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20 November 2025

Dear Mr Greaves

**Application number: 25/2571/OP**

**Location: Growing Baldock development site**

**Proposal: Outline application with all matters reserved except for means of highway access into the development from the A505/Royston Road, North Road and Clothall Road for: up to 3,200 homes, up to 16ha of employment, waste and leisure infrastructure, a mixed use local centre, up to 1 secondary school, up to 2 x primary schools, up to 1 SEND school, health hub, green infrastructure (including parks, formal sports provision, play, habitat areas, informal open space and structural planting), internal street network, access junctions and railway crossing, public transport infrastructure, pedestrian/cycle network (including PRow diversions, active travel routes, mobility hubs and crossing of the railway), utilities and drainage infrastructure (including diversions of existing and provision of new infrastructure, pumping stations, sustainable drainage, primary substations, rising main/strategic sewer and renewable energy infrastructure), ground remodelling/earthworks and any necessary demolitions.**

Thank you for consulting the Herts & Middlesex Wildlife Trust (HMWT) on this planning application. HMWT notes that the site is allocated in the North Herts Local Plan, and a strategic masterplan for the site has been agreed by North Herts Council. We acknowledge the significant work that the applicant has undertaken to bring forward a proposal that retains or enhances many of the ecological features of the site. However, we have a number of concerns about the ecological impacts, and would like the applicant to take the opportunity to be more ambitious for biodiversity.

The Herts and Middlesex Wildlife Trust therefore **objects** to this planning application due to:

- Impact on Corn Bunting (*Emberiza calandra*), a Red-listed species, and lack of detail about the Corn Bunting mitigation and compensation strategy;
- Uncertainty over impacts on the chalk aquifer and Ivel Springs Local Nature Reserve;
- Lack of provision for species which rely on buildings for nesting or roosting, specifically Swift (*Apus apus*) and species of bats;

- Insufficient ambition for biodiversity net gain, despite the provision of a significant amount of green infrastructure. The development should be achieving at least 30% biodiversity net gain.

I deal with each of these in more detail below.

### **Impact on Corn Bunting (*Emberiza calandra*).**

Corn Buntings are on the UK Red List, having declined by 83% between 1967 and 2022. There was a steep decline between the mid 1970s and 1980s, with local extinctions across large sections of their former range. The decline has continued, but at a reduced rate until around 2000, since when numbers have remained relatively stable. Recently there have been sign of recovery in some areas.<sup>1</sup>

The situation in Hertfordshire mirrors that of national decline. A 2014 survey of the tetrad (an area of 2 km x 2 km) covering Bygrave Common recorded 14 singing male birds, which indicate breeding pairs, plus an additional 12 birds which were non-singing. In Hertfordshire there were a total of only 170 singing male birds, which means this tetrad holds nearly 10% of the total breeding pairs and is central to this local population (data courtesy of Herts Bird Club).

The importance of the site has been confirmed by subsequent surveys; a 2022 breeding Corn Bunting survey showed that the site supports 20 Corn Bunting territories, 10% of the singing male Corn Buntings in Hertfordshire (Phase 2 Ecological Assessment, BMD). Ten of these territories are within site BA1. A 2024 survey recorded 21 singing males.

In the absence of mitigation, the Environment Statement assesses the construction-phase impacts as Moderate Adverse at County level for Corn Bunting. For the operational phase, the loss of suitable habitat is expected to result in a loss of approximately 50% of Corn Bunting territories within the site (i.e. 10-11 pairs), despite mitigation, which is assessed as a Minor Adverse effect at County level.

The report by BSG ecology carried out for North Herts District Council in 2016 ('Guidance note: Corn Bunting')<sup>2</sup> found that "All corn bunting territories within the site are likely to be lost as a result of development. Due to the habitat requirements of corn bunting no on-site mitigation is considered possible." The site here refers to site BA1. Although the specifics of the proposal have changed since then, we believe that this conclusion is still valid, despite mitigation measures. The applicant needs to demonstrate why they have come to a different conclusion.

The Green Infrastructure Strategy proposes a number of on-site mitigation measures, notably the creation of a Bygrave Common ecological area which creates a new open chalk grassland habitat, featuring areas of scattered trees and scrub to support a range of species, including Corn Bunting. While there is much to welcome here, the impact on Corn Buntings is uncertain. Bygrave Common as a whole is intended to be a new destination public parkland, with the public access part of it only separated from the ecological area by a wooded landscape buffer along the ridgeline.

