 m from the tussocky grassland margins, so that nesting structure and foraging habitat are sufficiently close to operate together. This is consistent with TN810, which identifies that corn buntings typically forage close to the nest, with studies recording mean foraging distances of approximately 115 m and most foraging trips within around 100–120 m depending on sex and context.
- 4.2.6 The strips should, where practicable, be aligned with existing tramlines and normal drilling operations to ensure ease of delivery. Their location may vary between years in response to crop rotation, drilling direction and field conditions; however, the annual location should be confirmed

and recorded as part of the implementation audit. This avoids a rigid prescription that conflicts with farming practicality while still ensuring that the ecological function of the strips is delivered.

- 4.2.7 The currently agreed minimum measure is the provision of the 12 m double-sown cereal strip in cereal years. However, the ecological performance of the measure may be enhanced where, by agreement with the tenant farmer and within the legal/funding framework, selected double-sown strips are managed as a lower-input or sacrificial element of the crop. TN810 identifies that leaving double-sown strips untreated with herbicide and/or retaining them unharvested could increase weed seed, invertebrate and winter grain resources, and could reduce the risk of active nests or dependent young being destroyed by harvesting operations.
- 4.2.8 Where full sacrificial management is not agreed at the outset, this should be retained as an adaptive management option. If monitoring shows that the double-sown strips are being used by corn bunting but there is limited evidence of successful breeding, or if harvesting occurs while late nesting activity remains likely, the management body and tenant farmer should review whether delayed harvesting, partial retention, reduced herbicide input or alternative strip placement is required in subsequent years.

4.3 Winter food and sacrificial resources

- 4.3.1 Winter food availability is important for adult survival and post-breeding population support. TN810 recommends provision of sacrificial cereal or standing/unharvested crop to enhance winter food resources. Where compatible with the tenant-farmer agreement, agri-environment options, crop rotation and farm operations, small areas of cereal or winter bird seed should be retained as winter food. Existing winter bird seed mix areas, where present, should be retained through appropriate agri-environmental options where possible.
- 4.3.2 If winter food provision cannot be delivered in a given field because of crop rotation or agronomic constraints, the annual monitoring report should record the reason and identify alternative provision elsewhere within the Plan F area or adjacent controlled land. The objective is to maintain continuity of winter resource at the landscape scale rather than require the same field to deliver the same intervention every year.
- 4.3.3 Winter food provision should be treated as a core objective of the compensation package, not an incidental benefit. Corn bunting survival outside the breeding season is influenced by the availability of cereal grain and other seed resources. Modern harvesting efficiency can reduce the availability of spilt grain, and TN810 therefore recommends sacrificial cereal or over-winter food provision to enhance winter survival and provide a stable food source for the post-breeding population.
- 4.3.4 Where suitable agri-environment options already provide winter bird seed or equivalent food resources, those areas should be retained where possible and counted as part of the functional compensation package. If such options expire or are withdrawn, replacement provision should be agreed through the annual farm operations review. Replacement provision may include wild bird seed mix, retained standing cereal, sacrificial cereal strips, over-winter stubble where seed availability is likely to persist, or other measures agreed by the project ornithologist.

- 4.3.5 The objective should be continuity of winter food provision across the Plan F land or immediately functionally connected land, rather than identical placement of the same feature each year. This is important because crop rotation and agri-environment agreements may change over the management period. The management plan should therefore secure the outcome — reliable winter food availability for corn bunting and the wider farmland bird assemblage — while allowing the exact delivery mechanism to vary by year, subject to ecological review.

