

F.A.O Shaun Greaves
Development and Conservation Manager

Hi Shaun,

Thank you for your comments on the outline application. We have reviewed the points raised by Hertfordshire Wildlife Trust carefully and set out below our response to the ecology matters you highlighted. These points are reflected in, and secured through, the submitted ES, the Ecology ES Addendum and the updated Ecological Mitigation Plan (EMP).

Corn bunting – domestic cat predation and on-Site viability

With regard to the concern that domestic cat predation could undermine the viability of retained on-Site corn bunting territories, we can address this clearly. Furthermore, this point is addressed in within the ES.

- The corn bunting territories recorded on the Site are located primarily within large open arable fields and areas of rough grassland, often several hundred metres from existing or proposed residential edges. These open farmland habitats are not favoured by domestic cats, which typically hunt within gardens, hedgerows and scrub margins rather than across open arable fields.
- The usual roaming range of a domestic cat is approximately 500 m. The retained and proposed corn bunting territories (notably within the northern arable fields, the Bygrave Road corridor and along the BA3 edges) are generally beyond this range and, where closer, are further buffered by green infrastructure corridors, agricultural land and areas of scrub and structural planting.
- These retained territories are therefore physically and functionally separated from residential parcels, significantly reducing the likelihood of sustained cat activity within corn bunting nesting and foraging habitat.
- There is no empirical evidence that domestic cats represent a meaningful limiting factor for corn bunting populations in arable landscapes. The primary drivers of population change for the species are well documented as agricultural intensification, winter food availability and boundary structure, rather than predation.
- This position is consistent with the species' ecology and with all previous assessments for the Site (including WYG, Ecus and BMD), none of which have identified domestic cat predation as a significant impact pathway for corn bunting.

On this basis, cat predation does not undermine the ecological feasibility of retaining a proportion of corn bunting territories on-Site. The green infrastructure strategy has been specifically designed to maintain appropriate separation between residential

development and retained arable/grassland habitat, providing a scientifically robust and proportionate response to this issue.

Deliverability of off-Site mitigation through HCC land ownership

In addition to the ecological suitability of the selected off-Site mitigation areas (Hinxworth, Ashwell End and the Potential Park area), a key factor in their selection is deliverability. All three parcels are under the ownership or control of Hertfordshire County Council, our joint venture partner.

This provides a number of material advantages:

- the sites are immediately deliverable;
- long-term management prescriptions can be secured, monitored and enforced with confidence;
- risks associated with reliance on private third-party land agreements are avoided; and
- mitigation delivery can be aligned with wider Hertfordshire County Council biodiversity objectives.

This approach is fully consistent with, and builds upon, the recommendations made in earlier WYG and Ecus work, and provides a robust mechanism for long-term conservation outcomes.

Swift nesting provision

We agree with the aspiration to maximise provision for swifts and acknowledge the Trust's preference for one swift brick per dwelling. However, at outline planning stage it is not possible to fix a unit-by-unit ratio due to the absence of detailed architectural design.

Instead, our proposed approach is as follows:

- building-integrated swift nesting features will be provided in line with current best-practice guidance (e.g. Swift Conservation, RSPB and NHBS standards);
- a strategic distribution plan will be prepared at Reserved Matters stage to ensure features are located on appropriate building typologies, elevations and heights, rather than applied as a blanket numerical ratio that may not be suitable for all house types; and
- provision will be secured through the EMP and monitored as part of the long-term ecological management framework.

This approach ensures delivery of best practice outcomes while avoiding over-commitment to a prescriptive requirement that may not be appropriate or deliverable at this stage.

Biodiversity Net Gain (BNG)

With regard to the request that the scheme should secure a minimum of 30% Biodiversity Net Gain, we can clarify the following.

The submitted BNG Assessment demonstrates that the Proposed Development is capable of delivering a substantial uplift well in excess of the statutory 10% requirement, achieved entirely on-Site through the scale of green infrastructure provision and habitat creation embedded within the masterplan. This level of uplift has been calculated using the Statutory Biodiversity Metric and conservative, policy-compliant assumptions appropriate to the outline stage.

There is no adopted local planning policy within North Hertfordshire that requires delivery of BNG above the national statutory minimum, nor is there a site-specific policy threshold applicable to the Baldock allocation. As such, while higher levels of BNG are welcomed in principle, a fixed requirement for 30% BNG is not policy-mandated.

However, the applicant has demonstrated that they will be maximising the opportunities of this site through the significant amount of open space to be provided in addition to the 10% BNG to be delivered.

It is also important to note that the current assessment indicates the generation of surplus habitat units beyond the statutory minimum. Under Schedule 7A of the Environment Act, the landowner is entitled to:

- retain surplus units for use in later phases of the wider Baldock allocation; and/or
- register and deploy surplus units as lawful off-Site biodiversity units, should they choose to do so.

The approach to securing BNG, including the use and governance of surplus units, will be formalised through the planning obligation framework, with delivery secured via the Biodiversity Gain Plan and associated Habitat Management and Monitoring Plan at the appropriate stage. This provides both regulatory compliance and flexibility to respond to detailed design evolution and emerging Local Nature Recovery Strategy priorities.

Aquifer and water resource comments

The waste water will be pumped to the treatment works in Letchworth which has capacity to manage this and Anglian Water have confirmed this (correspondence is included in the Drainage Strategy appendices). The Trust's concerns regarding how the Letchworth treatment works operate is not something this planning application can address, given that AW have confirmed foul waste can be accommodated.

Affinity Water (AW) have referenced that they source from man-made reservoirs and chalk bores located within their supply area – the AW supply area is extensive, and the information provided by Affinity Water does not suggest that they are abstracting, nor

planning to abstract any more, water. AW monitor the availability of supply within their network continuously and adjust the flow within their network accordingly.

We trust the above provides clarity and reassurance that the ecology matters raised have been carefully considered and addressed in a proportionate, evidence-led manner. We remain happy to continue constructive dialogue as the application progresses.

Kind regards,
Jonathan.

Jonathan Wood
Principal Ecologist



BRADLEY MURPHY DESIGN LTD
Remote Working – North West – Manchester

Head Office
Studio 3, Floor 18
Alpha Studios
Alpha Tower
Suffolk St Queensway
Birmingham
B1 1TT