The Environmental Statement acknowledges the potential impact of cat predation. In our view this is likely to be understated, and together with disturbance from humans and their dogs is likely to result

<sup>1</sup> RSPB website <https://www.rspb.org.uk/birds-and-wildlife/corn-bunting>

<sup>2</sup> BSG ecology (2016) Blackhorse Farm, Baldock. Guidance note: Corn Bunting.

in a higher impact on Corn Buntings, with the possibility that the impact of the operational phase is also Moderate Adverse at the County level. There is undeniably a risk that, in a worst-case scenario, all Corn Bunting territories on the site are lost to the development, so compensation measures need to be planned on this basis.

The applicant proposes off-site measures for Corn Buntings which are repeatedly referred to as mitigation measures when they are in fact compensation measures. What would be very helpful, given the multiplicity of documents in which Corn Buntings appear, is a bespoke Corn Bunting Mitigation and Compensation Strategy which pulls together all the information and proposals relating to Corn Buntings in a useable way (as proposed by the 2016 BSG report).

We do not object in principle to the Corn Bunting compensation measures as proposed, i.e. through enhancing habitat in other areas of arable land which already support Corn Buntings but are not at carrying capacity, within reasonable proximity to the site. The 2016 BSG report presents a useful outline of environmental measures to address impacts on Corn Bunting (section 4 of that report). Measures should also be designed to benefit the wider suite of farmland birds as far possible.

However, we need clarity on a number of issues, such as the rationale for site selection, and why only 3 sites were resurveyed in 2023 out of 5 potential 'mitigation' sites which were considered in 2017 and 2019. This appears to be simply because these are the three sites closest to the development site, but it is difficult to judge how many sites will be needed without clarity about the number of territories which the compensation measures are intended to achieve (i.e. what is the net gain in territories on those sites?). HMWT has contact with farmers in the area who have shown commitment to nature conservation and may be willing to host compensation sites; we would welcome further discussion about the suitability of compensation sites.

The local planning authority needs to ensure that the compensation measures are put in place before development commences, are legally and financially secured in perpetuity, and with appropriate monitoring measures. These could all be dealt with in a Corn Bunting Mitigation and Compensation Strategy as suggested.

However, at the moment we do not have these details and so HMWT **objects** to the proposed development on the grounds of impact on Corn Buntings and lack of detail about the Corn Bunting mitigation and compensation strategy. The proposal is also therefore contrary to Policy NE4 of the North Hertfordshire Local Plan, which states that:

*"Applicants should, having regard to the status of any affected site(s) or feature(s):*

*b) Demonstrate that adverse effects can be avoided and/or satisfactorily minimised having regard to the hierarchy of protection below:*

- i. locating on an alternative site with a less harmful impact;*
- ii. providing adequate mitigation measures; or*
- iii as a last resort compensated for.*

### **Uncertainty over impacts on the chalk aquifer and Ivel Springs Local Nature Reserve**

Ivel Springs Local Nature Reserve is susceptible to ecological pressures, as the Environmental Statement notes (paragraph 4.5). It is dependent on the chalk aquifer for its good health. Impacts do

not come just from changes in drainage or surface water flows resulting from the proposed development, which are considered in some detail in the Environmental Statement. Impacts may arise from the abstraction of water from the chalk aquifer and the treatment of waste water arising from the development. There is little in the Environmental Statement which addresses these issues in detail. There is a reported statement from Anglian Water that there is capacity to treat waste water at a treatment works in Letchworth, which is to be connected via a pumped rising main (paragraph 10.3.8). There is also a statement from Affinity Water that water supply from their network is sourced from man-made reservoirs and chalk bores located within their supply area (paragraph 16.4.13). The statement at paragraph 16.5.5 that therefore the aquifer will not be impacted is concerning, since chalk bores must be abstracting from the aquifer.

Further detail is required of impacts on the chalk aquifer. Until this is provided, HMWT objects due to the uncertainty over impacts.

### **Lack of provision for Swifts and bats**

Swifts are summer migrants to the UK and a familiar species in urban areas, but their numbers declined by 62% between 1995 and 2021 and they are now on the Red List of Birds of Conservation Concern. The loss of suitable nesting sites when buildings are renovated or demolished is likely to be a key factor in their decline, so providing integral swift bricks (which are more durable and less obtrusive than external boxes) in new buildings is an easy and cheap solution. Even when they are not used by Swifts, they benefit other red listed urban species such as House Sparrows, Starlings and House Martins. For housing developments this should be at a ratio of one brick per dwelling, as recommended by National Planning Practice Guidance.

