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20 May 2026

Dear Mr Chaston

Application number: 26/00558/HYA

Location: Land at Pound Farm Bedford Road Ickleford Hertfordshire SG5 3RS

Proposal: Hybrid application for a mixed-use development to provide a total of up to 230 dwellings, a residential care home (Use Class C2), an Independent Special School (ISS) and new sports pitch, with access from Bedford Road, landscaping, parking and SuDS comprising: Phase 1 Application for full planning permission for the erection of 100 dwellings, an ISS, new sports pitch and associated parking, landscaping, open space and SuDS; Phase 2 An outline application on the remaining part of the site for the erection of up to 130 dwellings, a residential care home (Use Class C2) and associated works with access from Bedford Road (all matters reserved apart from access).

The Herts and Middlesex Wildlife Trust does not comment on Green Belt issues as this lies outside our charitable remit. However, we **object** to this planning application due to the lack of an adequate mitigation and compensation strategy for farmland birds. Further amendments or clarifications are also required in relation to bird boxes and chalk grassland.

Impact on farmland birds

Provided that existing trees and hedgerows are retained wherever possible, the main ecological impact is on breeding farmland birds, in particular Skylark and Corn Bunting, as highlighted by the breeding bird survey by Cherryfield Ecology. According to the survey report, the "results indicate that the site is of local value for breeding birds, with supporting value for a corn bunting population in the local area of likely county importance." (1. None-Tech Summary (sic)).

Although not ideal, it is reasonable to compensate for the loss of suitable habitat by creating new habitat in nearby farmland, as proposed in the survey report for Skylark.

However, there are no details about the location of compensation land for Skylark, its ownership, or how the compensation will be secured. Nor are there any details about compensation for Corn Bunting. Although Corn Bunting is not confirmed as breeding on site it is clearly using it as supporting habitat, and the loss of this habitat requires compensation which will not be possible on

site. The mitigation measures proposed in the breeding bird survey are unlikely to be of benefit for Corn Bunting, as there is very limited natural habitat proposed on site and Corn Buntings prefer wide open fields which are more remote from people.

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. The situation in Hertfordshire mirrors that of national decline. A 2014 survey in Hertfordshire showed that there were a total of only 170 singing male birds (data courtesy of Herts Bird Club).

We draw your attention to our response of 20 November 2025 to application 25/2571/OP, the Growing Baldock development site, in which we objected to the impact on Corn Bunting. In that case, the applicant proposed 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. Measures could also be designed to benefit the wider suite of farmland birds as far as possible. We did not object in principle to these measures but to the lack of detail.

The applicant should provide a farmland bird mitigation and compensation strategy along similar lines, with details to be agreed in writing by the local planning authority. This could be secured either by a condition on the planning application or a S.106 agreement between the applicant and the local planning authority. The latter is preferable because the compensation would need to be secured financially, legally and in perpetuity.

In so doing, the applicant would be able to demonstrate that the proposal is in accordance with 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.”*

Other matters

The breeding bird survey report recommends a number of other ecological mitigation measures, all of which we support and should be secured by condition in the event that planning permission is granted.

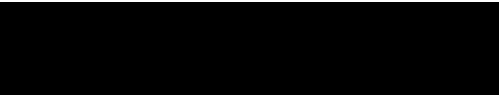
However, we note the proposal in the Preliminary Ecological Appraisal to install a minimum of 50 bird boxes, which is different to the breeding bird survey report recommendation. As proposed in the breeding bird survey report, the applicant should install integral Swift bricks throughout the development, which is something we request on all new housing developments in compliance with NPPF paragraph 187. In accordance with National Planning Practice Guidance, developments should include integrated nest boxes with the general aim across a development of a minimum of **one nest box per unit** (i.e. up to 230 boxes with the possibility that these could be clustered on

buildings of appropriate design and orientation). Swift bricks can provide a nesting place for a variety of building-nesting species and so act as a universal nest box.

Finally, the applicant makes no reference in the Planning Statement to the Hertfordshire Local Nature Recovery Strategy (LNRS), in which the site is part of the Herts Chalk Focus Area. A key priority in the Herts Chalk Focus Area is the creation of more high quality chalk grassland habitats, through both the enhancement and expansion of existing chalk grassland sites and the establishment of new sites. Although the Biodiversity Net Gain Assessment does refer to the LNRS, it is not clear whether any new grassland created on the site is specifically chalk grassland. Looking at the green infrastructure in the proposed development plan (see, for example, Appendix 3 in the Biodiversity Net Gain Assessment), there do not appear to be any significant blocks of grassland, as most of the green infrastructure is either narrow strips surrounding built development or potential playing fields. The applicant should take steps to establish chalk grassland on the site in support of the LNRS.

Please contact me if you wish to discuss any of these issues in further detail. I would be grateful for notification of the outcome of the planning application.

Yours sincerely

A black rectangular box redacting the signature of Simon Marsh.

Simon Marsh MBE BA MA MSc MRTPI
Planning and Policy Manager