

Growing Baldock

Environmental Statement Volume 2: Figures & Appendices

Chapter 1: Introduction

Appendix 1.3 NHC Scoping Opinion



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Ms Katrina Hordern
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Our Ref : 24/00920/SCOP
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Date : 11 September 2025

Dear Ms Hordern,

Town and Country Planning (Environmental Impact Assessment) Regulations 2017 – Formal EIA Scoping Opinion of North Hertfordshire Council as Local Planning Authority

Development Proposal: Up to c. 3,200 homes; up to 16 hectares of employment land; strategic 'green infrastructure'; a mixed use local centre; education provision; and associated infrastructure; waste infrastructure.

Site: Growing Baldock development site, comprising: Site BA1 (Land East Of North Road And North Of The Railway Line); Site BA10 (Land between The Railway Line and Royston Road; Site BA3 (Land west of the A505); Site BA2 (Land south of Clothall Road); Walls Field; Urban Open land west of the A505, and Land west of Station Road, Baldock, Hertfordshire

I refer to your submission of an Environmental Impact Assessment (EIA) Scoping Report in relation to the Proposed Development and Project Site referenced above, received by the Local Planning Authority on 18th February 2025.

This Scoping Opinion will provide a brief description of the Project Site and the Proposed Development followed by the Council's 'Scoping Opinion' incorporating representations and the opinion of officers.

It should be noted that this Scoping Opinion is based on the Request received on 18th February 2025, which is an iteration of the earlier Request received on 25th of April 2024. The later Request updated the development description, and the site extent (to include the Local Plan Allocation Site BA2), as noted above. The Request from 18th February 2025 can be found at Appendix A.

The Site

The Growing Baldock site in its entirety (encompassing the intended Outline Planning Application area) is c.220 hectares in size and located to the north and east of the historic market town of Baldock (population c.10,000), within the administrative area of North Herts and at Grid Reference [TL 25156 35043]. It benefits from a well-connected strategic location on the A1 and lies to the north of Stevenage and immediately to the east of Letchworth Garden City and Hitchin.

North Herts Council, PO Box 10613, Nottingham, NG6 6DW

The site is located to the immediate north and east of Baldock town centre and Baldock railway station, which provides direct rail connections to Letchworth Garden City and onwards to London. Baldock is a historic market town comprising a large Conservation Area and numerous listed buildings. A Scheduled Monument (Romano-British town and Late Iron Age settlement – Walls Field) is located off Clothall Road adjacent to (west of) the development site (BA11). A further Scheduled Monument is situated west of the BA1 site and North Road (Ivel Springs). Local Nature Reserves are located to the northwest of the BA1 site (Ivel Springs) and west of the BA2 site (Weston Hills).

The Growing Baldock site comprises of a series of parcels of predominantly agricultural land (with some associated buildings) immediately adjoining the urban area.

The majority of the site is given over to agricultural tenancies and is therefore rural in character, with field boundaries defined by hedgerows / trees of varying age and quality. There are no watercourses or water bodies present on site. A network of public rights of way and bridleways traverse the site.

The Subject Site for the purpose of the current Request for an EIA Scoping Opinion comprises the entire Growing Baldock site, which includes the sub-sites as listed above.

The Proposal

The submitted Scoping Report states that the Outline Planning Application proposal will comprise:

“Outline planning application with all matters reserved except for access in relation to junctions on North Road, Royston Road, Clothall Road and Wallington Road, for up to c. 3,200 homes, up to 16ha employment land, waste infrastructure, local centre, flexible land use on parcel BA3, up to 2 x primary schools, health hub, green infrastructure, primary street, public transport infrastructure and pedestrian/cycle network (including PRow diversions, mobility hubs and two crossings of the railway), utilities and drainage infrastructure (including diversions of existing, new pumping stations, sustainable drainage, primary sub stations, rising main/strategic sewer, potential net-zero infrastructure), ground remodelling/earthworks and any necessary demolitions.”*

**flexible land use to comprise one of following three options:*

- 1. up to 12FE secondary school and 1 SEND school;*
- 2. residential and 1 SEND school*
- 3. up to 5FE secondary school, residential and 1 SEND school.”*

EIA Screening

As a prelude to EIA Scoping, the submitted EIA Scoping Report paragraph 1.1.3 states that:

“The EIA Regulations require that any proposed development falling within the description of a Schedule 2 development will require an EIA where such development is likely to have ‘significant’ effects on the environment by virtue of factors such as its nature, size or location

(Regulation 2). The proposed development falls within the description of a Schedule 2 development as the site area is greater than the threshold of 0.5ha, and development will involve more than 150 dwellings, the thresholds set out in Schedule 2 Section 10 (b) with respect to Infrastructure Projects that may require the submission of an Environmental Statement (ES)."

The Local Planning Authority concurs that the Proposed Development surpasses the relevant regulatory thresholds to require a formal EIA to be carried out, and that this should be reported in an Environmental Statement for submission alongside any intended planning application submission(s).

Consultation

Regulation 2(1) defines certain public bodies as 'consultation bodies' for the purpose of the regulations. These include:

- Natural England;
- Environment Agency; and
- Marine Management Organisation.

The term 'consultation bodies' can also include other bodies designated by statutory provision as having specific environmental responsibilities and which the relevant local planning authority considers are likely to have an interest in the application. The North Hertfordshire Local Planning Authority (LPA) consulted on the basis of the originally submitted Request for an EIA Scoping Opinion from 25th April 2024. Upon receipt of the updated Request, the LPA reviewed the need for further consultation, and concluded that this was not required in light of a relatively minor change in magnitude of employment land in favour of waste infrastructure, and the difference between including Site BA2 within the Project Site or not would not lead to the identification of further potential significant environmental effects. Any potential significant environmental effects would throughout the further EIA process either be identified as part of the topic assessments for the Project Site, or as part of the assessment of cumulative impacts with nearby development sites.

A wide range of consultation responses have been received. The full version of each consultation response can be viewed on the Council's website via Public Access at the following link: [Search Planning Applications \(north-herts.gov.uk\)](https://www.north-herts.gov.uk/search-planning-applications) and for ease of reference, they are also included at Appendix B for completeness and for ease of reference. Consultation responses are also referred to, as appropriate, within the main body of this Scoping Opinion, although, for the avoidance of doubt, the Environmental Statement should take account of the full consultation responses. Although some consultee responses have not yet been received, any further responses received by the LPA after this formal scoping opinion letter will be forwarded in due course.

Detailed below is a list of the consultees that were notified by the Council, and of any consultation responses that were received.

NHDC Transport Policy Officer
NHDC Ecologist
NHDC Environmental Health (Contaminated Land)
NHDC Environmental Health (Noise and Other Nuisances)
NHDC Environmental Health (Air Quality)
NHDC (Conservation Officer)
NHDC (Urban Design)

NHDC (Economic Development)
NHDC (Community Development)
NHDC (Leisure Contracts Manager)
NHDC (Housing Development Officer)
NHDC Waste And Recycling Services Manager
NHDC Service Manager Green Space
NHDC Strategic Planning (Major Projects)

Bygrave Parish Council
Clothall and Luffenhall Parish Meeting

HCC (Highways)
HCC (Archaeology)
HCC (Lead Local Flood Authority)
HCC (Growth & Infrastructure Unit)
HCC (Ecologist)
HCC (Minerals and Waste Planning)
HCC (Forward Planning Unit)

Active Travel England
Historic England
National Grid
Environment Agency
Hertfordshire Police Architectural Liaison Officer
Herts Fire and Rescue Services
Thames Water
Affinity Water
Anglian Water
NHS (Cambridge and Peterborough Integrated Care)
NHS (Hertfordshire and West Essex Integrated Care)
NHS (North Herts and Stevenage Primary Care)
NHS (Hertfordshire Public Health)
UK Power Networks
The Water Officer
CPRE Hertfordshire
Sport England
Natural England
Network Rail

Neighbour Comments

There is no requirement to consult neighbours on an EIA Scoping Opinion request application. In this case, no neighbour comments were received.

Policy Context

- Town and Country Planning (Environmental Impact Assessment) (England & Wales) Regulations 2017.
- National Planning Policy Guidance “Environmental Impact Assessment” (Last updated 13 May 2020).

The Council's Scoping Opinion

The Local Planning Authority has considered the information submitted with the scoping request, specifically the proposed topic areas/chapters to be 'scoped in' in the Environmental Statement (ES) and listed below:

- Transport
- Noise and vibration
- Air quality
- Landscape and visual
- Heritage
- Hydrology and flooding
- Ecology
- Ground conditions and soils
- Socio-economics and health
- Waste
- Lighting
- Utilities and services
- Climate change

The Local Planning Authority is in broad agreement with the proposed content and no further environmental topics are required to be 'scoped in'.

Alternatives

The EIA Regulations require that the Environmental Statement includes an outline of the alternatives to the proposed development site and indicate the reasons for progressing the alternative chosen taking into account the environmental effects. Paragraph 2 of Schedule 4 of the EIA Regulations requires the applicant to include in their Environmental Statement a description of the reasonable alternatives studied (for example in terms of development design, technology, location, size and scale) and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects.

It is noted that the Scoping Report states that the Environmental Statement will describe the reasonable alternatives including the 'do-nothing' scenario and alternative designs. However, the Council is of the view that this chapter would need to consider all reasonable alternatives, including different sites and/or only the partial development of the site (for example development of just one half of the site).

It is of course acknowledged that much of the site is allocated as site BA1 under Policy SP14 of the North Herts Local Plan 2011-2031 as a Strategic Housing Site for a new neighbourhood of approximately 2,800 homes. The ES should refer to the Local Plan SA/SEA process and the testing of alternatives.

Environmental Topics to be addressed within the Environmental Statement

I have listed these in the order they appear in the Scoping Report.

Transport

The Applicant's Scoping Report (paragraph 3.1) describes a proposed assessment of Transport Effects.

Attention should be paid to a number of consultee responses regarding this environmental topic that have been received. First, the Highway Authorities for the proposed development are Hertfordshire County Council and Highways England. The County have provided a response and no response has been received from Highways England.

HCC Highways has given no specific commentary on the requirements for an EIA, suggesting that specific matters for assessment can be explored during the pre-application stage:

“Given that the applicant should deal with all relevant Highways and Transportation matters via any forthcoming Transport Assessment and Travel Plan, the Highway Authority wishes to make no further comment on the requirement for an EIA. It is noted that the applicant should take into account the relevant HCC policy documents, such as LTP4 and the recently adopted updated design guidance, “Place & Movement Planning and Design Guidance”. The applicant may wish to engage the Highway Authority using the pre-application advice service which would cover all highways and transportation matters which may be sought using the above link as contained within this note.”

Other statutory consultees have included Active Travel England and Network Rail, and Network Rail have responded. On the subject of railway crossings, Network Rail have highlighted the required grant of necessary rights for the proposed bridge crossings, and the potential closure of the existing pedestrian level crossing. Further, Network Rail expects the EIA to:

“consider any impact of the scheme upon the railway infrastructure and upon operational railway safety. It should also include a Transport Assessment to identify any HGV traffic/haulage routes associated with the construction and operation of the site that may utilise railway assets such as bridges and level crossings during the construction and operation of the site. The developer will also need to take into account the effect of the development on Baldock station itself, including station improvements, given the number of residential dwellings to be introduced, and we would require further engagement in regard to this element.”

Finally, the North Herts DC's Senior Transport Policy officer provided a response advising that a number of roads need to be considered for inclusion in the assessment :

- Icknield Way
- Football Close
- Norton Road between Icknield Way and the Norton Road that runs between Letchworth and Stotfold
- Norton Bury/Mill Lane
- Weston Way
- Mansfield Road
- Baldock Lane
- Letchworth Gate north of A1(M) Jn 9

These roads include roads that are likely to experience an increase in traffic to Knights Templar, while that is the site of the town's only secondary school, and may see traffic diverting away from the High Street if Hitchin St becomes more congested. These roads also include ones that may experience an increase in traffic if congestion around the High St–London Rd–South Rd–Tesco roundabout worsens.

The Council agrees that the Environmental Statement will need to include a chapter on transport matters and the proposed EIA methodology in respect of Transport is generally supported.

Noise and Vibration

The Applicant's Scoping Report (paragraph 3.2) describes a proposed assessment of Noise and Vibration Effects.

The NHDC Environmental Health officer has confirmed in a consultation response that they support the proposed EIA methodology in respect of Noise and Vibration.

The Council agrees that the Environmental Statement will need to include a chapter on Noise and Vibration matters, and the proposed EIA methodology in respect of Noise and Vibration is supported.

Air Quality

The Applicant's Scoping Report (paragraph 3.3) describes a proposed assessment of Air Quality Effects.

The NHDC Environmental Health officer has confirmed in a consultation response that they support the proposed EIA methodology in respect of Air Quality.

The Council agrees that the Environmental Statement will need to include a chapter on Air Quality matters, and the proposed EIA methodology in respect of Air Quality is supported.

Landscape and Visual Impact

The Applicant's Scoping Report (paragraph 3.4) describes a proposed assessment of Landscape and Visual Effects.

A related consultee responses has been received from the Environment Agency, although it information referenced in the Scoping report under this topic that relates to water abstraction issues, which in fact relate to the Hydrology and Flooding topic that is covered elsewhere in the coping report and in this Scoping Opinion.

The Council agrees that the Environmental Statement will need to include a chapter on Landscape and Visual Impact matters, and the proposed EIA methodology in respect of Landscape and Visual Effects is generally supported.

A key consideration for the LVIA will be the identification of relevant receptor locations inside and around the site, regarding views into, through and out from the site from the surrounding landscape. The list of visual receptors provided paragraph 3.4.20 is noted, although it is not yet clear how the visual receptors were chosen for their visual exposure. Therefore, a Zone of Visual influence analysis should inform the selection of visual receptors (and other consequential aspects of the assessment such as the baseline description).

The Scoping Report is not explicit regarding any visual representations that would inform the assessment, such as wireframe and/or rendered photomontages based on Verified Views, Accurate Visual Representations, or other suitably accurate representations. For the avoidance of doubt, in the Council's view, these will be required and the most appropriate

form of visualisation will require further consideration with the involvement of officers (and this is currently being worked through as part of the ongoing pre-application process).

Heritage (Archaeology)

The Applicant's Scoping Report (paragraph 3.5) describes a proposed assessment of Archaeology Effects.

Attention should be paid to the consultee response regarding this environmental topic from the County Council's Senior Historic Environment Advisor, who has advised some important commentary regarding the identification of non-designated heritage assets, the identified heritage assets and the potential for further heritage assets to be found. The commentary also describes the required further investigation to be undertaken to inform the EIA. Officers have seen at a recent site visit that related archaeological excavation was in progress.

The HCC Advisor concurs with the Scoping Report that the site contains a large number of known archaeological sites, some of which require further information in order to determine their significance. The HCC Advisor also believes that there is potential for currently unknown heritage assets to exist and these need to be accounted for and if identified their significance should also be assessed. The HCC Advisor also recommends in terms of the EIA, that a further programme of archaeological evaluation (including trial trenching) is carried out to provide this information and that the results should be submitted with the Environmental Statement.

No response regarding archaeology was received from Historic England after they were consulted.

Heritage (Built Heritage)

The Applicant's Scoping Report (paragraph 3.5) also describes a proposed assessment of Built Heritage Effects.

No response regarding built heritage was received from Historic England. The Council's Conservation Team have commented specifically regarding the merits of the proposals.

The Council agrees that the Environmental Statement will need to include a chapter on Heritage Effects (Archaeology and Built Heritage), and the proposed EIA methodology in respect of Heritage is supported.

Hydrology and Flooding

The Applicant's Scoping Report (paragraph 3.6) describes a proposed assessment of Hydrology and Flooding Effects.

Attention should be paid to a number of consultee responses that have been received regarding this environmental topic. Firstly, the Environment Agency has submitted commentary regarding:

- Risk to groundwater, with due consideration to be given to the impacts that the proposed development may have upon controlled waters receptors during both construction and operational phases
- Water supply and abstraction effects and associated mitigation within and outside the Application Site, and:
- the assessment of flood risk effects.

Secondly, Hertfordshire County Council as the Lead Local Flood Authority has also commented, highlighting the standard requirements of a surface water drainage assessment and a Flood Risk Assessment (FRA), as well as advice regarding the relevant design guidance requirements (e.g. regarding SuDS and water quality treatment). The LLFA requires the EIA to additionally consider groundwater flooding, as well as the consequences of phased development.

The Council agrees that the Environmental Statement will need to include a chapter on Hydrology and Flooding effects, and the proposed EIA methodology in respect of Hydrology and Flooding is supported.

Ecology

The Applicant's Scoping Report (paragraph 3.7) describes a proposed assessment of Ecology Effects.

Attention should be paid to a number of consultee responses regarding this environmental topic that have been received. First, Natural England responded, referring to its generic Advice on EIA Scoping.

Further, NHDC's Ecologist concurs generally with the proposed assessment methodology and has additionally highlighted the need to assess the construction-phase effects on ecology from water use (and abstraction).

The Council agrees that the Environmental Statement will need to include a chapter on Ecology matters and the proposed EIA methodology in respect of Ecology is supported.

Ground Conditions and Soils

The Applicant's Scoping Report (paragraph 3.8) describes a proposed assessment of Ground Conditions and Soils Effects.

Attention should be paid to a number of consultee responses regarding this environmental topic that have been received.

The Environment Agency has generally agreed with the assessment methodology, and added that:

"The risks from contamination for the proposed development must be addressed following the tiered approach specified within our Land Contamination Risk Management (LCRM) guidance, commencing with a preliminary risk assessment. Where applicable the risks associated with piling/ground improvement and infiltration drainage should also be included within this scheme."

The NHDC Environmental Health officer has confirmed in a consultation response that they support the proposed EIA methodology in respect of Ground Conditions and Soils.

The Council agrees that the Environmental Statement will need to include a chapter on Ground Conditions and Soils matters, and the proposed EIA methodology in respect of Ground Conditions and Soils is supported.

Socio-economics and Health

The Applicant's Scoping Report (paragraph 3.9) describes a proposed assessment of Socio-economics and Health Effects.

Attention should be paid to a number of consultee responses regarding this environmental topic that have been received.

The NHDC Housing Officer has responded outlining the policy guidelines for delivery of residential development at the Application Site, and the EIA would be required to incorporate relevant aspects of housing delivery.

Hertfordshire Constabulary have indicated that local policing and health services should be regarded as sensitive receptors for the purposes of an assessment of socio-economic effects.

The HCC Public Health Service has cross-referred to relevant Planning Guidance and has highlighted relevant determinants of health for the EIA. The response has also highlighted twelve specific relevant Health Impact Assessment aspects, in addition to general guidance on how to undertake a Full Health Impact Assessment, which HCC requires to be undertaken in this case.

No responses were received from Education Service providers.

The Council agrees that the Environmental Statement will need to include a chapter on Socio-economics and Health matters and the proposed EIA methodology in respect of Socio-economics and Health is supported.

A formal Health Impact Assessment, or (in case the applicant would propose that there are specific reasons as to why a formal Health Impact Assessment would not be appropriate) similar information to inform the Socio-economics and Health assessment, may be submitted as an Appendix to the EIA.

Waste

The Applicant's Scoping Report (paragraph 3.10) describes a proposed assessment of Waste Effects.

Attention should be paid to the consultee response regarding this environmental topic that have been received from Herts County Council Waste Management Department.

In particular, the Waste Planning Authority support the applicant's commitment to prepare a SWMP to accompany the ES and has noted their related requirements for the assessment and design process, and the associated information requirements.

The Council agrees that the Environmental Statement will need to include a chapter on Waste matters, and the proposed EIA methodology in respect of Waste is supported.

Lighting

The Applicant's Scoping Report (paragraph 3.11) describes a proposed assessment of Lighting Effects. No related consultee responses have been received regarding this environmental topic. However, officers would highlight that the assessment should, in

particular, take into account the Proposed Development's Lighting effects during Construction and Operational phases, and also any potential interactive effects with Ecological Resources, and Landscape and Visual resources.

The Council agrees that the Environmental Statement will need to include a chapter on Lighting matters.

Utilities and Services

The Applicant's Scoping Report (paragraph 3.12) describes a proposed assessment of Utilities and Services Effects.

Attention should be paid to a consultee response regarding this environmental topic that has been received from the Environment Agency. Appreciating that this also has relevance to other topic areas, the Environment Agency has submitted commentary regarding water supply and abstraction effects and associated mitigation within and outside the Application Site.

The Council agrees that the Environmental Statement will need to include a chapter on Utilities and Services matters.

Climate Change

The Applicant's Scoping Report (paragraph 3.13) describes a proposed assessment of Climate Change Effects.

Attention should be paid to consultee responses regarding this environmental topic that have been received. These comprise both HCC as the Lead Local flood Authority, and the Environment Agency, who both require climate change allowances to be incorporated into the flood risk calculations that are carried forward in the assessment of Hydrology and Flooding.

The Council agrees that the Environmental Statement will need to include a chapter on Climate Change matters.

Cumulative effects

The Applicant's Scoping Report describes a proposed assessment of Cumulative Effects within Paragraph 2.5 (Cumulative Sites) and within the individual environmental topic sections at Chapter 3. This presentation does not explicitly cover interactive effects (effects that result in effects on receptor of a different environmental topic), therefore for the avoidance of doubt, these should be considered.

Attention should be paid to a number of consultee responses regarding this matter that have been received, including from the NHDC Transport Policy Officer and from the Hertfordshire County Council Ecologist.

The Council agrees that the Environmental Statement will need to include a chapter on Cumulative Effects.

Topics to be scoped out of the EIA

The Applicant's Scoping report proposes explanations to scope out the topics of "Risks of Major Incidents and / or Disasters" and "Daylight, Sunlight, Overshadowing and Wind". These are considered to be acceptable in this case, and are matters that can be dealt with outside of an Environmental Statement. Therefore, it is agreed that these two subjects should be scoped out of the EIA.

Conclusion

The Council has not received full consultation responses from all relevant technical consultees. On this basis we cannot be certain that further issues in relation to the content of the Environmental Statement will not arise following formal consultation on a future planning applications and the associated Environmental Statement(s). The Council reserves the right to request additional information on any matter within the Environmental Statement under Regulation 15(9) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'S Greaves', written in a cursive style.

Shaun Greaves
Development and Conservation Manager

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Appendix A; Submitted Scoping Report

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1.0 INTRODUCTION**1.1 Background**

- 1.1.1 This Scoping Report has been prepared by David Lock Associates (DLA) on behalf of Hertfordshire County Council (HCC) and Urban&Civic (U&C) to support a request to North Herts Council (NHC) for a formal scoping opinion under Regulation 15 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, as amended (herein the 'EIA Regulations').
- 1.1.2 The proposed development site at land referred to as the Baldock 'urban extension', is located to the north and east of the town of Baldock in North Herts. The site covers an area of approximately 208 hectares (ha) and is allocated (through the North Herts Local Plan 2022 allocations BA1, BA2 and BA3 and BA10) for up to 3,245 dwellings and 19 hectares of employment land, alongside supporting infrastructure and open space. All of these allocations form part of a Strategic Masterplan and will be subject to an outline planning application.
- 1.1.3 The EIA Regulations require that any proposed development falling within the description of a Schedule 2 development will require an EIA where such development is likely to have 'significant' effects on the environment by virtue of factors such as its nature, size or location (Regulation 2). The proposed development falls within the description of a Schedule 2 development as the site area is greater than the threshold of 0.5ha, and development will involve more than 150 dwellings, the thresholds set out in Schedule 2 Section 10 (b) with respect to Infrastructure Projects that may require the submission of an Environmental Statement (ES).
- 1.1.4 Two outline planning applications (OPAs) covering broadly the same area covered by this ES (divided into applications north and south of the railway) were submitted in 2017 and subsequently withdrawn in 2022. This Scoping Report has been prepared having regard to the scope of the matters assessed through the withdrawn OPA EIAs, which were agreed through formal scoping opinions in 2017. However, due to the time that has passed since then, the evolution of the scheme and the planning strategy, and changes to environmental legislation in this period, further confirmation is requested as to the scope of this current ES.
- 1.1.5 This report has been prepared to assist NHC in identifying the issues which should be addressed in the EIA by considering what effects the project could have on the environment and which of these are likely to be significant. The Scoping Report sets out the proposed framework within which the EIA will be undertaken and the topic areas, proposed methodology and information that will be contained within the ES.

1.2 The Consultant Team

- 1.2.1 This report has been prepared by DLA, on behalf of U&C and HCC. DLA will coordinate the EIA and the preparation of the ES. DLA is a member of the Institute of Environmental Management and Assessment (IEMA), an organisation established to promote best practice in EIA and related disciplines. The EIA will be undertaken in accordance with the best practice guidelines issued by the IEMA. A number of specialist consultancies will be undertaking assessments of the environmental effects. The following table sets out the proposed content of the ES showing the various contributions:

Table 1.1 – EIA Specific Topics and Authors

Topic	Lead Author
Transport	ITP
Noise and vibration	RPS
Air quality	RPS

Landscape and visual	BMD
Heritage	HCUK
Hydrology / flooding	AKTII
Ecology	BMD
Ground Conditions (including soils)	Shadbolt
Socio-economics & health	DLA
Waste	RPS
Lighting	RPS
Utilities and services	U&C
Climate change	Turleys

1.3 Scope of the ES

- 1.3.1 The ES will be made of up of Volume 1: Text; Volume 2: Plans; Volume 3 Appendices; and a separate Non-Technical Summary. The assessments will be based upon a Parameter Plan and a Development Specification which will specify the maximum amounts and scale of development.
- 1.3.2 The ES will contain a description of the site and the proposals; and will outline the planning policy context. Policy considered will include the National Planning Policy Framework (NPPF), Planning Practice Guidance (PPG), and adopted North Herts Local Plan and Supplementary Planning Documents, and Baldock and Bygrave and Clothall Neighbourhood Plan policies.
- 1.3.3 The topic-specific chapters will be organised in a consistent format and will cover:
- Introduction:** An overview of the topic under consideration.
 - Assessment Methodology:** The proposed scope and method of the assessment, including approaches to surveys and data, criteria used to assess significance and any uncertainties or limitations encountered.
 - Legal and policy framework:** Legislation, policies and guidance in relation to the specific topic concerned.
 - Baseline conditions:** A description of the current baseline conditions and how those might change if the development does not proceed (the projected future baseline).
 - Potential effects:** Identification of likely significant effects in the absence of any mitigation measures, at construction stage and post-completion.
 - Mitigation measures:** Proposed measures to avoid or reduce the potential adverse effects arising from the proposed development.
 - Residual effects:** Identification of the residual effects once mitigation measures have been taken into account and identification of the significance of those residual effects.
 - Cumulative effects:** An assessment of any effects in combination with those arising from other reasonably foreseeable projects in the environs of the site. The technical chapters of this Scoping Report identify the projects that are proposed to be taken into account as part of each specific assessment. The transport assessment will take account of a wider range of reasonably foreseeable projects than other chapters, as part of the transport assessment. The noise and air quality assessments, insofar as they are underpinned by data arising from the transport assessment, will also take account of that wider range of projects.
- 1.3.4 The assessments will consider the significance of the effects identified with reference to the magnitude of the impact and the sensitivity of the receptor. Five levels of significance will be identified: substantial, major, moderate, minor and negligible. These evaluations will be specific to each discipline in the ES and will involve the use of recognised standards, industry guidance and professional judgement.

2.0 THE SITE AND PROPOSED DEVELOPMENT

2.1 Site Location and Surrounds

- 2.1.1 The Growing Baldock site in its entirety (encompassing the OPA area) is c.220 hectares in size and located to the north and east of the historic market town of Baldock (population c.10,000), within the administrative area of North Herts and at Grid Reference [TL 25156 35043]. It benefits from a well-connected strategic location on the A1 and lies to the north of Stevenage and immediately to the east of Letchworth Garden City and Hitchin (refer to Figure 1 below).

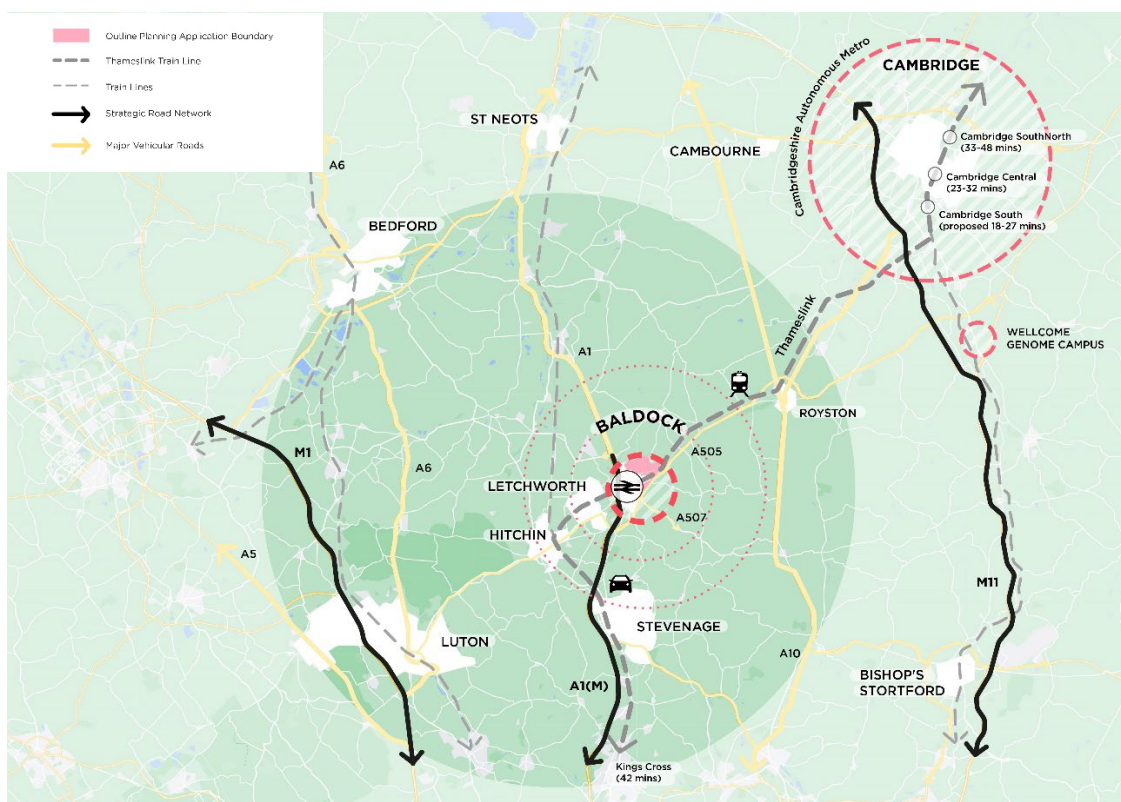


Figure 1: Strategic Context

- 2.1.2 The site is located to the immediate north and east of Baldock town centre and Baldock railway station, which provides direct rail connections to Letchworth Garden City and onwards to London. Baldock is a historic market town comprising a large Conservation Area and numerous listed buildings. A Scheduled Monument (Romano-British town and Late Iron Age settlement – Walls Field) is located off Clothall Road adjacent to (west of) the development site (BA11). A further Scheduled Monument is situated west of the BA1 site and North Road (Ivel Springs). Local Nature Reserves are located to the northwest of the BA1 site (Ivel Springs) and west of the BA2 site (Weston Hills).

2.2 Site Description

- 2.2.1 The Growing Baldock site comprises of a series of parcels of predominantly agricultural land immediately adjoining the urban area (refer to site features plan at Figure 2). The northernmost, and largest component of the site (BA1) lies to the east of North Road, which connects to the A1(M) junction to the north (the A1(M) runs in parallel to North Road in the vicinity of the site) and Baldock town centre to the south. The southern boundary is defined by the railway line and the eastern and northern edge by existing field boundaries and footpaths. Bygrave / Ashwell Road runs through this part of the site, from North Road to the village of Bygrave to the north east.

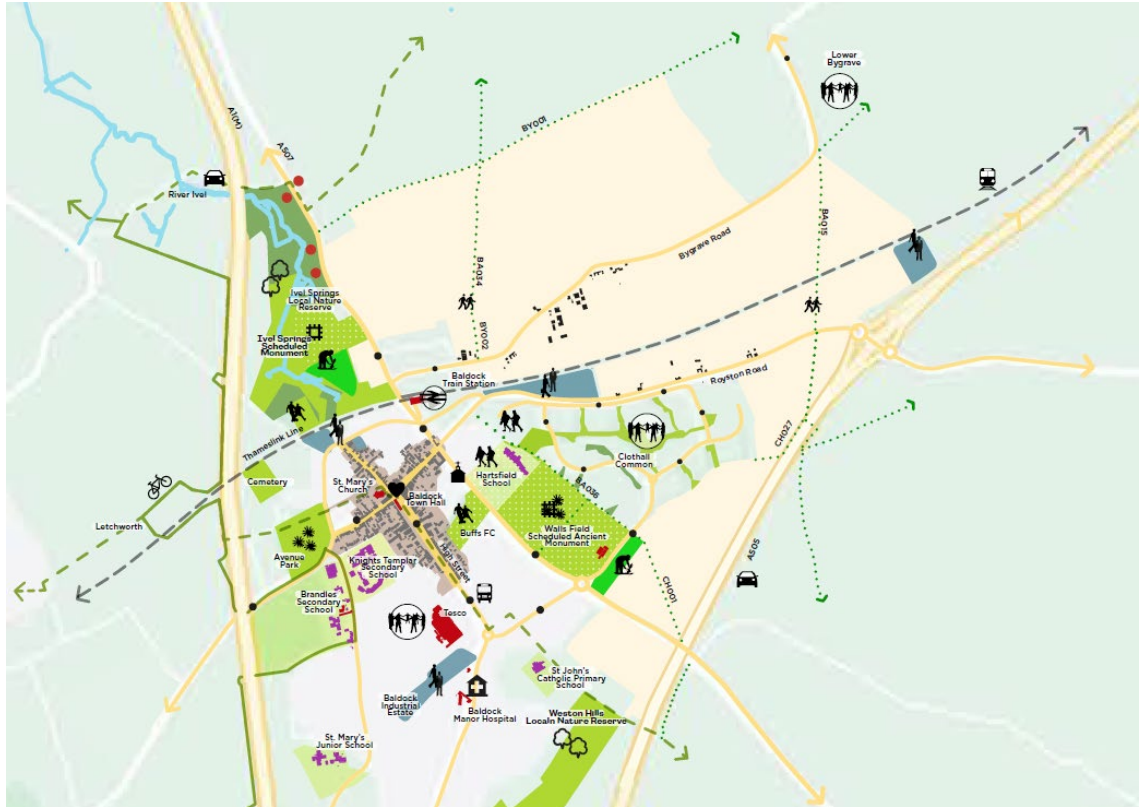


Figure 2: Site Context

- 2.2.2 The majority of the site is given over to agricultural tenancies and is therefore rural in character, with field boundaries defined by hedgerows / trees of varying age and quality. There are no watercourses or water bodies present on site. A network of public rights of way and bridleways traverse the site.