All species of bats are legally protected and, like Swifts, have suffered population decline which may be due in part to the loss of roosting sites in modern buildings. Integral bat bricks are part of the solution for new developments.

*“187. Planning policies and decisions should contribute to and enhance the natural and local environment by ...*

*d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures and incorporating features which support priority or threatened species such as swifts, bats and hedgehogs ...”*

NPPF paragraph 187

National Planning Practice Guidance:

*How can developments incorporate features which support priority or threatened species?*

*The National Planning Policy Framework expects development proposals to bolster wildlife by incorporating features which support priority or threatened species such as swifts, bats and hedgehogs.*

*The use of swift bricks is particularly important in this context because swifts rely on urban cavities for nesting, and the national loss of suitable nesting sites through building renovation has been part of the reason for the species' decline. Developments should include integrated nest boxes (commonly known as swift bricks) where possible, with the general aim across a development of a*

*minimum of one nest box per unit. Nest boxes can provide important habitat for other species as well as swifts, such as starlings and sparrows.*

*Extensive guidance is available on wildlife friendly features, including the National Design Guide and National Model Design Code which illustrate how well-designed places can support rich and varied biodiversity by facilitating habitats and routes for wildlife. More specific support for the selection and installation of swift bricks can be found in the British Industry Standard BS 42021:2022 the Future Homes Hub Homes for Nature Guidance, and the RSPB's Guide to Nestboxes.*

Paragraph: 017 Reference ID: 8-017-20250609

The applicant's Ecological Mitigation Plan states that built-in nesting features into the buildings should include those suitable for Swifts, House Martin, House Sparrow, Starling and tits (paragraph 4.4.25) and discusses bird boxes, but there is nothing about integral Swift bricks. BMD's Preliminary Ecological Assessment recommends that Swift bricks and House Martin 'nest cups' should be a core focus of onsite enhancement schemes (p47). We do not recommend the use of House Martin nest cups, as integral Swift bricks are a universal solution not only for Swifts but for other building-nesting species such as House Martin, House Sparrow and Starling. They are also more durable and aesthetically pleasing.

We would like Urban & Civic to commit to providing integrated Swift bricks at a ratio of one brick per dwelling across the development, and the local planning authority should secure this by means of a condition, such as, "No development shall take place of any phase of the development until written details are approved by the local planning authority of the model and location of integrated Swift bricks at a ratio of 1 per dwelling, to be fully installed prior to occupation and retained thereafter."

Provision should also be made for integrated bat bricks, in accordance with NPPF policy.

### **Insufficient ambition for biodiversity net gain**

The Green Infrastructure Strategy (part 8) states that, "The scheme will deliver policy compliant biodiversity net gain which is 10%, however, given the opportunities within retained habitat and extensive landscape proposals we will aspire to achieve beyond this."

According to the Biodiversity Net Gain report, the total net unit change for area habitat is 35.45%, and for hedgerows is 19.7%. This gives a good indication of the scale of opportunity across the site.

It is disappointing that the applicant only commits to the statutory minimum; an aspiration to go beyond this is worthy but not sufficiently ambitious. We realise that on a multi-site, multi-phase development which will likely be built out over many years it is difficult to be precise about the amount of biodiversity net gain which will ultimately be provided. However, a development at this scale should be setting an example and we believe should be achieving at least 30% biodiversity net gain in terms of habitat units, based on the opportunities identified in the Green Infrastructure Strategy and the Biodiversity Net Gain report.

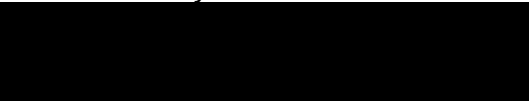
The local planning authority should seek to secure this through condition or legal agreement in the event that planning permission is granted.

**Management and maintenance options**

We note that in section 10 of the Green Infrastructure Strategy, the applicant states that they are exploring a number of options for the long-term management of the green infrastructure, including stewardship by the Wildlife Trust. While we are open to this possibility, subject to the satisfactory resolution of our objections to the proposal, we have not yet had any approach from Urban & Civic about the matter.

Please contact me if you wish to discuss any of these issues in further detail.

Yours sincerely

A solid black rectangular box used to redact the signature of Simon Marsh.

Simon Marsh MBE BA MA MSc MRTPI  
Planning and Policy Manager