4.4 Existing agri-environment and uncultivated areas

- 4.4.1 Some areas of the Plan F land are currently uncultivated or entered into agri-environmental schemes. It would be beneficial if these areas were incorporated into the compensation package once current schemes expire unless they remain in a suitable agri-environment option that already provides equivalent or superior benefit for corn bunting and the wider farmland bird assemblage.
- 4.4.2 It would also be beneficial for existing agri-environment areas to be treated as part of the compensation resource where they provide equivalent or better ecological function for corn bunting and the wider farmland bird assemblage. This should avoid replacing a functioning agri-environment option with a new prescription merely for administrative consistency. Instead, where an existing option already provides winter seed, pollen and nectar, rough grassland, or other farmland bird benefit, it should be retained and integrated into the compensation package.
- 4.4.3 However, reliance on existing agri-environment areas should be transparent. The annual monitoring report should identify which areas are currently under agri-environment management, the nature of the option, the expected duration of the agreement where known, and the ecological function it provides. This will allow the Local Planning Authority and consultees to understand how the package is functioning and whether replacement measures are required when agreements expire.
- 4.4.4 Where agri-environment options are withdrawn, expire, or are changed to options that no longer provide equivalent corn bunting benefit, the fallback prescriptions in this strategy should apply. These include establishment of 6 m tussocky grassland margins, retention of open grassland with limited scrub, and additional tussocky grassland creation where land is not returned to arable use.
- 4.4.5 Table 4.1 sets out how existing agri-environment and uncultivated areas within the Plan F land could be treated to benefit corn bunting. The intention being to retain existing management where it already provides suitable or equivalent benefit for corn bunting and the wider farmland bird assemblage, while providing clear fallback prescriptions where existing options expire, change or are withdrawn.

Table 4.1 Management Response for Existing Agri-Environment and Uncultivated Areas

Area	Current position	Management response
Land south of Warren Lane	Currently under an agri-environmental scheme and sown with winter bird seed mix.	Continue in a suitable scheme where possible. If withdrawn, provide a 6 m grass margin along the field boundary bordering Warren Lane, managed as tussocky grassland.
Land north of Warren Lane - existing grassland/scrub	Currently uncultivated grassland/scrub adjacent to Warren Lane; contains hawthorn used as song posts.	Include as compensation habitat and manage as minimum 90% grassland and maximum 10% scrub. Retain selected hawthorn/scrub as song posts.
Land north of Warren Lane - pollen/nectar mix	Some land between Warren Lane and A505 is under an agri-environment scheme and sown with pollen/nectar mix.	Continue where suitable. If withdrawn, convert to additional tussocky grassland with very limited scrub. If reverting to arable, extend the proposed 6 m tussocky strip alongside the A505.

4.5 Grassland and scrub management north of Warren Lane

- 4.5.1 The existing grassland/scrub area north of Warren Lane is currently suitable for corn bunting and therefore it would be beneficial for this to be maintained as open grassland with limited scrub. This would also mean the area would need to be managed to maintain a minimum of 90 per cent grassland and no more than 10 per cent scrub. Established hawthorn and other selected scrub would need to be retained where it provides song posts, but scrub spread should be controlled so that the area does not succeed into dense scrub unsuitable for corn bunting.
- 4.5.2 In this instance, the established grassland should require minimal management. Cutting may be required every three years to prevent scrub or bramble spread. Up to half of the total grassland area may be cut in any one year if management is required, with cutting undertaken between October and December. Any scrub removal should be undertaken between December and February to avoid the bird nesting season.

4.6 Crop rotation and annual farm operations

- 4.6.1 The compensation strategy must be compatible with normal farm operations while still delivering consistent ecological function. The location and detail of double-sown strips will therefore need to be agreed annually with the tenant farmer once the crop rotation, drilling direction and field use for that year are known.
- 4.6.2 Before each cropping year, the applicant or appointed management body, tenant farmer and project ecologist should review the intended crop rotation across the Plan F land. This review should identify which fields will be sown with autumn or spring cereals and therefore require double-sown cereal strips; which fields will be in non-cereal crops or fallow; which existing agri-environment areas will remain; and whether any fallback or alternative measures are required.

- 4.6.3 Where a field is not sown with cereal in a given year, the absence of a double-sown strip in that field should not automatically be treated as non-compliance, provided that the annual implementation plan demonstrates how the overall compensation function is maintained across the Plan F land. This may include provision in another cereal field, retention of winter bird seed areas, maintenance of tussocky grassland strips, continuation of pollen/nectar or wild bird seed options, or temporary alternative measures agreed with the project ecologist.
- 4.6.4 The annual review should be recorded in a short implementation note, appended to the monitoring report or submitted to the Local Planning Authority where required by the condition/legal agreement. This note should include a simple plan or schedule showing the location of that year's cereal strips, grassland strips, existing agri-environment areas, winter food resources and any management variations.