2.3 Planning Policy Context

- 2.3.1 The national context is provided by the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG). The Development Plan for North Herts comprises the recently adopted Local Plan and the Baldock, Bygrave and Clothall Neighbourhood Plan, in addition to Supplementary Planning Documents (SPDs).
- 2.3.2 The North Herts Local Plan 2011-2031, adopted in November 2022, addresses the key issues in the District including the allocation of at least 13,000 new homes. Land east and west of Baldock is allocated for major development, within allocation sites BA1, BA2, BA3 and BA10 (refer to Figure 3). The Urban Open Land area between BA2 and BA3 is required by policy to remain open and undeveloped.



Figure 3: Local Plan Site Allocations and Policy Areas

2.4 The Proposed Development

- 2.4.1 U&C have undertaken substantial technical work to inform the development proposals including the production of a Strategic Masterplan (SMP) as required by NHC Policy SP9, to be formally approved by NHC in 2025. This will directly inform the emerging application for the Growing Baldock development area, which will be in the form of an Outline Planning Application (OPA) – covering the BA1, BA2, BA3 and BA10 allocation sites, as well as the Urban Open Land, Walls Field Scheduled Monument and land to the west of North Road.
- 2.4.2 The proposed boundary for the OPA, is indicated on the plan at Figure 4 overleaf, and at Appendix 1.

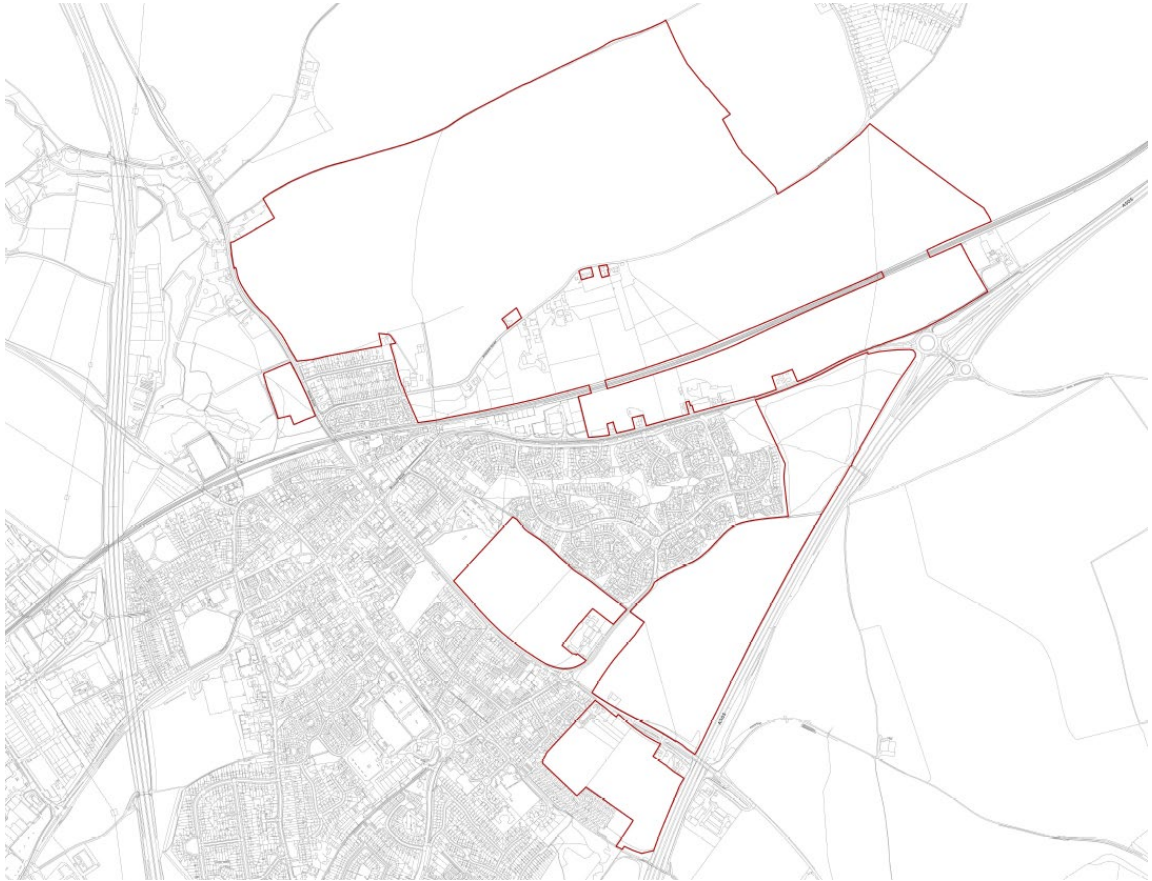


Figure 4: Outline Planning Application Boundary

- 2.4.3 At this stage, a proposed description of development is provided to set out the likely maximum extent of the proposed OPA development for EIA scoping purposes. This is important in being able to provide flexibility for the emerging development proposals and to allow consideration of the likely significant effects.

Outline Planning Application:

Outline planning application with all matters reserved except for access in relation to junctions on North Road, Royston Road, Clothall Road and Wallington Road, for up to c. 3,200 homes, up to 16ha employment land, waste infrastructure, local centre, flexible land use on parcel BA3, up to 2 x primary schools, health hub, green infrastructure, primary street, public transport infrastructure and pedestrian/cycle network (including PRow diversions, mobility hubs and two crossings of the railway), utilities and drainage infrastructure (including diversions of existing, new pumping stations, sustainable drainage, primary sub stations, rising main/strategic sewer, net-zero infrastructure), ground remodelling/earthworks and any necessary demolitions*

**flexible land use to comprise one of following three options:*

- 1. up to 12FE secondary school and 1 SEND school;*
- 2. residential and 1 SEND school*
- 3. up to 5FE secondary school, residential and 1 SEND school.*

- 2.4.4 It is envisaged that the site will be phased, with development commencing in site BA2 (Phase 1) and thereafter progressing in BA1 from a west to easterly direction (from North Road). Infrastructure, including education provision will be delivered at appropriate triggers throughout the development, to be agreed as part of the S106 agreement.

- 2.4.5 The off-site infrastructure improvements required in association with the proposed development are currently being investigated. The EIA will identify and assess any likely significant effects of any such improvements.

2.5 BA3 Flexible Land Use and Secondary School Provision

- 2.5.1 As outlined within the draft description of development, the OPA will include a flexible land use parcel within the southern half of BA3 which will comprise of either one, or a combination, of residential / educational / recreational uses. The flexible land use is introduced in order to allow for the most appropriate secondary school provision option to be selected at a later date, in accordance with a review process to be set out in the S106 agreement, to meet the additional needs generated by the development.
- 2.5.2 The flexible land use parcel will deliver three potential land use mixes dependent upon the selected secondary school strategy, as outlined below:

Option	Secondary School Solution	Flexible Land Use Parcel Mix
1	Relocation and expansion of Knights Templar School (KTS) on BA3 – up to 12FE	Up to 12FE secondary school SEND school
2	Expansion of KTS on existing site	SEND school Residential
3	Provision of additional secondary school on BA3 – up to 5FE	Up to 5FE secondary school SEND school Residential

- 2.5.3 The options also have implications for the use of the adjacent Urban Open Land. Option 2 will require outdoor 4G floodlit pitches to be provided on the adjacent Urban Open Land in order to meet open space requirements for the development on site. Options 1 and 3 will include a sport hall, and 4G floodlit pitches on BA3 as part of the school campus, alongside grass pitches (not floodlit) on the Urban Open Land. Use of the indoor and 4G pitches will be shared by both the school and the community.
- 2.5.4 Whilst each scenario will have different effects, in most cases a “worst case scenario(s)” can be selected and tested for EIA purposes. The worst case may be different depending on each topic area and some topic areas may require all scenarios to be tested. Each chapter will outline and justify the approach taken, to ensure that any significant environmental impacts of the options are thoroughly assessed.
- 2.5.5 The conclusions drawn from each chapter will be assembled and considered as a whole within the final conclusion of the Environmental Statement.
- 2.5.6 In the event that a new secondary school is proposed on BA3, this will be included in the OPA and assessed accordingly. An expansion of Knights Templar on its existing site will fall outside the scope of the OPA and will be subject to a separate planning application in due course.

2.6 Cumulative Sites

- 2.6.1 The ES will consider the potential for likely significant effects on the environment resulting from committed developments in the area. Each technical chapter identifies which sites are likely to generate a cumulative effect, alongside the proposed development. This varies dependent on the topic, the localised (or otherwise) nature of effects and potential for interrelationship between effects. The following major developments are located within Baldock or the general vicinity of the site, are generally at least 50 dwellings in scale (where residential), and have an intervisibility with the site, and therefore have been identified for the

assessment of likely significant cumulative effects within some of the technical chapters (refer to each for details):

- LG1 – North Herts Local Plan allocation north of Letchworth. Allocated in LP for 900 dwellings. Strategic Masterplan being prepared. OPA to be prepared;
- LG3 – North Herts Local Plan allocation northeast of Letchworth. Outline planning application submitted for 120 homes (ref: 21/00504/OP). Resolution to grant consent received, subject to S106 agreement resolution;
- Solar Photovoltaic Farm north of Bygrave. Application submitted to NHC (ref: 22/00741/FP). Application referred to the Secretary of State on 14th September 2023;
- BA4 – North Herts Local Plan allocation west of BA3 in Baldock. Planning application for 42 dwellings refused by NHC (ref: 21/01882/FP), however, given the site allocation it is proposed that this is still considered as a cumulative site.

3.0 KEY ISSUES AND LIKELY EFFECTS TO BE ADDRESSED IN THE ES

3.0.1 This chapter of this EIA Scoping report summarises the key issues and likely effects which are proposed to be addressed in the Environmental Statement. These are:

- Transport
- Noise and vibration
- Air quality
- Landscape and visual
- Heritage
- Hydrology and flooding
- Ecology
- Ground conditions and soils
- Socio-economics and health
- Waste
- Lighting
- Utilities and services
- Climate change

3.0.2 The following sections set out the approach to the assessment of environmental effects in relation to each topic area.

3.1 Transport Effects

- 3.1.1 The Transport chapter of the EIA will be prepared by Integrated Transport Planning (ITP). This chapter summarises the approach that is proposed to be taken in its preparation.

Baseline Conditions

- 3.1.2 The existing local transport network consists of a mix of rural and sub-urban streets, with and without footways, local bus services, Baldock railway station and the A1(M) and A505 strategic/primary routes.

- 3.1.3 The existing local street network likely to be subject to the greatest effects consists of:

- Royston Road (B656)
- Bygrave Road / Ashwell Rd
- Clothall Road (A507)
- North Road / Station Road (A507)
- Whitehorse Street (B656)
- High Street (B197)
- London Road (B197)

Key Issues

- 3.1.4 The key issues to be addressed by the ES will be drawn from the baseline analysis underway, existing experiences of people in Baldock, raised through consultation activities, and the likely impact of construction and operation associated with a development of this scale.

- 3.1.5 The emerging proposals are based on key principles that are intended to deliver positive environmental and societal transport outcomes. These currently include:

- Designing a place where half of all trips are made on foot, bicycle or by using public transport, drawing on best practice across the UK and Europe;
- Delivering improvements that encourage walking, cycling and public transport within Baldock, creating one connected town; and
- Restricting through traffic and making it more difficult to drive through the town, including less room for cars underneath the existing railway bridge.

- 3.1.6 The development options for the flexible land use parcel in BA3 and the Urban Open Land will be considered with regards transport impacts. The Transport Assessment (TA) will accommodate all options and therefore it is appropriate for the EIA to assess all options with respect of transport as follows:

Option 1 - KTS on BA3

- *Interventions* – Option 1 will have the greatest impacts on the South Road > Wallington Road and Clothall Road corridors, and create the greatest demand for the active travel link crossing the railway. It is likely therefore that in this option the interventions in this area will require further enhancement, in comparison to Options 2 and 3. Therefore, greater detail will be provided as part of the OPA for the interventions proposed along this corridor, with the scale and scope of interventions, as well as the level of detail required, determined by strategic modelling and supported by local modelling (as needed). The timing of delivery of the active travel railway crossing to BA1 will be influenced by the phasing of housing on BA1, as well as by the new school on BA3, with clear triggers set out in TA.

- *Modelling* – The TA analysis will be supported by option-specific COMET¹ model scenarios testing. The outputs from the COMET model, combined with local traffic surveys, will be used to gain an understanding of trip distribution and network operation, and the outputs will inform local modelling. The local modelling (making use of a range of appropriate tools such as Junctions 10, LinSig and VISSIM) will test in more detail the operation of the network where interventions are proposed or where capacity challenges are suggested by the COMET outputs. The modelling will be used to provide the optimum balance between delivering clear priority for walking, cycling and public transport without unacceptable impacts on network operation for private vehicles. Option 1 would represent a 'worst case' scenario in terms of impacts on South Road and Wallington Road, and the junction of Clothall Road / South Road and Wallington Road. A combination of COMET and local modelling will also be used to identify triggers for specific interventions, for example the delivery of changes to the junction at Clothall Road / South Road / Wallington Road, along with the wider phasing plan.
- *Monitor and Manage* – Given the scale of the Growing Baldock proposals and associated interventions, a Monitor and Manage Framework (MMF) will be set out as part of the TA. The MMF will identify the governance (e.g. review bodies), processes and data required (including from the new school) to continually monitor transport impacts across the town (drawing on U&C's experience at Waterbeach) from first occupation through to a defined future point. The initial mode share targets and intervention triggers used to inform the MMF (and S106) will be drawn from the TA analysis. The MMF will set out how progress will be monitored against the targets, and the process for adjusting the scope and timing of interventions, as necessary to respond to monitored outcomes. The MMF will allow for measures to be brought forward or amended if targets are not met. It will link to the S106 and identify how funds will be held and accessed for the above, as well as the period that monitoring will take place for.

Option 2 - KTS Expansion

- *Interventions* – Option 2 will have the greatest impacts on Icknield Way, Norton Road, Weston Way, via North Road / Station Road and the junctions of Norton Road and Weston Way with Letchworth Road / Hitchin Street. In all options, demand for 2FE will be created to the existing KTS, and therefore interventions will be required to some degree in all options, and this will be determined in the TA. The scale of interventions required, as well as the level of detail required, will be determined by strategic modelling and supported by local modelling as necessary. Given our understanding of the existing context of Knights Templar School, additional feasibility work would be provided to demonstrate deliverable interventions for access to an enlarged school and the associated sports centre, incorporating likely changes on Weston Way and Letchworth Road. A separate TA would subsequently be required to support any standalone application for expansion of Knights Templar School in the future. Therefore, the indicative proposals set out in the TA for the OPA, and other supporting documents, would be provided solely to demonstrate broad option feasibility.
- *Modelling* – The modelling process will be the same as for Option 1. As noted above Option 1 would represent a 'worst case' scenario in terms of impacts on Icknield Way, Norton Road, Weston Way and the junctions of Norton Road and Weston Way with Letchworth Road / Hitchin Street. A combination of COMET and local modelling will also be used to identify the triggers for specific interventions, along with assumptions regarding phasing

¹ The COMET model is a multi-modal transport model suite that includes a Highway Assignment Model, Public Transport Model and Variable Demand Model. It is used to determine motorised vehicle movements across Hertfordshire and can identify the kind of impacts on movements that might take place at a strategic level if there are changes to the transport network or population (eg through development proposals)

more generally. The phasing plan will include a clear set of assumptions regarding expansion of KTS.

- *Monitor and Manage* – The approach to Monitor and Manage will be the same as for Option 1, culminating in a MMF.

Option 3 - Additional School on BA3

- *Interventions* – Options 1 and Options 2 will have assessed 'worst case' impacts in relation to the school options presented. Lower trip generating schools will be present on the KTS and BA3 sites in Option 3. Moreover, the two schools will have more contained catchments than the larger schools in Options 1 and 2. In combination this means that the trip generation at each school will be lower (reflecting lower pupils numbers), as will the movements across the town (reflecting more contained catchments). Local modelling will be used to identify whether the interventions developed in Options 1 and 2 are triggered by Option 3 along the corridors identified above.
- *Modelling* - The option-specific sections of the TA for Option 3 will outline the specific trip generation, distribution and assignment outcomes, but no additional strategic COMET modelling will be undertaken as it can be assumed (for the reasons set out above) that the impacts will be lower for Option 3 than for either of Options 1 and 2. Local modelling may be used to identify trigger points for specific interventions, as needed.
- *Monitor and Manage* – The approach to Monitor and Manage will be the same as for Option 1, culminating in a MMF. This will reflect the need to include both school sites in the monitoring programmes and appropriate representation of the sites in decision making (i.e. as part of the review bodies created).

Likely Significant Effects

- 3.1.7 Likely significant effects, both positive and negative, will result temporarily from construction activities and permanently from the impacts of an increased population and the planned infrastructure upgrades.
- 3.1.8 The emerging proposals seek to address existing longstanding issues within Baldock, such as the inappropriate routing of HGVs through the town, as well as integrating the proposed development with the existing community. Significant effects may, therefore, reach beyond the scope traditionally seen for development considered in isolation. The intention is for the development to deliver a positive net transport impact, which will be demonstrated in the ES.
- 3.1.9 In line with the principles set out in the emerging SMP, the significant effects are likely to be positive for pedestrians, cyclists and public transport-based receptors, whilst there is likely to be a negative effect on driver-based receptors. Other non-transport receptors, such as properties alongside the highway, are likely to experience a mix of positive and negative effects. These will be fully classified and assessed within the ES to ensure that an acceptable balance is being drawn.

Approach and Assessment Methodology

- 3.1.10 The *Institute of Environmental Management and Assessment (IEMA) Guidelines: Environmental Assessment of Traffic and Movement* (July 2023) introduces a wide range of potential impacts that should be considered in the Transport chapter, including:
- Severance of communities
 - Road vehicle driver and passenger delay
 - Non-motorised user delay
 - Non-motorised user amenity

- Fear and intimidation on and by road users
 - Road user and pedestrian safety
 - Hazardous and large loads
- 3.1.11 Effects will be considered for their impact on a full range of sensitive receptors, with significant focus given to pedestrians, cyclists and public transport users in line with the principles set out in 3.1.5. Further detail of the proposed methodology for the assessment of impacts and effects is set out in Appendix 2.
- 3.1.12 Consultation and collaboration have taken place with North Herts Council, in their role as Local Planning Authority, Hertfordshire Country Council, in their role as Local Highway Authority, and National Highways, in their role as Strategy Highway Authority. This is expected to continue as the proposed development is further detailed.
- 3.1.13 ITP will also produce a Transport Assessment (TA) and Travel Plan (TP), which will accompany the ES as appendices. The purpose of the TA is to report the overall transport strategy for the development, whilst the TP will set out a strategy for securing sustainable mode shift over a defined period of time once the development is occupied. In contrast, the purpose of the ES in a transport context is to present the impacts of traffic and movement on people and the environment.

Indicative Mitigation Measures

- 3.1.14 The emerging proposals include significant built-in mitigation, largely focused on integrating the proposed development with the existing town of Baldock. Continuing with this approach, mitigation will likely be focussed on making improvements to the walking, cycling and public transport environments to offset, and ideally deliver betterment, to the current future baseline scenario.
- 3.1.15 Examples of specific mitigations measures may include:
- Promotion of mobility hubs and car clubs to reduce the need to own a car;
 - Introducing bus gates, shuttle working and modal filters to prioritise sustainable modes; and
 - Enforcing weight limits to ensure heavy goods vehicles use appropriate routes.

Cumulative Effects

- 3.1.16 The cumulative assessment will be undertaken by looking at the impact experienced by each receptor, taking the calculated future baseline with the addition of the proposed development and other specific nearby development with overlapping effects.
- 3.1.17 The TA will use the COMET strategic model which includes the future year traffic of all committed development plus any developments that have been recently constructed, allowing a consideration of cumulative development without identifying individual sites within the overall traffic figures. In relation to the ES, the following process has been applied to establish which specific sites will be considered in relation to the assessment of cumulative transport effects:
- a review of sites within the study area (within Baldock and between the A1(M) junctions 9 and 10;
 - exclusion of sites that don't have planning permission and are less than 50 dwellings;
 - consideration of sites beyond the study area that are of a scale that their assessments distribute significant traffic onto the links assessed by the TA;
 - judgement applied to whether any 'near certain' sites or allocations should be included;

- assume other cumulative development and smaller sites in the wider area is accounted for in general growth factors applied to future year scenarios.

3.1.18 On this basis, the ES will consider the cumulative effects of LG1 (North of Letchworth) and BA4 (as an allocated site).

3.2 Noise and Vibration Effects

- 3.2.1 This chapter of the ES Scoping Report has been produced by the acoustics team of RPS Consulting UK (RPS) and sets out the scope of the assessment in terms of noise and vibration for the Environmental Statement (ES) Chapter.
- 3.2.2 The scope of works is set-out in more detail below, but broadly comprises of an assessment of the potential:
- noise and vibration impact during the construction phase on existing and proposed noise sensitive receptors; and
 - noise impact during the operational phase on existing and proposed noise sensitive receptors.
- 3.2.3 RPS is a member of the Association of Noise Consultants (ANC), the representative body for acoustics consultancies, having demonstrated the necessary professional and technical competence.
- 3.2.4 This scoping report has been prepared with integrity, objectivity and honesty in accordance with the Code of Conduct of the Institute of Acoustics (IOA) and ethically, professionally and lawfully in accordance with the Code of Ethics of the ANC.
- 3.2.5 The acoustics scoping report uses the following guidance and standards, as detailed in section Approach and Assessment Methodology Section of this scoping report:
- British Standards Institution.
 - British Standard 8233:2014 Guidance on sound insulation and noise reduction for buildings (BS:8233:2014).
 - British Standard 4142:2014+A1:2019. Methods for rating and assessing industrial and commercial sound (BS:4142:2104+A1:2019).
 - British Standard 5228-1:2009+A1:2014. Code of practice for noise and vibration control on construction and open sites - Part 1: Noise (BS:5228-1:2009+A1:2014 Part 1).
 - British Standard 5228-1:2009+A1:2014. Code of practice for noise and vibration control on construction and open sites - Part 2: Vibration. (BS:5228-1:2009+A1:2014 Part 2).
 - British Standard 7445-2:1991 Description and measurement of environmental noise - Part 2: Guide to the acquisition of data pertinent to land use (BS:7445-2:1991).
 - Department of Transport. Calculation of Road Traffic Noise. HMSO. 1988 (CRTN)
 - Highways Agency. Design Manual for Roads and Bridges. LA 111: Noise and Vibration. Revision 2. May 2020 (LA 111).
 - Professional Practice Guidance on Planning & Noise. New Residential Development. May 2017 (ProPG)

Baseline Conditions

- 3.2.6 The baseline conditions for the site will be established by a noise survey covering both weekday and weekend periods.
- 3.2.7 The main existing constraint on the development with respect to noise sensitive uses is noise from road traffic. The principal roads affecting the development site are the A1(M) which lies approximately 300 m to the west of the development site boundary and the A505 which is adjacent to the south eastern boundary of the development site. There is also a railway line

running through the centre of site. This line is a local branch line between Baldock and Royston and is therefore not thought to be used for freight movements.

- 3.2.8 There are also existing industrial and commercial uses to the north of Baldock Road, and south of the railway line. ProPG states that for industrial sites, it should be established whether the industrial noise is 'dominant' in any location, and if that is the case the noise will be assessed in accordance with BS:4142:2014+A1:2019. Following a review of the aerial photography of the sites, the uses appear to be mainly offices with some service yards and delivery areas. These uses are generally considered to have relatively low noise emission which can be compatible with residential use with respect to noise.
- 3.2.9 Additional contributions from local residents have also been identified (use of gardens, cars on local network, pedestrians using footpaths etc).
- 3.2.10 Another noise source within the area is the Firs Kennels and Cattery. There is presently no specific method for the assessment of noise from kennels and the way that these are considered varies between planning authorities. Therefore, liaison with the local Environmental Health Department (EHD) will be key in determining how this source of noise is considered. Currently there is an Institute of Acoustics (IoA) working group that has been set up to produce guidance in relation to the assessment of noise from dog kennels, this guidance will be reviewed at the time of the assessment.

Key Issues

- 3.2.11 For the construction phase, construction noise and vibration can cause adverse impact to noise sensitive receptors.
- 3.2.12 For the operational phase, the existing noise climate consists of road, rail and commercial sources, increased road traffic levels and the addition of commercial noise sources can cause adverse impact to noise sensitive receptors.
- 3.2.13 The development scenarios for the flexible land use on BA3 comprising of secondary school / residential / SEND school will require all options to be modelled in order to establish the worst-case scenario, informed by the traffic modelling.

Likely Significant Effects

- 3.3.1 Likely effects of the development include potential noise and vibration on existing and proposed receptors.
- 3.3.2 There is also the potential for the development to impact human health, both through the production of noise during construction, the increase in noise levels from traffic once the site is operational and also any plant noise associated with the industrial units.

Approach and Assessment Methodology

- 3.2.14 We will consult with local authority to agree an appropriate assessment methodology and any specific local noise and vibration assessment policy / criteria relevant to the Proposed Development. In addition, we will aim to agree the location of the existing sensitive receptors for the noise and vibration assessment.
- 3.2.15 The following paragraphs outline the proposed noise and vibration impact assessment methodology (subject to consultation with the local authority).

-
- 3.2.16 The detailed baseline noise survey methodology will be agreed in advance with the local authority. However, all measurements will be carried out in accordance with BS 7445-2:1991 and BS 4142:2014+A1:2019.
- 3.2.17 The assessment of noise and vibration impacts during the construction / demolition phase will be carried out qualitatively and, where appropriate information is available, quantitatively based on guidance provided in BS:5228-1:2009+A1:2014 Part 1: Noise and BS:5228-2:2009+A1:2014 Part 2: Vibration.
- 3.2.18 The impact of changes in traffic noise as a result of the construction / demolition phase will be predicted based on the methodology contained in CRTN and assessed based on guidance provided in LA 111.
- 3.2.19 The impact of operational noise from the Proposed Development (assumed to be primarily commercial / industrial noise associated with building services plant / equipment) on existing and proposed receptors will be assessed based on the guidance provided in BS 4142:2014+A1:2019.
- 3.2.20 The impact of changes in traffic noise as a result of the operation of the proposed development will be predicted based on the methodology contained in CRTN and assessed based on guidance provided in LA 111.
- 3.2.21 The impact of existing and future transportation noise sources on the Proposed development will be assessed based on guidance provided in ProPG and BS 8233:2014.
- 3.2.22 The impact of existing industrial and commercial noise sources on the Proposed Development will be carried out in accordance with the BS 4142:2104+A1:2019.

Indicative Mitigation Measures

- 3.2.23 Should initial results of the assessment indicate that there are potentially significant effects, mitigation measures will be provided to ensure that the residual effects are not significant.
- 3.2.24 Mitigation during the construction phase will utilise Best Available Techniques. Best Available Techniques could include and not be limited to acoustic barriers, use of quieter machinery and operational times.
- 3.2.25 Mitigation of operational phase commercial noise may be required. If necessary, mitigation measures would comprise the re-location of the plant away from noise sensitive uses, acoustic barriers, use of quieter plant and operational on times.
- 3.2.26 Mitigation of operational phase proposed residential noise may be required. Any mitigation measures could comprise the layout of proposed plots to screen noise sensitive facades of plots and garden areas, acoustic barriers, glazing and façade options.

Cumulative Effects

- 3.2.27 Cumulative developments within 700m of the site will be considered in the assessment of cumulative construction noise effects.
- 3.2.28 For the operational phase, cumulative traffic data will be used in the assessment to ensure that the cumulative operational effects are considered.

3.3 Air Quality Effects

3.3.3 This chapter of the ES Scoping Report has been produced by RPS Consulting Services Ltd.

Baseline Conditions

3.3.4 North Hertfordshire Council has designated two Air Quality Management Areas (AQMAs) due to high levels of nitrogen dioxide (NO₂) pollution from road traffic. The Site is located approximately 9.5 km from the closest AQMA.

3.3.5 The major sources of pollution in the borough are road traffic emissions. There are no other major sources of pollution to air surrounding the Site.

Key Issues

3.3.6 For the construction phase, the most important consideration is dust. Without appropriate mitigation, dust could cause temporary soiling of surfaces, particularly windows, cars and laundry. For the operational phase, arrivals at and departures from the Proposed Development may change the number, type and speed of vehicles using the local road network. Changes in road vehicle emissions are the most important consideration during this phase of the development.

3.3.7 There is also the potential for the development to include a proposed a household waste storage facility which could be a source of odour.

3.3.8 The development scenarios for the flexible land use on BA3 comprising of secondary school / residential / SEND school will require all options to be modelled in order to establish the worst case scenario.

3.3.9 The air quality assessment will cover:

- An evaluation of the temporary effects from fugitive construction dust and construction vehicle exhaust emissions;
- An evaluation of the impacts of the development traffic on the local area once the development is operational; and
- An evaluation of the impacts on future occupants of the development from their exposure to the prevailing levels of air pollution, which can be a factor in the suitability of the Site for its proposed uses.
- If relevant, an assessment of odour impacts from the proposed household waste storage facility on existing and proposed receptors.

3.3.10 The data collected during the six-month monitoring scheme undertaken by RPS from December 2023 to June 2024 will be used in the assessment to help obtain a background concentration value and supplement modelling.

Likely Significant Effects

3.3.11 Likely effects of the development include nuisance dust setting on receptors such as cars and laundry. There is also the potential for the development to impact human health, both through the production of dust during construction and the increases in emissions of NO_x and PM from traffic once the site is operational.

Approach and Assessment Methodology

- 3.3.12 The Environmental Health Officer at North Herts Council will be consulted to agree the approach to the assessment.

Assessment of Impacts during Construction

- 3.3.13 Dust can contain a wide range of particles of different sizes. The normal fate of suspended (i.e. airborne) dust is deposition. The rate of deposition depends largely on the size of the particle and its density; together these influence the aerodynamic and gravitational effects that determine the distance it travels and how long it stays suspended in the air before it settles out onto a surface. In addition, some particles may agglomerate to become fewer, larger particles; whilst others react chemically.
- 3.3.14 The effects of dust are linked to particle size and two main categories are usually considered.
- PM₁₀ particles, those up to 10 µm in diameter, remain suspended in the air for long periods and are small enough to be breathed in and so can potentially impact on health; and
 - Dust, generally considered to be particles larger than 10 µm which fall out of the air quite quickly and can soil surfaces (e.g. a car, window sill, laundry). Additionally, dust can potentially have adverse effects on vegetation and fauna at sensitive habitat sites.

- 3.3.15 The risk of dust and emissions during demolition/ construction of the Proposed Development will be assessed using the method set out in the *IAQM Guidance on the assessment of dust from demolition and construction*.

Assessment of Impacts Once the Development is Operational

- 3.3.16 For the operational phase of the Proposed Development, the main pollutants from road traffic with potential for local air quality impacts are nitrogen oxides (NO_x) and particulate matter. Emissions of total NO_x from combustion sources comprise nitric oxide (NO) and NO₂. The NO oxidises in the atmosphere to form NO₂. The assessment of operational impacts will therefore focus on changes in NO₂ and PM₁₀ concentrations. The impact from fine particulate matter, known as PM_{2.5} (a subset of PM₁₀) concentrations will also be considered.
- 3.3.17 The ADMS-Roads model will be used to predict the air quality impacts from changes in traffic on the local road network. This is a version of the Atmospheric Dispersion Modelling System (ADMS), a formally validated model developed in the UK by Cambridge Environmental Research Consultants Ltd (CERC) and widely used in the UK and internationally for regulatory purposes.
- 3.3.18 Existing air pollution levels at monitoring locations will be predicted using the detailed dispersion model, ADMS Roads, with a view to verifying and, if necessary, adjusting model input parameters and correcting the model output. The ADMS Roads model will use traffic data provided by the project's traffic consultants. The model will be run using hourly sequential meteorological data collated at Luton in 2021.
- 3.3.19 The verified model will be used to predict future air pollution levels at existing receptors around the Site, without the Proposed Development, to determine the future baseline air quality conditions. The verified model will then be used to predict future air pollution levels at existing and proposed receptors with the proposed development in its first fully operational year.
- 3.3.20 The model will be used to assess the impacts of the three development options for the flexible land use parcel in BA3 and the Urban Open Land. A worst-case scenario will be modelled for all options.

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- 3.3.21 The significance of the illustrated effects on the surrounding area will be described using criteria definitions from the Environmental Protection UK (EPUK) & IAQM 2017 *Land-Use Planning & Development Control: Planning For Air Quality* document and professional judgement.
- 3.3.22 Predicted pollutant concentrations at proposed receptors will be compared with the relevant health-based limit values and objectives to determine the suitability of the site for future occupants.
- 3.3.23 If the household waste storage facility is proposed, a qualitative predictive assessment of odour impacts will be undertaken based on the source-pathway-receptor conceptual model according to Appendix 1 of the IAQM Guidance on the assessment of odour for planning.

Indicative Mitigation Measures

- 3.3.24 Mitigation measures will be drawn from the IAQM construction dust guidance, depending on the classification of risk at the site.
- 3.3.25 Should initial results of the assessment indicate that there are potentially significant effects, mitigation measures will be recommended to ensure that the residual effects are not significant.

