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By Email

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Application Ref: 25/02571/OP

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

Subject: Growing Baldock – response to RSPB representation dated 2 July 2026 and clarification of corn bunting compensation strategy

Dear Liz,

We write further to the recent RSPB representation dated 2 July 2026 in respect of the updated corn bunting mitigation and compensation information submitted for the Growing Baldock outline planning application.

We understand that the principal outstanding points relate to the off-site corn bunting compensation strategy, including the extent and sufficiency of the Homestead compensation land, whether further land should be identified at this stage, the duration of management and monitoring, and how the strategy would be reviewed if the proposed measures do not perform as anticipated.

This letter provides BMD's consolidated response to those matters and explains how we propose to clarify the Off-Site Corn Bunting Compensation Strategy and Management Plan.

Function of the Homestead compensation land

At the outset, it is important to clarify that the Homestead land is not being presented as a direct "receptor site" for displaced corn buntings. The strategy does not rely on the assumption that individual birds displaced from the development Site will necessarily move directly to the Homestead land.

Rather, the purpose of the off-site compensation package is to improve the quality, productivity and carrying capacity of nearby working farmland within the same local corn bunting landscape. The intended ecological mechanism is therefore population support through improved breeding conditions, increased chick-food availability, winter food resources and long-term farmland habitat management.

This distinction is important in responding to the RSPB representation. The off-site strategy is not a translocation or receptor-site strategy. It is a compensation strategy designed to increase the ability of nearby

farmland to support the local corn bunting population. This may provide additional carrying capacity for some displaced birds, particularly those associated with fields between the A505 and the edge of Clothall Common, but it is not dependent on proving direct movement of individual birds from the development Site to the Homestead land.

Extent and sufficiency of the Homestead land

The Homestead land remains the preferred off-site compensation area. The land comprises approximately 78.84 acres / 31.907 ha and is located within the local farmland landscape relevant to the affected corn bunting population.

The land has been selected because it is:

- proximate to the affected corn bunting population;
- capable of remaining in active agricultural production;
- capable of accommodating targeted corn bunting management prescriptions;
- under a land-management arrangement where practical measures have been discussed with the tenant farmer; and
- capable of being secured, monitored and adaptively managed.

In our view, these factors make the Homestead land materially more robust than an unidentified or theoretical additional land parcel.

We have considered the RSPB's comments regarding the scale of the compensation area, including reference to territory-size evidence. We acknowledge that area-based metrics can be useful as a broad sense-check. However, corn bunting compensation should not be determined solely through a fixed hectares-per-pair calculation.

Corn bunting territory density and productivity vary depending on crop type, crop structure, field layout, song-post availability, invertebrate abundance, winter food availability, disturbance, predation pressure and farming practice. A larger area of conventionally managed farmland would not necessarily provide greater ecological value than a smaller but targeted, secured and actively managed compensation area.

For that reason, the compensation strategy is based on functional habitat improvement rather than simple land-area replacement. The Homestead package includes:

- 6 m tussocky grassland strips;
- 12 m double-sown cereal strips in cereal years;
- management of existing grassland and limited scrub;
- retention or replacement of suitable agri-environment options;
- winter food provision;
- annual implementation auditing;
- ornithological monitoring; and
- adaptive management.

These measures are targeted at the key ecological requirements for corn bunting, namely suitable nesting structure, chick-food resources, winter food availability and avoidance of high-risk edge nesting.

We also note that the RSPB representation does not appear to identify a materially different suite of management measures that should be applied elsewhere. If the same measures were applied to additional land, there would be no guarantee that they would perform better than at the Homestead. In our view, the more robust ecological approach is therefore to secure the Homestead land properly and ensure that the management can be actively reviewed and adapted if monitoring identifies underperformance.

Additional land

We understand that the possibility of identifying additional land has been raised as a potential contingency. From an ecological perspective, we do not consider that additional land should be assumed to be required at this stage.

The first response to any future underperformance should be to review and adapt the management within the secured Homestead land. This is because the proposed measures at the Homestead are already targeted at the principal mechanisms available to improve corn bunting habitat function in working farmland. If these measures did not perform as anticipated at the Homestead, it is not evident that the same or similar measures would necessarily be more effective elsewhere.

Accordingly, we propose that the strategy should focus on securing a robust adaptive management process within the Homestead land, rather than identifying further land at this stage.

Duration of management, monitoring and review

The current Off-Site Corn Bunting Compensation Strategy identifies a suggested monitoring framework comprising a Year 0 baseline / implementation check, annual monitoring in Years 1 to 5, and further reviews at Years 10 and 15. We propose to retain this broad approach, with additional clarification regarding the purpose of the Year 15 review.

The corn bunting off-site package is a working farmland management strategy. It depends on crop rotation, tenant-farmer agreement, future agri-environment arrangements, annual farming operations and the legal mechanism used to secure delivery. For that reason, we do not consider it appropriate at this stage to pre-commit to a fixed 30-year off-site farming prescription. Unlike newly created habitats within the Site boundary or BNG land managed under an HMMP, the off-site compensation land will remain in active agricultural use, and the management prescriptions must remain capable of responding to future farming and tenancy arrangements.

We therefore propose that the bespoke off-site corn bunting monitoring and review framework is secured to Year 15, with intensive monitoring during the early establishment and response period. This is considered proportionate because the key test is whether the compensation measures establish, are implemented correctly and are being used by corn bunting during the early years following implementation.