5. MANAGEMENT SCHEDULE

- 5.1.1 The indicative management schedule in Table 5.1 sets out the principal timing requirements for establishing, maintaining and reviewing the off-Site compensation measures. This schedule should be used to inform the final legal / condition mechanism and annual implementation planning with the tenant farmer. Specifics need to be agreed with the tenant farmer and should be compatible with the farming regime

Table 5.1 Indicative Management and Implementation Schedule

Timing	Action
Autumn prior to first delivery year	Sow 6 m tussocky grassland strips; confirm field locations and cereal strip alignment with tenant farmer.
April-September, first summer	Top newly sown tussocky grassland strips every 4-6 weeks to control annual weeds and undesirable species.
End of first summer	BMD ecologist to inspect establishment and identify any areas requiring resowing.
Cereal drilling each year	Provide 12 m double-sown strips in all fields sown with autumn or spring cereals, positioned 60-100 m from tussocky grass margins.
October-December after establishment	Cut up to one third of tussocky strips where required to prevent scrub/bramble; maintain rotational structure.
Every 2-3 years	Review grassland strip structure and scrub/bramble encroachment; undertake selective cutting if needed.
Every 3 years or as required	Review existing grassland/scrub north of Warren Lane; cut up to half of grassland if needed and control scrub between December and February.
Annually	Confirm winter food provision, whether through agri-environment options, retained standing cereal, wild bird seed mix or other agreed measures.

6. CONSTRUCTION AND PHASING CONTROLS

6.1 Securing mechanism

- 6.1.1 RSPB and HMWT both seek confidence that the off-Site package will be legally secured, funded and monitored. This strategy should therefore be secured through an appropriate planning mechanism, likely a planning condition requiring approval of the Corn Bunting Mitigation and Compensation Strategy and a legal agreement or other binding mechanism securing the off-Site land, funding and long-term management. The precise route should be confirmed by the planning and legal team.
- 6.1.2 The final mechanism should specify the land to which the strategy applies, the minimum management period, the responsible delivery body, the funding route for tenant-farmer reimbursement and ecological monitoring, and the process for agreeing adaptive management.

6.2 Tenant farmer costs

- 6.2.1 All reasonable tenant costs associated with establishing and maintaining the measures, including labour, materials and inputs, will be reimbursed subject to evidence of expenditure such as receipts. Where no specific cost is attributable, standard industry rates will be referred to by agreement of both parties. This cost-reimbursement mechanism is central to deliverability and should be carried forward into the final legal/funding arrangements.

6.3 Roles and responsibilities

- 6.3.1 Table 6.1 identifies the indicative roles and responsibilities for delivering, managing, monitoring and reviewing the off-Site compensation strategy. These responsibilities should be confirmed through the final planning condition, legal agreement and/or approved management framework.

Table 6.1 Roles and Responsibilities

Party	Indicative responsibility
Landowner / applicant	Secure land-management agreement, fund reasonable tenant costs, appoint ecological advisor, ensure monitoring and reporting are delivered.
Tenant farmer	Implement agreed agricultural measures in accordance with annual farm operations and approved strategy; liaise on crop rotations and practical constraints.
Project ecologist / ornithologist	Review implementation, undertake/oversee monitoring, interpret results and recommend adaptive management.
LPA	Approve strategy, receive monitoring reports and agree any material changes or adaptive management where required.

- 6.3.2 The landowner/applicant will be responsible for ensuring that the off-Site compensation land is secured, that the approved measures are funded, that the tenant farmer is reimbursed for reasonable costs, and that monitoring and reporting are commissioned for the duration of the agreed management period.

- 6.3.3 The tenant farmer will be responsible for implementing the agreed agricultural measures in accordance with the approved annual implementation plan, subject to normal farming constraints, weather, crop rotation and agronomic considerations. The tenant farmer or appropriate managing agent will be responsible for notifying the management body or project ecologist where crop rotation or operational constraints mean that a prescribed measure requires adjustment in a given year.
- 6.3.4 The project ecologist/ornithologist will be responsible for advising on the annual implementation plan, undertaking or overseeing breeding bird monitoring, reviewing habitat establishment, interpreting results, identifying underperformance and recommending adaptive management. The project ecologist should also provide the link between the practical farming operation and the ecological objectives of the strategy.
- 6.3.5 The Local Planning Authority will be responsible for approving the strategy as part of the OPA determination, receiving monitoring reports and agreeing any material changes to the approved prescriptions where required. Where minor annual adjustments are necessary to reflect crop rotation or farming practicality, the strategy should allow these to be agreed through the annual monitoring / implementation process without requiring unnecessary formal variation, provided the ecological function is maintained.