Cumulative Effects

- 3.3.26 Cumulative developments within 700m of the site will be considered to assess the cumulative construction dust effects.
- 3.3.27 For the operational phase, cumulative traffic data will be modelled to ensure that the cumulative effects are considered.

3.4 Landscape and Visual Effects

- 3.4.1 The Landscape and Visual Impact Assessment (LVIA) chapter of the EIA will be prepared by Bradley Murphy Design (BMD).
- 3.4.2 The LVIA ES Chapter will:
- 1 Define the landscape and visual baseline conditions;
 - 2 Identify relevant landscape and visual receptors;
 - 3 Assess:
 - a. the potential for landscape and visual impacts – throughout the enabling and construction works and as a result of the completed and operational development – and will identify the resultant effects;
 - b. the likely significant landscape and visual effects;
 - c. any required mitigation or monitoring to address any likely significant adverse and then identify residual landscape and visual effects after implementation of mitigation;
 - d. the potential for cumulative landscape and visual effects.

Baseline Conditions

Landscape Character

- 3.4.3 The preliminary study prepared as part of the baseline evidence supporting the Growing Baldock Strategic Masterplan, included a review of the following existing landscape character assessments, which describe National and District character within the study area:
- The Character of England : Landscape, Wildlife and Natural Features (2014), Natural England; and
 - North Hertfordshire and Stevenage Landscape Character Assessment (2011).
- 3.4.4 The Site lies within the following character areas (See Appendix 4 LVIA Baseline Figures), which will be considered as part of the LVIA:
- National Character Area 87: East Anglian Chalk
 - District Character Area LCA 224 : North Baldock Chalk Uplands
- 3.4.5 The Site lies directly adjacent to the following character areas, which will be considered as part of the LVIA:
- County Character Area LCA 216 : Arlesey / Great Wymondley
 - County Character Area LCA 219 : Baldock Gap
 - County Character Area LCA 216 : Arlesey / Great Wymondley
- 3.4.6 Given the extent of existing intervening urban form and substantial green infrastructure in the context surrounding the Site, the effect on all other county landscape character areas identified by the assessments noted above would be negligible at most. Therefore, no other National or County landscape character areas would be considered as part of the LVIA.
- 3.4.7 Whilst providing a clear and concise description of the wider landscape character within the study area, it is considered unlikely that the published National and County assessments will provide a sufficient level of detail appropriate to the nature of effects likely to arise at a local level. Therefore, a local landscape character assessment will be undertaken by Bradley Murphy Design, based on current best practice guidance. The local landscape character assessment will also consider likely effects on existing attributes of the landscape such as land use, ecology, landform / topography, hydrology, vegetation cover and access.

- 3.4.8 The contribution made by designated features to the value and character of the landscape will also be considered within this part of the assessment. Care will be taken to avoid double counting of effects assessed as part of other topics, such as heritage or ecology.
- 3.4.9 Features of note within 2km of the Site boundary (see Appendix 4 LVIA Baseline Figures), include the following:
- Bygrave Road Local Wildlife Site (LWS), located within the northern part of BA1;
 - Ivel Springs Local Nature Reserve (LNR), which is designated for its mosaic of habitats including wildflower meadows, glades, chalk grassland, wetland and springs that are a key source for the river Ivel, located directly to the north west of BA1;
 - Weston Hills Local Nature Reserve (LNR), which is designated for its calcareous grassland habitat, beech and ash woodland and wildflower grassland, located directly to the south of BA2;
 - Baldock Conservation Area, enclosed within the historic market town of Baldock located circa 100m beyond the Site boundary;
 - Two Scheduled Monuments: Ivel Springs lies directly to the north west of BA1; and an area within the Site itself (referred to as Walls Field) comprises the Romano-British small town and Late Iron Age Settlement off Clothall Road;
 - Individual listed buildings: Outside of the conservation area, which include four Grade II listed dwellings along North Road (namely The Nook, Long Bailey, Blackhouse Farmhouse and The Compasses); and
 - Grade I Church of St Mary, Baldock, located in the centre of the Baldock Conservation Area.
- 3.4.10 There are a number of key archaeological / heritage features that will be considered as part of the LVIA (with regard to their contribution to the value and composition of landscape character and views). Features of note within 2km of the Site boundary (Appendix 4: LVIA Baseline Figures), include the following:
- Bygrave Common characterised by strip fields, being vestigial remains of medieval agricultural system, located within the northern part of BA1;
 - Millers Way a historic trackway recorded within the area of Bygrave Common, located within the Site along the northern edge of BA1; and
 - Paleo Channel 'Winterbourne', which is a winter river route and ancient stream-bed now infilled with soil, located within the southern part of BA1.
- 3.4.11 Within 3km of the Site, there are also Conservation Areas at Letchworth, Norton, Weston and Wallington. It is currently considered that these sites will not be impacted by the Proposed development, however this will be considered further as part of the LVIA.

Landscape Resource

- 3.4.12 The Site covers approximately 220 hectares and is located on the north and eastern settlement edge of Baldock, comprising a series of land parcels separated by rail and road infrastructure.
- 3.4.13 The Site, for the majority, comprises arable farmland and grassland vegetation with limited hedgerow, field trees and woodland cover. Much of the Site is in active arable use including areas: to the north of Royston Road; between Wallington Road and the A505; and, the area south west of the A507 Clothall Road. These are broken up by smaller areas of rough grassland and small pasture fields.
- 3.4.14 The landform of the site is influenced and characterised by the rolling chalk landscape of north Hertfordshire. The northern part of the Site is large scale, open, rolling chalk landform featuring

rounded ridges and valleys running in a generally east-west direction (at circa +60 to +75m AOD). Between Bygrave Road / Ashwell Road and Royston Road, the landform becomes flat and even (at circa +60m AOD), rising only gently eastwards. The localised elevated landform south of Royston Road and east of Clothall Common (at circa +85m AOD) was artificially created after the construction of the A505 Baldock bypass. Closer to the settlement edge of Baldock the landform becomes flatter, particularly land south of Clothall Common, Walls Field and the Urban Open Land around Clothall Road.

- 3.4.15 The Site and immediate study area are drained by a limited network of local streams and ditches. The only watercourses are beyond the Site, including the seasonal Cat Ditch to the east and River Ivel to the west.
- 3.4.16 There are also a number of public rights of way that cross the site (see Appendix 4 LVIA Baseline Figures), including:
- BA1 North of Baldock – Public bridleway Bygrave 001 runs along the Site’s northern boundary from North Road in the west to Ashwell Road in the east. Public bridleway Bygrave 002 runs north to south through the western part of the Site, from Bygrave Road at Laymore Farm, extending north to restricted byway Bygrave 014 beyond the Site. There is also public footpath Bygrave 015 on the eastern extent of BA1, which runs north to south from Ashwell Road, across farmland and over the railway line to Royston Road, also on the eastern edge of BA10;
 - BA3 Land south of Clothall Common – Public bridleway Clothall 003 runs from Royston Road, south through the Site towards the A505, where it forks with one part continuing over the A505 and the other staying within the Site and becoming bridleway Clothall 027, heading west towards Clothall Common;
 - Urban Open Land and Walls Field – Within the land designated Urban Open Land, public footpath Clothall 001 runs between Clothall Road and Wellington Road. Within Walls Field, public footpath Baldock 037 bisects the land centrally, running from Clothall Road to Mercia Road; and
 - Public footpath Baldock 036 runs along the north eastern boundary of Walls Field at the interface with the Clothall Common settlement edge.
- 3.4.17 There is a much more extensive network of PRoW beyond the site boundary, including:
- The Icknield Way Trail, long distance footpath, which borders the Site’s southern-most boundary (BA2); and
 - The Kingfisher Way, long distance footpath, which runs along North Road and through Ivels Spring LNR, directly to the north west of the Site’s boundary (BA1).

- 3.4.18 As required by GLVIA3, the LVIA will assess the contribution that these resources make to the character and value of the landscape (including landscape quality / condition, scenic quality, rarity, representativeness, conservation interests, recreation value, perceptual aspects and any cultural associations), along with the likely impact and effect on this landscape resource.

Visual Impact

- 3.4.19 Following consideration of the preliminary study area and extent of likely visual receptors (residential properties, PRoW and other publicly accessible locations) within and surrounding the Site, a series of viewpoint locations were identified to represent the range of likely views of the Proposed development (see Appendix 4 LVIA Baseline Figures and Viewpoint Sheets) and are summarised below.

3.4.20 Survey work for this LVIA was undertaken in July 2022 (to establish summer baseline) and early March 2023 (to establish the winter baseline, which represents the worst-case scenario) - to confirm those features or elements that contribute to the character of the area and determine the potential visibility of the Proposed Development.

3.4.21 Key visual receptors (places with potential views of the Site) include the following:

- Residential properties on the outer settlement edges of Baldock, whose properties directly interface with the Site (BA1 includes Salisbury Road, North Road and Larkins Close; BA2 includes Walnut Avenue, Laxton Gardens and Baldock Park Homes; BA3 includes Barley Rise, Chauncy Gardens and Merchants Walk in Clothall Common);
- Residential properties fronting Ashwell Road, at Lower Bygrave, in close proximity to the Site (BA1);
- A small number of farmsteads on Bygrave Road and Royston Road that are located directly on the Site boundaries;
- The footpaths and bridleways that pass directly through the Site including within BA1 Bridleway Bygrave 001 (also referred to as Millers Way), Bridleway Bygrave 001 and footpath Bygrave 015, in land east of Clothall Common Bridleway Clothall 027, in Walls Field footpath Baldock 037 and in the Urban Open Land footpath Clothall 001;
- A number of footpaths, bridleways and byways surrounding the Site;
- Icknield Way long distance trail, which runs directly adjacent to the southern part of BA2 and Kingfisher Way long distance trail, which runs along North Road and into Ivel Springs LNR adjacent to the north western edge of BA1;
- Clothall Road allotments and North Road allotments, directly adjacent to the Site;
- Ivel Springs LNR and Weston Hills LNR, directly adjacent to the Site; and
- Bygrave Road which turns to Ashwell Road a rural road that passes directly through the agricultural landscape of BA1.

Key Issues

Landscape Character

- Maintaining the open character of the North Baldock Chalk Uplands in the elevated parts of the Site;
- Ensuring new development is appropriately sited and of a scale, form and style appropriate to the character area;
- Planting mitigation is appropriate to local character and does not necessarily, fully enclose development;
- Ensure that new development does not necessitate the inappropriate removal of existing woodland blocks or hedgerow;
- Protect and preserve the narrow rural lanes.

Visual Impact

- Avoid development on the northern exposed ridge (BA1), and minimise adverse impacts on longer distance views, where the landscape is rural, elevated, remote and is visually sensitive;
- Retain and frame views of St Mary's Church spire from key locations within the Site, including bridleway Bygrave 001, on the ridgeline, land east of Clothall Common and from the area of Urban Open Land;
- Retain the informal recreation land east of Clothall Common, which provides elevated long distance views east to Wallington scarp slopes;
- Retain an open landscape transition from Walls Field to the urban open land and beyond to the rural landscape;

- Visually sensitive edges – transition to the surrounding rural landscape and Green Belt – with strong views of the surrounding rural context;
- Incorporate landscape buffering along the Site's boundary with A505 and railway line, to minimise impacts of these visual detractors;
- Incorporate landscape buffering along the Site's boundary with Lower Bygrave, to minimise the visual impact; and
- Use of woodland / hedgerow planting to mitigate / control / frame views and assimilate the development into the context.

Likely Significant Effects

- 3.4.22 The LVIA will determine the sensitivity of landscape and visual resources. The initial indication is that the sensitivity of the landscape ranges from medium (in areas on the edge of the existing settlement) to high (in areas currently covered by existing arable land, areas associated with Ivel Springs LNR, Weston Hills LNR and Wallington Scarp Slopes) with the sensitivity of visual receptors ranging from low (on roads and in areas containing no designation) to high (for recreational destinations, residential receptors or designated locations such as the scheduled monuments).
- 3.4.23 Potential significant landscape and visual effects are as follows:
- Temporary visual effects during enabling and construction activities;
 - Loss of landscape features such as trees and hedgerows as a result of enabling and construction activities;
 - Effects on landscape character resulting from the completed and operation of the Proposed development; and
 - Visual effects to nearby receptors surrounding the Site, as a result of the completed and operation of the Proposed development.
- 3.4.24 Describing the effects likely to arise as a result of the Proposed development and determining their significance will comprise the application of professional judgement, to weigh the findings of the sensitivity of receptors against the predicted magnitudes of impact, which can be beneficial, adverse or neutral.
- 3.4.25 Landscape and visual effects are described using a five-point word scale. Intermediate levels of effect can be attributed where relevant. Landscape and visual effects are assessed as being substantial, major, moderate, minor or negligible – with the potential for intermediate effects between these judgements. A judgement of neutral effect can also be determined where there is likely to be no discernible change.
- 3.4.26 Typically, residual effects considered substantial, major or moderate / major are considered significant, with any effects of moderate or lower considered not significant. However, professional judgement will be applied as part of the assessment of potential landscape and visual effects to determine if any effects which are considered moderate would also be considered significant.

Approach and Assessment Methodology

- 3.4.27 The LVIA ES Chapter will aim to identify and describe the nature, scale and thus significance of landscape and visual effects likely to arise, as a result of the proposed development, on the existing landscape features, character and the visual amenity of people within the site and surrounding area.

- 3.4.28 Whilst the methodology used throughout the EIA will be adhered to for consistency, it will be adapted for the LVIA to ensure the assessment accords with the principles of best practice set out in the following relevant published guidance:
- Guidelines for Landscape and Visual Impact Assessment, Third Edition (2013), (GLVIA3), Landscape Institute and the Institute of Environmental Management & Assessment;
 - GLVIA3 Statements of Clarification (2013 - 2015), Landscape Institute;
 - An Approach to Landscape Sensitivity Assessment (Natural England, 2019)
 - Natural England's 'An Approach to Landscape Character Assessment' (2014); and
 - Landscape Institute (2019), Technical Guidance Note 06/19, Visual Representation of Development Proposals.
- 3.4.29 Whilst linked, an assessment of the effects of development on landscape features, character and visual amenity are treated separately in LVIA. The overall approach used to identify and assess landscape and visual effects is summarised as follows (the detailed methodology for this assessment is provided within a separate annex, see Appendix 3 LVIA Methodology):
- Agree the scope of the assessment as set out within this Topic Sheet (to be discussed as part of EIA Scoping with North Herts Council (NHC) / Place Services and relevant statutory consultees);
 - Collate baseline information through desk study research and field-based survey work, select appropriate landscape and visual receptors and establish their value;
 - Review the Proposed development and determine the susceptibility of landscape and visual receptors to the nature of development proposed;
 - Combine value with susceptibility to determine sensitivity of landscape and visual receptors to the nature of development proposed;
 - Describe the nature and magnitude of impact likely to be experienced by landscape and visual receptors as a result of the Proposed development without mitigation measures;
 - Judge the combination of sensitivity and impact to assess the scale of effects for landscape and visual receptors without mitigation measures;
 - Describe mitigation measures to avoid or reduce the magnitude of any adverse impact;
 - Assess the scale of residual effects for landscape and visual receptors following implementation of mitigation measures; and
 - Identify those effects that are considered significant and relevant to decision making.
- 3.4.30 The LVIA will include an assessment of the likely effects for both the construction phase and for the operation of the site. Operational effects will be considered for both the year of completion of the development and for 15 years in the future when proposed mitigation planting would be maturing.
- 3.4.31 The LVIA will include an assessment of effects during the winter and summer, along with an assessment of effects during the daytime and nighttime. For the latter, a formal Lighting Impact Assessment will be carried out and appended to the ES, the scope of which is included in Section 3.11 of this Scoping Report.
- 3.4.32 The LVIA will also include a review of relevant legislation and key National, Regional and Local Planning Policies, followed by consideration of how they inform judgements on the value and sensitivity of the landscape or specific views.
- 3.4.33 A preliminary study of the landscape character and visual amenity surrounding the Site has been carried out, based on a radius of 3km from the centre of the Site. Given the topography and extent of intervening vegetation and built form, it is considered that any effects beyond 3km would be insignificant and so would not be included as part of the assessment.

- 3.4.34 In relation to the three development options for the flexible land use parcel on BA3 and the Urban Open Land, it is proposed the LVIA ES chapter will assess each scenario individually - for those landscape and visual receptors with potential to be influenced (located immediately to the east and south of the Site). Visual receptors with the potential to be influenced by these options are from Viewpoints 7, 8, 9, 10, 12 A&B and 16. Landscape receptors with potential to be influenced by these options are LCA 223: Wallington Scarp Slopes, LCA 224: North Baldock Chalk Uplands and LCA 219: Baldock Gap. It is considered that all other receptors would be unaffected by the options proposed for BA3 and Urban Open Land.

Indicative Mitigation Measures

- 3.4.35 Mitigation measures will include a comprehensive green infrastructure strategy, to provide screening and softening of the proposed development where required – minimising adverse effects on landscape character and visual amenity – whilst providing suitable visual links between the Proposed development and the surrounding landscape.
- 3.4.36 Mitigation which has been designed as an integral part of the scheme will be considered as 'embedded mitigation', which forms part of the proposed development. This includes iterative input into the Proposed development's height, layout and massing parameters, including the extent of green infrastructure within which the Proposed development is to be embedded.
- 3.4.37 The effects of the proposed development will be assessed firstly at Year 1 (when new vegetation is yet unlikely to be providing any mitigation function) and then at Year 15 (once any proposed planting has matured and is providing mitigation as designed).

Cumulative Effects

- 3.4.38 An assessment of cumulative effects will be carried out as part of the LVIA, to consider any likely increase in effect as a result of the proposed development, when combined with the following sites, by virtue of their potential intervisibility with the site and effects on key features of the landscape character area:
- Bygrave Solar Farm;
 - LG1 (North of Letchworth);
 - LG3 (Northeast of Letchworth);
 - BA4.

3.5 Heritage and Archaeology Effects

- 3.5.1 The Heritage and Archaeology chapter of the EIA will be prepared by Dr Paula Jones (Heritage) and Mr James Meek MCIFA (Archaeology) of HCUK.

Baseline Conditions

- 3.5.2 There are no designated heritage assets within the site itself, however there are a number of listed buildings, scheduled monuments and a conservation area within close proximity of the site boundaries. The proposals have the potential to affect the setting of these heritage assets and consequently their significance, and they are therefore the subject of this impact assessment. These assets comprise:

- Baldock Conservation Area: The application site is located beyond the boundaries of the conservation area, however given its relatively close proximity any effects on the setting of the conservation area and its character and appearance are fully considered within this assessment.
- Two scheduled monuments: These sites comprise the Romano-British small town and Late Iron Age settlement off Clothall Road and the Settlement site south of Blackhorse Farm. Both of these scheduled monuments are currently experienced as areas of open greenspace on the edges of Baldock, but are not visually tangible historic features (i.e. there is no visible built form or clear earthworks which give them prominence).
- Individual listed buildings outside the conservation area: These include four Grade II listed dwellings along North Road (namely, The Nook, Long Bailey, Blackhorse farmhouse and The Compasses).
- Grade I Church of St Mary, Baldock: The church is situated in the centre of the Baldock Conservation Area, however as the most prominent asset in the area it is considered here additionally as an individual heritage asset.

- 3.5.3 No non-designated heritage assets have been identified by the Local Planning Authority as requiring consideration.

- 3.5.4 For archaeology, there are a number of identified archaeological sites within the site boundary and in its vicinity, indicating activity in the area from around 4000BC to the present. This has been documented in an archaeological desk-based assessment prepared by Phoenix Archaeology (January 2023) in support of the Growing Baldock Strategic Masterplan. This incorporated information held on the Hertfordshire Historic Environment Record (HER) regarding known archaeological and historic sites within and around the site. The HER recorded 74 sites within the Site boundary.

- 3.5.5 The report also included a review of the previous archaeological investigations undertaken within the site area, through geophysical survey in 2008 and trial trench evaluation undertaken in 2008, 2009 and 2016. These works have revealed a large number of archaeological remains within the site, one of which has been identified as potentially being of national significance, a high status Roman site on the eastern side of the development area.

- 3.5.6 Further archaeological evaluation is proposed at the site to learn more about the date, character, significance, depth and state of preservation of identified archaeological remains.

Key Issues

- 3.5.7 There are no designated heritage assets within the site itself, however there are a number of listed buildings, scheduled monuments and a conservation area within close proximity of the site boundaries. No non-designated heritage assets have been identified by the Local Planning

Authority during pre-application consultations or during the course of preparation of the Heritage Impact Assessment which supports the Growing Baldock Strategic Masterplan.

- 3.5.8 The proposals have the potential to affect the setting of a number of designated heritage assets and consequentially their significance, and they will therefore be the subject of the environmental impact assessment.
- 3.5.9 The heritage assets identified as being potentially susceptible to impacts comprise:
- The Baldock Conservation Area;
 - Two scheduled monuments: The Romano-British small town and Late Iron Age settlement off Clothall Road and the Settlement site south of Blackhorse Farm;
 - Four Grade II listed dwellings along North Road (The Nook, Long Bailey, Blackhorse farmhouse and The Compasses);
 - The Grade I Church of St Mary, Baldock.
- 3.5.10 The application site is located beyond the boundaries of the conservation area, and is separated from the historic core by the built form which surrounds it, however given its still relatively close proximity any effects on the setting of the conservation area and its character and appearance require further consideration.
- 3.5.11 The site contains a large number of known archaeological sites, some of which further information is required from in order to determine their significance.

Likely Significant Effects

- 3.5.12 As part of the Good Practice Advice in Planning:3 (GPA3) settings assessment 8 designated heritage assets were identified as being potentially susceptible to impacts by the proposal due to either their close proximity or the potential extents of their settings. These assets included the Baldock Conservation Area, two scheduled monuments, four Grade II listed buildings along North Road (Blackhorse Farmhouse, The Nook, Long Bailey and The Compasses) and the Grade I Listed Church of St Mary within Baldock centre.
- 3.5.13 The site visits undertaken as part of the HIA and further consideration under Steps 2 and 3 of the GPA3 (see Appendix 3) indicate that while the proposals will increase the amount of built form in the broader vicinity of these assets, and extend the current settlement, any potential adverse impacts are to be mitigated through design and layout. No significant effects are considered likely.

Baldock Conservation Area

- 3.5.14 The application site is located well beyond the boundaries of the conservation area, however given its still relatively close proximity and in acknowledgment that settings may be particularly extensive spatially, any effects on the setting of the conservation area and its character and appearance have been fully considered.
- 3.5.15 It is clear that there is a sufficient 'buffer' of existing built form around the conservation area and the listed buildings within it, that separates the application site from the heritage asset visually, and more broadly experientially. Therefore, while the proposals would increase the overall settlement area of Baldock and would reduce the agricultural surrounds which are currently experienced along North Road and Bygrave Road, it is not considered that this effect would consequentially pose any harm to the character and appearance or the significance of the conservation area as a heritage asset. The development will include substantial areas of greenspace within these areas, and this will serve to retain the open character of the settlements broader surrounds. No significant effects are considered likely.

Scheduled Monuments

- 3.5.16 The scheduled monuments comprise the Romano-British small town and Late Iron Age settlement off Clothall Road and the Settlement site south of Blackhorse Farm. Both of these scheduled monuments are currently experienced as areas of open greenspace on the edges of Baldock, but are not visually tangible historic features (i.e. there is no visible built form or clear earthworks which give them prominence).
- 3.5.17 As identified within the HIA (Appendix 3) the significance of these monuments stems principally from their archaeological (evidential value), and this will not be altered by the proposals.
- 3.5.18 Their settings are currently characterised by the surrounding settlement of Baldock, particularly at Clothall Road, and by their very nature, both are 'settlements' sites. The development will be designed to include sufficient green space to mitigate any effects caused by the growth of the settlement off North Road and south at Clothall Common, and while there would be a change in the character of these assets wider settings, it is not considered that this would pose any consequential harm to their significance. No significant effects are considered likely.

Listed Buildings along North Road

- 3.5.19 These include four Grade II listed dwellings along North Road (The Nook, Long Bailey, Blackhorse farmhouse and The Compasses). While the proposals would alter an aspect of the current setting of these assets (which currently is characterised by agricultural land), following Steps 2 and 3 of the GPA3 assessment it is evident that this would not cause harm to their significance.
- 3.5.20 None of these assets are considered to be particularly susceptible to the level of change posed, and the development will further mitigate this potential effect through the inclusion of substantial areas of green space (including landscaping, parkland and open space) which would intervene between these assets and the new residential areas. No significant effects are considered likely.

Grade I Church of St Mary

- 3.5.21 The church, which is situated in the centre of the conservation area, is the most prominent asset in the area. There is wide visibility of its spire from surrounding areas, including from the site itself (north of Bygrave Road). There are no outward views from the church (i.e. views from the church will not be changed by the proposals).
- 3.5.22 The development will take into consideration the wider visibility of the church spire, and there is the potential for some improvement of views towards it and greater accessibility of these views (which are currently from private/ inaccessible agricultural land). The increased levels of built form surrounding the existing settlement, which the proposals will create, is not considered to have any detrimental effect on the setting of the church. The church is clearly sited at the centre of the settlement it serves and it will remain so should consent be granted. The proposals are not considered to pose any harm to the significance of this asset. No significant effects are considered likely.

Undesignated Archaeological Assets

- 3.5.23 As noted above, the previous archaeological investigations have identified numerous areas of archaeological remains within the Site. These have been subject to geophysical survey and initial schemes of trial trenching, with further trial trenching proposed, the results of which will also be included to support the outline planning and detailed planning applications.
- 3.5.24 The results of the evaluations and previous assessment will enable a strategy to be developed that will provide information on how such sites will be mitigated prior to development occurring. This will likely be through a mix of preservation in-situ for some areas (where the remains will be protected from any disturbance) through to preservation through record, whereby the archaeology is excavated, recorded and reported on to an appropriate level of detail that will enable remove the archaeology to allow development to proceed.
- 3.5.25 Reports on all of the mitigation work undertaken at the site will also be prepared and archaeological archives compiled for all of the site records, artefacts and ecofacts collected from the investigations.

Summary

- 3.5.26 Overall, and given the above, while the proposals will pose various (but minimal) levels of change within the settings of these assets, the development will effectively mitigate any adverse effects, and in doing so, no harm would be posed to the significance of the designated heritage assets. No significant effects on the designated heritage assets are considered likely.
- 3.5.27 Through the implementation of appropriate levels of fieldwork, mitigation will be implemented for archaeological remains that will lead to some areas being preserved in-situ and a negligible effect on the remains occurring, through to full preservation through record, which will result in a low negative effect occurring to the remains. Even with a full record being made, a negative effect will occur as the archaeological remains will have been removed, and all archaeological remains are an irreplaceable resource. This should not be a significant effect in EIA terms, as long as an appropriate level of mitigation is implemented.

Approach and Assessment Methodology*Guidance*

- 3.5.28 The following guidance will be taken into consideration in the assessment: *Historic Environment Good Practice Advice in Planning: 3 (2nd Edition)* ("GPA3").
- 3.5.29 The following policy and legislation will also be considered as part of the assessment:

Planning (Listed Buildings and Conservation Areas) Act 1990: This requires in section 66 that the decision maker in the planning process should have special regard to the desirability of preserving a listed building or its setting or any features of architectural or historic interest which it possesses. Section 72 sets out a similar duty in respect of conservation areas and their character and appearance. The Act does not make provision for special regard to the desirability of preserving the setting of conservation areas and only applies to buildings which lie within the conservation area boundary.

National Planning Policy Framework (NPPF): The NPPF was issued in March 2012 and a revised NPPF adopted in July 2019. This was subsequently, revised in December 2023. It provides the national framework for decision making affecting historic buildings and areas. It is a material consideration in determining applications and provides guidance to local planning authorities.

- 3.5.30 Paragraph 8 of the NPPF makes it clear that one of the Government's core objectives is to conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations.
- 3.5.31 The historic environment section of the NPPF (section 16, paragraphs 195-214) includes guidance on how heritage assets should be assessed as part of the development management process. Paragraph 200 of the NPPF requires applicants for planning permission to describe the significance of the heritage assets affected, including any contribution made by their setting, in proportion to their importance. It also states that the level of information provided should 'be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposals on their significance'.
- 3.5.32 Significance is defined, in Annex 2 as:
"The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting. For World Heritage Sites, the cultural value described within each site's Statement of Outstanding Universal Value forms part of its significance."
- 3.5.33 Paragraph 201 of the NPPF urges local planning authorities to avoid or minimise conflict between a heritage asset's conservation and any aspect of the proposal, by assessing the particular significance of heritage assets.
- 3.5.34 There is a helpful and concise definition of setting in the glossary at Annex 2 of the NPPF, as follows:
"The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, or may be neutral."
- 3.5.35 It should be noted that the definition of setting is the surroundings in which a heritage asset is experienced. It is not defined as other land that might be visible from a heritage asset. The definition makes it plain that the experience will normally be felt when looking towards a heritage asset. In order to be material to the experience of the asset, views from a heritage asset must be views into surroundings which have a bearing on its significance – that is to say, there must be a material connection between the asset and the view outward into its surroundings.
- 3.5.36 Paragraph 203 of the NPPF requires local planning authorities to take account of the desirability of sustaining and enhancing the significance of heritage assets, of the positive contribution that conservation of heritage assets can make to sustainable communities, and the desirability of new development making a positive contribution to local character and distinctiveness. Where there is conflict with these aims this forms part of the balancing exercise between the adverse effects of the proposal and its beneficial effects in the overall planning assessment.
- 3.5.37 The NPPF requires the impact on the significance of the designated heritage asset to be considered in terms of either 'substantial harm' or 'less than substantial harm' as described within paragraphs 207 and 208 of that document. National Planning Practice Guidance (NPPG) makes it clear that substantial harm is a high test, and case law describes substantial harm in terms of an effect that would vitiate or drain away much of the significance of that asset.
- 3.5.38 Paragraphs 207 and 208 of the NPPF refer to two different balancing exercises in which harm to significance, if any, is to be balanced with public benefit. Paragraph 18a-020-20190723 of National Planning Practice Guidance (NPPG) online makes it clear that some heritage-specific

benefits can be public benefits. Paragraph 18a-018-20190723 of the same NPPG makes it clear that it is important to be explicit about the category of harm (that is, whether paragraph 207 or 208 of the NPPF applies, if at all), and the extent of harm, when dealing with decisions affecting designated heritage assets, as follows:

"Within each category of harm (which category applies should be explicitly identified), the extent of the harm may vary and should be clearly articulated."

- 3.5.39 Paragraph 205 of the NPPF state that great weight should be given to the conservation of a designated heritage asset when considering applications that affect its significance, irrespective of how substantial or otherwise that harm might be.
- 3.5.40 Paragraph 209 of the NPPF refers to the approach to be taken towards non-designated heritage assets as follows:
"The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset."
- 3.5.41 All archaeological fieldwork and assessment will follow the standard and guidelines of the Chartered Institute for Archaeologists (CIfA); including the Standards for evaluation, excavation and archaeological observation, and the Universal Guidance documents prepared in 2023. All archives prepared for the fieldwork will follow the Hertfordshire Archaeological Archive Standards. It is anticipated that the archive will be deposited with the North Hertfordshire Museum in Hitchin.

Methodology

- 3.5.42 The assessment will be carried out using a combination of fieldwork and documentary research.
- 3.5.43 A Heritage Impact Assessment, inclusive of a settings assessment in accordance with GPA3 guidelines, will be undertaken in order to inform the development proposals further and assess the level of any harm posed. This will accompany the Built Heritage ES Chapter.
- 3.5.44 The basis for the methodology is drawn from multiple guidance documents relating to Environmental Impact Assessment (EIA) and the assessment of setting. First and foremost Good Practice Advice (GPA) 3 , and its stepped approach to assessment:
- Step 1: Identifying the assets affected;
 - Step 2: Assessing the contribution setting makes to heritage significance;
 - Step 3: Assessing the effect of the Development for both the construction and completed development stages;
 - Step 4: Maximising enhancement and minimising harm; and
 - Step 5: Making and documenting the decision and monitoring outcomes.
- 3.5.45 It should be noted that the above is not a prescriptive methodology and that it forms the basis of advice given by Historic England when responding to consultations.
- 3.5.46 The desk-based assessment already prepared for the Site has been undertaken following the CIfA Standard and Guidance for historic environment desk-based assessments. Archaeological fieldwork has been undertaken following the relevant Standard and Guidance for archaeological investigations, and future fieldwork will follow the Standard and Universal Guidance documents prepared in 2023.

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- 3.5.47 The development options for the flexible land use parcel on BA3 and the Urban Open Land (residential or education – secondary and SEND) will lead to disturbance regardless of the option carried forward and therefore the assessment will test the worst-case scenario (ground disturbance in BA3) which is consistent whichever option is progressed.

Indicative Mitigation Measures

- 3.5.48 Any potentially significant effects on the designated heritage assets will be mitigated through the careful design and layout of the development.
- 3.5.49 Additional mitigation measures for archaeological remains are broadly outlined above, but will include a mix of preservation in-situ and preservation through record (comprising appropriate levels of investigation, recording, reporting and archiving).

Cumulative Effects

- 3.5.50 Any effects on the historic environment are limited to the site and its immediate environs, so no cumulative developments will be taken into account in the cumulative assessment.

3.6 Hydrology and Flooding Effects

- 3.6.1 The Hydrology and Flooding Effects chapter of the EIA will be prepared by AKT II.

Baseline Conditions

3.6.2 *Flooding*

Based on the available information, the site is considered to be at very low risk of flooding from fluvial and tidal sources, sewers, groundwater and artificial sources. However, areas of the existing site are susceptible to flooding from surface water ponding or overland flow. These areas are: along the south western edge of Walls Field, the low point within Plot BA3 close to Merchants Walk, the low point within Plot BA10 between Watts Roofing Supplies and the railway embankment and an east to west flow path approximately following the former line of the Winterbourne historic watercourse and ponds at a low point adjacent to North Road at the western boundary of Plot BA1.

3.6.3 *Surface Water*

There are currently no surface water sewers located on the site and therefore the existing site will be considered as 100% greenfield in the design calculations.

