

Shaun Greaves
Development and Conservation Manager
North Herts Council
PO Box 10613
Nottingham
NG6 6DW

Grebe House
St Michael's Street
St Albans
AL3 4SN


info@hmwt.org
hertswildlifetrust.org.uk

Email: planning.control@north-herts.gov.uk

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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 your letter of 18 March re-consulting the Herts & Middlesex Wildlife Trust (HMWT) on amendments to the above proposal. I note in particular the correspondence by Jonathan Wood of BMD on the planning application portal responding to our concerns. If BMD had contacted me directly I might have been able to respond in a more timely way as I was not aware of the correspondence until over a month after it was placed on the portal. Having said, that, I will try to address his points.

Corn buntings

In my previous response, I was not referring to cat predation solely but the combined impacts of cat predation, human and dog disturbance. For corn bunting territories on the periphery of the site, I accept that there is a degree of separation from new residential areas and the more intensive uses of green infrastructure. Nonetheless I still consider that there is a degree of risk to these territories and it would be prudent to assume, on a precautionary basis, that these territories might be lost and compensation planned accordingly.

I am not surprised that there is no empirical evidence that cat predation is a limiting factor for corn bunting populations in an arable landscape (or indeed a grassland landscape, noting that the proposal is to replace arable fields with grassland habitat). However, the impacts of cat predation on sensitive bird species is well-known and has been an issue in previous planning cases (such as Dartford Warbler in the Thames Basin Heaths).

I note the points on off-site mitigation, which are helpful, although I re-iterate that this is off-site compensation, not mitigation. As previously stated, the local planning authority will need to secure a suitable off-site compensation strategy legally and financially in perpetuity. This matter could be dealt with by a planning condition and/or a legal agreement.

Swift nesting provision

To clarify, it is not our intention that every dwelling should necessarily have a swift brick, but that the general ratio across a development should be a minimum of one nest box per unit, which leaves scope for clustering swift bricks where the height and orientation of buildings allows it. This is my reading of National Planning Practice Guidance and is in line with best practice. We are aligned with BMD on this point.

Biodiversity net gain

The comments are noted but we remain of the view that a site of this scale should seek an ambitious level of biodiversity net gain such as 30%, without retaining surplus units for use on other sites or registering them as off-site biodiversity units, as this diminishes the overall pool of new habitat creation.

Aquifer and water resources

We appreciate the clarification and accordingly withdraw our objection on these points.

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

Yours sincerely

A black rectangular box redacting the signature of Simon Marsh.

Simon Marsh MBE BA MA MSc MRTPI
Planning and Policy Manager