7. IMPLEMENTATION SCHEDULE

7.1 Monitoring objectives

- 7.1.1 Monitoring is necessary because corn bunting responses vary with crop rotation, weather, predator pressure, territory behaviour and annual conditions. The objective is not simply to count birds each year, but to determine whether the agreed management measures are being implemented, whether habitat structure is suitable, whether corn bunting and wider farmland birds are using the area, and whether adaptive management is required. Monitoring should be designed to answer three questions:

Has the compensation package been implemented?

- 7.1.2 This requires annual checks of the management measures, including double-sown strips, grassland strips, winter food provision and agri-environment areas.

Is the habitat developing in a way that is suitable for corn bunting?

- 7.1.3 This requires assessment of sward structure, scrub extent, cereal strip location, song-post availability, invertebrate-rich foraging habitat, weed/seed resources and the relationship between nesting and foraging resources.

Is the local corn bunting population responding?

- 7.1.4 This requires breeding-season territory mapping, recording of singing males, concurrent singing, song posts, evidence of breeding behaviour, food carrying, fledged juveniles where observed, and use of compensation features. Monitoring should also record wider farmland birds where practical, including skylark, yellowhammer, linnet, grey partridge and yellow wagtail, because the compensation package is expected to provide wider bird assemblage benefits.

- 7.1.5 The monitoring should be undertaken by a suitably experienced ornithologist familiar with corn bunting ecology and territory mapping. Given the species' complex breeding behaviour, including the possibility of unmated territorial males and polygyny, monitoring should avoid simplistic interpretation of singing males as directly equivalent to breeding pairs. The focus should be on territory distribution, repeated use, breeding evidence and habitat association.

7.2 Breeding-season monitoring

- 7.2.1 A suitably experienced ornithologist should undertake breeding-season monitoring using territory mapping principles. A minimum of three visits between May and July is recommended for the core monitoring years, with the surveyor recording singing males, concurrent singing, song posts, feeding behaviour, carrying food, fledged juveniles where seen, and the relationship between territories and implemented management measures. The methodology should be consistent enough to allow year-to-year comparison, while recognising the complexities of corn bunting territorial behaviour.

7.3 Habitat monitoring

- 7.3.1 Habitat monitoring should record whether the 6 m tussocky strips, 12 m double-sown cereal strips, existing grassland/scrub areas, winter food resources and agri-environment areas have been delivered in accordance with the approved strategy. The monitoring should include photographs, GIS/sketch mapping, sward structure notes, scrub extent, evidence of mowing/cutting, and confirmation of whether management operations occurred in the approved windows.

7.4 Suggested monitoring years

- 7.4.1 The following framework is recommended: year 0 baseline/implementation check; annual monitoring in years 1 to 5 after initial implementation; then years 10 and 15, or as otherwise required by the legal agreement. If monitoring identifies repeated underperformance, additional annual monitoring may be required.

7.5 Success indicators

- 7.5.1 The success indicators in Table 7.1 provide a framework for assessing whether the off-Site compensation strategy is being implemented and whether it is functioning as intended. The indicators include both delivery-based measures and ecological-response measures.

Table 7.1 Success Indicators for the Off-Site Compensation Strategy

Indicator	Success measure
Implementation	Tussocky strips, double-sown cereal strips and agreed agri-environment/fallback measures delivered in accordance with approved prescriptions.
Habitat structure	Tussocky strips establish and maintain suitable structure; existing grass/scrub areas maintained at approximately 90% grassland / 10% scrub; song posts retained.
Corn bunting use	Territorial males recorded using or adjacent to the compensation area over the monitoring period, with any evidence of breeding/productivity noted.
Adaptive response	Identified failures or underperformance lead to timely remedial action rather than passive reporting.

7.6 Adaptive management triggers

- 7.6.1 Table 7.2 identifies the indicative adaptive management triggers that may arise during implementation and monitoring. The purpose of this table is to ensure that any underperformance is met with a defined remedial response, rather than simply being recorded through monitoring.