3.6.4 *Foul Water*

There are currently no foul water sewers located on the site although there are foul sewers located within the adjacent housing areas. There is a foul water rising main crossing BA1 from north east to south west which discharges into a foul sewer in Bygrave Road.

Key Issues

3.6.5 *Flooding*

In line with the National Planning Policy Framework, it is a requirement to prove that the development will not increase flood risk to itself or adjacent land. The areas of surface water ponding and overland flow noted above will therefore need to be managed appropriately as part of the development.

3.6.6 *Surface Water*

In line with the National Planning Policy Framework, it is a requirement to restrict the surface water discharge rates from the proposed site to the equivalent greenfield rate using Sustainable Drainage Systems to provide water quantity, water quality and amenity benefits.

3.6.7 *Foul Water*

The route of the existing foul water rising main has an easement associated with it which provides a constraint to the proposed plot layouts if left in place. The capacity of the existing foul water network and Baldock-Norton Road Pumping Station is limited. A new foul water rising main between the site and Letchworth Treatment Works will need to be agreed with the relevant stakeholders.

Likely Significant Effects

3.6.8 *Flooding*

The creation of new areas of hardstanding will generate more direct surface water runoff and overland flow. In addition, the introduction of new artificial flooding sources e.g. sewers, water mains, etc. will require the future flood risk from these sources to be reassessed and integrated into the design in order to ensure the risk remains low.

3.6.9 *Surface Water*

The creation of new areas of hardstanding will generate significant quantities of more concentrated runoff than the current greenfield situation. This will need to be contained and controlled through a new surface water sewer system and SuDS strategy.

3.6.10 *Foul Water*

The existing foul water rising main will have a significant impact upon the proposed plot layouts if it remains on the current line. Therefore, a diversion may be sought to relocate it to a more favourable position. The additional foul water discharge generated by the proposed development will potentially have an impact upon the existing foul water sewer network both locally and at Letchworth Treatment Works.

Approach and Assessment Methodology

3.6.11 *Flooding*

Flood risk will be assessed in line with the requirements of the National Planning Policy Framework and will refer to the following documentation:

- North Hertfordshire Strategic Flood Risk Assessment (dated 2016)
- Hertfordshire County Council Level 1 Strategic Flood Risk Assessment (dated 2015)
- Hertfordshire County Council Preliminary Flood Risk Assessment (dated June 2011)
- The Hertfordshire County Council SuDS Design Guidance and Developer Guide

3.6.12 *Surface Water*

In line with the Sustainable Drainage Manual published by CIRIA, the following drainage hierarchy will be considered when preparing the surface water disposal strategy:

1. Rainwater use as a resource (for example rainwater harvesting, blue roofs for irrigation).
2. Rainwater infiltration to ground at or close to source
3. Rainwater attenuation in green infrastructure features for gradual release (for example green roofs, rain gardens)
4. Rainwater discharge direct to a watercourse (unless not appropriate)
5. Controlled rainwater discharge to a surface water sewer or drain
6. Controlled rainwater discharge to a combined sewer

3.6.13 *Foul Water*

The likely foul water flows will be assessed in accordance with Sewers for Adoption 7th Edition and BS EN 12056 – 2 : 2000 – “Gravity Drainage Systems Inside Buildings – Part 2: Sanitary Pipework, layout and calculation”.

Indicative Mitigation Measures

3.6.14 *Flooding*

Flooding will be mitigated / managed by the introduction of the new surface water drainage systems. These will reduce and control any overland flow to both reduce ponding and also incorporate it into blue or green infrastructure to direct it to temporary, semi-permanent and permanent water features for further treatment and control.

3.6.15 *Surface Water*

Surface water discharge rates will be reduced to the greenfield rate in line with the requirements of the National Planning Policy Framework. The use of infiltration to recharge the existing aquifer and rainwater harvesting will be the favoured SuDS options given the pressure on water resources in the area.

3.6.16 *Foul Water*

A pre-development enquiry has been lodged with Anglian Water to ascertain the capacity within the existing sewer network. Anglian Water have confirmed that there is capacity available within the existing foul network for approximately 200 homes to connect to manhole MH1403 in Laxton Gardens. This capacity will be used to serve Plot BA2. The pre-development enquiry confirms that any future plots beyond the initial 200 homes will require to be pumped directly to Letchworth Treatment Works. Anglian Water have advised that there is sufficient capacity within the works for this direct connection without the need for mitigation works.

3.6.17 *Parcel BA3*

In respect of the three development options for the flexible land use parcel on BA3 and the Urban Open Land, it is appropriate to test the worst-case scenario which comprises the option with the most area of hardstanding, because this generates the most surface water run-off. This will potentially be the option which includes the most amount of housing on BA3.

Cumulative Effects3.6.18 *Flooding*

The site will retain and treat any flooding it generates within the redline boundary and so there will be no impact upon any other schemes.

3.6.19 *Surface Water*

All surface water will be retained and treated on site and so will not impact any other schemes – water will either be reused or disposed of to the ground via infiltration.

3.6.20 *Foul Water*

Further dialogue will be undertaken with Anglian Water regarding the routing of the new foul water rising main to Letchworth Treatment Works. There may be a requirement to co-ordinate the route and strategy with the proposed LG1 development and this site will be considered as part of the assessment of cumulative effects.

3.7 Ecology Effects

- 3.7.1 The Ecology chapter of the EIA will be prepared by Bradley Murphy Design (BMD). Based on the nature and significance of the effects likely to arise in relation to ecology and nature conservation within the zone of influence associated with the proposed development, ecology will be scoped into the ES.

Baseline Conditions

- 3.7.2 The Site comprises a c.217ha parcel of land dominated by a complex of agricultural fields, notably arable and associated hedgerows. There are also areas of neutral grassland, poor semi-improved grassland and buildings associated with agricultural holdings.
- 3.7.3 There are no statutory designated sites of nature conservation importance located within the Site itself. The Site lies within 2 km of two statutory designated sites of nature conservation importance.
- 3.7.4 These are:
- Weston Hills Local Nature Reserve (LNR) which is designated for its calcareous grassland habitat, beech and ash woodland and wildflower grassland; and
 - Ivel Springs LNR which is designated for its mosaic of habitats including wildflower meadows, glades, chalk grassland, wetland and springs that are a key source for the river Ivel.
- 3.7.5 The Site lies within 1 km of ten non-statutory designated sites of nature importance, including Bygrave Road Local Wildlife Site (LWS) which lies within the Site. This LWS is known to support neutral grassland which is of elevated value relative to the Site. Neutral grassland of elevated value is also present within the wider Site such as open land associated with Clothall Common.
- 3.7.6 A suite of Phase II surveys have confirmed the following:
- Great crested newt: No ponds are present within the Site and previous Habitat suitability index has been carried out of ponds within 500 m. The results conclude no further surveys is necessary for great crested newt.
 - Badger: There are areas of suitable habitat for badgers to construct their setts. All surveys to date have showed no evidence of active badger setts within the Site.
 - Bats (roosting): There are trees and buildings on the Site which have the potential to support bat roosts. All structures and trees were initially assessed with further surveys undertaken in 2023 where bat roosting potential was identified. No evidence of roosting bats was recorded.
 - Bats (activity): The bat activity surveys conducted in 2022 recorded a total of 8 species of bat using the Site. All of the species are known to occur in the local and surrounding areas. The recorded bat activity was associated with existing tree lines, areas of scrub and hedgerows.
 - Breeding birds: The site includes significant areas suitable for ground nesting birds. The breeding bird survey recorded 16 species holding territory within the survey area. The Site supports a diverse assemblage of breeding birds, including an onsite population of corn bunting of County importance for the species. The 2022 breeding corn bunting survey has demonstrated that the Site continues to support around 10% of the singing male corn buntings present in Hertfordshire.
 - Wintering birds: The Site supports an over wintering population of corn bunting. The Site also supports wintering populations of other bird species of conservation concern such as skylark, yellowhammer and grey partridge that also breed on Site. A total of 42 species were recorded during the wintering bird survey. Of these, four species were not recorded in the breeding bird survey: peregrine, raven, redwing and fieldfare.

- Reptiles: Two species of reptile have been recorded at the Site during the reptile surveys conducted between May and July 2022. The reptile species confirmed as present were common lizard and slow worm. The overall Site result for common lizard (a maximum count of 24 adults during a single visit) indicates a 'low' population. The overall score for slow worm (a maximum count of 18 adults observed during one visit) indicates a 'low' population.
- Other notable species: A number of other species were identified incidentally within the Application Site. These included small blue butterfly and lizard orchid.

3.7.7 In 2024 further surveys were updated which included:

- Breeding birds: Corn bunting updates
- Reptile surveys: An update of the various reptile areas for the Site
- Bat activity surveys: An update of the transects originally done in 2022
- Habitats: A verification of the habitats on site including building inspections

3.7.8 Full survey methodology for all surveys undertaken are provided within Appendix 5.

3.7.9 Ahead of the planning application submission an update of some building emergence surveys will be undertaken to verify the conclusions that no roosts are present on site. These surveys will consider moderate and high potential buildings.

Key Issues

3.7.10 The key issues that could arise from the baseline due to the proposed development are:

- Loss of arable habitat which currently supports breeding birds and wintering birds, including a population of corn bunting deemed to be of County importance.
- There is potential for indirect impacts to negatively impact Ivel Springs LNR and Weston Hills LNR due to construction and operational activities.
- Potential for Bygrave Road LWS to be directly and indirectly impacted by the proposed development due to construction and operational impacts.
- Direct and indirect impacts on other protected and notable species including species such as reptiles, bats, other notable mammals, notable invertebrates and protected plant species.
- Direct and indirect impact on other habitats of elevated value e.g. neutral grassland, scattered trees, hedgerow and broad-leaved woodland.

Likely Significant Effects

3.7.11 The assessment of potential effects of the scheme on ecological receptors has been informed by the baseline survey work and the evolving Strategic Masterplan, that will inform the parameters of the planning applications.

3.7.12 The potential impacts of the proposed development will be considered in relation to the construction phase and the operational (i.e. occupation) phase.

3.7.13 Certain effects will be permanent e.g. permanent loss of habitat to the proposed development may occur during the construction stage. Other effects will cease after construction is complete e.g. dust and noise during construction activities.

3.7.14 Where possible, significant ecological effects will be avoided through careful design e.g., realignment of development parameters to avoid direct loss of a valuable habitat or sensitive timing to avoid impacts on important groups such as breeding birds and bats.

- 3.7.15 Where avoidance of effects is not feasible then suitable mitigation will be implemented to ensure residual effects are not significant.
- 3.7.16 The potential for ecological features to be affected as a result of the proposed development will be assessed, taking into consideration any direct loss of habitats and associated flora or fauna; indirect effects on flora or fauna; effects on any sites of nature conservation importance; and specific effects on protected species, both during the construction and operational phase of the development.
- 3.7.17 The effects to be considered will include construction phase:
- Temporary Land-take (construction)
 - Loss of habitat (construction)
 - Disturbance (visual, noise)
 - Hydrology and pollution (dust generation, pollution of aquatic habitats)
 - Lighting (construction)
 - Construction site hazards
- 3.7.18 The effects to be considered will include construction phase:
- Permanent Land-take
 - Anthropogenic / urban effects (including recreational pressure, disturbance etc)
 - Air Quality / Pollution and Hydrology
 - Permanent Lighting

Approach and Assessment Methodology

- 3.7.19 The assessment will consider both direct and indirect effects on the identified important ecological features resulting from a range of activities including, but not limited to the sensitive receptors identified as an outcome of the baseline assessments.
- 3.7.20 The Ecological Impact Assessment (EcIA) will be undertaken with reference to the CIEEM 'Guidelines for Ecological Impact Assessment in the UK and Ireland - Terrestrial, Freshwater, Coastal and Marine - Version 1.2). The aims of the ecology assessment will be to:
- Identify relevant ecological features (i.e. designated sites, habitats, species or ecosystems) which may be impacted;
 - Provide an assessment of the likely ecological impacts and resultant effects of the Proposed Development. Impacts and effects may be beneficial (i.e. positive) or adverse (i.e. negative);
 - Facilitate determination of the consequences of the Proposed Development in terms of national, regional and local policies relevant to nature conservation and biodiversity; and
 - Set out the approach to adhere to legal requirements relating to the relevant ecological features concerned
- 3.7.21 The assessment will describe the methods used to identify and assess the potential significant effects of the Proposed Development during the construction and operational phases. Baseline conditions will be described, including a summary of legislation/policy relevant to the baseline conditions, and subsequently the impact assessment will be undertaken taking into account avoidance and mitigation measures that are inherent to the design, including the use of best practice construction methods (e.g. implementation of methods to suppress dust generation or avoid pollution of water courses).
- 3.7.22 The outline planning application will be considered using the existing baseline that exists for the application areas which will consider various ecological features.

3.7.23 The development options for the flexible land use parcel in BA3 and the Urban Open Land (residential or education – secondary and SEND) will lead to changes to the ecological mitigation albeit there will be development on BA3 whichever option is progressed and therefore a single assessment (in terms of BA3) tested for EIA purposes is suitable .

3.7.24 Full methodology for Ecological Impact Assessment is provided within Appendix 5.

Indicative Mitigation Measures

3.7.25 Mitigation measures will be determined following assessment of the likely significant effects.

3.7.26 Such mitigation measures are likely to include the implementation of safeguard measures to protect important habitats and protected species during construction works, such as protective fencing and a Construction Environmental Management Plan (CEMP) and Ecological Implementation Management Plan (EIMP) to reduce effects of dust, noise and hydrology during construction works; and the sensitive design of lighting.

3.7.27 In the operational stage the subsequent Landscape and Ecological Management Plans (LEMP) will detail extensive habitat creation areas, management regime of habitat areas; and the design of green space to enhance green infrastructure and recreational opportunities within the site. Offsite mitigation requirements will also be determined if required for any impacts that cannot be fully compensated for onsite e.g. farmland bird, biodiversity net gain requirements etc.

3.7.28 Mitigation measures will aim to reduce or offset the adverse impacts of the culminative developments. These may include:

- Preservation: Identify and protect ecologically valuable habitats from direct disturbance or destruction;
- Enhancement: Implement measures to improve the quality and resilience of existing habitats, such as reforestation, wetland restoration, or the creation of wildlife corridors;
- Protected Species Management:
- Avoidance: Adjust project design or construction methods to avoid impacting habitats critical for protected species;
- Strategic Planning: Landscape-level planning and management approaches to be adopted that account for cumulative effects. This may involve regional conservation strategies, habitat connectivity planning, and coordinated efforts among multiple stakeholders.
- Translocation: Safely relocate sensitive species to suitable habitats away from the development area including potential for receptors sites for species of local importance;
- Timing Restrictions: Schedule construction activities to avoid sensitive periods for breeding, nesting, or other critical life stages of wildlife.
- Best Management Practices (BMPs): Implement measures to minimize soil erosion, sedimentation, and pollution during construction, such as installing silt fences and erosion control structures;
- Buffer zones: Establish buffer zones around sensitive habitats to reduce the direct impacts of development. These zones act as protective areas to minimise disturbance.
- Wildlife Crossings: Design and construct wildlife crossings, such as tunnels or bridges, to facilitate the movement of wildlife across roads and other barriers;
- Stormwater Management: Implement measures to manage stormwater runoff, preventing pollutants from entering water bodies and protecting aquatic ecosystems such as Ivel Springs;
- Green Infrastructure Design: Incorporate further green infrastructure into the project design, such as green roofs, permeable pavements, and urban green spaces, to enhance ecological connectivity and provide habitat.

- Compensatory Mitigation: If unavoidable impacts occur, compensate for them by restoring or creating equivalent or greater ecological value elsewhere. This could include creating new habitats or supporting conservation projects.

3.7.29 Mitigation measures should be tailored to the specific characteristics of the components which have breached the threshold into an adverse effect.

Cumulative Effects

3.7.30 Addressing cumulative effects with regard to ecology involves assessing the combined impacts of multiple developments, activities, or stressors on ecosystems, habitats, and species over time within proximity to the Site.

3.7.31 A robust baseline exists for the Site. Cumulative assessment will consider and categorise the individual stressors or activities contributing to cumulative effects. These can include urbanisation, air quality, loss of habitat, pollution, climate change, and other anthropogenic influences.

3.7.32 Once the combined impacts of multiple stressors on the ecological components have been evaluated including analysis of the spatial and temporal aspects of cumulative effects, specific mitigation will be implemented. Ecological thresholds or limits will be established beyond which adverse effects are likely to occur.

3.8 Ground Conditions and Soils Effects

- 3.8.1 This Chapter of the Environmental Statement will be prepared by Shadbolt Group, an independent geo-environmental specialist. It will examine the environmental impact of the Proposed Development with respect to ground conditions.
- 3.8.2 Major Accidents and Disasters (MA&D) has been scoped out of the EIA for the Proposed Development as the risk of the ground conditions being affected by a natural disaster is considered negligible and the Proposed Development is unlikely to fall under Control of Major Accident Hazards (COMAH) Regulations 2015 (HSE, 2015).

Baseline Conditions

- 3.8.3 The superficial deposits across much of the development area consist of the Lowestoft Formation – Diamicton and localised Glaciofluvial Deposits, Mid Pleistocene. evidence of Dry Valley Deposits – Clay, Silt, Sand and Gravel are also indicated to be present. Towards the southern boundaries of the development area Alluvial Fan Deposits of Sand and Silt are identified.
- 3.8.4 The solid geology beneath the development area is indicated to comprise of the Holywell Nodular Chalk Formation and New Pit Chalk formation. Towards the Northwest of the development area the Melbourne Rock Member (Chalk) has also been identified. There are small areas of the chalk formations, Totternhoe Stone Member and Zig Zag Formation.
- 3.8.5 The superficial geology located beneath the site is designated as both Secondary A and Secondary Undifferentiated Aquifers. Secondary Undifferentiated; Assigned where it is not possible to attribute either category A or B to a rock type. In general, these layers have previously been designated as both minor and non-aquifer in different locations due to the variable characteristics of the rock type. Secondary A; Permeable layers capable of supporting water supplies at a local rather than strategic scale, and in some cases forming an important source of base flow to rivers. These are generally aquifers formerly classified as minor aquifers.
- 3.8.6 The solid geology located beneath the site is designated as a Principal Aquifer; Geology of high intergranular and/or fracture permeability, usually providing a high level of water storage and may support water supply/river base flow on a strategic scale. Generally principal aquifers were previously major aquifers.
- 3.8.7 The likelihood of significant contamination being present within the soils located within the development area is considered to be low. However, the potential may exist for localised oil spills and buried material associated with agricultural buildings and activities.
- 3.8.8 The development area is predominantly in agricultural use, with Agricultural Land Classification Grade 2 (very good) and Grade 3 (good to moderate) soils.

Key Issues

- 3.8.9 The key issues to be assessed are the potential contaminants that may exist with the soils beneath the development that may affect future site users, building fabric and the environment.

Likely Significant Effects

- 3.8.10 Limited Made Ground is anticipated to be located at the site and as such the site is unlikely to exhibit significantly elevated concentrations of contaminants that may impact upon human health, the environment or building fabric. However, potential significant environmental effects arising from the presence of such substances (ash pipe and access tracks) and any necessary remediation which is required will be explained in the ES.
- 3.8.11 Ground gas (methane and carbon dioxide) may exist within the underlying soils; however, it is considered that the site is unlikely to pose a significant environmental effect from either explosion or asphyxiation. The ES will consider this environmental effect and describe the proposed measures to mitigate it.
- 3.8.12 Construction workers during the construction period for the Development may also be at risk from elevated methane and carbon dioxide concentrations if entry into excavations and/or confined spaces is required. The ES will set the appropriate mitigation measures to address such potential risks.
- 3.8.13 Made Ground may not provide competent founding strata for either a shallow foundation for a dwelling, or for a road or pavement and may not provide the gradient needed for the drainage to function properly without the raising of ground levels with engineered fill. The future earthworks strategy will address the measures required to provide a competent founding strata and suitable gradient to allow drainage to function properly.

Approach and Assessment Methodology

- 3.8.14 The following ground conditions assessment methodology will be adopted, which will be undertaken in a series of stages set out below.
- 3.8.15 A review of all available existing geo-environmental and geotechnical reports to provide an initial baseline of the ground conditions and to provide information on the potential impacts to the Development.
- 3.8.16 Consultation with the LPA shall be undertaken to ensure that the assessment of potential risks to future site users, the development infrastructure and to surface waters and groundwater and other relevant environmental media is appropriate and comprehensive.
- 3.8.17 Appropriate risk assessments will be carried out using the results of either the existing desk studies and intrusive investigations and any additional reviews/investigations which have been undertaken as deemed necessary.
- 3.8.18 The methodology for the assessment of risks to human health and the environment shall be based on Land Contamination Risk Management (LCRM) 'How to assess and manage the risks from land contamination' October 2020, Environment Agency.
- 3.8.19 The development options for the flexible land use parcel on BA3 and the Urban Open Land (residential or education – secondary and SEND) will lead to ground disturbance for all scenarios, with the same or similar levels of risks to potential future users and therefore the assessment will test the worst-case scenario which is consistent whichever option is progressed.

Indicative Mitigation Measures

- 3.8.20 Mitigation measures embedded into the design of the Proposed Development include the appropriate remediation / placement of Made Ground soils at the site into areas that would not pose a significant risk to future sites users the environment or building fabric.
- 3.8.21 Any necessary remediation which is required will be explained in the ES. The implementation of gas protections measures within the development to mitigate against methane and carbon dioxide.
- 3.8.22 The earthworks strategy would describe the works necessary to provide a competent founding strata and suitable gradient to allow drainage to function properly.

Cumulative Effects

- 3.8.23 Provided that appropriate mitigation measures are adopted during the site preparation and construction phase of the development area and similar best practice measures are in place during construction of the committed developments, no potential cumulative effects on human health, controlled waters and property are likely.
- 3.8.24 During the operational phase, it is likely that there will be a net beneficial effect on the surrounding areas as any identified contamination within the development area will be managed as part of the development works.
- 3.8.25 As any potential impacts are localised and focused on the site itself, no additional cumulative development sites will be considered as part of the assessment of cumulative effects.

3.9 Socio-Economic and Health Effects

- 3.9.1 The socio-economic and health chapter of the EIA will be prepared by David Lock Associates. The assessment will consider likely impacts on social, economic and health conditions directly resulting from the residential development, new commercial or leisure uses, community facilities and green spaces.

Baseline Conditions

- 3.9.2 An initial high-level assessment has identified the following baseline conditions:

- North Herts District has a resident population of 133,600 (NOMIS, 2021)
- 64,000 jobs identified and a jobs density of 0.78 (NOMIS).
- Baldock Town urban area had a population of 7,434 at the time of the 2011 Census. This is pending updated census data from 2021. The latest publicly available date will be used.
- Health services in Baldock are at capacity;
- Some primary schools in Baldock have falling rolls and existing capacity, so any new provision, without using up this capacity first, may negatively impact the future prospects of these schools;
- Existing community facilities are well used and there is currently no youth provision in Baldock;
- Baldock has the lowest geographical area of open space within North Herts and low amounts of play space and green corridors. Conversely, the wider area is well served by Public Rights of Way (albeit with some gaps in provision) and walking routes (e.g. the Letchworth Greenway)

Key Issues

- 3.9.3 The development will generate additional demand for health, community, education, leisure and open space provision, by way of the increased population that it will generate. Without mitigation, the development may therefore place undue additional demands on services and facilities in Baldock that are already under pressure and without capacity to meet this additional demand.
- 3.9.4 The development options for the flexible land use on BA3 and the Urban Open Land (residential or education – secondary and SEND) will lead to some differences in housing yields and potential future pupil yields, which will be mitigated for either on or off site. This chapter will consider each option at a high level.

Likely Significant Effects

- 3.9.5 The socio-economic effects of the proposed development are anticipated to be largely beneficial, subject to the timely delivery of additional social and community infrastructure made necessary by the development, to avoid undue pressure being placed on existing local infrastructure. Timely delivery can be secured by suitably worded conditions on any grant of planning permission, as well as by appropriate thresholds for infrastructure delivery/contributions within the Section 106 Agreement attached to any permission.

Approach and Assessment Methodology

- 3.9.6 Published statistical information and bespoke research sources will be consulted to establish the existing conditions and indicate where the development is likely to have an impact in the future. This will include:

- Office for National Statistics (ONS) census data 2021, including Nomis Labour Market Statistics and local authority profiles;
 - Hertfordshire County Council documents including relating to school provision/capacity and census profiles;
 - NHC documents including open space and relevant background documents published by the Town Council.
- 3.9.7 Consultation with appropriate bodies will also be undertaken to establish current baseline conditions with respect to facilities and capacities, for example on schools and health care. Planning policies and other local strategies relevant to the provisions of housing, employment, leisure and education will also be identified.
- 3.9.8 Baseline information will be obtained on:
- Population, housing and affordability;
 - Crime, health and education statistics;
 - Employment data and principal employment locations; and
 - Social and community facilities, including schools.
- 3.9.9 The assessment of the socio-economic and health impacts arising from the development is proposed to cover the following:
- Impacts on local population and the housing and labour markets;
 - Impact of new development on existing social and community facilities including education, health, community facilities, emergency services, recreational facilities and open space.
 - Employment levels, including during construction and at completed development for proposed non-residential uses; and
 - community safety and crime.

Indicative Mitigation Measures

- 3.9.10 As a result of these assessments, any necessary mitigation measures will be identified to ensure adequate and/or enhanced facilities and services provision for both existing and future residents of the area. Residual impacts will then be evaluated. The socio-economic effects of the proposed development are anticipated to be largely beneficial, subject to the timely delivery of additional social and community infrastructure made necessary by the development.

Cumulative Effects

- 3.9.11 The cumulative effects of the development alongside the following neighbouring strategic sites will be assessed, with a focus on ensuring that provision of new facilities is coordinated and proportionate. These cumulative development sites have been selected on the basis of proximity to the site, proposed land use, size and location within the combined settlement of Baldock / Letchworth, within which the majority of local community, retail, education and other facilities will be accessed:
- LG1 – North Herts Local Plan allocation north of Letchworth – 900 homes;
 - LG3 – North Herts Local Plan allocation northeast of Letchworth – 120 homes;
 - BA4 – North Herts Local Plan allocation west of BA3 in Baldock – 42 homes.

3.10 Waste Effects

3.10.1 This chapter of the ES Scoping Report has been prepared by RPS Consulting Services Ltd.

Baseline Conditions

3.10.2 Existing waste management infrastructure and waste generation within Hertfordshire will principally be identified from Hertfordshire County Council's Waste Local Plan (also known as the Waste Development Framework). The Framework will also provide details on waste forecasts and future site allocations for waste management within the region.

3.10.3 The Framework comprises the Waste Core Strategy and Development Plan Policies, which were adopted in 2012 and cover the period 2011-2026. These documents set out the spatial vision and strategic objectives for waste planning in Hertfordshire together with planning policies to implement the objectives and the decision-making process for waste planning applications. The Framework is supported by a number of targets and indicators; these are used to monitor the implementation of the Waste Core Strategy policies and the Waste Site Allocations document. The targets were revised in 2018 and progress is recorded in the Authority's Monitoring Report.

3.10.4 Other documents from the waste planning authority will also be used to characterise the waste baseline. This will include the Local Authority Collected Waste Spatial Strategy (Hertfordshire County Council, 2021), the key findings of which include:

- The current network of recycling centres is not expected to be capable of sustaining service delivery for the plan period (up to 2031). An improved network of more fit-for-purpose and strategically located recycling centers that are designed to serve larger catchment areas could provide a more effective and efficient service.
- Increased provision of privately owned materials recycling facilities within Hertfordshire would increase competition and reduce the reliance of the waste disposal and waste collection authorities on a single service provider.
- In 2019/20, 15% of Local Authority Collected waste was principally disposed of at two landfill sites in Bletchley in Buckinghamshire and Ware, in Hertfordshire. However, post 2020 the landfill in Ware is no longer accepting waste and is in the process of being restored.

3.10.5 Information from Hertfordshire's Waste Partnership, for example, waste minimisation initiatives, and data from the Environment Agency Waste Data Interrogator will also be included in the baseline.

Key Issues

3.10.6 Construction activities will generate different types and quantities of Construction, Demolition and Excavation (CD&E) waste. Without mitigation, the volume and types of waste will not be recorded, opportunities to minimise waste will be lost, waste is less likely to be sustainably managed with less waste diverted from landfill. The operation of the Proposed Development will primarily generate municipal waste but may also include Commercial and Industrial (C&I). This will increase the amount of waste generated in the region and without mitigation, it will cause adverse impacts to waste management infrastructure.

Likely Significant Effects

3.10.7 The likely effect of the waste generation from the Proposed Development is the reduction in the capacity of the waste management infrastructure within the region to manage existing and forecast waste streams.

Approach and Assessment Methodology

- 3.10.8 Relevant guidance to inform the assessment will be taken from IEMA's Guide to Materials and Waste in Environmental Impact Assessment (IEMA, 2020), in particular the terms used to define the magnitude of impact and sensitivity of receptors.
- 3.10.9 The local authority will be consulted to gain a detailed understanding of the existing waste management infrastructure and the proposals to increase its capacity, including the likely timeframes and locations of these facilities.
- 3.8.26 The development options for the flexible land use on BA3 and the Urban Open Land (residential or education – secondary and SEND) will each lead to variations in the construction and operational waste effects. Therefore all options will be tested to ensure the assessment is robust enough whichever option is progressed.

Indicative Mitigation Measures

- 3.10.10 An outline site waste management plan (SWMP) will accompany the waste chapter. The SWMP will set out the main types and estimates of waste likely to be generated during the construction of the Proposed Development and how these wastes will be managed. It will also identify the steps taken to minimise waste from the design process and the measures that will be implemented during the construction process. The SWMP will be kept updated during the construction process.

Cumulative Effects

- 3.10.11 Cumulative developments within 1km of the site (BA4) will be considered in the assessment of cumulative waste effects.

3.11 Lighting Effects

- 3.11.1 The lighting impact chapter of the EIA will be prepared by RPS Consulting Services Limited by a chartered engineer.

Baseline Conditions

- 3.11.2 A desktop assessment of the baseline conditions will be used to apply the appropriate Environmental Zone classification applicable to artificial external lighting. Environmental Zones are classed E1 to E4 as defined in Commission Internationale de l'Eclairage (CIE: 150 :2017).
- 3.11.3 The baseline environmental zone classification sets out the limitation of pre-curfew and post curfew lighting design parameters.

Key Issues

- 3.11.4 Lighting will be used during construction stage and will be required for operational purposes for the proposed development proposals. Key issues will be limiting light spillage and glare to adjacent ecologically sensitive areas highly sensitive receptors.
- 3.11.5 Construction stage lighting also has the potential for disturbance to existing residential areas.
- 3.11.6 Employment areas will require safety operational lighting and consideration will be required to floodlighting provided for educational sites. All these installations will require a greater degree of lighting than the baseline conditions.
- 3.11.7 The development options for the flexible land use on parcel BA3 will have different effects depending on the location and type of land use proposed. The scoping report will take account of the impact to receptors located adjacent to the development proposals in each of the options.

Likely Significant Effects

- 3.11.8 The installation of artificial lighting required for the development has the potential to increase sky glow and also light spillage to adjacent sites.
- 3.11.9 There are mitigating measures which can be taken to reduce the likely impact of light spillage and sky glow.
- 3.11.10 As detailed in clause 3.11.7 the various development options will have differing effects on the receptors. Significant effects on receptor will be assessed.

Approach and Assessment Methodology

- 3.11.11 The approach and methodology for the assessment will be in accordance with best practice guidance from the ILP PLG 04 document 'Guidance on Undertaking Environmental Lighting Impact Assessments' (2013).
- 3.11.12 The methodology requires both a desktop study and an on-site survey to establish existing baseline conditions.
- 3.11.13 Potentially sensitive receptor locations will be considered e.g. housing, in conjunction with the proposed development. The assessment will determine the magnitude of impact (magnitude of change) at each receptor (high, medium, low) to determine the overall impact in terms of beneficial or adverse effects.

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- 3.11.14 The methodology to determine potential effects to receptors of development proposals will involve preparing lighting schemes for critical areas to illustrate light distribution.

Indicative Mitigation Measures

- 3.11.15 To ensure the potential for obtrusive light is suitably minimised, a lighting strategy may be developed to mitigate significant environmental effects.
- 3.11.16 The assessment will advise high level design standards and mitigating measures to lessen the impact of light spillage, perceived glare and sky glow.
- 3.11.17 The specification of all lighting proposed in the scheme should not cause nuisance to motorists or adjacent land users.
- 3.11.18 Measures should be incorporated to minimise the light spill by utilising equipment with asymmetric distribution, minimal upward light output ratios and spill shields.

Cumulative Effects

- 3.11.19 Due to the existing nature of the development site and the proposed usage, the likely cumulative effect of artificial lighting may be an increase in sky glow when viewed locally to the site.

3.12 Utilities and Services Effects

- 3.12.1 The Utilities and Services chapter of the EIA will be prepared by Urban&Civic and will assess the effects of the proposed development on utilities, specifically electricity, gas, potable water and telecommunications.

Baseline Conditions

- 3.12.2 A desktop Level 1 Utility Statement for the Baldock site has been prepared which identifies the key constraints derived from statutory utility infrastructure on the proposed development. This statement is based on a review of the utility records received from statutory network operators.

Electricity

- 3.12.3 There are two overhead powerlines (11KV) located within the site: one running along the western boundary, adjacent to North Road, and a second in the southernmost parcel of the site south of Clothall Road. It is assumed that both powerlines could be diverted or undergrounded as part of the masterplan, the former within the verge, and the latter potentially within the road or green infrastructure network.
- 3.12.4 33KV undergrounded cables are present along the northern edge of the site and routed across this area (broadly along the route of the existing footpath) linking Bygrave Road. The latter connection may be retained in situ if the footpath is also retained in the masterplan. A further 33KV cable runs along the northern side verge of Royston Road, transecting the central part of the development site. Some localised diversion may be needed if site access from Royston Road is required.
- 3.12.5 An 11KV cable is located on the southern side of the railway line, which could, if required, be diverted along Royston Road, or alternatively retained in situ with an appropriate easement. None of the existing underground or overhead powerlines pose an absolute constraint on development, with the majority located at site boundaries or along roads / footpaths that may be retained as part of the development.