The proposed framework is as follows:

1. An implementation baseline / Year 0 check would be undertaken to confirm that the agreed measures are in place or ready for delivery.
2. Annual implementation audits would be undertaken during the early delivery period to confirm whether the agreed prescriptions have been implemented, including the location and extent of double-sown cereal strips, condition of tussocky grassland strips, status of agri-environment areas, winter food provision, crop rotation, management variations and remedial action.
3. Annual corn bunting monitoring would be undertaken in Years 1 to 5 after implementation. Each monitoring year would include a minimum of three breeding-season visits between May and July, undertaken by a suitably experienced ornithologist using territory-mapping principles.
4. Further periodic ornithological and management reviews would be undertaken in Years 10 and 15.
5. Additional monitoring would be triggered where repeated underperformance is identified, until the issue is understood and appropriate adaptive management has been agreed and implemented.

The intention is therefore to provide a strong early monitoring and adaptive management framework, rather than defer action until the end of the review period. If the measures are not establishing, not being implemented, not being used, or are affected by practical farming constraints, corrective action would be agreed during the early monitoring period.

Review and adaptive management process

The review process would be active and iterative. It would not rely on waiting until a fixed long-term review point before action is taken.

Each year during the early delivery period, the implementation audit would be reviewed by the applicant / management body, tenant farmer and project ecologist. In ornithological monitoring years, the implementation audit would also be informed by the results of breeding-season monitoring.

The review would consider:

- whether the agreed management prescriptions have been implemented;
- whether the tussocky grassland strips have established and are being maintained appropriately;
- whether the double-sown cereal strips have been provided in cereal years;
- whether winter food provision is available;
- whether existing agri-environment areas remain suitable or require replacement measures;
- whether crop rotation or farming constraints require adjustment of the annual implementation plan;
- whether corn bunting are using the compensation area;
- whether there is evidence of breeding behaviour or productivity where observable; and
- whether any disturbance, access or land-management issues are affecting the function of the compensation area.

If the compensation package is not being implemented, fails to establish, is not being used by corn bunting, or is affected by disturbance or farming constraints, the project team would agree corrective action before the next suitable farming / management window.

Corrective action could include:

- relocating double-sown cereal strips within the fields;

- increasing or relocating tussocky grassland strips;
- adjusting the relationship between cereal strips and grassland margins;
- reviewing crop rotation;
- increasing winter food provision;
- controlling scrub or bramble;
- retaining selected cereal strips unharvested;
- reducing inputs within selected strips where agreed with the tenant farmer;
- adjusting cutting frequency or timing; and/or
- otherwise altering the management prescription to improve function while remaining compatible with agricultural operations.

The first response to any underperformance would therefore be to adapt management within the secured Homestead land. This is considered a more proportionate and ecologically justified response than identifying additional land in advance of evidence that the Homestead measures are failing and that additional land would provide a demonstrably better outcome.

Bridleway and disturbance risk

We also propose to clarify the position regarding the eastern grassland strip and the bridleway.

Earlier indicative mitigation plans showed grassland provision adjacent to the bridleway. This raised concerns regarding disturbance from horse traffic, dog walking and informal access, particularly given the relationship with the wider Growing Baldock green infrastructure strategy.

The tenant farmer also identified existing issues with people entering the field and dogs being off-lead along the bridleway, with concern that this could worsen. In response, the grassland strip was moved to the opposite side of the field to reduce disturbance risk. This will be made clearer in the revised off-site strategy.

This is a useful example of the strategy already responding to site-specific land-management issues and disturbance risk, rather than applying generic habitat measures without regard to the practical farming context.

Plan reference

Finally, we will correct the plan reference issue. The strategy currently refers to Plan F throughout, while the appended plan appears to be labelled Plan D. This is a naming inconsistency rather than a substantive ecological issue.

The strategy will be amended so that the Homestead compensation land and its final plan reference are used consistently throughout the document and carried through into the condition / legal agreement wording.

Summary

In summary, our proposed position in response to the RSPB representation dated 2 July 2026 is as follows:

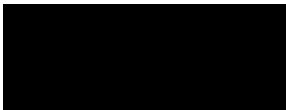
- the Homestead land remains the preferred and defined off-site compensation area;

- it should not be described as a direct receptor site for displaced corn buntings;
- it should be described as a managed compensation area designed to improve breeding productivity, carrying capacity and winter survival within the local corn bunting population;
- the extent of the land is considered appropriate because adequacy is based on functional habitat improvement, deliverability and adaptive management, rather than area alone;
- the bespoke off-site corn bunting monitoring and review framework should run to Year 15, with intensive early monitoring in Years 1 to 5;
- annual implementation audits should be undertaken during the early delivery period, with further reviews in Years 10 and 15;
- adaptive management should be implemented as soon as issues are identified and should focus first on modifying the prescriptions within the secured Homestead land; and
- the plan reference and bridleway-related clarification will be corrected in the revised off-site strategy.

Subject to your agreement, we will update the Off-Site Corn Bunting Compensation Strategy and Management Plan to reflect the above clarifications, including the monitoring framework, adaptive review process, plan reference and bridleway design response.

We trust this provides the clarification required in relation to the RSPB comments and the proposed approach to securing and reviewing the corn bunting compensation strategy.

Yours sincerely,



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for **BRADLEY MURPHY DESIGN LIMITED**