Table 7.2 Indicative Adaptive Management Triggers and Remedial Responses

Trigger	Remedial response
Failure of grassland strip establishment	Re-sow failed sections in the next suitable autumn window and review seedbed preparation/weed control.
Scrub/bramble exceeds target	Undertake winter scrub/bramble control, retaining selected song posts only.
Double-sown cereal strips not delivered in cereal year	Record reason, agree replacement strips or alternative measures in the following cropping cycle; consider temporary enhancement elsewhere in Plan F area.
No winter food available	Use suitable agri-environment option, retained standing cereal, wild bird seed mix or equivalent provision in following winter.
Decline in corn bunting use over multiple years	Review crop rotation, location of strips, input regime, predator/disturbance factors and adjacent habitat; consider moving or increasing management measures within the secured land.
Evidence of management conflict with farming operations	Meet tenant farmer and ecologist to adjust location/timing while maintaining ecological function.

- 7.6.2 Adaptive management should be treated as an active obligation, not a discretionary afterthought. If monitoring identifies that the compensation package is not being implemented, is failing to establish, or is not being used by corn bunting over repeated years, the management body, tenant farmer and project ecologist should meet to agree corrective actions before the next suitable management window.
- 7.6.3 The first preference should be to adjust management within the secured Plan F land. This may include relocating double-sown strips within a field, altering the distance between cereal strips and grassland margins, increasing the extent of grassland strips, adjusting cutting frequency, controlling scrub, increasing winter food provision, retaining selected cereal strips unharvested, reducing herbicide input within selected strips, or modifying the balance between agri-environment options and bespoke measures.
- 7.6.4 Where underperformance relates to farming practicality rather than ecological suitability, the response should seek an alternative that maintains ecological function while remaining deliverable. For example, if a proposed strip location conflicts with tramlines, field access or crop management, the strip may be relocated within the same field or to another suitable field, provided the project ecologist confirms that the alternative remains functionally appropriate.
- 7.6.5 Where monitoring indicates that the Plan F land is persistently failing to support corn bunting despite implementation of the agreed measures, the applicant and project ecologist should review whether additional compensation measures are required outside of the current landholding. This should be treated as a contingency response rather than an assumption at the outset.
- 7.6.6 These measure should be reasonable and compatible with farming practices.

7.7 Implementation audit and compliance reporting

- 7.7.1 An annual implementation audit should be undertaken to confirm whether the agreed management prescriptions have been delivered. This audit should be separate from, but coordinated with, the breeding bird monitoring. Its purpose is to provide objective evidence that the off-Site compensation package is being implemented in accordance with the approved strategy.
- 7.7.2 The implementation audit should record: the crop present in each relevant field; whether double-sown cereal strips were required that year; the location and length/area of any double-sown strips provided; the location and condition of tussocky grassland strips; the status of agri-environment areas; the presence and nature of winter food resources; any changes to field boundaries, scrub, ditches or song posts; and any deviations from the approved strategy.
- 7.7.3 Where a prescribed measure has not been delivered, the audit should record the reason and the corrective action proposed. For example, if a cereal strip was not provided because a field was not in cereal production, the audit should explain what alternative provision was available that year. If a grassland strip failed to establish because of drought or weed competition, the audit should identify the reseeding or remedial management proposed. This approach will help demonstrate to RSPB, HMWT and NHC that the compensation package is not simply a one-off plan, but an actively managed and accountable process.