Gas

- 3.12.6 There is no gas mains apparatus present within the development site itself, therefore no on-site diversionary works are required to facilitate the scheme. It is assumed that no gas connections will be made to the development, reflecting the recent changes to Building Regulations and Future Homes Standards.

Water

- 3.12.7 A water main is routed within the carriageway and verge of North Road on the northwestern edge of the development. On the basis that no substantial alterations are expected to be made to North Road, it is assumed that this water main will be unaffected by the scheme. Similarly, water mains are routed along the northern side of Royston Road and the site side verge of Bygrave Road, to provide connections to the existing properties. These may need diversions dependent upon the masterplan, particularly if site access point are proposed from these roads.
- 3.12.8 The southern part of the site is dissected by a number of existing water mains of varying sizes (125mm to 400mm), which are likely to be affected by the proposed development and may therefore need to be diverted, potentially through proposed roads, footpaths or green space. Diversionary works may have significant associated timescales and cost implications, in particular in relation to the 400mm main, which will need to be factored into wider master planning, viability and phasing decisions.

Telecommunications

- 3.12.9 Openreach and Virgin records indicate a network of communications apparatus present in the verge alongside North Road, Royston Road, Clothall Road, Wallington Road and Bygrave Road. It is assumed that a connection can be taken from this existing infrastructure to serve the development site and that localised diversions may be required.

Key Issues

- 3.12.10 As identified above, some existing services may pose a constraint on development and therefore may need to be diverted. The development will introduce greater demand for services and upgrades of existing infrastructure or new connections are required to increase capacity may be required.
- 3.12.11 It is anticipated that there may be sufficient capacity in the existing infrastructure to supply the development with water, although it is noted that Baldock and the south-east more generally are in an area of identified water stress. Affinity Water are considering options to increase water supply in the area including reducing leakage in the short term and potential new reservoirs in the longer term.
- 3.12.12 The development options for the flexible land use parcel on BA3 and the Urban Open Land (residential or education – secondary and SEND) are likely to lead to similar requirements in terms of new utilities connections. The demand patterns for a school on site may differ from residential and therefore enquiries with utilities providers will consider a worst-case demand position.

Likely Significant Effects

- 3.12.13 The development will provide its own services and utilities infrastructure, connecting to existing networks. Appropriate upgrades and diversions to existing infrastructure will be made, such that the development should not result in any significant effects.

Approach and Assessment Methodology

- 3.12.14 The electricity and water capacity available for the development will be confirmed, via a pre-development enquiry. This will also establish the need for network reinforcement works to provide additional capacity within the clean water and electricity network.

Indicative Mitigation Measures

- 3.12.1 The scheme will include any necessary utilities infrastructure required to service the new development.

Cumulative Effects

- 3.12.2 Limited cumulative effects are anticipated as the statutory providers will factor in the energy and water demands of neighbouring developments to their calculations of available capacity. No specific assessment of other sites will therefore be included into the cumulative effects section.

3.13 Climate Change Effects

- 3.13.1 The Climate Change chapter of the EIA will be prepared by Turley Sustainability and ESG.
- 3.13.2 The UK Climate Change Projections (UKCP18)² set out that climate change is projected to lead to increasing temperatures, decreasing summer rainfall, and increasing winter rainfall as a result of increasing global Greenhouse Gas (GHG) emissions. This applies to the UK, including the Site.
- 3.13.3 In this context the EIA Regulations require the consideration of Climate Change, including the resilience of the development to the effects of climate change, and also how the development mitigates its impact on climate change through GHG emissions and their reduction. IEMA has published guidance for EIA practitioners for both Climate Change Adaptation³ and Mitigation⁴ which will be used in the Climate Change assessment for the Proposed development.

Baseline Conditions – Climate Change Mitigation

- 3.13.4 Current baseline conditions regarding GHG emissions have been established at the local authority (North Herts) and the regional level (East of England) from the latest (2021) UK Government local authority and regional carbon dioxide emissions national statistics: 2005 to 2021⁵ as presented in Table 3.13.1.

Table 3.13.1 Baseline Local & Regional GHG Emissions

Geographical Area	2021 GHG Emissions (tonnes CO ₂ e)
North Herts	684,200
East of England	38,062,600
UK	399,046,100

- 3.13.5 Future baseline conditions regarding GHG emissions have been established in the form of carbon budgets proposed for North Herts via the Tyndall Centre⁶, and set for the UK⁷ as presented in Table 3.13.2. These budgets will be used to contextualise GHG emissions from the Proposed development in order to establish the magnitude of its net GHG effect.

Table 3.13.2 UK & North Herts Carbon Budgets (tCO₂)

Period	UK	North Herts
2018 – 2022	2,544,000,000	2,800,000
2023 – 2027	1,950,000,000	1,400,000
2028 – 2032	1,725,000,000	700,000
2033 – 2037	965,000,000	300,000

² <https://www.metoffice.gov.uk/research/approach/collaboration/ukcp/index>

³ IEMA (2020). Environmental Impact Assessment Guide to Climate Change Resilience and Adaptation

⁴ IEMA (2022). EIA Guide to: Assessing Greenhouse Gas Emissions and Evaluating their Significance

⁵ <https://www.gov.uk/government/statistics/uk-local-authority-and-regional-greenhouse-gas-emissions-national-statistics-2005-to-2021>

⁶ <https://carbonbudget.manchester.ac.uk/reports/E09000009/>

⁷ Carbon Budgets - GOV.UK (www.gov.uk)

Period	UK	North Herts
2038 – 2042	Not yet set	200,000
2043 – 2047	Not yet set	100,000
2048 - 2100	Not yet set	100,000

- 3.13.6 The site currently comprises a series of fields used for agricultural purposes. While there are likely to be GHG emissions associated with agricultural use, for the purpose of setting the baseline GHG emissions, emissions from the existing site will be assumed to be zero to provide a worst case scenario for assessment.

Baseline Conditions – Climate Change Mitigation

- 3.13.7 Current baseline climate conditions for the Site have been established from the Met Office's closest automatic weather station, located at Bedford⁸ circa 25km to the north west. The data provides average monthly conditions for the 1981-2010 period summarised below to show summer maximum temperature and average summer and winter rainfall. Although data for the 1991-2020 period is available, data for 1981-2010 has been used as this is the baseline on which the UKCP18 projections are based.

Table 3.13.3 Current climate baseline

Description	Value
Summer maximum temperature (°C)	21.1
Average summer rainfall (mm per month)	51.7
Average winter rainfall (mm per month)	45.1

- 3.13.8 Future baseline climate conditions for the Site area have been established from the Met Office's latest climate projections UKCP18 for the 25km Ordnance Survey grid square within which the Site is located (526463, 234723).
- 3.13.9 The projections comprise forecast changes relative to 1981 to 2010 baseline conditions for annual and seasonal temperatures and rainfall, as well as sea level rise (where appropriate) and wind speed. In accordance with IEMA guidance, projections are taken from the "high" emissions scenario (known as "RCP8.5"), 50th percentile (i.e. median) scenario for the 2030s for the construction stage, and 2050s and 2080s to provide context for the medium and long term operation of the Site.
- 3.13.10 Projected changes to seasonal and annual temperature and rainfall relative to 1981-2010 conditions, which could result in severe weather effects such as droughts, floods and heat waves, are provided in Table 3.13.4.

⁸ <https://www.metoffice.gov.uk/research/climate/maps-and-data/uk-climate-averages>

Table 3.13.4 Future climate baseline

		2030s		2050s		2080s	
Descripti on	Temp / Rainfall baseline	Change to baseline	Future baseline Temp / rainfall	Change to baseline	Future baseline Temp / rainfall	Change to baseline	Future baseline Temp / rainfall
Summer maximum temperatu re (°C)	21.1	+1.58	22.7	+2.82	23.9	+5.63	26.7
Summer rainfall (mm per month)	51.7	-7%	48.0	-16%	43.4	-35%	33.7
Winter rainfall (mm per month)	45.1	+6%	47.6	+9%	49.0	+19%	53.8

Key Issues

3.13.11 The UK Climate Projections provide the anticipated effects of climate change. Using these projections, the UK Climate Change Risk Assessment (UKCCRA)⁹, updated in 2022, identifies potential risks and impacts of climate change across a number of areas including Infrastructure, Health, Communities and the Built Environment. Key risks from the UKCCRA which potentially relate to the Proposed development are summarised below.

- N1 – Risks to species and habitats from climate change
- I2 – Risks for infrastructure from flooding
- I7 – Risks to infrastructure from subsidence
- H1 – Risks to health and wellbeing from high temperatures
- H3 – Risks to people, communities and buildings from flooding
- H5 – Risks to building fabric
- H10 – Risks to water quality and household water supplies
- B1 – Risks to businesses from flooding
- B3 – Risks to business from water scarcity
- B5 – Risks to business operations due to high temperatures

3.13.12 Based on the Climate Projections and risks from the UKCCRA, key likely receptors to be impacted by climate change include:

- The **Global Climatic System** from additional GHG emissions;
- **Construction Employees** and **Building Occupants** may be impacted due to overheating from increasing temperatures;
- **Site Infrastructure** may be impacted due to changing ground conditions and as a result of increased rainfall and flood risk;

⁹ [UK Climate Change Risk Assessment 2022 - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/111111/ukccra-2022.pdf)

- **Construction Operations** may be impacted by changing weather patterns leading to risks of flooding, pollution and impacts on air quality;
- **Site Habitats and Species** may be impacted by changing climate space;
- **Site Operations, Infrastructure and Future Occupants** may be impacted by decreasing summer rainfall and water availability, as well as increased risks of flooding due to increasing winter rainfall.

3.11.20 The development options for the flexible land use on parcel BA3 will be covered within the GHG assessment which will take a worst case approach, giving consideration to which option(s) is likely to result in the greatest GHG impact.

Likely Significant Effects

3.13.13 Table 3.13.5 outlines the effects (and associated receptor[s]) that are considered to be likely and significant and therefore will be assessed within the EIA and reported in the ES.

Table 3.13.5 Potential Likely Significant Effects and Sensitive Receptors

Effect	Receptor(s)	Applicable Stage(s)
GHG emissions	Global Climatic System	Construction and Operation

Approach and Assessment Methodology – Climate Change Mitigation

- 3.13.14 The assessment of climate change mitigation will be undertaken in accordance with IEMA's EIA Guide to Climate Change. The GHG emissions of the proposed development will consider both the construction and operational stages.
- 3.13.15 The Site will form the principal study area for the assessment; however, the assessment will include off-site GHG emissions / savings such as those associated with the manufacture and transportation of construction materials, and those associated with the off-site generation (e.g. at a power station) of grid electricity consumed by the operational Proposed development.
- 3.13.16 The Site predominantly comprises a series of fields used for agricultural purposes. Whilst the existing Site may result in the release of GHG emissions, the scale of such GHG emissions is considered likely to be limited. For the purposes of the GHG emissions assessment, the assessment will consider GHG emissions to be zero to assess a worst case scenario.
- 3.13.17 GHG emissions from the construction and operation of the proposed buildings will be estimated using available data or recognised industry benchmarks/targets, for example RIBA 2030 Climate Challenge¹⁰ which sets out targets on embodied carbon and operational energy demand. The significance of the Proposed development's net GHG effect will then be determined by considering the magnitude of its net GHG emissions effect in conjunction with consideration of whether it makes an appropriate contribution to the UK's net zero trajectory.
- 3.13.18 The global climate system is the receptor for GHG emissions and is considered highly sensitive in accordance with IEMA guidance.
- 3.13.19 The assessment of likely significant effects to sensitive receptors will consider the sensitivity of the receptor (on a scale of high, medium, low and negligible) and the magnitude of change (on a scale of large, medium, small and negligible) to determine the level of effect on a scale

¹⁰ [2030 Climate Challenge \(architecture.com\)](https://www.architecture.com/2030ClimateChallenge)

of major, moderate, minor and negligible. Significant effects will be determined following this through professional judgment.

Approach and Assessment Methodology – Climate Change Adaptation

- 3.13.20 At this stage potential climate change adaptation effects have been scoped out based on the mitigation set out above. If additional effects are noted during the next stage of work and assessment is required, the climate change resilience assessment will be undertaken in accordance with IEMA's EIA Guide to Climate Change Resilience and Adaptation. This will include establishing the baseline climate conditions and a review of the UKCP18 projections as noted in this document to determine the extent of potential impacts, identifying any further effects not noted here.
- 3.13.21 As part of the ongoing design work, the climate change projections and potential impacts will be considered, in particular to ensure the Proposed development is resilient to the long-term effects of climate change given its likely lifespan.
- 3.13.22 The assessment of likely significant effects to sensitive receptors will consider the sensitivity of the receptor (on a scale of high, medium, low and negligible), the magnitude of change (on a scale of large, medium, small and negligible), the level of effect on a scale of major, moderate, minor and negligible. Significant effects will be determined from this evaluation and through the use of professional judgment.
- 3.13.23 If required, in accordance with the IEMA guidance, the 2080s RCP8.5 climate scenarios will be used as a worst-case scenario.

Indicative Mitigation Measures

- 3.13.24 The following effects are considered unlikely to be significant and therefore will not be considered further within the EIA or reported in the ES. A factual evidence base has been provided below to support this.
- 3.13.25 **Increasing summer mean and daily maximum temperatures and influence on human health during construction** - Increasing summer temperatures may lead to health and safety risks for construction employees.
- 3.13.26 A Construction Environmental Management Plan (CEMP) will be prepared to support the construction of the proposed development and will set out climate change adaptation and measures to reduce risks to human health from overheating such as provision of shaded refuge areas, personal protective equipment (PPE) and potable water supplies during construction.
- 3.13.27 Therefore, the effect of an increasing summer mean and daily maximum temperatures on construction employees and their human health is not considered to be significant and will not be considered further in the EIA or reported in the ES.
- 3.13.28 **Changing annual temperatures / rainfall patterns and changes to water supply, flood risk and air quality in construction** - Changing annual temperatures and rainfall patterns may lead to a reduction of water supply; an increased risk of flooding; (and damage); and an impact on air quality due to dryer weather conditions.
- 3.13.29 Mitigation will include water savings measures during construction, controlled by the CEMP.
- 3.13.30 The Site is largely within Flood Zone 1 and development will be restricted to areas of low or very low flood risk within Flood Zone 1, with flood alleviation measures to reduce flood risk to be incorporated where appropriate.

- 3.13.31 In order to limit the discharge rate of surface water runoff entering the receiving watercourse network, the surface water drainage system will attenuate operational runoff from events up to and including the 1 in 100-year storm event with a 40% allowance for climate change.
- 3.13.32 It is anticipated that dust and particulate matter emissions produced during construction activities would be controlled through the implementation of a CEMP. This CEMP will be informed by the Institute of Air Quality Management (IAQM) guidance and would include prevention measures, such as screening stockpiles of materials, deployment of windbreak netting and dampening exposed soils as appropriate.
- 3.13.33 All of these tertiary mitigation measures would be considered an integral part of the Proposed development and considered as part of the CEMP. Therefore, changing temperatures / and rainfall patterns and changes to water supply, flood risk and air quality is not considered to be significant and will not be considered further in the EIA or reported in the ES.
- 3.13.34 **Changes to future climate including temperature and rainfall and risk to building infrastructure during operation** - Changes to future climate including temperature and rainfall may cause ground conditions to change which may lead to impacts on building foundations and structures and the future occupants.
- 3.13.35 The Building Regulations¹¹ require new developments to consider the impact of ground movement in foundation design. The Proposed development will be designed in accordance with current guidance and best practice, and this will include the consideration of changing climate on stability of the ground conditions, influencing foundation design as necessary.
- 3.13.36 Therefore, the effect of changes to future climate including temperature and rainfall upon site infrastructure and future occupants is not considered to be significant and will not be considered further in the EIA or reported in the ES.
- 3.13.37 **Changes to future climate and resilience of site habitats and species** - Changes to future climate, including higher winter and summer temperatures and a decrease in summer rainfall, could impact upon site habitats and species.
- 3.13.38 The layout of the proposed development will be designed to protect and enhance existing features and avoid development within areas of landscape value/biological importance. Other areas of open space will include waterbodies, drainage features, planted areas, trees, and hedgerows. As part of the landscape and biodiversity strategy, consideration will be given to mitigating the anticipated impacts of climate change in accordance with the England Biodiversity Strategy¹² and Natural England Climate Change Adaptation Manual¹³. This approach will provide a landscape and biodiversity strategy resilient to climate change.
- 3.13.39 Therefore, changes to future climate and resilience upon site habitats and species is not considered to be significant and will not be considered further in the EIA or reported in the ES.
- 3.13.40 **Higher average summer temperatures and risk of building overheating to future occupants** - Higher average summer temperatures may lead to building overheating, adversely affecting the health and well-being of occupants.

¹¹https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/540328/BR_PDF_AD_L2A_2013_with_2016_amendments.pdf

¹²

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/69446/pb13583-biodiversity-strategy-2020-111111.pdf

¹³ <http://publications.naturalengland.org.uk/publication/5679197848862720>

- 3.13.41 Part O of the Buildings Regulations¹⁴ sets out new requirements for mitigating overheating, specifying that residential buildings must limit unwanted solar gains in the summer and provide means to remove heat.
- 3.13.42 As part of the detailed design of homes, an overheating assessment demonstrating compliance with the requirements of Part O will be prepared assessing and reducing the risk of summer overheating taking into account future climate scenarios. Where necessary measures to reduce the risk of overheating will be specified in accordance with the cooling hierarchy.
- 3.13.43 Similarly, as part of the detailed design of non-residential development, an overheating assessment will be prepared assessing and reducing the risk of summer overheating taking into account future climate scenarios.
- 3.13.44 Therefore, higher summer temperatures and risk of building overheating is not considered to be significant, and will not be considered further in the EIA or reported in the ES.
- 3.13.45 **Reduction in summer rainfall and risk of restricted water supply during operation -** Reducing summer rainfall may restrict water supply which may impact on Future Occupants and Site Operations.
- 3.13.46 To reduce water consumption residential and non-residential buildings will meet the following targets:
- All residential homes will achieve a water consumption rate of 110l/p/d in line with the Building Regulations Part G higher water efficiency standard.
 - Non-residential development will achieve at least two BREEAM Water Efficiency Wat01 credits
- 3.13.47 Therefore, reduction in summer rainfall and risk of restricted water supply impacting site occupants and operations is not considered to be significant and will not be considered further in the EIA or reported in the ES.

Cumulative Effects

- 3.13.48 The atmospheric concentration of GHGs and resulting effect on climate change is affected by all sources and sinks globally, anthropogenic and otherwise. As GHG emissions impacts and resulting effects are global rather than affecting one localised area, the approach to cumulative effects assessment for GHGs differs from that for many EIA topics where only projects within a geographically bounded study area would be included.
- 3.13.49 For example, air pollutants are dispersed and diluted after being emitted and only the cumulative contributions of other relatively nearby sources contribute materially to the pollutant concentration, and hence effect, at a particular sensitive receptor in the study area. Due to the persistence of GHGs in the atmosphere, that same dispersion effect contributes to the global atmospheric GHG emissions balance. There is no greater local climate change effect from a localised impact of GHG emission sources (or vice versa).
- 3.13.50 For this reason, IEMA's GHG guidance states that effects of GHG emissions from specific cumulative projects should not in general be assessed. Instead, the contextualisation of GHG emissions from the proposed development within the context of current and future baseline GHG emissions at various specific geographical levels (i.e. local authority, region and UK) is inherently a cumulative assessment within that boundary.

¹⁴ <https://www.gov.uk/government/publications/overheating-approved-document-o>

4.0 OTHER TOPICS TO BE CONSIDERED OR SCOPED OUT OF THE ES**4.1 Risks of Major Incidents and / or Disasters**

- 4.2.1 The EIA Regulations relate to a very broad range of development types. These development types include, for example, power stations and hazardous waste facilities. Clearly, it is these types of project that would have a higher risk of major accidents and / or disasters rather than a residential led project such as the development proposed. It therefore follows that the consideration of risk(s) of major accidents and / or disasters in the context of EIA needs to be proportionate to the likelihood of the risk(s). In the context of the development proposed, it is considered reasonable for this topic to be scoped out of the ES.

4.2 Daylight, Sunlight, Overshadowing and Wind

- 4.6.1 Maximum heights within areas will be set by a parameter plan with detailed proposals brought forward through reserved matters applications. Daylight, sunlight, and overshadowing may be relevant planning considerations in terms of amenity at the detailed stage of design, but it is considered unlikely that there would be environmental impacts to be considered on these topics. Similarly, there are not expected to be any significant environmental effects as a result of winds.

4.3 The conclusions of the ES

- 4.7.1 The proposed conclusions of the ES will contain: (i.) a summary of all proposed mitigation measures and how they are intended to be implemented (designed in, legal obligation or condition); and (ii.) a summary of all residual effects and the significance levels of the effects.

APPENDIX 1 – SITE PLAN

APPENDIX 2 – TRANSPORT METHODOLOGY

The Institute of Environmental Management and Assessment (IEMA) published its updated *Guidelines: Environmental Assessment of Traffic and Movement* in July 2023. This will form the basis for the Transport methodology.

Geographical Extent

The IEMA guidelines introduce two 'broad rules of thumb' to determine the study area, noting that this may not be suitable for assessing air quality, noise, road safety and driver delay:

- Rule 1: Include highway links where traffic flows will increase by more than 30% (or the number of heavy goods vehicles will increase by more than 30%)
- Rule 2: Include highway links of high sensitivity where traffic flows have increased by 10% or more

Prior to the collection of updated traffic survey data, the following draft study area for the Transport chapter has been determined using existing data and our current understanding of where impacts may be felt across the network. It may be necessary to adjust the study area once further survey data is returned and both the development proposals and associated off-site interventions are further developed so that trips can be more reliably distributed across the network. The proposed study area is naturally bound by the A505 dual carriageway to the east and A1(M) strategic road to the west.

The network of local streets set out in Chapter 3 joins the primary and strategic road network at the following points:

- A505 / Royston Road (B656) grade-separated junction
- A505 / London Road (B197) roundabout
- A1(M) junction 9 grade-separated junction
- A1(M) junction 10 grade-separated junction

The geographical extent of the study area is shown on the plan overleaf.

Sensitive Receptors

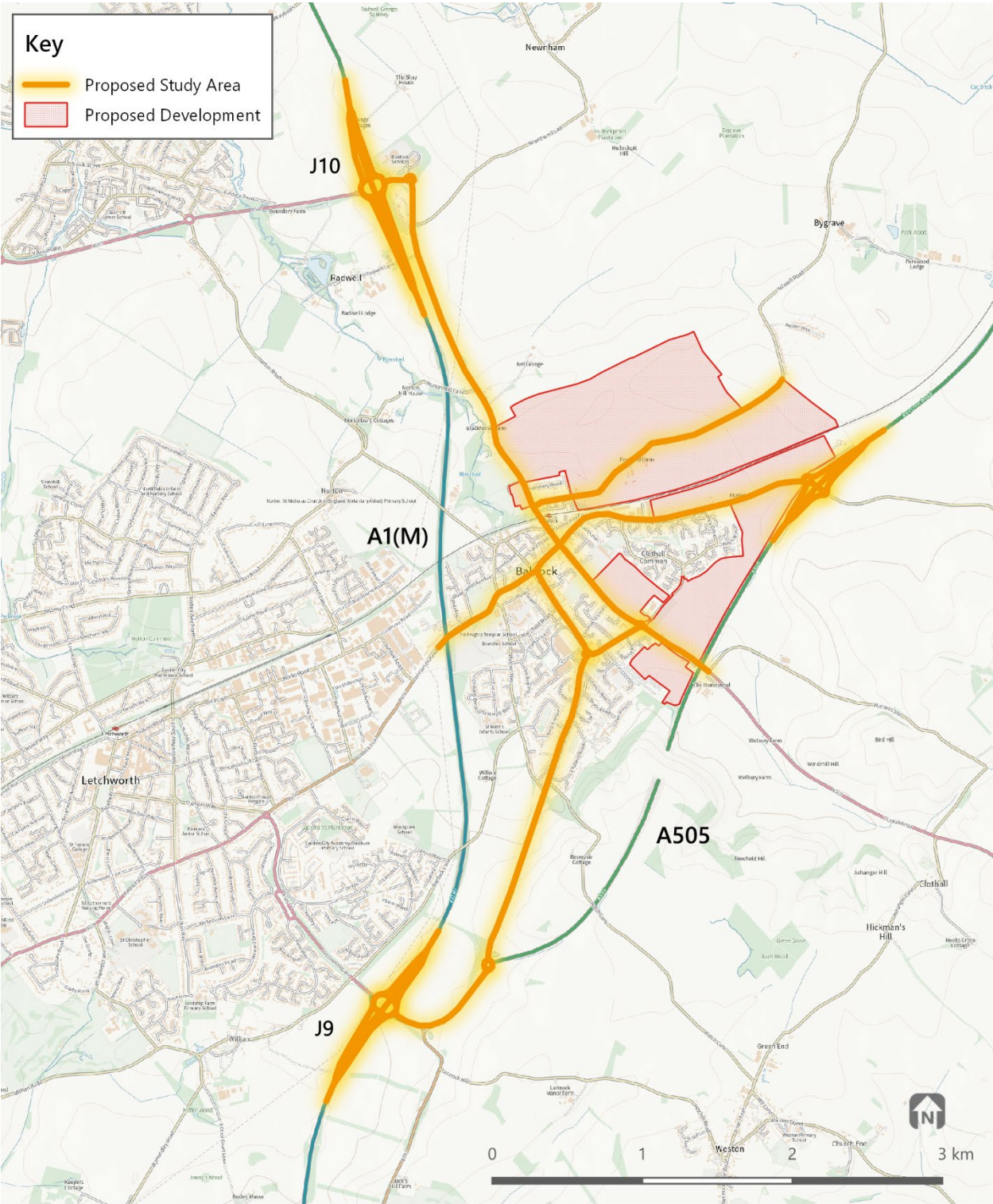
Sensitive receptors relating to transport users have been identified as those that could be affected by any of the potential impacts considered within the scope of the Transport ES chapter. These are:

- Non-motorised users
- Public right of way users
- Motorists or freight vehicles
- Public transport
- Emergency services

As well as the transport-related receptors above, there will be other receptors adjacent to the proposed development and transport networks that will be sensitive to the effects of transport impacts. These will include:

- People at home
- People at work
- Locations with concentrations of vulnerable users (e.g. Knights Templar school)
- Retail areas
- People travelling to existing and newly created recreational areas
- Collision clusters and routes with road safety concerns
- Junctions and highway links at (or over) capacity

In line with the IEMA guidelines, each sensitive receptor will be assigned to the relevant highway link and rated based on the relative level of sensitivity. These will be set out in the ES and used as the basis for qualitative and quantitative assessment.



Contains OS data © Crown copyright 2023

Years of Assessment

The proposed development will be delivered over a long period of time. Several years of assessment may therefore be necessary to account for key milestones in the delivery of the proposed development, supporting infrastructure, cumulative developments and changes to the local transport networks.

Years of assessment will be determined to ensure that the assessment is representative of each key stage of the development. Changes in conditions that could require an updated assessment include:

- Changes to the highway network that affect the routing of vehicles through or around the proposed development
- Implementation of significant public transport improvements, for example the introduction of a new bus route
- Thresholds in occupation of new residential units being reached, e.g. 500 homes

Years of assessment will be aligned with those detailed in the TA for consistency and will also be agreed with other disciplines, such as Air Quality and Noise.

Future Baseline

The future baseline scenario is intended to reflect that external changes to the transport context may take place between now and the assessment of the cumulative development. The IEMA guidelines describe this as 'natural changes' that would otherwise occur in the absence of the development. These develop from long-term trends in travel and transport, changes to the economic landscape or more general growth in housing or employment.

As set out for the years of assessment above, it will be necessary to develop a future baseline scenario for each chosen year of assessment to represent what would have otherwise been likely to occur without the proposed development. In each case this will represent the alternative scenario where none of the proposed development is delivered, rather than falling back to the previous stage of development.

Cumulative Development

An assessment of potential impacts and their effects will take place by applying the impacts of the proposed development to the future baseline. In doing so the assessment will consider a realistic scenario where there is interaction between the current transport networks, long-term trends, surrounding development and the proposed development itself.

The outcome of the cumulative development assessment will determine the required primary, secondary and tertiary mitigation that is not already built-in to the proposed development. In the case of temporary construction impacts, this is likely to lead to integration with a CEMP or Traffic Management Plan. For operational impacts, there may be a need to consider further physical interventions, such as traffic demand management features, or longer-term behaviour change programmes accompanied by appropriate monitoring. It will be important to identify the trigger points for each mitigation item so that it can be put in place at the right stage of development. More generally it is anticipated that a Monitor and Manage approach will be taken, whereby the exact package of interventions and mitigations are determined through monitoring, thereby ensuring the proposals remain fit for purpose into the future and mode share targets are reached and impacts on sensitive receptors minimised. How the group that oversees this process will be constituted will be determined in due course.

APPENDIX 3 – HERITAGE IMPACT ASSESSMENT

APPENDIX 4 – LVIA METHODOLOGY

APPENDIX 5 – LVIA BASELINE FIGURES

APPENDIX 6 – LVIA VIEWPOINT PHOTOGRAPHS

APPENDIX 7 – ECOLOGICAL IMPACT ASSESSMENT METHODOLOGY

The assessment will consider both direct and indirect effects on the identified important ecological features resulting from a range of activities including, but not limited to the sensitive receptors identified as an outcome of the baseline assessments.

The Ecological Impact Assessment (EcIA) will be undertaken with reference to the CIEEM 'Guidelines for Ecological Impact Assessment in the UK and Ireland - Terrestrial, Freshwater, Coastal and Marine - Version 1.2). The aims of the ecology assessment will be to;

- Identify relevant ecological features (i.e. designated sites, habitats, species or ecosystems) which may be impacted;
- Provide an assessment of the likely ecological impacts and resultant effects of the Proposed Development. Impacts and effects may be beneficial (i.e. positive) or adverse (i.e. negative);
- Facilitate determination of the consequences of the Proposed Development in terms of national, regional and local policies relevant to nature conservation and biodiversity; and
- Set out the approach to adhere to legal requirements relating to the relevant ecological features concerned

The assessment will describe the methods used to identify and assess the potential significant effects of the Proposed Development during the construction and operational phases. Baseline conditions will be described, including a summary of legislation/policy relevant to the baseline conditions, and subsequently the impact assessment will be undertaken taking into account avoidance and mitigation measures that are inherent to the design, including the use of best practice construction methods (e.g. implementation of methods to suppress dust generation or avoid pollution of water courses).

Additional mitigation, compensation and enhancement measures will be described, followed by an assessment of the significance of residual effects. A summary of the assessment will together with relevant conclusions.

When describing potential impacts reference will be made to the following characteristics;

- Nature (i.e. beneficial or adverse);
- Magnitude
- Spatial extent;
- Duration; and
- Timing and frequency.

Potential impacts on relevant ecological features will be assessed and a judgement reached on whether or not the resultant effect on conservation status or structure and function is likely to be significant. This process will take into consideration the characteristics of the impact, the sensitivity of the ecological feature concerned, and the geographic scale at which the feature is considered important.

The CIEEM guidelines state that *'For the purposes of EcIA a 'significant effect' is an effect that either supports or undermines biodiversity conservation objectives for 'important ecological features' (i.e. relevant ecological features) or for biodiversity in general'.*

In broad terms, significant effects encompass impacts on structure and function of defined sites, habitats or ecosystems and the conservation status of habitats and species.

For designated sites, defined sites and ecosystems the assessment will consider how the proposals are likely to affect the conservation objectives for the Site and/or its interest/ qualifying features. For ecosystems, consideration will be given to whether the proposals are likely to result in a change in ecosystem structure and/or function.

For species and habitats, the effects of impacts on individual habitats and species will be considered in relation to 'conservation status'. In considering effects on conservation status, reference will be made to relevant available guidance on the existing conservation status of a feature.

Taking the value of the ecological feature (geographic scale) and the overall impact into account, an evaluation of the significance of an effect can be derived. The tables below are one way in presenting and determining the significance of effects on ecological features, CIEEM's 2018 guidance does avoid and discourage the use of a matrix approach, if this is not possible then a clear distinction between evidence-based (resulting in the use of the matrix) and value-based judgements (i.e. professional opinion) must be identified.

The scale of significance of an effect may not be the same as the geographic context in which the feature is considered important. For example, an effect on a species of principal importance for nature conservation at the national level may not have a significant effect on the conservation status of the national population of that species.

Tabel 1. Magnitude of Change to Environmental Receptor

Extent of Change	Magnitude
High	Entire loss / gain or major variation to key elements / features of the baseline conditions so that the post-development character / configuration of the baseline condition would be fundamentally changed.
Medium	Loss / gain or variation to one or more key elements / features of the baseline conditions so that the post-development character / configuration of the baseline condition would be materially changed.
Low	Minor change from the baseline conditions. The changes are measurable, but not material in the sense that the changes are similar to those pre-development.
Negligible / None	Inconsequential or no change from baseline conditions

Table 2. Sensitivity of Receptors

Sensitivity	Receptor
High	Internationally / Nationally Important
Medium	Regionally Important
Low	Locally Important

Table 3. Significance Matrix

Sensitivity/value of receptor Text	Magnitude of Potential Impact			
	High	Medium	Low	Neg/None
High	Major	Major / Moderate	Moderate	Negligible
Medium	Major / Moderate	Moderate	Moderate / Minor	Negligible
Low	Moderate	Moderate / Minor	Minor	Negligible
Negligible	Minor / Negligible	Minor / Negligible	Negligible	Negligible

Geographical Scope: Data received through consultation, desk-based investigations and field surveys will be used to allow relevant ecological features (including designated sites, ecosystems, habitat and species) of value (or potential value) to be identified, and the main factors contributing to their value described and related to available guidance.

