



ENGLAND

01/07/26

By email

Dear Sir/Madam

RE: Outline Planning Application 25/02571/OP Growing Baldock Development Site – Additional Information

The RSPB has read and considered the additional information provided by the proponent – specifically Appendix 11.1 - 'Corn Bunting Mitigation Strategy (On-site)' and Appendix 11.2 – 'Corn Bunting Mitigation (Off-site)'. As set out below, although we welcome this additional information, which provides the missing information we had requested, we still have **significant concerns** regarding this proposal's impacts on North Hertfordshire's corn bunting population.

On-site Mitigation

We welcome this additional information. Appendix 11.1 sets out clearly the measures and principles that will be employed to try to retain corn bunting territories within the red-line development. We support the measures as set out and believe that if these are implemented properly, they provide the possibility for some corn bunting territories to be retained on site.

Regarding the measures set out in section 6.4.4 including habitat and landform modifications to keep cats and dogs out of core areas – we are dubious as to the efficacy of these, as our experience is that predatory animals will invariably find ways into areas if they are so inclined. However, we acknowledge that when these are combined with other measures set out, they may have some additional benefit.

As set out in the document, it will be important for all the elements suggested, eg: inclusion of measures in HMP and LEMP, provision of long-term monitoring and iterative adaptive management, to form part of the conditions if the council is minded to consent.

Off-site Mitigation

The RSPB welcomes the detail provided about the Homestead/Plan F land and the management measures detailed to provide suitable habitat within the farming operation for corn bunting. Contrary to Section 2.3, the RSPB has not questioned the principle of providing compensatory corn bunting habitat within an existing farming operation, and much of the advice we give landowners is exactly to provide habitat for farmland birds within commercial arable farms.

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Rather, our concerns about efficacy related to the inherent uncertainty that comes with trying to provide compensatory habitat, as set out below.

We welcome the proposed management measures as set out, and the proposals for long term monitoring and adaptive management. As above, if the Council is minded to consent, it will be important to put in place rigorous conditions and legal agreements to ensure a mitigation and compensation strategy is implemented and secured and financed long term (as set out in section 6.1).

Precautionary Principle

Notwithstanding the above, the RSPB still has significant concerns about this Outline Application. We still believe that retaining 50% of the corn bunting breeding territories on site, even with the measures and principles as set out, is optimistic. In addition, as stated above, habitat creation comes with inherent uncertainty as to whether it will work and to what extent target species will respond – even within the context of an existing meta-population in the surrounding landscape, as set out in section 2.3 of Appendix 11.2.

We acknowledge that the 3.5ha territory size from our research may be conservative and that where optimal nesting conditions exist, territories may well be more concentrated. However, in our view, for the proposal to not impact the North Hertfordshire corn bunting population, the on-site mitigation predictions and offsite habitat would both have to succeed as planned, with very little wriggle room for failure.

This is not precautionary, and we would expect a bigger off-site compensation area to be provided up-front to address these uncertainties. We acknowledge the proposed adaptive management approach and also the possibility set out in section 7.6.5 of Appendix 11.2 that additional compensation measures could be pursued if those proposed do not deliver the results required. However, this leaves uncertainty as to how these additional compensation areas would be enforced, secured and managed.

If the council were minded to grant consent, we would encourage you to find a suitable legal mechanism to ensure that if long-term monitoring shows that corn bunting populations are not reacting as planned, that further compensation land is provided and managed long-term.

Yours Sincerely

A black rectangular box used to redact the signature of Daniel Pullan.

Daniel Pullan, MRTPI
Senior Conservation Officer