8. SIZE OF COMPENSATION AREA

- 8.1.1 The RSPB representation refers to research suggesting corn bunting territory sizes of approximately 3.5 ha per pair. This figure has been considered as part of the compensation area selection process and is useful as a broad sense-check when considering whether the proposed off-Site compensation land is of a meaningful scale. However, it should not be treated as a fixed or universally applicable land-take formula as corn bunting territory size and territory density vary according to crop type, sward structure, field size, management, song-post availability, invertebrate abundance, winter food availability, predator pressure, and the wider spatial arrangement of suitable nesting and foraging habitats.
- 8.1.2 In this case the compensation land has been selected by reference to five linked criteria: the predicted scale of loss and uncertainty arising from the Proposed Development; the close proximity of the compensation land to the affected local population; the ability of the land to remain in functional arable management; the capacity to introduce targeted management prescriptions known to benefit corn bunting; and the practical deliverability of those measures through landowner and tenant-farmer agreement.
- 8.1.3 The starting point is the established baseline at the development Site. The Site supports a county-important corn bunting population, with 21 territories recorded in 2024. Existing assessment work anticipates that approximately 50% of the current territories are likely to be lost or displaced, principally those associated with interior arable compartments. In addition, consultee comments from RSPB and HMWT identify uncertainty in relation to the long-term functionality of some retained peripheral territories because of domestic cat predation, dog disturbance and recreational pressure. The off-Site compensation strategy therefore addresses both direct displacement from central arable land and residual uncertainty affecting retained on-Site territories.
- 8.1.4 The Plan F land is therefore considered to provide a substantial and proportionate defined compensation area. It is considered important that the 3.5 ha figure is not applied mechanically, because the purpose of the off-Site strategy is not simply to allocate an equivalent area of land, but to improve the ecological productivity and carrying capacity of land for corn bunting, boosting the local population through improved site conditions.
- 8.1.5 This distinction is important. A gross area of unmanaged or conventionally managed arable land cannot be assumed to provide equivalent value to a smaller area subject to targeted corn bunting management. Conversely, a large area of land without appropriate nesting structure, chick-food resources, winter food and song-post availability may provide limited compensatory value. The compensation package is therefore based on the principle of functional habitat enhancement in an area already known to support corn bunting. Its purpose is to increase breeding productivity and seasonal survival within nearby working farmland, rather than merely identifying a replacement land area on a plan.
- 8.1.6 The management prescriptions proposed for the Plan F land are directly informed by published research and by the technical work already undertaken for the Baldock scheme. Research by Setchfield and Peach identifies crop tiller density as a strong predictor of corn bunting nest-site

selection, but also demonstrates the risk that operational double-drilling close to crop edges can create an ecological trap, because birds are attracted to dense edge swards where nest survival is reduced. Their work supports the provision of deliberately located mid-field double-drilled cereal strips as a practical conservation intervention, with the intention of creating attractive nesting structure away from high-risk field edges. This is directly reflected in the Plan F approach, which provides 12 m double-sown cereal strips in cereal years, positioned within the field and in functional proximity to associated foraging habitat.

- 8.1.7 The strategy also responds to evidence that corn bunting breeding success depends on the proximity of nesting habitat to invertebrate-rich foraging habitat. TN810 records that studies in southern England found corn buntings preferentially selected grassy field margins, spring-sown barley, unintensified grassland and set-aside for foraging, and that invertebrate densities were highest in unintensified grassland and field margins. It also records mean foraging distances from nests of approximately 115 m, with only 10% of foraging distances exceeding 230 m, and references North Uist work where 95% of foraging trips were within 100 m for males and 120 m for females. The Plan F strategy therefore deliberately combines 12 m double-sown cereal strips with 6 m tussocky grassland strips and other retained grassland/scrub features, so that nesting structure and chick-food resources are provided as a spatially linked package rather than as isolated habitat elements.
- 8.1.8 Seasonal nesting requirements also support the selected approach. Perkins, Maggs and Wilson found that corn bunting nest-site selection varies through the breeding season, with early-season nesting associated with forage grasses and autumn-sown cereals, and later nesting attempts shifting towards spring cereal fields. They also found that birds favoured sward density over sward height, and that cereal fields with weed abundance were selected. This supports a management package that combines structurally dense cereal strips, tussocky grassland, limited scrub/song-post features, and flexibility in response to crop rotation, rather than a fixed single habitat type.
- 8.1.9 The Plan F land has also been selected because it is deliverable. The area comprises 31.907 ha of land within the local farmland landscape at the Homestead, Clothall, Baldock, and the management prescriptions have been discussed with the tenant farmer. This is a material advantage over a theoretical or remote offsetting area. The compensation measures can be layered into ongoing agricultural management through annual double-sown cereal strips, tussocky grassland margins, retention and management of existing grassland/scrub features, and continuation or replacement of suitable agri-environmental options. This approach maintains the working farmland context required by corn bunting while providing additional nesting, foraging and winter-support resources.
- 8.1.10 The strategy also recognises that corn bunting territory mapping is not a simple one-pair-to-one-exclusive-area exercise. TN810 records that assessing breeding numbers is complicated by the species' breeding behaviour, including the presence of unmated males and polygynous males with more than one nesting female within a territory. It also records that some birds using song posts on the edge of a survey area may have the bulk of their territory off-Site. Therefore, while territory estimates are essential for impact assessment and monitoring, they should not be

converted into a rigid land-area formula without considering habitat function, productivity, crop structure and management quality.