Relevant reasons for which an ecological feature is important will be described and considered in order to assign each feature an overall value in accordance with the following geographical frames of reference:

- International;
- National;
- County;
- Borough;
- Local;
- Site; and
- Negligible (where the value is lower than the Site level).

Temporal Scope: For each phase of the Proposed Development (e.g. construction, operation), the assessment will be structured and reported by ecological feature with relevant potential impacts on that feature described in turn, and then the overall effect arising from those impacts reported.

Appendix B; Consultee Responses

Justin Booij

From: Edward Leigh
Sent: To: 12 June 2024 17:06
Subject: Justin Booij
RE: EIA Scoping 24/00920/SO

Hi Justin,

The list I provided also considers cumulative impact with Letchworth developments. The inclusion of A1(M) junction 10 will pick up cumulative impacts of development in Central Beds. Presumably HCC Highways was also notified? They can provide a more authoritative response on what should be scoped.

Kind regards,

Edward

Edward Leigh (he/him/his)
Senior Transport Policy Officer
North Herts Council
01462 474 368

From: Justin Booij <justin.booij@north-herts.gov.uk>
Sent: Wednesday, June 12, 2024 12:29 PM
To: Edward Leigh <Edward.Leigh@north-herts.gov.uk>
Subject: RE: EIA Scoping 24/00920/SO

Thanks for your response Edward. Sam may have forwarded it but my simple search did not unearth it at first instance.

Your response references key roads for the assessment. Have you also had a chance to consider the cumulative sites list eg would any further sites need to be added?

The EH officer has already commented on the AQ and Noise chapters in the meantime, so that has been dealt with.

Kind regards,

Justin



Justin Booij
Senior Projects Officer
(Major Sites)
01462 474165

www.north-herts.gov.uk

From: Edward Leigh <Edward.Leigh@north-herts.gov.uk>

Sent: Wednesday, June 12, 2024 11:45 AM

To: Justin Booij <justin.booij@north-herts.gov.uk>

Subject: FW: EIA Scoping 24/00920/SO

Hi Justin,

This was my comment to Sam on the Baldock Scoping Report. I should add that I'm not qualified to comment on air quality, noise or vibration. We do have a consultant retained who is qualified to comment on that if needed – Roger Pitman, who works for Frank Harrison.

Kind regards,

Edward

Edward Leigh (he/him/his)
Senior Transport Policy Officer
North Herts Council
01462 474 368

From: Edward Leigh

Sent: Tuesday, May 7, 2024 12:20 PM

To: Sam Dicocco <Sam.Dicocco@north-herts.gov.uk>

Cc: Planning Control <Planning.Control@north-herts.gov.uk>

Subject: EIA Scoping 24/00920/SO

Hi Sam,

Regarding the EIA Scoping Report for Baldock (24/00920/SO) ...

The site plan does not match the application description, which is limited to BA1 ("north of the railway line").

The proposed draft study area omits some roads where significant impacts are likely, either because of traffic generated by this development or as a result of highway alterations that are likely to be proposed as part of the mitigation plan. In descending order of significance, these roads should be considered for inclusion from the outset:

- Icknield Way
- Football Close
- Norton Road between Icknield Way and the Norton Road that runs between Letchworth and Stotfold
- Norton Bury/Mill Lane
- Weston Way*
- Mansfield Road*
- Baldock Lane†
- Letchworth Gate north of A1(M) Jn 9†

* These roads are likely to experience an increase in traffic to Knights Templar, while that is the site of the town's only secondary school, and may see traffic diverting away from the High Street if Hitchin St becomes more congested.

†These roads may experience an increase in traffic if congestion around the High St–London Rd–South Rd–Tesco roundabout worsens.

§3.1.14 cites "Enforcing weight limits" as a specific mitigation. This does not lie within the powers of the applicant, planning or highway authorities. Powers lie with the police, which currently do not have the resources to prioritise this over other more impactful policing activities. I suggest the applicant remove or replace this example.

I have no further comments on the Transport Effects and Transport Methodology sections of the report.

Kind regards,

Edward



Celebrating 50 years



Edward Leigh (he/him/his)
Senior Transport Policy Officer

01462 474 368

www.north-herts.gov.uk

Officer Liz Anderson – Ecologist
Date 14/05/24

Ref: 24/00920/SCO
Att: Sam Dicocco

**Land East Of North Road And North Of The Railway Line, Bygrave Road, Baldock,
Scoping Opinion : Up to 3,000 homes; up to 19 hectares of employment land; strategic
'green infrastructure'; a mixed use local centre; education provision; and associated
infrastructure.**

Consultee comments on the EIA Scoping Report;

I am satisfied with the proposed scope of surveys in relation to wildlife on site. However, whilst consideration has been given to water use at the operational, post development stage, impacts during construction phases should also be assessed. The site lies adjacent to Ivel Springs, the source of a nationally rare chalk stream habitat.

Impacts to the river in terms of pollution incidents from run off have been considered but the chalk aquifer has previously been at depleted levels which has had a detrimental impact to the springs and the flow of the river. The hydrology section only considers impacts from flooding and waste water but not water use/ / abstraction.

3.13.39 states '*..changes to future climate and resilience upon site habitats and species is not considered to be significant and will not be considered further in the EIA or reported in the ES.*'. With climate change and the extended build out time of the development it would be reassuring to know that the applicant adequately considered and addressed any potential impact on the chalk stream as a result of increased abstraction and how water use during construction will be minimised.

NORTH HERTS COUNCIL

MEMORANDUM

To: PLANNING CONTROL AND CONSERVATION Sam Diocco	From: ENVIRONMENTAL HEALTH Alan Stone Ext 4108
	Date: 10 th June 2024
Our Ref: 5886/24	Your Ref: 24/00920/SO
Subject: Screening Opinion : Up to 3,000 homes; up to 19 hectares of employment land; strategic 'green infrastructure'; a mixed use local centre; education provision; and associated infrastructure. Land East Of North Road And North Of The Railway Line, Bygrave Road, Baldock, Hertfordshire,	

Comments:

Thank you for consulting Environmental Protection on this scoping opinion.

The application is supported by an EIA Scoping Report which sets out what issues are to be covered and outlines how these matters will be addressed. For Environmental Protection, the sections of concern are 3.2 (Noise and Vibration), 3.3 (Air Quality), 3.8 Ground Conditions) and 3.11 (Lighting).

For all these aspects the proposal is to establish baseline conditions and then assess the proposals using national guidance and standards in liaison with the Local Authority. I am satisfied with this approach and fully endorse the necessity and willingness for communication as regards the detail with this department.

If you have any queries, then please do not hesitate to contact me.

Regards

Alan Stone

NHDC Conservation

North Hertfordshire District Council

Building Conservation comments

File Ref: 24/00920/SCOP

Date: 25/06/2024

Planning Officer: JBJ

Address: Land east of North Road and north of the railway line, Bygrave Road Baldock, Hertfordshire

Subject: Up to 3,000 homes; up to 19 hectares of employment land; strategic 'green infrastructure'; a mixed-use local centre; education provision; and associated infrastructure.

The applicant has submitted a Scoping Report (SR) entitled Growing Baldock EIA Scoping Report prepared by David Lock Associates and dated April 2024 and which also includes a Heritage Impact Assessment (HIA) by HCUK Group dated December 2023. There is clearly a degree of overlap/repetition here as noted for instance at 3.5.2 of the SR and 1.4 of the HIA.

I note Andy Instone's email response on 11 June 2024 recommending that a further programme of archaeological evaluation is carried out and the results submitted with the Environmental Statement. It is, therefore, not my intention to comment on matters of archaeology or the setting of nearby scheduled monuments.

My attention is first drawn to Chapter 3.5 of the SR entitled ***Heritage and Archaeology Effects*** including the following selected extracts setting out the heritage case.

Growing Baldock EIA Scoping Report by David Lock Associates dated April 2024.

3.5.2 There are no designated heritage assets within the site itself, however there are a number of listed buildings, scheduled monuments, and a conservation area within close proximity of the site boundaries. The proposals have the potential to affect the setting of these heritage assets and consequently their significance, and they are therefore the subject of this impact assessment. These assets comprise:

- Baldock Conservation Area: The application site is located beyond the boundaries of the conservation area, however given its relatively close proximity any effects on the setting of the conservation area and its character and appearance are fully considered within this assessment.*
- Two scheduled monuments: These sites comprise the Romano-British small town and Late Iron Age settlement off Clothall Road and the Settlement site south of Blackhorse Farm. Both of these scheduled monuments are currently experienced as areas of open greenspace on the edges of Baldock, but are not visually tangible historic features (i.e. there is no visible built form or clear earthworks which give them prominence).*
- Individual listed buildings outside the conservation area: These include four Grade II listed dwellings along North Road (namely, The Nook, Long Bailey, Blackhorse farmhouse and The Compasses).*
- Grade I Church of St Mary, Baldock: The church is situated in the centre of the Baldock Conservation Area, however as the most prominent asset in the area it is considered here additionally as an individual heritage asset.*

3.5.8 The proposals have the potential to affect the setting of a number of designated heritage assets and consequentially their significance, and they will therefore be the subject of the environmental impact assessment.

3.5.9 The heritage assets identified as being potentially susceptible to impacts comprise:

- The Baldock Conservation Area;
- Two scheduled monuments: The Romano-British small town and Late Iron Age settlement off Clothall Road and the Settlement site south of Blackhorse Farm;
- Four Grade II listed dwellings along North Road (The Nook, Long Bailey, Blackhorse farmhouse and The Compasses);
- The Grade I Church of St Mary, Baldock.

3.5.13 The site visits undertaken as part of the HIA and further consideration under Steps 2 and 3 of the GPA3 (see Appendix 3) indicate that while the proposals will increase the amount of built form in the broader vicinity of these assets, and extend the current settlement, any potential adverse impacts are to be mitigated through design and layout. No significant effects are considered likely.

3.5.15 It is clear that there is a sufficient 'buffer' of existing built form around the conservation area and the listed buildings within it, that separates the application site from the heritage asset visually, and more broadly experientially. Therefore, while the proposals would increase the overall settlement area of Baldock and would reduce the agricultural surrounds which are currently experienced along North Road and Bygrave Road, it is not considered that this effect would consequentially pose any harm to the character and appearance or the significance of the conservation area as a heritage asset. The development will include substantial areas of greenspace within these areas, and this will serve to retain the open character of the settlements broader surrounds. No significant effects are considered likely.

Heritage Impact Assessment by HCUK Group dated December 2023

2.4 The setting of a heritage asset can contribute to its significance. Setting is defined in the NPPF as follows: **The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.**

2.5 Historic England has produced guidance on development affecting the setting of heritage assets in *The Setting of Heritage Assets* (second edition, December 2017), better known as GPA3. The guidance encourages the use of a stepped approach to the assessment of effects on setting and significance, namely (1) the identification of the relevant assets, (2) a statement explaining the significance of those assets, and the contribution made by setting, (3) an assessment of the impact of the proposed development on the setting and significance of the assets, and (4) consideration of mitigation in those cases where there will be harm to significance.

3.1 Historic mapping shows that the application site to the north, east and south-east of Baldock has remained open land throughout the 19th, 20th and 21st centuries (Figures 3 – 5). It is largely comprised of the area known as 'Bygrave Common', part of the Parish of Bygrave which lies between Baldock and Ashwell.

3.2 The site and its surrounds are characterised by large open fields as the parish was never subject to an Enclosure Act in the 18th or 19th centuries, so that the open fields of the medieval period were largely maintained. The settlement of Baldock itself can be seen to expand considerably only later in the 20th century and into the 21st century, when the residential areas extended into Clothall Common to the east (Figure 6).

4.10 Given the above observations, the setting of the Baldock Conservation Area makes

a very limited contribution to its significance, character and appearance, and its distinctive architectural and historic interest is best appreciated from within the town centre and in close proximity.

It is noted that in general terms the map regression (pages 7 and 8 of HIA) identifies that the application site has remained generally free of any notable development throughout the last 140+ years. Whilst I generally agree that the setting of currently identified Designated Heritage Assets are unlikely to be significantly affected by the proposed development, the 'narrative' of arriving at Baldock from the north via Bygrave Road will significantly and irrevocably change. The development will impact upon the perception of Baldock being seen as a modest-sized North Hertfordshire town. This experience from this approach would see a substantial urban extension not too dissimilar in size to that experienced at Biggleswade to the north.

Whilst not a heritage matter, there is the possibility that when developed, the most easterly section of the application site running parallel to and on the north side of the railway line, could lead to a heightened perception of coalescence with the outlying western part of Bygrave where I note on Fig 9 of the HIA (below right) that this part of the site is identified as 'LIA TO ROMAN HIGH STATUS / RITUAL SITE'. However, this observation is set in the context of acknowledging that this is an allocated site in the Local Plan.



Recommendation

I have considered the section entitled ***GPA3 Assessment: Historic England's guidance on setting*** in the HIA.

Given that the conservation area is some distance to the south-west, is surrounded by modern settlement and commercial premises (Appendix 2 Page 26, HIA) and that topographically there is no clear intervisibility between the site and the conservation area (other than the church spire), I agree that the potential effects of the proposals will not be dependent upon screening subject to seasonal or diurnal change. I note that it is stated that the proposals will not alter the skyline or silhouette.

Next, I note that the nearest listed building (The Compasses) is about 50m away (Appendix 2 Page 29, HIA) whilst the application site is also c. 600m from the church at its closest point (Appendix 2 Page 31, HIA). With respect to the setting of Blackhorse Farmhouse, The Nook, Long Bailey and The Compasses I note that there is no built form proposed within the immediate vicinity of any of the listed buildings (an intervening greenspace buffer is indicated on the masterplan).

Furthermore, I note the assessment for the two Scheduled Monuments: i) Romano-British small town and Late Iron Age settlement off Clothall Road and ii) Settlement site south of Blackhorse Farm, and the fact that the masterplan includes sufficient greenspace adjacent to the scheduled monuments to ensure that there will be a limited tangible increase in built form within their immediate vicinity.

I note at 2.4.1 of the SR that U&C are undertaking substantial technical work to inform the development proposals including the production of a Strategic Masterplan (SMP) as required by NHC Policy SP9, to be formally approved by NHC later in 2024. Whilst at 1.1 of the HIA it says that *'This Heritage Impact Assessment has been prepared by HCUK Group on behalf of Urban and Civic Developments Ltd as part of a Strategic Masterplan for the development of land at Baldock, North Hertfordshire (hereafter 'the site')*'. At 5.13 of the HIA I note that *'The Strategic Masterplan will take into consideration the wider visibility of the church spire, and there is the potential for some improvement of views towards it and greater accessibility of these views (which are currently from private/inaccessible agricultural land)'*.

I am interested in seeing how the greenspaces mentioned above respond to the nearest heritage assets and whether the tangible increase in built form is limited in the vicinity. I also await the evidence that will indicate as to how some improvement of views towards the church spire is made possible.

At 6.4 of the HIA it states that *"... while the proposals will increase the amount of built form in the broader vicinity of these assets, and extend the current settlement, any potential adverse impacts can be mitigated through the design and layout of the masterplan."* At this stage I have not seen any evidence or have separately come to the view that there would be any direct adverse impact upon, or harm identified to the significance of known designated heritage assets.

Mark Simmons
Senior Conservation Officer

Justin Booij

From: Andrew Figgis
Sent: To: 13 June 2024 17:00
Subject: Justin Booij
RE: 24/00920/SCOP Land East of North Road and North of the Railway Line,
Bygrave Road, Baldock

Hi Justin,

Thank you for the reference. I have no comments to make at this stage of the planning process and the contents of the report are much as I would expect.

I would be interested to see the Socio-Economic Chapter when it is produced.

The employment land BA10 offers an almost unique opportunity to capitalise on the high salary/high growth industries in the A1 / A505 London-Cambridge corridor with access by rail from both and excellent strategic siting for the road network. Commercial capacity in Stevenage, Royston and Welwyn Garden City is finite and we look to attract these growth industries to North Herts.

Secondly, the residential development presents both an opportunity and a threat to the Town Centre, although properly managed and given the right connection to the new residential sites, the new schemes could provide the impetus for a renaissance for the area.

Yours

Af
Andrew Figgis
Economic Development Officer
Direct Dial : 01462 474477
Mobile : 07825 191 814

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MEMORANDUM

To: Sam Dicocco
Principal Planning Officer

From: Debbie Ealand
Housing Supply Officer
Ext: 4526

Ref: 24/00920/SCOP

Date: 13 June 2024

Scoping Opinion: Up to 3,000 homes; up to 19 hectares of employment land; strategic 'green infrastructure'; a mixed use local centre; education provision; and associated infrastructure.

Land east of North Road and north of the Railway Line, Bygrave Road, Baldock, Hertfordshire.

Application reference: 24/00920/SCOP

Dear Sam,

Thank you for your memo of 23 May 2024 in respect of the above scoping application.

The affordable housing requirement is 40% on sites which will provide 25 dwellings and above, in accordance with the Local Plan.

There are eight allocated housing sites in and around Baldock in the Local Plan, expected to deliver 3,360 new homes. The scoping application covers Strategic Housing Site SP14: BA1- North of Baldock, which is expected to deliver approximately 2,800 homes, allocated housing site BA3 – land south of Cothall Common, expected to deliver 245 homes, new allocated employment site BA 10 – Royston Road and two other parcels of land.

The two parcels of land; land west of North Road and land at Walls Field Scheduled Monument are not allocated sites in the Local Plan. The land at Walls Field scheduled monument site is within Baldock town boundary but the land west of North Road is outside the town boundary in the green belt. Policy SP5: Countryside and Green Belt applies.

The Baldock, Bygrave and Clothall Neighbourhood Plan (BBCNP) was made in June 2021 and policies of the BBCNP apply.

The preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals, in accordance with the NPPF.

Paragraph 63 of the NPPF says “Within this context of establishing need, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. These groups should include (but are not limited to) those who require affordable housing; families with children; older people (including those who require retirement housing, housing-

with-care and care homes); students; people with disabilities; service families; travellers; people who rent their homes and people wishing to commission or build their own homes”.

Paragraph 64 of the NPPF says “Where a need for affordable housing is identified, planning policies should specify the type of affordable housing required³⁰, and expect it to be met on-site unless:

- a) off-site provision or an appropriate financial contribution in lieu can be robustly justified; and
- b) the agreed approach contributes to the objective of creating mixed and balanced communities.”

Within the overall affordable housing requirement, a 65%/35% rented/ other intermediate affordable housing tenure split is required, in accordance with the Local Plan and the council’s Developer Contributions SPD, supported by the 2016 Stevenage and North Hertfordshire Strategic Housing Market Assessment (SHMA) Update.

Based on the provision of 3000 new homes the affordable housing requirement would be 1200 dwellings; 780 rented and 420 other intermediate affordable housing tenure.

Within the 65% rented affordable housing element the following mix best meets housing needs, as identified in the 2016 SHMA:

21% x 1 bed flats (164)
12% x 2 bed flats (94)
26% x 2 bed houses (203)
35% x 3 bed houses (272)
6% x 4+ bed houses. (47)

Within the 35% intermediate affordable housing element the following mix best meets housing needs as identified in the 2016 SHMA:

8% x 1 bed flats (34)
8% x 2 bed flats (34)
20% x 2 bed houses (84)
54% x 3 bed houses (226)
10% x 4+ bed houses (42)

There is high housing need across the district for two bedroom family homes for rent and the provision of an increased number of two bedroom houses and fewer three bedroom houses would be considered favourably.

The Local Plan recognises that there will be a substantial increase in the number of and proportion of older residents in North Hertfordshire over the plan period. Older people are living longer, and government policy seeks to support people living at home for as long as possible.

Other groups will also have support needs, including people of all ages with physical or learning disabilities. There is a growing need for three and four bedroom wheelchair adapted/ accessible bungalows/ houses for families with a child or other family member in a wheelchair and/ or with limited mobility. The provision of this size/ type of accommodation is required to meet some of this need, in accordance with Policy HS5: Accessible and adaptable housing.

Local Plan Policy HS4: Supported, sheltered and older persons housing says that planning permission for sheltered and supported housing in uses classes C2 and C3 will be granted where:

- a. There is good access to local services and facilities;
- b. The site is well served by public transport;
- c. Appropriate levels of on-site landscaping, amenity space and car parking (for residents, visitors and staff) are provided; and
- d. It would accord with Policy HS3 (b).

Policy HS3: Housing mix says that planning permission for new homes will be granted where:

- b. The scheme would provide a density, scale and character of development appropriate to its location and surroundings.

It is expected that a modest proportion of sheltered and/ or supported housing will be delivered/ provided on the largest housing sites to contribute towards the modelled demand for older persons housing. This should include affordable housing provision where appropriate.

The 2016 SHMA identifies additional modelled demand for 2,060 specialist older persons housing units of various types, in North Hertfordshire over the 20-year period from 2011-2031. Almost half (48%) of this need is for Leasehold Schemes for the Elderly (LSE). There is also demand for 490 units of conventional sheltered housing to rent, 80 units of sheltered or sheltered plus units to rent and 120 Extra Care units to rent.

Given that Hertfordshire County Council (HCC) is the landowner and applicant for this site, a 60 bed Extra Care rented tenure scheme could be delivered on this site to meet housing needs for older North Hertfordshire residents/ people with support needs, as identified in the 2016 SHMA and by HCC.

These units will be one bedroomed flats predominately, with a smaller number of two bedroom flats. The overall number of one and two bedroom flats, given above, for general needs rented affordable housing will be reduced accordingly, to accommodate this.

The affordable homes should be owned and managed by a registered provider, be spread across the site in small clusters rather than be situated on one part of the site and should be physically indistinguishable from the market housing.

The definition for affordable housing includes housing for sale or rent, for those whose needs are not met by the market (including housing that provides a

subsidised route to home ownership and/or is for essential local workers).

The council currently accept social rent and affordable rent for the rented tenure dwellings, but it should be noted that the affordable rent for one or two bedroom dwellings should be no more than 80% of the equivalent local market rent (including service charges, where applicable).

For three bedroom dwellings the affordable rent should be no more than 70% of the equivalent local market rent (including service charges, where applicable) and for a four bedroom dwelling the affordable rent should be no more than the equivalent rent (excluding service charges, where applicable) to a social rented home in the locality, to ensure affordability.

All rents must be within Local Housing Allowance (LHA) rates, in accordance with the council's Tenancy Strategy and the Developer Contributions SPD.

The nationally described technical housing standards provide the nationally recognised standards for bedrooms, storage and internal areas in new dwellings across all tenures. All the affordable units are required to meet these standards.

Parking courts are not desirable as there is often limited or no natural surveillance and residents prefer to park outside or near to their homes. To minimise on street parking, parking spaces should be provided in front of or adjacent properties with good natural surveillance.

Registered Providers (RPs) usually prefer any affordable units/flats, particularly for rent, to be in a self-contained block, with their own entrance as this works better in terms of management and maintenance. In addition, service charges costs for affordable housing residents are generally cheaper in self-contained blocks as RPs are often able to negotiate their own service contracts or use their in-house maintenance teams.

In June 2021, the Government introduced a policy requiring 25% of affordable housing provided to be First Homes, although there are transitional arrangements in place. First Homes can be considered on merit where the overall proportion of affordable housing that can be achieved on site will not be adversely affected and the Local Plan requirement for 65% of affordable homes for rent is met. Based on the provision of 40% affordable housing on 300 of the 420 intermediate affordable housing units could be delivered as First Homes to meet this requirement.

Grant funding for the provision of affordable housing is not available on S106 sites and any affordable homes should be delivered through planning gain alone.

The applicant will need to provide documentary evidence of any viability issues using a recognised financial toolkit, which the council will have independently assessed at full expense to the applicant.

I hope these comments are useful, but please contact me if I can provide any further information.

Regards

Debbie Ealand
Housing Supply Officer

HCC Highways



Mark Youngman
Development Management Group Manager
Hertfordshire County Council
Postal Point CHN115
Farnham House
Six Hills Way
Stevenage
SG1 2ST

Response to Planning application from Hertfordshire County Council (T and CP GDP Order 2015)

Director of Planning

North Hertfordshire Council
Council Offices
Gernon Road
Letchworth Garden City
Hertfordshire
SG6 3JF

District ref: 24/00920/SCOP
HCC ref: NH/20951/2024
HCC received: 9 May 2024
Area manager: James Dale
Case officer: Oliver Sowerby

Location

Land East Of North Road And North Of The Railway Line, Bygrave Road, Baldock, Hertfordshire

Application type

Screening/Scoping Opinion

Proposal

Scoping Opinion : Up to 3,000 homes; up to 19 hectares of employment land; strategic 'green infrastructure'; a mixed use local centre; education provision; and associated infrastructure

Recommendation

OTHER

EIA Scoping Request

The Local Planning Authority (North Hertfordshire District Council), has consulted the Highway Authority (Hertfordshire County Council, HCC), regarding a request for a scoping opinion for an Environmental Impact Assessment (EIA) for a Up to 3,000 homes; up to 19 hectares of employment land; strategic 'green infrastructure'; a mixed use local centre; education provision; and associated infrastructure.

Separate to any EIA the Highway Authority would expect a Transport Assessment (TA) and Residential Travel Plan (RTP) to accompany the planning application for the site in order to allow the highways and transport impacts of the development to be considered. The Highway Authority note the transport section in the aforementioned document and the preparation of a TA.

It is recommended that a TA is prepared in alignment with pre-application advice that can be provided by HCC and also in compliance with HCC's Local Transport Plan 4 (LTP4) (May 2018).

The precise scope of the assessment and attendant modelling work should also be agreed with the Highway Authority and National Highways. Reference may be made to the following weblink to HCC's Development Management page where information on a variety of highways and transportation matters may be found:

<https://www.hertfordshire.gov.uk/services/highways-roads-and-pavements/business-and-developer-information/development-management/highways-development-management.aspx>

The Highway Authority seeks that TA's are prepared in accordance with the LTP4 document, which includes the following key policies.

LTP 4 Policy 1 (Transport User Hierarchy) considers that 'To support the creation of built environments that encourage greater and safer use of sustainable transport modes, the county council will in the design of any scheme and development of any transport strategy consider in the following order:

- Opportunities to reduce travel demand and the need to travel;
- Vulnerable road user needs (such as pedestrians and cyclists);
- Passenger transport user needs;
- Powered two wheeler (mopeds and motorbikes) user needs; and
- Other motor vehicle user needs.

LTP 4 Policy 5 (Development Management) states that 'The county council will to work with development promoters and the district and borough councils to:

- a) Ensure the location and design of proposals reflect the LTP Transport User Hierarchy and encourage movement by sustainable transport modes and reduced travel demand;
- b) Ensure access arrangements are safe, suitable for all people, built to an adequate standard and adhere to the county council's Highway Design Standards;
- c) Consider the adoption of access roads and internal road layouts where they comply with the appropriate adoption requirements and will offer demonstrable utility to the wider public. Where internal roads are not adopted the county council will expect suitable private management arrangements to be in place;
- d) Secure developer mitigation measures to limit the impacts of development on the transport network, and resist development where the residual cumulative impact of development is considered to be severe;
- e) Require a travel plan for developments according to the requirements of 'Hertfordshire's Travel Plan Guidance';
- f) Only consider new accesses onto primary and main distributor roads where special circumstances can be demonstrated in favour of the proposals;
- g) Resist development that would either severely affect the rural or residential character of a road or other right of way, or which would severely affect safety on rural roads, local roads and rights of way especially for vulnerable road users; and
- h) Ensure new developments provide facilities for charging plug-in and other Ultra Low Emission vehicles, as well as shared mobility solutions such as car clubs.

Further information can be found at: <https://www.hertfordshire.gov.uk/services/recycling-waste-and-environment/planning-in-hertfordshire/transport-planning/local-transport-plan.aspx>

Given that the applicant should deal with all relevant Highways and Transportation matters via any forthcoming Transport Assessment and Travel Plan, the Highway Authority wishes to make no

further comment on the requirement for an EIA. It is noted that the applicant should take into account the relevant HCC policy documents, such as LTP4 and the recently adopted updated design guidance, "Place & Movement Planning and Design Guidance". The applicant may wish to engage the Highway Authority using the pre-application advice service which would cover all highways and transportation matters which may be sought using the above link as contained within this note.

Signed
Oliver Sowerby

30 May 2024

From: Andy Instone <Andy.Instone@hertfordshire.gov.uk>

Sent: Tuesday, June 11, 2024 5:15 PM

To: Sam Dicocco <sam.dicocco@north-herts.gov.uk>

Cc: Planning Control <Planning.Control@north-herts.gov.uk>

Subject: historic environment comments: 24/00920/SCOP at Land East Of North Road And North Of The Railway Line Bygrave Road Baldock

Dear Sam,

Thank you for consulting us.

The applicant has submitted a Scoping Report (SR) which includes a chapter on Heritage and Archaeology Effects (sic) and a Heritage Impact Assessment (HIA). The HIA notes that an Archaeological Desk-Based Assessment (DBA) has been submitted (Phoenix Archaeology). Although to this has not actually been included with the Scoping request it has previously been submitted to this office.

We disagree with the applicant's assertion that, "*No non-designated heritage assets have been identified by the Local Planning Authority as requiring consideration.*" (SR para 3.5.3, HIA para 1.5) and also disagree that "*No non-designated heritage assets have been identified by the Local Planning Authority during pre-application consultations or during the course of preparation of the Heritage Impact Assessment which supports the Growing Baldock Strategic Masterplan*" (SR para 3.5.7).

The DBA clearly illustrates that the sites proposed for development contain heritage assets worthy of consideration and many are shown on the Historic Environment Record (HER). There is also potential for further as yet unrecorded heritage assets to exist. These may be worthy of designation and/or conservation.

The HER notes that geophysical survey has been undertaken on these sites followed up by some archaeological trial trenching. This was at a low level to confirm the principle of development but is not sufficient to fully evaluate the sites and demonstrate any constraints on development. Neither is it sufficient to fully illustrate all the opportunities to incorporate the historic environment into Masterplanning.

The SR concludes that "*The site contains a large number of known archaeological sites, some of which further information is required from in order to determine their significance*" (SR para 3.5.11.) This office concurs but also believes that there is potential for currently unknown heritage assets to exist and these need to be accounted for and if identified their significance should also be assessed.

Recommendations

We therefore recommend that a further programme of archaeological evaluation is carried out to provide this information and the results submitted with the Environmental Statement.

This is noted by the SR which says, “the previous archaeological investigations have identified numerous areas of archaeological remains within the Site. These have been subject to geophysical survey and initial schemes of trial trenching, with further trial trenching proposed, the results of which will also be included to support the outline planning and detailed planning applications” (SR para 3.5.23).

This archaeological information should also be used to assist in Masterplanning by both appropriately conserving the archaeological resource and integrating it into the design. For example retention of significant archaeological views within the landscape and reflection of archaeological features in the layout such as the route of Roman roads and prehistoric boundary features. We note that the SR says “*Any potentially significant effects on the designated heritage assets will be mitigated through the careful design and layout of the development*” (para 3.5.47). We recommend that this should be extended to all heritage assets should they enhance the sense of place of the proposals and/or their archaeological significance warrant it.

Regards,.

Andy Instone

Senior Historic Environment Advisor | Hertfordshire LEADS |

Environmental Sustainability | Sustainable Growth

Hertfordshire County Council

County Hall, Pegs Lane, Hertford, SG13 8DN Postal Point: CHN108

T: 01992 555241 (**Internal:** 25241)

E: andy.instone@hertfordshire.gov.uk

Hertfordshire LEADS provides Landscape, Ecology, Archaeology, Design and Sustainability support to planning departments in Hertfordshire

Please see the Historic Environment Team’s charging policy for 2021/2022 here:

[charging policy](#)

To contact the Historic Environment team, please direct all enquiries to the team’s telephone number and email address:

t: 01992 555021 **Comnet / Internal:** 25021

historic.environment@hertfordshire.gov.uk



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HCC Lead Local Flood Authority

Sam Dicocco
Planning Department
North Herts Council
PO Box 10613
Borehamwood
Hertfordshire
WD6 1WA

Lead Local Flood Authority
Post Point CHN 215
Hertfordshire County Council
County Hall, Pegs Lane
HERTFORD SG13 8DN

Contact Flood Risk Management Team
Email FRMConsultations@hertfordshire.gov.uk

Date 24 May 2024

Dear Sam

RE: 24/00920/SCOP – Request for Scoping Opinion (Environmental Impact Assessment) – Land East of North Road and North of the railway line Bygrave Road Baldock

Thank you for consulting the LLFA in relation to the proposed development referred to as the Baldock 'urban extension', which involves residential development of up to 3045 residential dwellings, access road, and 19 hectares of employment land; strategic 'green infrastructure'; a mixed use local centre; education provision; alongside supporting infrastructure and open space. We also note that it is intended to be a Hybrid application, where part detailed planning application having nearly 200 dwellings in part of BA2. For other sites, outline planning application will be submitted.

The LLFA would not wish to make any comments on whether the screening report is, or is not, required for this development, however we would like to offer some guidance in relation to the flood risk and drainage that may concern the proposed site.

The LLFA have reviewed the EIA Scoping report, undertaken by David Lock Associates, dated April 2024. A surface water drainage assessment should be carried out to demonstrate that the proposed development will not create an increased risk of flooding from surface water to the development site and the surrounding area. This should be done in accordance with the National Planning Policy Framework (NPPF) and Planning Policy Guidance (PPG) along with the Hertfordshire LLFA guidance.

Since the site is over 1 hectare in size, a comprehensive Flood Risk Assessment (FRA), in line with Hertfordshire Lead Local Flood Authority guidance and the current NPPF and PPG guidance, would be required to be submitted as part of the planning application. The FRA should demonstrate that any existing areas of surface water flood risk and ground water flood risk are managed within the site without increasing flood risk elsewhere. We would expect any submitted documents to support a planning application to demonstrate the proposed surface water drainage system is designed to include the four pillars of

SuDS within the site and the post development surface water runoff rates and volumes for its lifetime for all rainfall events up to and including the 1% AEP plus climate change rainfall event.

The Environment Agency's Surface Water Flood Risk mapping indicates that the part of the site is located in areas at risk of flooding. The whole area (including BA2) are associated with surface water flooding, ponding and overland flow paths, within the site or adjacent the site. The FRA must demonstrate that the sequential test and sequential approach has been applied in accordance to NPPF and PPG along with flood mitigation measures without any adverse flood risk off-site. The FRA must demonstrate that any development has safe access and egress for the 1% AEP plus climate change rainfall event in accordance. Avoidance is the most sustainable form of flood risk management and hence surface water flow paths must be investigated and avoided where possible. If some mitigation or management is required, there should be no increase risk of flooding elsewhere and be shown via pre and post flood risk modelling. BA3 appears to have a flow path which is cut off in the upper catchment via the A505, this must be confirmed and any new small catchment considered.

The latest climate change allowances are required to be applied at the time of the assessment and ordinary watercourses (less than 3km²) that need to be assessed for flood risk can use the appropriate rainfall climate change allowances.

The latest FEH rainfall data (FEH13 or FEH22) should be applied in all hydraulic modelling calculations at the time of any calculations and assessment (flood risk or surface water drainage).

Groundwater flooding should also be considered. The LLFA are aware that there are several public water supply boreholes in the area that may be suppressing groundwater levels. However, as the site is on the edge of the chalk escarpment, springs and high groundwater levels must be investigated. Evidence will be required to show how groundwater levels change over time and we suggest that monitoring is undertaken as soon as possible using telemetry to establish on site conditions / variations in groundwater level. We are aware in some areas of chalk groundwater levels can rise 10 to 30m during wet winters or high intensity rainfall events.

We note that BA4 has applied for planning permission and relies on the maintenance of a swale / watercourse for the management of surface water overland flows. This feature runs east to west on the south of Royston Road and must be maintained and if possible improved through this development.

A Sustainable Drainage Strategy should be considered at an early stage of planning. The drainage system should consider the four pillars of sustainable drainage (SuDS) of Water Quality, Water Quantity, Amenity, and Biodiversity. We would expect that above-ground green SuDS such as water reuse solutions, source control, green roofs, bio-retention area, wetlands, ponds, basins, swales, rain gardens and SuDS planters to be used frequently and as a priority within the proposed surface water design. Sufficient space to provide these multifunctional SuDS must be evidenced at an outline stage of development or masterplan development to support any parameter plan or drawing. For example, a strip of 5 to 10m next to a main link road may be required to include swales and multi-use footpaths.

The LLFA expects the application of the surface water discharge hierarchy to the development of the sustainable drainage solution. We would expect that ground investigations into the viability of infiltration to be undertaken using the methods in accordance with the BRE 365 methods across the whole site but in more detail in any area being applied for Full Planning Permission. However, if unfavourable infiltration testing results are obtained, any existing runoff rates / volumes be discharged at a pre-development greenfield scenario and any watercourse proved to be positively connected to the wider watercourse network.

All SuDS must demonstrate that there will be sufficient surface water quality treatment by implementing an appropriate amount of water quality treatment stages using SuDS. An appropriate water quality assessment specific to and for each of the proposed surface water drainage networks is required to demonstrate the suitable water quality management arrangements are in place to prevent pollution from any potential contaminants. The site is in Groundwater Source Protection Zone II, and III; and hence surface water quality runoff must be considered in the proposed drainage for the site, potentially requiring an additional step of treatment prior to any discharge to ground. We are also aware that some watercourses in the area may be designated as Chalk Streams which may also require to be considered in any surface water quality runoff.

For any supporting surface water drainage modelling, the following must be used; up to date FEH; climate change allowances on any rainfall modelling scenarios; the CV value of 1; and allowance for urban creep within any SuDS conveyance and storage features.

Phasing of the development should match any phasing of the supply of flood risk mitigation and drainage infrastructure. So, each phase can be completed with an independent flood risk mitigation and drainage strategy. This includes the consideration for how any phases e.g. schools, strategic link roads or other civic infrastructure will be constructed by a specific developer but rely on connection to the housing development areas to discharge surface water runoff. A high-level assessment of a timeline of how each flood mitigation or drainage scheme needs to be implemented prior to the phasing of each development parcel should be provided.

Details of the required maintenance of any blue green infrastructure for flood risk management or SuDS features / structures and who will be adopting these features for the lifetime of the development must be provided in accordance with NPPF. Early engagement with adopting authorities is highly recommended to consider any specific requirements which may not be immediately apparent in the planning process e.g. easements to allow for maintenance along linear or pond features. We recommend that multifunctional designs are included e.g. roads and pavements / cycle tracks separated with swales or linear bio-retention areas.

The LLFA also requires the applicant to submit information and drawings for full planning applications which clearly shows the exceedance flood flow routes for all areas of the development. These plans should include the finished floor levels of all building, the finished ground levels and the potential exceedance flow route.

Details of the construction phase temporary drainage arrangements are required by the LLFA to ensure there will be no increase in flood risk due to the construction works of the development either onsite or elsewhere. Furthermore, the applicant will also need to

submit the proposed construction phasing plans for the development to demonstrate that prior to completing the site there will be no increase in flood risk due to the interim development phases either onsite or elsewhere.

For further advice on what we expect to be contained within the FRA to support an outline planning or full planning application, please refer to our Developers Guide and Checklist on our surface water drainage webpage

<https://www.hertfordshire.gov.uk/services/recycling-waste-and-environment/water/surface-water-drainage/surface-water-drainage.aspx> this link also includes HCC's policies on SuDS in Hertfordshire.

Yours sincerely

Raktim

Raktim Haldar
SuDS and Watercourses Support Officer
Environment & Transport and Sustainable Growth

Director of Public Health
Sarah Perman



Hertfordshire County Council
Public Health Service
Farnham House
Stevenage SG1 2FQ

Sam Dicocco
Planning Officer
North Herts District Council
By Email:

Email: healthypaces@hertfordshire.gov.uk

Date: 22nd May 2024

Dear Sam,

Location: Land East Of North Road And North Of The Railway Line Bygrave Road Baldock Hertfordshire

App No: 24/00920/SCOP

Proposal: Up to 3,000 homes; up to 19 hectares of employment land; strategic 'green infrastructure'; a mixed use local centre; education provision; and associated infrastructure.

Thank you for the opportunity to comment on the above.

For all development proposals Public Health recommends that applicants refer to the Hertfordshire Health and Wellbeing Planning Guidance¹, Public Health England's Spatial Planning for Health evidence resource² and the NHS England 'Putting Health into Place, 10 Principles' Guidance document 2019³. This sets out our expectation of developers in terms of the delivery of healthy development and communities, and focusses on the principle of 'designing in' health and wellbeing as an essential part of the planning process. In doing so, this recognises the *wider determinants of health* as a diverse range of social, economic and environmental factors which influence people's mental and physical health⁴, and would demonstrate that an application for development has been *positively prepared*.

¹ <https://www.hertfordshire.gov.uk/media-library/documents/public-health/hertfordshires-health-and-wellbeing-planning-guidance-may-2017.pdf>

² https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/729727/spatial_planning_for_health.pdf

³ <https://www.england.nhs.uk/wp-content/uploads/2019/09/hip-executive-summary.pdf>

⁴ <https://www.gov.uk/government/publications/health-profile-for-england-2018/chapter-6-wider-determinants-of-health>

National and Local Policy

The recently revised NPPF, in its planning objective 8b, sets out that *the planning system has a social objective to support strong, vibrant and healthy communities and to support communities' health and social wellbeing*. This has been retained from the previous NPPF and should be seen as an equal consideration to environmental and economic objectives. Paragraph 92 requires planning to aim to achieve healthy places which enable and support healthy lifestyles, especially where this would address identified local health and wellbeing needs (Para 92c).

Paragraph 93b sets out that planning decisions should take into account and support the delivery of local strategies to improve health, social and cultural wellbeing for all sections of the community.

The Hertfordshire Health and Wellbeing Strategy 2022 – 2026⁵ sets out the vision and strategic priorities for improving health and wellbeing and reducing health inequalities in the County. This strategy outlines three key overarching ambitions and six themed strategic outcomes we are collectively aspiring to in Hertfordshire.

Health Impact Assessment

Specific Comments on the Proposal

- 1. Air quality:** The effects of air pollution on health have been intensively studied in recent years. The results of these studies showed that air pollution harms human health and particularly is harmful for those who are already vulnerable because of their age as children and older people or existing health problems. Ambient air pollution has been associated with a multitude of health effects, including mortality, respiratory and cardiovascular hospitalizations, changes in lung function and asthma attacks.⁶ Whilst it is better to reduce air pollution at source than mitigate the consequences, every new development will have an impact on air quality, usually by increasing emissions from buildings or from traffic generation. The links between poor air quality, human health, and the environment are well documented and is classed by Public Health England as a major public health risk alongside cancer, heart disease and obesity.

Public Health advises that the developer should consider sensitive placement of sensitive receptors to air pollution. This includes careful location of any affordable dwelling contribution in areas likely to have low concentrations of air pollutants and noise.

I defer to the North Herts District Council Environmental Health team to ensure that development will not create air quality problems. In particular, I seek reassurance that this development will not contribute to a worsening of local air quality that may lead to poor health outcomes (through exposure) for the existing community living in the vicinity, or for new and vulnerable populations (such as the elderly or young children).

The Planning Authority may wish to consider the National Institute for Health and Care Excellence (NICE) 2017 Guidance on Outdoor Air Pollution, as well as the 2019 Quality Standard (QS181) which covers road-traffic-related air pollution and its impact

⁵ https://www.hertfordshire.gov.uk/downloads/file/3677/health_and_wellbeing_strategy

⁶ https://www.researchgate.net/publication/221917185_Impact_of_Air_Pollution_on_Public_Health

on health. The Quality Standard describes high-quality actions in priority areas for improvement, with Quality Statement 2 focussed on planning applications.

2. **Indoor air quality:** Exposure to poor indoor air quality can impact negatively on health⁷. The National Institute for Clinical Excellence (NICE) have recently published guidance on indoor air quality (NICE guideline NG149)⁸.
3. **Creating access for all:** To meet the needs of an ageing population and individuals with physical disabilities and limiting illnesses it is recommended to give consideration to the accessibility across the development. This includes: footpath surfaces and colour schemes (particularly for people with dementia) and street furniture design (i.e. seating suitable for older adults).
4. **Adoption of active travel behaviours from the new occupants:** We recommend there is appropriate signage for pedestrian/cycle routes towards key local destinations (including the bus and train stations) and rights of way which includes journey times. To encourage the adoption of new active travel behaviours, this needs to be in place prior to first occupation when individuals are more susceptible to change. The planning authority may wish to consider this by way of a condition.
5. **Active Design:** The development should maximise opportunities for encouraging physical activity by following the guidance in Sport England's and Public Health England's Active Design guidance <https://www.sportengland.org/how-we-can-help/facilities-and-planning/design-and-cost-guidance/active-design>. In particular, the checklist in the Active Design guidance should be used for informing the design and consideration of how the checklist has been considered should be included in a planning application e.g. as part of the Health Impact Assessment or Design and Access Statement. The planning authority may wish to consider this by way of a condition to request details to be submitted and approved which demonstrate how promoting physical activity has been considered in the design and layout of the development. Public Health strongly advises the developer to consult Sport England on this application.
6. **Affordable Housing:** having a good quality home is important to our health and wellbeing and ensuring accessibility to affordable housing is a priority across the County. It isn't clear how and where the affordable housing will be provided. It is, without a doubt, crucial that the development provides its affordable housing in a way which is integrated and avoids demarcation. It should also have equal access to the green space provided.
7. **Provision of healthy, affordable food: We seek to encourage affordable, healthy food choices and a balance in the range of food outlets occupying the retail space to enable individuals to make healthy choices, whilst promoting local commercial diversity.** The environment in which we live, work and play has a considerable influence on our food choices⁹. Easy access to affordable, healthy food choices can help to support a balanced diet and prevent unhealthy weight in the population¹⁰. We look to the local planning authority to consider licencing restrictions for food outlets within this development to provide a balance of food choices
8. available. **Contributions towards modal shift and active recreation:** We recommend the planning authority considers seeking contributions by way of a planning condition towards local schemes to encourage modal shift towards active and sustainable travel.

⁸ <https://www.nice.org.uk/guidance/ng149/resources/visual-summary-pdf-7022755693>
<https://www.nice.org.uk/guidance/ng149>

⁹ <https://publichealthmatters.blog.gov.uk/2019/08/08/health-matters-addressing-the-food-environment-as-part-of-a-local-whole-systems-approach-to-obesity/>

¹⁰ <https://www.tcpa.org.uk/Handlers/Download.ashx?IDMF=7166d749-288a-4306-bb74-10b6c4ffd460>

- 9. Charging points for electric vehicles:** To encourage the use of cleaner vehicles, electric charging points should be provided for all new residential and non-residential buildings with associated parking.
- 10. Car club:** We would like to see the developer making a contribution to setting up a car club.
- 11. Safe crossing points beyond site perimeter:** to encourage residents to use active travel, a key indicator will be perceptions of safety. Safe crossing points will encourage behaviour change for residents to use active travel in favour of car usage.
- 12. Healthy Streets:** Consideration of using the Healthy Streets **New Development Check:** [Healthy+Streets+Checklist+for+new+developments+April+2024.pdf \(squarespace.com\)](https://www.squarespace.com/healthy-streets-checklist-for-new-developments-april-2024.pdf). This tool can be used in the early stages of planning new streets to ensure the development maximises its Healthy Streets potential. It can be used to assess how a street performs against the 10 Healthy Streets indicators and therefore, the extent to which the street is meeting the basic needs of people.

Health Impact Assessment

Health Impact Assessment (HIA) is a recognised tool that can assist development applications demonstrate both the positives of the proposal as well as identifying any unintended consequences. Robust assessments of the health implications of development proposals consider how different populations will be positively and negatively impacted by the development; HIA can draw out these inequalities in relation to the impact of a development on existing local communities and how the development may influence the health and wellbeing of its new residents. It is also important to consider the cumulative impact of neighbouring developments on new and existing communities which can be taken into account when undertaking an HIA.

In November 2019, Herts County Council adopted a HIA Position Statement which sets out that an HIA is undertaken for developments in excess of 100 residential units. It also clearly sets out the recommended frameworks to use for each stage of the HIA process. This includes guidance on the quality assurance framework that will be used to assess how well an HIA has been undertaken. The Hertfordshire County Council (HCC) HIA Position Statement can be downloaded from the link below:

<https://www.hertfordshire.gov.uk/media-library/documents/public-health/health/hia-position-statement.pdf>

The HIA Position Statement does not specify a particular methodology to use for the appraisal stage - this is to be determined by the developer. However, we recommend developers familiarise themselves with the “Wales Health Impact Assessment Support Unit (WHIASU) Quality Assurance Review Framework for HIA” to ensure the framework chosen to undertake the HIA meets the requirements of a high quality HIA. Hertfordshire Public Health will be quality assessing HIAs (using the WHIASU Quality Assurance Review Framework) submitted with planning applications either as standalone assessments or as part of Environmental Impact Assessments.

Given the scale of the proposed development, Public Health will require the developer to undertake a Health Impact Assessment (HIA) to assess the potential positive and negative health impacts of this development. In doing so, the applicant would be demonstrating how it is meeting the various requirements of the NPPF, chapter 8.

In the absence of an agreed national set of guidelines on HIA, and appreciating there are different methodologies, our expectation is that an HIA must:

- consult Public Health and the planning authority on its scope;
- have robustly considered *health inequalities* and demonstrate an understanding of how health inequalities apply in the context of the development proposal;
- have clearly and appropriately identified vulnerable populations as part of the HIA process (see Population Group Checklist¹¹ for example);
- have utilised relevant local health profiles and other appropriate community data, preferably down to ward level where possible;
- be robust in its consideration of the *wider determinants of health*, and can demonstrate understanding of what these are in the context of the development proposal and wider communities;
- be balanced in its findings.
- To ensure the completeness and quality of the Health Impact Assessment: (a) the developer must ensure that the Health Impact Assessment is prepared by competent experts; and (b) the Health Impact Assessment must be accompanied by a statement from the developer outlining the relevant expertise or qualifications of such experts.

For a development of this size, we would be expecting a Full HIA to be undertaken. The applicant should consider how much more work this would entail set against the benefits of demonstrating to the local planning authority how the proposal is positively planned and how it will offer opportunities to the existing and new communities.

The development proposals represent significant change to the built environment which, whilst intended as positive, may have unintended negative impacts on health that an HIA may highlight. There are a range of guidance and resources that can be used to inform HIA development to ensure it is robust, balanced, evidence-driven and puts health at the heart of planning. See [Table 1](#) of the recent Public Health England publication on HIA. More useful guidance on HIA is available here: <https://www.hertfordshire.gov.uk/services/health-in-herts/healthy-places/the-role-of-public-health-in-planning.aspx#HIA>

We request that Public Health is consulted at the scoping stage of the HIA via HealthyPlaces@hertfordshire.gov.uk to help ensure it focusses on the 'wider determinants of health'¹² and 'health inequalities'.¹³ We are happy to discuss baseline information, data and intelligence that the HIA will need to utilise.

Yours sincerely,

Lucy Fish
Health Improvement Co-ordinator – Healthy Places
Hertfordshire Public Health

¹¹ <https://www.hertfordshire.gov.uk/media-library/documents/public-health/health/appendix-a-population-groups-checklist.pdf>

¹² The wider determinants of health are a diverse range of social, economic and environmental factors which influence people's mental and physical health such as: air quality; noise; access to healthy food choices; movement and access; local economy and employment; education; neighbourhood and community spaces, play and recreation; housing and development design.

¹³ A helpful definition of Health inequalities is "... the unjust and avoidable differences in people's health across the population and between specific population groups... Health inequalities go against the principles of social justice because they are avoidable. They do not occur randomly or by chance. They are socially determined by circumstances largely beyond an individual's control. These circumstances disadvantage people and limit their chance to live longer, healthier lives" (NHS Health Scotland, 2018).

HCC Growth and Infrastructure

From: Xavier Preston
Sent: Tuesday, May 28, 2024 4:15 PM
To: planning.control@north-herts.gov.uk
Cc: Sam Dicocco <sam.dicocco@north-herts.gov.uk>
Subject: HCC response to 24/00920/SCOP Land East of North Road and North of the Railway Line, Bygrave Road, Baldock

Hi Sam,

HCC has the following comments to make on the EIA scoping report provided in relation to 24/00920/SCOP.

LLFA

The LLFA have responded separately and directly to NHDC on this consultation.

Sustainable Growth

General comment: It should be noted that for a development such as this with its proposed suite of development types that there is no safe level of exposure to air pollutants therefore during the detailed design stage all developments ought to be positioned so as to provide stand off distance from sources of pollution (most likely to be the main road network) where possible and to consider placing more sensitive land uses (schools, care homes, affordable housing) in areas noted to have less impact from environmental stressors such as air pollution and noise. Ensuring access to schools from across the expected locally derived catchment area is made as convenient as possible for active travel modes is particularly important and may require access at different aspects of a site to reduce travel times by active travel means in order to promote this approach. Ensuring all new highways promote a healthy street approach is encouraged.

-

Public Health

Please see the formal response from Public Health attached to this email.

Kind regards,

|



Xavier Preston

Senior Planning Officer | Growth & Infrastructure Unit | Sustainable Growth

Hertfordshire County Council

Office Address: Farnham House, Six Hills Way, Stevenage, SG1 2ST

Postal Point: County Hall, Pegs Lane, Hertford, SG13 8DE, Postal Point CHN114

Telephone: 01992 555277

Xavier.Preston@hertfordshire.gov.uk



[Our vision](#) is to create a cleaner, greener and healthier Hertfordshire, guided by our RISE values

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Residents' lives

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Integrity

We act
Sustainably

We champion
Equality & fairness

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From: Simon Richards1 <Simon.Richards1@hertfordshire.gov.uk> on behalf of Ecology <Ecology@hertfordshire.gov.uk>
Sent: 19 August 2024 13:30:44 UTC+01:00
To: "Planning Control" <Planning.Control@north-herts.gov.uk>
Subject: FW: Baldock EIA Scoping Opinion consultation 24/00920/SO
Attachments: Scoping Report.pdf, 24-00920-SCOP Rsp1 SR.pdf

Dear Justin

Up to 3,000 homes; up to 19 hectares of employment land; strategic 'green infrastructure'; a mixed use local centre; education provision; and associated infrastructure. 
24/00920/SCOP
Land East Of North Road And North Of The Railway Line Bygrave Road Baldock Hertfordshire

Please find response attached.



Simon Richards (Hons), MSc
Senior Ecological Advisor , Hertfordshire LEADS*

Address: Farnham House Six Hills Way, Stevenage SG1 2F Postal Point: CHN109
T: 01992 556872 (**Internal:** 56872) **mobile 07970274157** **E:** Simon.Richards1@hertfordshire.gov.uk

To contact the Ecology team, please direct enquiries to:
ecology@hertfordshire.gov.uk or phone 01992 555220

**Hertfordshire LEADS provides Landscape, Ecology, Archaeology, Design and Sustainability support to Local Planning Authorities in Hertfordshire.*



[Our vision](#) is to create a cleaner, greener and healthier Hertfordshire, guided by our RISE values

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Residents' lives**

**We work with
Integrity**

**We act
Sustainably**

**We champion
Equality & fairness**

Justin Booij
Development & Conservation
North Hertfordshire District Council,
PO BOX 10163, Nottingham, NG6

Hertfordshire LEADS
Hertfordshire County Council
County Hall, Pegs Lane
Hertford, Herts, SG13 8DF
Email:ecology@hertfordshire.gov.uk
Date:09/08/2024

Dear Justin

Up to 3,000 homes; up to 19 hectares of employment land; strategic 'green infrastructure'; a mixed use local centre; education provision; and associated infrastructure.

24/00920/SCOP

Land East Of North Road And North Of The Railway Line Bygrave Road Baldock Hertfordshire

Thank you for consulting this office on the above application.

Schedule 4 of the EIA regulations sets out the information that should be included in an Environmental Statement, including the aspects of the environment likely to be significantly affected by the development. These are:

- population
- fauna
- flora
- soil
- water
- air
- climatic factors
- material assets, including architectural and archaeological heritage
- landscape

On this basis, I can confirm that Section 3.7 Ecology Effects is included within the Topics to be considered for the Land East Of North Road And North Of The Railway Line Bygrave Road Baldock Hertfordshire Ecological Impact Assessment.

Schedule 4 section 5 of the EIA regulations requires a description of the likely significant effects- the EIA Scoping Opinion includes a section 3.7.9- 16 -Likely Significant Effects (for ecology) so I consider this will be included within the EIA. These will be informed by survey results targeting the presence and use of the site by great crested newts, Badgers, bats, breeding birds, and reptiles, as well as botanical and habitat surveys.

Schedule 4 section 5 of the EIA regulations. Also requires the consideration of significant effects on the factors specified in regulation 4(2) should cover the direct effects and any indirect, secondary, cumulative, transboundary, short-term, medium-term and long-term, permanent and temporary, positive and negative effects of the development.

The key issues resulting from the impacts are highlighted in section 3.7.8 of the Ecological Impact Assessment and include:

The key issues that could arise from the baseline due to the proposed development are:

- Loss of arable habitat which currently supports breeding birds and wintering birds, including a population of corn bunting deemed to be of County importance.
- There is potential for indirect impacts to negatively impact Ivel Springs LNR and Weston Hills LNR due to construction and operational activities.

- Potential for Bygrave Road LWS to be directly and indirectly impacted by the proposed development due to construction and operational impacts.
- direct and indirect impacts on other protected and notable species including species such as reptiles, bats, other notable mammals, notable invertebrates and protected plant species.
- Direct and indirect impact on other habitats of elevated value e.g. neutral grassland, scattered trees, hedgerow and broad-leaved woodland

The EIA Scoping Opinion includes sections 3.7.27-30 -Cumulative Effects (for ecology) so I consider these matters will be included within the EIA.

Schedule 4 section 6 of the EIA regulations. Requires a description of the forecasting methods or evidence, used to identify and assess the significant effects on the environment, including details of difficulties- the EIA Scoping Opinion includes sections 3.7.17-21 and Appendix 5 Approach and Assessment Methodology so I consider this will be included within the Ecological Impact Assessment.

Schedule 4 section 7 of the EIA regulations requires a description of the measures envisaged to avoid, prevent, reduce or, if possible mitigate impacts, the EIA Scoping Opinion includes sections 3.7.22- 26 -Indicative Mitigation Measures, this acknowledges the need to consider avoidance and Preservation so I consider these matters will be included within the Ecological Impact Assessment.

I trust these comments are of assistance,

Regards

Simon Richards

Senior Ecologists, Hertfordshire LEADS

Hertfordshire LEADS provides Landscape, Ecology, Archaeology, Design and Sustainability support to planning departments in Hertfordshire.

**Mark Doran, Executive Director of
Growth & Environment**



**Sam Dicocco
Planning Department
North Herts District Council
Council Offices
Gernon Road
Letchworth Garden City
Hertfordshire SG6 3JF**

**Spatial Planning Unit
Minerals and Waste Policy Team
CHN216
County Hall
Pegs Lane
Hertford, Herts SG13 8DF
www.hertfordshire.gov.uk**

Tel: 01438 844950
Email: MineralsandWaste@hertfordshire.gov.uk
My ref: SPEU/FB
Your ref: 24/00920/SCOP
Date: 14/06/2024

Dear Sam Dicocco,

Location: Land East Of North Road And North Of The Railway Line
Bygrave Road Baldock
Proposal: Up to 3,000 homes; up to 19 hectares of employment land;
strategic 'green infrastructure'; a mixed use local centre;
education provision; and associated infrastructure.
Application Number: 24/00920/SCOP

I write with regards to the above, to provide a response on behalf of the county council as the Minerals and Waste Planning Authority.

Waste

Section 3.10 of the Scoping Report acknowledges the Waste Core Strategy and Development Management Policies Development Plan Document (2012), as well as identifying the key issues associated with waste and the likely significant effects.

The policies in the adopted Waste Core Strategy and Development Management Policies DPD (2012) that relate to this proposal, and which must be considered by the Local Planning Authority in determining the application, include Policy 1: Strategy for the Provision for Waste Management Facilities (namely the penultimate paragraph of the policy) and Policy 12: Sustainable Design, Construction and Demolition.

Waste Policy 12: Sustainable Design, Construction and Demolition requires all relevant construction projects to be supported by a SWMP.

The Waste Planning Authority would like to take this early opportunity to welcome the applicant's commitment to preparing a SWMP to accompany the waste chapter of the environmental report.

The SWMP must be prepared and agreed in consultation with the Waste Planning Authority prior to commencement of the project. The SWMP must be implemented throughout the duration of the project, from initial site preparation works to final completion of the construction phase.

By preparing a SWMP prior to commencement, early decisions can be made relating to the management of waste arisings and building supplies made from recycled and secondary materials can be sourced, to help alleviate the demand for primary materials such as virgin sand and gravel. The County Council is committed to promoting the use of alternative materials to primary land-won aggregates. Adopted Minerals Local Plan Policy 7: Secondary and Recycled Materials, states that the County Council will seek, encourage and support the increased use of secondary and recycled materials in place of primary land-won aggregates in development proposals.

Early planning for waste arisings will help to establish what types of containers/skips are required for the project and when segregation would be best implemented for various waste streams. It will also help in determining the costs of removing waste from the site.

As a minimum, the SWMP should include the following:

Project and People

- Identification of the client
- Identification of the Principal Contractor
- Identification of the person who drafted the SWMP
- Location of the site
- An estimated cost of the project
- Declaration that the client and contractor will comply with the requirements of Duty of care that materials will be handled efficiently and waste managed appropriately (Section 34 of Environmental Protection Act 1990 and Environmental Protection (Duty of Care) Regs 1991)

Estimating Waste

- A description of the types of waste that are expected to arise on site (recorded through the use of 6-digit European Waste Catalogue codes) and an estimated quantity for each of the types (in tonnes)
- Waste management actions for each waste type (i.e., will the waste be re-used or recycled (on-site or off-site?), recovered or disposed of)

Space for Later Recordings

- Space for the recording of actual figures against the estimated figures
- Space for the recording and identification of those responsible for removing the waste from site and details of the sites they will be taking it to
- Space to record explanations for any deviations from what has been set out in the SWMP, including explanations for differences in actual waste arisings compared to the estimates

Minerals

In relation to minerals, the site is not located within the 'Sand and Gravel Belt' or a Mineral Resource Block as identified in Hertfordshire County Council's adopted Minerals Local Plan 2002 – 2016. The Sand and Gravel Belt is a geological area that spans across the southern part of the county and contains the most concentrated deposits of sand and gravel throughout Hertfordshire. The Minerals Resource Blocks are regarded as the most viable areas for future mineral extraction in the county.

Whilst the development does not fall within the Sand and Gravel Belt, or one of the identified Mineral Resource Blocks, British Geological Survey Data does identify that there could potentially be some sand/gravel deposits beneath the proposed development site BA1 to the north and the southwest.

Opportunistic extraction refers to cases where preparation of a site for built development, such as excavating the foundations and footings or landscaping works, may result in suitable material being uncovered that could be extracted and processed for use on site as part of the development.

The Minerals Planning Authority would like to take this early opportunity to encourage the opportunistic extraction and subsequent use of sand and gravel deposits within the developments wherever possible. Opportunistic use of minerals will reduce the need to import sand and gravel to the site and make sustainable use of these valuable resources.

Yours sincerely,

Finlay Banks



Planning Officer- Minerals and Waste Policy

Justin Booij
North Hertfordshire District Council
Planning, Housing & Enterprise
Directorate
Council Offices Gernon Road
Letchworth Garden City
Hertfordshire
SG6 3JF

Our ref: NE/2024/137025/01
Your ref: 24/00920/SCOP
Date: 7 June 2024

Dear Justin,

Land East Of North Road And North Of The Railway Line, Bygrave Road, Baldock, Hertfordshire.

Up to 3,000 homes; up to 19 hectares of employment land; strategic 'green infrastructure'; a mixed use local centre; education provision; and associated infrastructure.

Thank you for consulting us on the above Scoping Opinion on 9 May 2024, apologies for the delay in our response. As part of the consultation, we have reviewed the: Growing Baldock, EIA Scoping Report, prepared by David Lock Associates (DLA) on behalf of Hertfordshire County Council (HCC) and Urban&Civic (U&C), ref UAC092, dated April 2024.

Upon review of the above document, we have the following comments to make. For ease, our comments have been sectioned into **risk to groundwater, water resources and supply, and flood risk.**

Risk to Groundwater

The proposed development site is located upon principal and secondary aquifers within Source Protection Zones 2 and 3. It is in a sensitive location as contaminants from the site could enter the ground and pollute groundwater and the protected source.

We are satisfied with the proposed structure of the Environmental Statement (ES) in relation to groundwater protection. Notwithstanding this, due consideration should be given to the impacts that the proposed development may have upon controlled waters receptors during both construction and operational phases. We would refer the applicant to The [Environment Agency's approach to Groundwater Protection](#) which sets out our position for a wide range of activities and developments. We have provided below some general comments on various aspects of the proposals as they affect controlled waters receptors. Further advice is provided within Appendix 1 on page 4.

Chapter: Hydrology and Flooding Effects

Section 3.6.15: Infiltration SUDs

Cont/d..

It is noted that “*The use of infiltration to recharge the existing aquifer and rainwater harvesting will be the favoured SuDS options given the pressure on water resources in the area*”. We support the use of infiltration SUDs provided it does not pose a pollution risk to controlled waters. Please refer to the appendix for further advice.

Chapter: Ground Conditions and Soil Effects

Section 3.8.7: Land Contamination

We welcome the inclusion of Ground Conditions within the scope of the ES. It is noted that “*The likelihood of significant contamination being present within the soils located within the development area is considered to be low. However, the potential may exist for localised oil spills and buried material associated with agricultural buildings and activities*”. The risks from contamination for the proposed development must be addressed following the tiered approach specified within our [Land Contamination Risk Management \(LCRM\)](#) guidance, commencing with a preliminary risk assessment. Where applicable the risks associated with piling/ground improvement and infiltration drainage should also be included within this scheme.

Water Resources and Supply

The location of the development means that it will be serviced by Affinity Water (AFW) for water supply. We do not know which of AFW's sources will physically provide the water, but it is likely that the supply will come from the Chalk aquifer.

AFW has licensed boreholes close to the proposed development site, located to the south in and around Baldock. The company is presently implementing measures to mitigate for the effect its abstractions have on the Upper River Ivel, also known as Ivel Springs. These measures include:

1. River restoration/habitat improvement
2. Licence reductions (capping) to manage the risk of deterioration
3. Installing a river support scheme to deliver the required flow improvement to the springs.

We recommend that the developers open discussions with AFW at the earliest opportunity to ensure that adequate supply can be delivered to the site.

We support the aim for all residential homes to achieve a water consumption rate of 110l/p/d in line with the Building Regulations Part G higher water efficiency standard.

Chapter: Landscape and Visual Effects

Section 3.4.15 Watercourses

This section of the scoping report notes that there is a limited network of local streams and ditches. While this may be true for the site itself, the report also notes that there are rivers beyond the site boundary, including the River Ivel. Given that the effects of water supply provision are related to where the water is abstracted, to assess the environmental effects of supplying the growth the study area cannot be constrained to the limits of the development site itself. AFW should be able to advise on likely sources of abstracted water to supply this development, which can then be used to consider the environmental effects of that abstraction.

As AFW is already needing to take remedial action to mitigate for the effects of its local abstraction, we would advise that the EIA considers water supply as a key issue. The

effects of this development on local abstraction should be considered and whether Affinity Water can supply it sustainably without exacerbating the existing impacts on the River Ivel Springs, or compromising the measures being implemented to restore flows.

Indicative mitigation measures

We would also recommend that the EIA includes consideration of enhanced water efficiency in the development to reduce the risks from increased groundwater abstraction locally.

Flood Risk

The red line boundary (RLB) of this scoping opinion is within Flood Zone 1 according to the current published flood map for planning. However, there are several ordinary watercourses, some of which are culverted, that our outside of our statutory remit within the RLB. The applicant should consider the flow routes and rates when detailing any surface water outfalls. We recommend that they speak to the Lead London Flood Authority at the earliest opportunity and look to reduce the runoff rate.