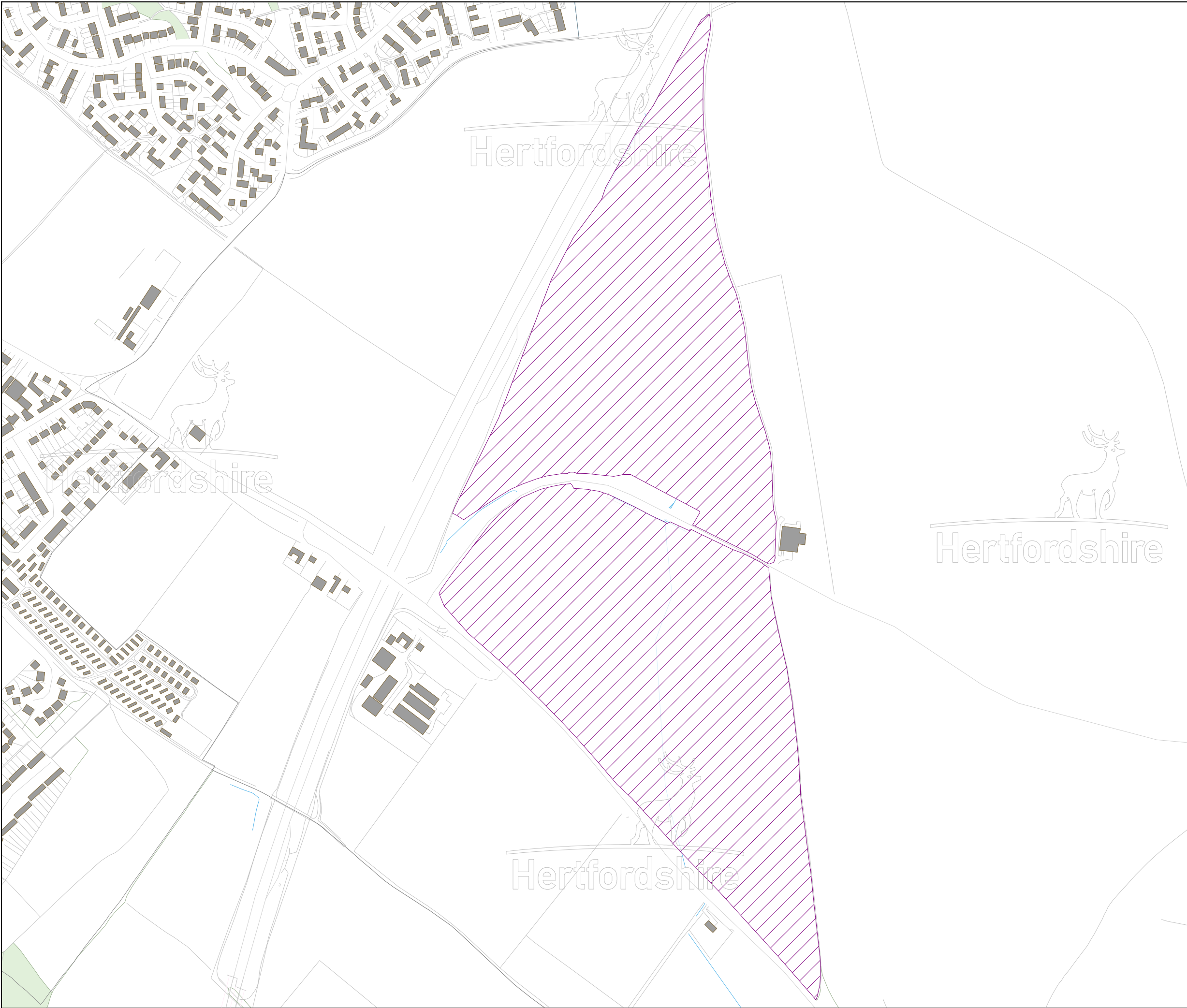
- 8.1.11 The area size selection should therefore be understood as a two-stage process. First, the Plan F land provides a defined and substantial compensation area t. Secondly, the land will be managed to increase its functional value for corn bunting through targeted prescriptions that address the principal limiting factors identified in the ecological literature: suitable nesting structure, chick-food availability, winter food availability and avoidance of high-risk edge nesting.
- 8.1.12 For these reasons, Plan F is considered an appropriate and robust off-Site compensation area. It is close to the affected population, large enough to represent a meaningful farmland compensation unit, capable of being managed while remaining in agricultural production, and subject to specific prescriptions that are more ecologically targeted than a simple area replacement approach. The adequacy of the area will also be tested through the monitoring and adaptive management framework. If monitoring demonstrates that the land is not delivering the expected functional response, the strategy provides for measures to be altered, intensified or relocated within the secured compensation area, with further remedial action to be agreed through the approved strategy and legal/condition framework if required.
- 8.1.13 In summary, the Plan F area has been selected as it provides a substantial, proximate, deliverable and functionally suitable area of working farmland where evidence-based management can be secured to increase corn bunting productivity and carrying capacity.

9. CONCLUSION

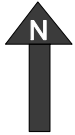
- 9.1.1 This Off-Site Corn Bunting Compensation Strategy provides a detailed, deliverable and management-led response to the key consultee concerns. It identifies the Homestead/Plan F land as a substantial compensation area, draws on measures discussed with the tenant farmer, and sets out specific prescriptions for tussocky grassland strips, double-sown cereal strips, existing grassland/scrub management, agri-environment areas, winter food provision, cost reimbursement, monitoring and adaptive management.
- 9.1.2 The strategy directly addresses the RSPB and HMWT request for a dedicated Corn Bunting Mitigation and Compensation Strategy with legal securing, funding, monitoring and adaptive management. It also clarifies that off-Site provision is compensation for loss and uncertainty, not merely enhancement. Subject to final confirmation of the legal mechanism, management period and Plan F reference, this document provides a robust basis for condition/legal agreement wording and subsequent delivery.
- 9.1.3 The off-Site compensation strategy provides the central mechanism for addressing loss and uncertainty affecting the development Site's corn bunting population. It responds directly to the RSPB and HMWT concerns by identifying a defined compensation area, setting out practical field-scale measures, confirming the role of tenant-farmer delivery, distinguishing compensation from on-Site mitigation, and embedding monitoring and adaptive management.
- 9.1.4 The strategy is deliberately based on working farmland management because that is the ecological context in which corn bunting occurs locally. The Plan F land provides a substantial defined compensation area. The additional monitoring, annual implementation audit, legal/funding provisions and adaptive management framework set out in this strategy provide the necessary mechanism to move from high-level ecological intent to enforceable long-term management.
- 9.1.5 It should be read as the compensatory counterpart to the on-Site Corn Bunting Mitigation Strategy (TN.819.001), with the two documents together providing a coherent, precautionary and deliverable response to consultee concerns.

10. REFERENCES

- BMD.21.0045.RPE/TN.817 - High Level Corn Bunting Management Plan: The Homestead, Baldock (BMD, March 2026).
- Plan F - Mitigation Area, The Homestead, Clothall, Baldock, 78.84 acres / 31.907 ha (Hertfordshire County Council Property GIS).
- BMD.21.0045.RPE/TN.810.A - Assessment of Corn Bunting Mitigation Sites (BMD, August 2025).
- BMD.21.0045.RPE-P2.814.Eco Assessment - Phase 2 Further Ecological Assessment (BMD, 2025).
- BMD.21.0045.RPE/MP.809.B.Ecological Mitigation Plan (BMD, January 2026).
- BMD.21.0045.LET.818.001 - Response to RSPB and HMWT representations regarding corn bunting (BMD, April 2026).
- BMD.21.0045.RPE.TN.819.001 – Corn Bunting On-Site Mitigation Strategy and Management Plan: Land to the East and South of Baldock.
- RSPB representation, Outline Planning Application 25/02571/OP Growing Baldock Development Site (8 December 2025).
- Herts and Middlesex Wildlife Trust correspondence regarding corn bunting, swift provision, BNG and water resources (15 April 2026).
- NHC Ecology response (2 April 2026).



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 Mitigation Area
78.84 acre/31.907ha



Resources
Hertfordshire County Council
County Hall
Hertford SG13 8DQ

PROJECT
The Homestead
Clothall
Baldock

DRAWING TITLE
Plan D - Mitigation Area

DRAWN Property GIS
CHECKED
DATE 09/09/2025
SCALE 1:5000 @ A3

PLAN NO. REVISION
RE 3979

09/09/2025