The applicant will need to submit a Flood Risk Assessment (FRA) which factors in the risk posed by the surface water flow routes as outlined above and demonstrate that the proposal does not increase flood risk within the RLB or elsewhere. We would refer the applicant to the [National flood risk standing advice for local planning authorities](#) guidance for further information on when an FRA is required.

Advice to Applicant

Pre-Application Advice

Regarding future applications, if you would like us to review a revised technical report prior to a formal submission, outside of a statutory consultation, and/or meet to discuss our position, this will be chargeable in line with our planning advice service. If you wish to request a document review or meeting, please contact our team email address at HNLsustainableplaces@environment-agency.gov.uk.

Further information on our charged planning advice service is available at; <https://www.gov.uk/government/publications/planning-advice-environment-agency-standard-terms-and-conditions>.

Final comments

Thank you for contacting us regarding the above application. Our comments are based on our available records and the information submitted to us. Please quote our reference number in any future correspondence. Please provide us with a copy of the decision notice for our records. This would be greatly appreciated.

Should you have any queries regarding this response, please contact me.

Yours sincerely,

Lucy Serjent
Planning Advisor

Email: HNLsustainablePlaces@environment-agency.gov.uk
Telephone: +44 20 3025 2653

Appendix 1

1. Land Contamination Assessments

We expect land contamination assessments to follow the tiered approach laid out in our [Land Contamination Risk Management \(LCRM\)](#) guidance. The preliminary risk assessment (PRA) should include historical plans of the site, an appraisal of the environmental setting (including geology, hydrogeology, groundwater and surface water receptors, potential contaminants of concern and source areas), an initial conceptual site model (CSM) describing possible pollutant linkages for controlled waters, and identification of potentially unacceptable risks. Land contamination investigations should be undertaken by suitably qualified and experienced professionals and in accordance with BS 5930: [Code of practice for ground investigations](#) and BS 10175: [Investigation of potentially contaminated sites – code of practice](#). Soil and water analysis should be fully MCERTS accredited. Investigation, demolition, remediation, or construction works must not create new pathways or linkages to controlled waters. Clean drilling techniques may be required for boreholes that penetrate contaminated ground.

2. Sustainable Drainage System (SUDs)

Soakaways and other infiltration SUDS must comply with statements G1 and G9 to G13 of [The Environment Agency's Approach to Groundwater Protection](#) and should be constructed in line with good practice and guidance documents including the [CIRIA C753](#) SuDS Manual and the [Susdrain website](#). They must not be constructed in contaminated ground where infiltration could re-mobilise contaminants to pollute groundwater. All infiltration SuDS should be designed to maintain a minimum 1.2m clearance above peak seasonal groundwater levels. We do not consider deep infiltration systems (>2.0m below ground level) to be routinely acceptable. Only clean roof water can be directly discharged to infiltration SuDs or watercourses; systems for the discharge of surface water from hard-standing, roads and impermeable vehicle parking areas must incorporate appropriate pollution prevention measures and a suitable number of SUDs treatment components in line with the environmental sensitivity of the receiving waters. An oil separator/interceptor (or equivalent device) may be required to remove oil from water draining off hard surfaces with a risk of oil contamination.

3. Waste Management during Development

Developers should ensure that all contaminated materials are adequately characterised both chemically and physical in line with BS EN 14899:2005, and that the permitting status of any proposed on site operations are clear. Excavated materials recovered via a treatment operation can be re-used on-site under the CL:AIRE Definition of Waste: Development Industry Code of Practice, subject to certain conditions being met. However, contaminated materials that are, or must be disposed of, classify as waste and are subject to waste management legislation which includes: Duty of Care Regulations 1991, Hazardous Waste (England and Wales) Regulations 2005, Environmental Permitting (England and Wales) Regulations 2010, The Waste (England and Wales) Regulations 2011.

4. Dewatering

Dewatering, if undertaken during development, could have an adverse impact upon local wells, watercourses or other environmental interests. Proposals for dewatering should therefore be supported by a detailed hydrogeological impact assessment examining the potential impacts upon receptors due to development-induced changes in groundwater flows, levels, and availability. The movement of potentially contaminated groundwater should also be considered within the scope of this impact assessment, in addition to any consideration needed under the contaminated land regime. Dewatering operations of 20 cubic metres a day or more would require a water abstraction licence

from the Environment Agency unless the activity qualifies for an exemption as set out in 'Water abstraction and impoundment (exemptions) regulations 2017'. There is no guarantee that a licence would be granted. If a licence were granted, there would likely be a requirement to return all dewatered water to the aquifer at suitable quality.

We recommend that developers:

- Refer to our [Groundwater Protection](#) webpages, which include our [The Environment Agency's Approach to Groundwater Protection](#)
- Refer to our [Land Contamination Technical Guidance](#), including our [Land Contamination Risk Management \(LCRM\)](#) guidance, when dealing with land affected by contamination and for the type of information required in order to assess the risks to controlled waters. The Local Authority can advise on management of risks to human health.
- Consider using the [National Quality Mark Scheme for Land Contamination Management](#) which involves the use of competent persons to ensure that land contamination risks are appropriately managed.
- Refer to British Standards BS 5930 [Code of practice for ground investigations](#) and BS 10175 [Investigation of potentially contaminated sites – code of practice](#)
- Refer to our [Piling and Penetrative Ground Improvement Methods on Land Affected by Contamination](#) National Groundwater & Contaminated Land Centre Project NC/99/73. The selected method, including environmental mitigation measures, should be presented in a Foundation Works Risk Assessment Report, guidance on the production of which can be found in Table 3 of [Piling Into Contaminated Sites](#)
- Refer to [Position Statement on the Definition of Waste: Development Industry Code of Practice](#)
- Refer to our [Good Practice for Decommissioning Boreholes and Wells](#)
- Refer to our [Dewatering building sites and other excavations: environmental permits](#) guidance when temporary dewatering is proposed.



HERTFORDSHIRE

CONSTABULARY

Prevention First

Sam Dicocco
North Herts Council
Planning Department
Council Offices
Gernon Road
LETCHWORTH
SG6 3JF

Date 24th May 2024

Our Ref: CPD 11272024

Your Ref: 24/00920/SO

Direct Line: 07590 461376

e-mail: mark.montgomery@herts.police.uk

**Re: Land East of North Road and North of The Railway Line, Bygrave Road, Baldock,
Hertfordshire,**

Dear Sam,

Thank you for inviting me to comment on the Scoping Option for the above site, I have studied the documents on the Council's planning portal and have the following comments to make.

- A development of this scale will have an impact on local Policing, and I would expect our Force Planning Obligations Officer to contact you in due course regarding the Policing infrastructure. This may mean a new Police Office or station to help provide a suitable

Hertfordshire Constabulary Headquarters
Stanborough Road, Welwyn Garden City, Hertfordshire, AL8 6XF

[herts.police.uk](https://www.herts.police.uk)



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Policing response. For example, I have looked at the period from the 2nd of April 2024 to today using closed sources (Police databases) there were nine hundred and twenty-seven crimes recorded. Of these one hundred and seventeen were due to criminal damage, sixtyOne were vehicle related, twenty-one involved burglary of commercial property and ten were dwelling burglaries. To reduce the potential demand on the Police Service I would strongly recommend that the whole scheme be accredited to the Police preferred minimum security standard that is Secured by Design (SBD). This is a proven method for crime reduction (see attached Infographic). Not only will this aid compliance with Building Regulations (Approved Document 'Q'), but it can also reduce the carbon footprint of the development over its lifetime (Professor Ken Pease – 'Carbon Cost of Crime and Its Implications' see www.securedbydesign.com guidance/research section). This would also demonstrate the compliance with both local and national Planning Policy regarding addressing concerns around crime, disorder, and the fear of crime.

- In addition to the policing requirements, it is stated that the local health provisions are already at capacity, thus new facilities will be required. NHS England host the Health Technical Memoranda (HTM) and Health Building Notes (HBN). These provide guidance for the construction and operation of NHS facilities. HBN 11 – 01 deals with community facilities, such as surgeries etc., it states that all facilities must be built to SBD standards. Therefore, at all stages the architects and project team must engage with the local Designing Out Crime Officer/Crime Prevention Design Advisor (DOCO/CPDA). I would recommend that this involvement should start as soon as possible and ideally at the pre-app stage and carry on throughout the whole development and building stages until completion.

Hertfordshire Constabulary look to support this scheme and, if it were to seek to achieve SBD accreditation then we would positively endorse it.

Hertfordshire Constabulary Headquarters
Stanborough Road, Welwyn Garden City, Hertfordshire, AL8 6XF

herts.police.uk



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Pre **vention** First

Yours faithfully

Mark Montgomery

Mark Montgomery

Crime Prevention Design Advisor

Hertfordshire Constabulary

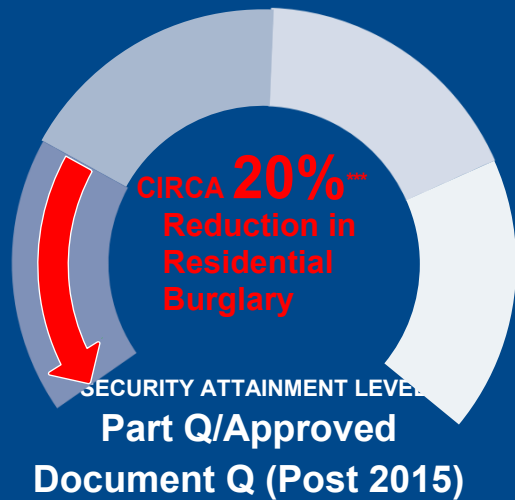
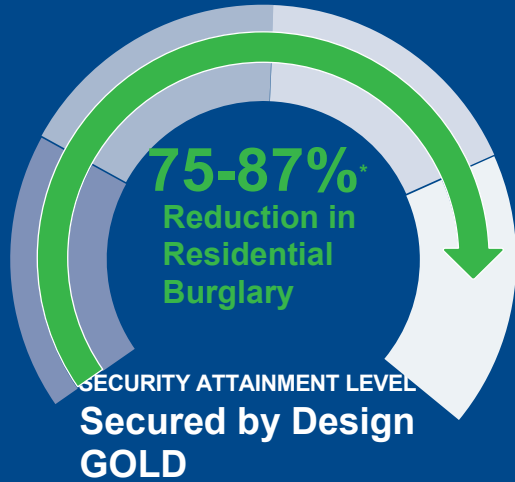


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herts.police.uk

Domestic security comparison chart

Sustainable year on year reductions



*Academically evaluated in 1999, 2009 and 2017. **Academically evaluated in 2008 & 2009. ***No Academic evaluation, however the compliance requirement is significantly lower for Part Q than SBD (no Factory Production Control or ongoing audit testing). ****No guarantee of any security provision.

Other advantages of SBD



†Academically proven.

Thank you for consulting Sport England.

Sport England considers that the impact of a development on sports facilities or activities would not normally be a material planning consideration. Consequently, we do not wish to comment on the Screening or Scoping Opinion consultation.

However, any subsequent planning application should consider the implications for sport in the context of NPI and any strategic evidence set out in local playing pitch and/or built facilities strategies.

Sport England should be consulted on the planning application if it meets the statutory requirements contained within the Planning Policy Framework (affecting playing fields) or the guidance for non-statutory consultation with Sport England contained within Planning Policy Framework for Sports and Recreation Facilities (Paragraph: 003, Reference ID: 37-003-20140306).

General guidance on assessing the need to protect, enhance and provide sports facilities can be found by following

https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#planning_applications

If you need any further advice, please do not hesitate to contact Sport England using the contact details below.

Yours sincerely,

Planning Technical Team

E: planning.south@sportengland.org

Date: 19 June 2024
Our ref: 479753
Your ref: 24/00920/SCOP



North Hertfordshire District Council
justin.booij@north-herts.gov.uk

BY EMAIL ONLY

Consultations
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 900

Dear Justin Booij,

Environmental Impact Assessment Scoping consultation (Regulation 15 (4) of the Town and Country Planning EIA Regulations 2017): Up to 3,000 homes; up to 19 hectares of employment land; strategic 'green infrastructure'; a mixed use local centre; education provision; and associated infrastructure.

Location: Land East Of North Road And North Of The Railway Line, Bygrave Road, Baldock, Hertfordshire.

Thank you for seeking our advice on the scope of the Environmental Statement (ES) in the consultation dated 19 June 2024, received on 19 June 2024.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

A robust assessment of environmental impacts and opportunities based on relevant and up to date environmental information should be undertaken prior to a decision on whether to grant planning permission. Annex A to this letter provides Natural England's advice on the scope of the Environmental Impact Assessment (EIA) for the proposed development.

Further guidance is set out in Planning Practice Guidance on [environmental assessment, natural environment and climate change](#).

Should the proposal be amended in a way which significantly affects its impact on the natural environment then, in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, Natural England should be consulted again.

Please note that Natural England must be consulted on Environmental Statements.

Please send any new consultations or further information on this consultation to consultations@naturalengland.org.uk.

Yours sincerely

Victoria Sweeney
Consultations Team

Annex A – Natural England Advice on EIA Scoping

General Principles

[Schedule 4](#) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, sets out the information that should be included in an Environmental Statement (ES) to assess impacts on the natural environment. This includes:

- A description of the development – including physical characteristics and the full land use requirements of the site during construction and operational phases
- Expected residues and emissions (water, air and soil pollution, noise, vibration, light, heat, radiation etc.) resulting from the operation of the proposed development
- An assessment of alternatives and clear reasoning as to why the preferred option has been chosen
- A description of the aspects of the environment likely to be significantly affected by the development including biodiversity (for example fauna and flora), land, including land take, soil, water, air, climate (for example greenhouse gas emissions, impacts relevant to adaptation, cultural heritage and landscape and the interrelationship between the above factors
- A description of the likely significant effects of the development on the environment – this should cover direct effects but also any indirect, secondary, cumulative, short, medium, and long term, permanent and temporary, positive, and negative effects. Effects should relate to the existence of the development, the use of natural resources (in particular land, soil, water and biodiversity) and the emissions from pollutants. This should also include a description of the forecasting methods to predict the likely effects on the environment
- A description of the measures envisaged to prevent, reduce and where possible offset any significant adverse effects on the environment
- A non-technical summary of the information
- An indication of any difficulties (technical deficiencies or lack of know-how) encountered by the applicant in compiling the required information

Further guidance is set out in Planning Practice Guidance on [environmental assessment](#) and [natural environment](#).

Cumulative and in-combination effects

The ES should fully consider the implications of the whole development proposal. This should include an assessment of all supporting infrastructure.

An impact assessment should identify, describe, and evaluate the effects that are likely to result from the project in combination with other projects and activities that are being, have been or will be carried out. The following types of projects should be included in such an assessment (subject to available information):

- a. existing completed projects;
- b. approved but uncompleted projects;
- c. ongoing activities;
- d. plans or projects for which an application has been made and which are under consideration by the consenting authorities; and
- e. plans and projects which are reasonably foreseeable, i.e. projects for which an application has not yet been submitted, but which are likely to progress before completion of the development and for which sufficient information is available to assess the likelihood of cumulative and in-combination effects.

Environmental data

Natural England is required to make available information it holds where requested to do so. National datasets held by Natural England are available at <http://www.naturalengland.org.uk/publications/data/default.aspx>.

Detailed information on the natural environment is available at www.magic.gov.uk.

Natural England's SSSI Impact Risk Zones are a GIS dataset which can be used to help identify the potential for the development to impact on a SSSI. The dataset and user guidance can be accessed from the [Natural England Open Data Geoportal](#).

Natural England does not hold local information on local sites, local landscape character, priority habitats and species or protected species. Local environmental data should be obtained from the appropriate local bodies. This may include the local environmental records centre, the local wildlife trust, local geo-conservation group or other recording society.

Biodiversity and Geodiversity

General principles

The [National Planning Policy Framework](#) (paragraphs 180-181 and 185-188) sets out how to take account of biodiversity and geodiversity interests in planning decisions. Further guidance is set out in Planning Practice Guidance on the [natural environment](#).

The potential impact of the proposal upon sites and features of nature conservation interest and opportunities for nature recovery and biodiversity net gain should be included in the assessment.

Ecological Impact Assessment (EclA) is the process of identifying, quantifying, and evaluating the potential impacts of defined actions on ecosystems or their components. EclA may be carried out as part of the EIA process or to support other forms of environmental assessment or appraisal. [Guidelines](#) have been developed by the Chartered Institute of Ecology and Environmental Management (CIEEM).

Local planning authorities have a [duty](#) to conserve and enhance biodiversity as part of their decision making. Conserving biodiversity can include habitat restoration or enhancement. Further information is available [here](#).

Designated nature conservation sites

The proposal is unlikely to adversely impact any European or internationally designated nature conservation sites (including 'habitats sites' under the NPPF) or nationally designated sites (Sites of Special Scientific Interest, National Nature Reserves or Marine Conservation Zones).

Regionally and Locally Important Sites

The ES should consider any impacts upon local wildlife and geological sites, including local nature reserves. Local Sites are identified by the local wildlife trust, geoconservation group or other local group and protected under the NPPF (paragraph 180 and 181). The ES should set out proposals for mitigation of any impacts and if appropriate, compensation measures and opportunities for enhancement and improving connectivity with wider ecological networks. Contact the relevant local body for further information.

Protected Species

The conservation of species protected under the Wildlife and Countryside Act 1981 and the Conservation of Habitats and Species Regulations 2017

is explained in Part IV and Annex A of Government Circular 06/2005 [Biodiversity and Geological Conservation: Statutory Obligations and their Impact within the Planning System.](#)

The ES should assess the impact of all phases of the proposal on protected species (including, for example, great crested newts, reptiles, birds, water voles, badgers and bats). Natural England does not hold comprehensive information regarding the locations of species protected by law. Records of protected species should be obtained from appropriate local biological record centres, nature conservation organisations and local groups. Consideration should be given to the wider context of the site, for example in terms of habitat linkages and protected species populations in the wider area.

The area likely to be affected by the development should be thoroughly surveyed by competent ecologists at appropriate times of year for relevant species and the survey results, impact assessments and appropriate accompanying mitigation strategies included as part of the ES. Surveys should always be carried out in optimal survey time periods and to current guidance by suitably qualified and, where necessary, licensed, consultants.

Natural England has adopted [standing advice](#) for protected species, which includes guidance on survey and mitigation measures. A separate protected species licence from Natural England or Defra may also be required.

District Level Licensing for Great Crested Newts

District level licensing (DLL) is a type of strategic mitigation licence for great crested newts (GCN) granted in certain areas at a local authority or wider scale. A [DLL scheme for GCN](#) may be in place at the location of the development site. If a DLL scheme is in place, developers can make a financial contribution to strategic, off-site habitat compensation instead of applying for a separate licence or carrying out individual detailed surveys. By demonstrating that DLL will be used, impacts on GCN can be scoped out of detailed assessment in the Environmental Statement.

Priority Habitats and Species

Priority Habitats and Species are of particular importance for nature conservation and included in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest, on the Magic website or as Local Wildlife Sites. Lists of priority habitats and species can be found [here](#). Natural England does not routinely hold species data. Such data should be collected when impacts on priority habitats or species are considered likely.

Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land. Sites can be checked against the (draft) national Open Mosaic Habitat (OMH) inventory published by Natural England and freely available to [download](#). Further information is also available [here](#).

An appropriate level habitat survey should be carried out on the site, to identify any important habitats present. In addition, ornithological, botanical, and invertebrate surveys should be carried out at appropriate times in the year, to establish whether any scarce or priority species are present.

The Environmental Statement should include details of:

- Any historical data for the site affected by the proposal (e.g. from previous surveys)
- Additional surveys carried out as part of this proposal
- The habitats and species present
- The status of these habitats and species (e.g. whether priority species or habitat)
- The direct and indirect effects of the development upon those habitats and species
- Full details of any mitigation or compensation measures
- Opportunities for biodiversity net gain or other environmental enhancement

Ancient Woodland, ancient and veteran trees

The ES should assess the impacts of the proposal on any ancient woodland, ancient and veteran trees, and the scope to avoid and mitigate for adverse impacts. It should also consider opportunities for enhancement.

Natural England maintains the Ancient Woodland [Inventory](#) which can help identify ancient woodland. The [wood pasture and parkland inventory](#) sets out information on wood pasture and parkland.

The [ancient tree inventory](#) provides information on the location of ancient and veteran trees.

Natural England and the Forestry Commission have prepared [standing advice](#) on ancient woodland, ancient and veteran trees.

Biodiversity net gain

Paragraph 180 of the NPPF states that decisions should contribute to and enhance the natural and local environment by minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.

Biodiversity Net Gain is additional to statutory requirements relating to designated nature conservation sites and protected species.

Proposals for mandatory biodiversity net gain should be in line with the Environment Act 2021 and supporting regulations. Further information on biodiversity net gain, including [draft Planning Practice Guidance](#), can be found [here](#)

The statutory [biodiversity metric](#), together with ecological advice, should be used to calculate the change in biodiversity resulting from proposed development and demonstrate how proposals can achieve a net gain.

The metric should be used to:

- assess or audit the biodiversity unit value of land within the application area
- calculate the losses and gains in biodiversity unit value resulting from proposed development
- demonstrate that the required percentage biodiversity net gain will be achieved

Biodiversity Net Gain outcomes can be achieved on site, off-site or through a combination of both. On-site provision should be considered first. Delivery should create or enhance habitats of equal or higher value. When delivering net gain, opportunities should be sought to link delivery to relevant plans or strategies e.g. Green Infrastructure Strategies or Local Nature Recovery Strategies.

Opportunities for wider environmental gains should also be considered.

Landscape

Landscape and visual impacts

The environmental assessment should refer to the relevant [National Character Areas](#). Character area profiles set out descriptions of each landscape area and statements of environmental opportunity.

The ES should include a full assessment of the potential impacts of the development on local landscape character using [landscape assessment methodologies](#). We encourage the use of Landscape Character Assessment (LCA), based on the good practice guidelines produced jointly by the Landscape Institute and Institute of Environmental Assessment in 2013. LCA provides a sound

basis for guiding, informing, and understanding the ability of any location to accommodate change and to make positive proposals for conserving, enhancing or regenerating character.

A landscape and visual impact assessment should also be carried out for the proposed development and surrounding area. Natural England recommends use of the methodology set out in *Guidelines for Landscape and Visual Impact Assessment 2013* ((3rd edition) produced by the Landscape Institute and the Institute of Environmental Assessment and Management. For National Parks and AONBs, we advise that the assessment also includes effects on the 'special qualities' of the designated landscape, as set out in the statutory management plan for the area. These identify the particular landscape and related characteristics which underpin the natural beauty of the area and its designation status.

The assessment should also include the cumulative effect of the development with other relevant existing or proposed developments in the area. This should include an assessment of the impacts of other proposals currently at scoping stage.

To ensure high quality development that responds to and enhances local landscape character and distinctiveness, the siting and design of the proposed development should reflect local characteristics and, wherever possible, use local materials. Account should be taken of local design policies, design codes and guides as well as guidance in the [National Design Guide](#) and [National Model Design Code](#). The ES should set out the measures to be taken to ensure the development will deliver high standards of design and green infrastructure. It should also set out detail of layout alternatives, where appropriate, with a justification of the selected option in terms of landscape impact and benefit.

Heritage Landscapes

The ES should include an assessment of the impacts on any land in the area affected by the development which qualifies for conditional exemption from capital taxes on the grounds of outstanding scenic, scientific, or historic interest. An up-to-date list is available at www.hmrc.gov.uk/heritage/lbsearch.htm.

Connecting People with nature

The ES should consider potential impacts on access land, common land, public rights of way and, where appropriate, the England Coast Path and coastal access routes and coastal margin in the vicinity of the development, in line with NPPF paragraph 104. It should assess the scope to mitigate for any adverse impacts. Rights of Way Improvement Plans (ROWIP) can be used to identify public rights of way within or adjacent to the proposed site that should be maintained or enhanced.

Measures to help people to better access the countryside for quiet enjoyment and opportunities to connect with nature should be considered. Such measures could include reinstating existing footpaths or the creation of new footpaths, cycleways, and bridleways. Links to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider green infrastructure. Access to nature within the development site should also be considered, including the role that natural links have in connecting habitats and providing potential pathways for movements of species.

Relevant aspects of local authority green infrastructure strategies should be incorporated where appropriate.

Soils and Agricultural Land Quality

Soils are a valuable, finite natural resource and should also be considered for the ecosystem services they provide, including for food production, water storage and flood mitigation, as a carbon store, reservoir of biodiversity and buffer against pollution. It is therefore important that the soil

resources are protected and sustainably managed. Impacts from the development on soils and best and most versatile (BMV) agricultural land should be considered in line with paragraphs 180 and 181 of the NPPF. Further guidance is set out in the Natural England [Guide to assessing development proposals on agricultural land](#).

As set out in paragraph 217 of the NPPF, new sites or extensions to sites for peat extraction should not be granted planning permission.

The following issues should be considered and, where appropriate, included as part of the Environmental Statement (ES):

- The degree to which soils would be disturbed or damaged as part of the development
- The extent to which agricultural land would be disturbed or lost as part of this development, including whether any best and most versatile (BMV) agricultural land would be impacted.

This may require a detailed Agricultural Land Classification (ALC) survey if one is not already available. For information on the availability of existing ALC information see www.magic.gov.uk.

- Where an ALC and soil survey of the land is required, this should normally be at a detailed level, e.g. one auger boring per hectare, (or more detailed for a small site) supported by pits dug in each main soil type to confirm the physical characteristics of the full depth of the soil resource, i.e. 1.2 metres. The survey data can inform suitable soil handling methods and appropriate reuse of the soil resource where required (e.g. agricultural reinstatement, habitat creation, landscaping, allotments and public open space).
- The ES should set out details of how any adverse impacts on BMV agricultural land can be minimised through site design/masterplan.
- The ES should set out details of how any adverse impacts on soils can be avoided or minimised and demonstrate how soils will be sustainably used and managed, including consideration in site design and master planning, and areas for green infrastructure or biodiversity net gain. The aim will be to minimise soil handling and maximise the sustainable use and management of the available soil to achieve successful after-uses and minimise off-site impacts.

Further information is available in the [Defra Construction Code of Practice for the Sustainable Use of Soil on Development Sites](#) and The British Society of Soil Science Guidance Note [Benefitting from Soil Management in Development and Construction](#).

Air Quality

Air quality in the UK has improved over recent decades but air pollution remains a significant issue. For example, approximately 85% of protected nature conservation sites are currently in exceedance of nitrogen levels where harm is expected (critical load) and approximately 87% of sites exceed the level of ammonia where harm is expected for lower plants (critical level of 1µg) ^[1]. A priority action in the England Biodiversity Strategy is to reduce air pollution impacts on biodiversity. The Government's Clean Air Strategy also has a number of targets to reduce emissions including to reduce damaging deposition of reactive forms of nitrogen by 17% over England's protected priority sensitive habitats by 2030, to reduce emissions of ammonia against the 2005 baseline by 16% by 2030 and to reduce emissions of NO_x and SO₂ against a 2005 baseline of 73% and 88% respectively by 2030. Shared Nitrogen Action Plans (SNAPs) have also been identified as a tool to

^[1] [Report: Trends Report 2020: Trends in critical load and critical level exceedances in the UK - Defra, UK](#)

reduce environmental damage from air pollution.

The planning system plays a key role in determining the location of developments which may give rise to pollution, either directly, or from traffic generation, and hence planning decisions can have a significant impact on the quality of air, water and land. The ES should take account of the risks of air pollution and how these can be managed or reduced. This should include taking account of any strategic solutions or SNAPs, which may be being developed or implemented to mitigate the impacts on air quality. Further information on air pollution impacts and the sensitivity of different habitats/designated sites can be found on the Air Pollution Information System (www.apis.ac.uk).

Information on air pollution modelling, screening and assessment can be found on the following websites:

- SCAIL Combustion and SCAIL Agriculture - <http://www.scail.ceh.ac.uk/>
- Ammonia assessment for agricultural development <https://www.gov.uk/guidance/intensive-farming-risk-assessment-for-your-environmental-permit>
- Environment Agency Screening Tool for industrial emissions <https://www.gov.uk/guidance/air-emissions-risk-assessment-for-your-environmental-permit>
- Defra Local Air Quality Management Area Tool (Industrial Emission Screening Tool) – England <http://www.airqualityengland.co.uk/laqm>

Water Quality

The planning system plays a key role in determining the location of developments which may give rise to water pollution, and hence planning decisions can have a significant impact on water quality, and land. The assessment should take account of the risks of water pollution and how these can be managed or reduced. A number of water dependent protected nature conservation sites have been identified as failing condition due to elevated nutrient levels and nutrient neutrality is consequently required to enable development to proceed without causing further damage to these sites. The ES needs to take account of any strategic solutions for nutrient neutrality or Diffuse Water Pollution Plans, which may be being developed or implemented to mitigate and address the impacts of elevated nutrient levels. Further information can be obtained from the Local Planning Authority.

Climate Change

The ES should identify how the development affects the ability of the natural environment (including habitats, species, and natural processes) to adapt to climate change, including its ability to provide adaptation for people. This should include impacts on the vulnerability or resilience of a natural feature (i.e. what's already there and affected) as well as impacts on how the environment can accommodate change for both nature and people, for example whether the development affects species ability to move and adapt. Nature-based solutions, such as providing green infrastructure on-site and in the surrounding area (e.g. to adapt to flooding, drought and heatwave events), habitat creation and peatland restoration, should be considered. The ES should set out the measures that will be adopted to address impacts.

Further information is available from the [Committee on Climate Change's \(CCC\) Independent Assessment of UK Climate Risk](#), the [National Adaptation Programme \(NAP\)](#), the [Climate Change Impacts Report Cards](#) (biodiversity, infrastructure, water etc.) and the [UKCP18 climate projections](#).

The Natural England and RSPB [Climate Change Adaptation Manual](#) (2020) provides extensive information on climate change impacts and adaptation for the natural environment and adaptation focussed nature-based solutions for people. It includes the Landscape Scale Climate Change Assessment Method that can help assess impacts and vulnerabilities on natural environment features and identify adaptation actions. Natural England's [Nature Networks Evidence Handbook](#) (2020) also provides extensive information on planning and delivering nature networks for people

and biodiversity.

The ES should also identify how the development impacts the natural environment's ability to store and sequester greenhouse gases, in relation to climate change mitigation and the natural environment's contribution to achieving net zero by 2050. Natural England's [Carbon Storage and Sequestration by Habitat report](#) (2021) and the British Ecological Society's [nature-based solutions report](#) (2021) provide further information.

Contribution to local environmental initiatives and priorities

The ES should consider the contribution the development could make to relevant local environmental initiatives and priorities to enhance the environmental quality of the development and deliver wider environmental gains. This should include considering proposals set out in relevant local strategies or supplementary planning documents including landscape strategies, green infrastructure strategies, tree and woodland strategies, biodiversity strategies or biodiversity opportunity areas.

From: Aaron Walsh <Aaron.Walsh@networkrail.co.uk> **On Behalf Of** Town Planning LNE
Sent: Wednesday, July 31, 2024 12:16 PM
To: Planning Control <Planning.Control@north-herts.gov.uk>
Subject: 24/00920/SCOP - Land East Of North Road And North Of The Railway Line, Bygrave Road, Baldock, Herts

OFFICIAL

Network Rail Consultation Response

FAO:	Justin Booji
Date:	31/07/2024
Application reference	24/00920/SCOP
Proposal:	Up to 3,000 homes; up to 19 hectares of employment land; strategic 'green infrastructure'; a mixed use local centre; education provision; and associated infrastructure
Location:	Land East Of North Road And North Of The Railway Line, Bygrave Road, Baldock, Hertfordshire

Thank you for your recent correspondence relating to the above screening opinion.

Network Rail own, operate and develop Britain's railway infrastructure. Our role is to deliver a safe and reliable railway. All consultations are assessed with the safety of the operational railway in mind and responded to on this basis.

We understand that the proposed development seeks the provision of new bridge crossings over the railway. There is a method by which we take forward the grant of any necessary rights for the bridges, which has been issued by our colleagues in property (Mike Stancliffe). Any part of the scheme that would require the use of, or access across railway owned land including the operational railway itself, the developer will be required to obtain the necessary agreements and consents (easement agreements, wayleaves, licences etc) from Network Rail going forward. We would strongly recommend that the developer continues to engage with us early in the development of their scheme to ensure such matters are resolved well in advance.

In addition, Network Rail's policy is to seek the closure of level crossings wherever possible on safety grounds; the developments around Baldock area will clearly increase the usage of Bygrave Level Crossing (Footpath user crossing with stiles) to an unacceptable level. Therefore Network Rail would expect the development to promote a diversion of the PROW on the level crossing onto the proposed road bridge and for the subsequent closure of the crossing.

Impact on Network Rail Infrastructure

With reference to the protection of the railway, the Environmental Impact Assessment should consider any impact of the scheme upon the railway infrastructure and upon operational railway safety. It should also include a Transport Assessment to identify any HGV traffic/haulage routes associated with the construction and operation of the site that may utilise railway assets such as bridges and level crossings during the construction and operation of the site. The developer will also need to take into account the effect of the development on Baldock station itself, including station improvements, given the number of residential dwellings to be introduced, and we would require further engagement in regard to this element.

Conclusion

Thank you again for the opportunity to comment on the proposed scheme. We trust that the above will be given due consideration in determining the application and if you have any enquiries in relation to the above, please contact us at townplanninglne@networkrail.co.uk.

Useful Network Rail contacts;

Asset Protection Eastern

For enquiries, advice and agreements relating to construction methodology, works in proximity to the railway boundary, drainage works, or schemes in proximity to railway tunnels (including tunnel shafts) please email assetprotectioneastern@networkrail.co.uk.

Land Information

For enquiries relating to land ownership enquiries, please email landinformation@networkrail.co.uk.

Property Services

For enquiries relating to agreements to use, purchase or rent Network Rail land, please email propertyservicesneem@networkrail.co.uk.

Kind regards



Aaron Walsh

Town Planning Technician

Network Rail Land & Property (Eastern)

George Stephenson House, ToŌ Green, York, YO1 6JT

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