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Client: Howarth Contractors Ltd

Project: Codicote Development

Report: Reptile Survey Report

QUALITY ASSURANCE

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1.0 EXECUTIVE SUMMARY

Greengage Environmental Ltd (Greengage) was commissioned by Howarth Contractors Ltd to undertake a reptile presence/likely absence survey on a site known as Codicote Development, Hertfordshire, Welwyn AL6 9TU, hereafter referred to as 'the site'.

The proposed development seeks to demolish the former Big Cat Sanctuary Site on Codicote Road and construct approximately 109 new residential dwellings. A Preliminary Ecological Appraisal (PEA¹) was undertaken in January 2026. The site was considered to provide 'Moderate' potential to support reptiles and surveys to identify the presence/likely absence of reptiles on site were recommended. The reptile presence/likely absence survey has been conducted during April - October 2026, comprising seven survey visits within optimal conditions to monitor 50 artificial refugia that were deployed across suitable habitat on the site. The surveys visits were conducted in suitable conditions, with reference to best practice guidance².

Only a single common lizard has been recorded on the 17.06.26, under mat 15 and mitigation can therefore take the form of a precautionary method of works, which can also serve to minimise risk of harm to other species, should they be present during the construction works.

Enhancement recommendations have also been provided, to increase the site's value to reptiles.

As long as these recommendations are followed, the risk of harm to reptiles from the proposed development is considered negligible.

2.0 INTRODUCTION

Greengage Environmental Ltd (Greengage) was commissioned by Howarth Contractors Ltd to undertake a reptile presence/likely absence survey on a site known as Codicote Development, Hertfordshire, Welwyn AL6 9TU, hereafter referred to as 'the site'. The proposed development seeks to demolish the former Big Cat Sanctuary Site on Codicote Road and construct approximately 109 new residential dwellings.

A Preliminary Ecological Appraisal (PEA) was undertaken in January 2026. The site was considered to provide 'Moderate' potential to support reptiles and surveys to identify the presence/likely absence of reptiles on site was recommended.

2.1 SURVEY AIMS

The survey aims were to establish the presence or likely absence of reptiles at the site, evaluate the reptile population size if present and identify the requirement for/approach to mitigation considering the potential future development of the site. This document is a report of the surveys undertaken between April - October 2026.

2.2 SITE DESCRIPTION

The site extends to approximately 4.02 hectares (ha) and is centred on Ordnance Survey National Grid Reference (OS NGR): TL 22313 10947, OS Co-ordinates 522313, 210947.

The site comprises land at 'The Codicote Development' on Codicote Road, Codicote, Hertfordshire. This includes urban habitats, that comprise a large main dwelling with an associated farm shop use, smaller residential bungalows, lodges and mobile homes; areas of incomplete construction comprising walls and foundations; hardstanding gravel roads and driveways; and barns, sheds, and other related storage. Due to the site's past use for the keeping of big cats, parts of the site also contain rows of open-air, square, brick-built enclosures, planted with non-native species, now also overgrown with native scrub species such as bramble (*Rubus fruticosus*) and nettle (*Urtica dioica*). The site also consists of extensive green space, comprising areas of unmanaged scrub, deciduous and mixed woodlands, rough grassland and individual trees, as well as managed grasslands in the form of modified grassland lawns, and small fenced pastures.

Although much of the site is undisturbed, some areas are subject to ongoing human activity, with occupied mobile homes, bungalows and lodges present within the site, and areas of disturbance associated with storage, household waste and derelict structures. Vegetation across the site reflects limited management, with scrub and tall unmanaged grassland dominating outside the built footprint, alongside localised areas of bare ground and debris.

The site is located within a rural settlement-edge on the outskirts of Codicote, with surrounding land use comprising a mix of residential properties, roads, agricultural land and semi-natural habitats. Danesbury Park Local Nature Reserve lies to the south-east of the site, while Singlers Marsh Local Nature Reserve lies to the south, associated with the River Mimram corridor.

Beyond the immediate site, the wider landscape comprises a mosaic of farmland, woodland, river corridor habitats and settlement typical of north Hertfordshire, with several locally designated sites forming a connected ecological network.

2.3 ECOLOGICAL BACKGROUND

A PEA of the site was conducted in January 2026 by Greengage¹, which identified that habitats suitable for supporting reptiles were present, and that, if present within these habitats, reptiles may be impacted by any potential future development. These habitats included areas of grassland, scrub and woodland, which provide suitable conditions for reptiles. Areas of taller grassland and dense bramble scrub offer opportunities for basking, shelter and foraging.

As part of a desk study to inform the PEA, biological records were obtained from Hertfordshire Environmental Records Centre (HERC) in March 2025. However, desk study data did not return any records of reptiles within 2km of the site in the last 20 years, though this does not preclude their presence. The habitats on site are considered suitable to support common widespread reptile species such as slow worm (*Anguis fragilis*), common lizard (*Zootoca vivipara*) and grass snake (*Natrix helvetica*). The site is therefore assessed as having moderate suitability for reptiles, despite the lack of records returned by HERC.

3.0 METHODOLOGY

The reptile presence / likely absence survey was completed across April and October 2026. The survey was carried out with reference to Froglife Guidelines².

The reptile presence/likely absence survey was conducted during April - October 2026, comprising seven survey visits within optimal conditions to monitor 50 artificial refugia deployed across suitable habitat on the site. The surveys visits were conducted in suitable conditions, with reference to best practice guidance.

Artificial refugia were constructed of 0.5m x 1.0m bitumen felt sheeting. Mat distribution across site is shown in Appendix A.1. In accordance with best practice guidance, a minimum of 10 artificial refugia per hectare of suitable habitat is recommended in accordance with best practice guidelines². The artificial refugia were focused on areas of suitable habitat (suitable habitat across the site totals approximately 2.5ha in area), to increase the probability of detecting reptiles on the site, if present.

The artificial refugia were allowed to 'bed in' for two weeks following their distribution. Seven visits were subsequently undertaken on non-consecutive days. Typically, seven visits are deemed the necessary minimum for providing confidence of presence / likely absence and to establish a population size from the data.

During each visit, the artificial refugia were checked visually from a distance to determine whether reptiles were basking on their surface. The artificial refugia were then carefully approached and lifted to check for reptiles sheltering beneath them. Between artificial refugia the site was also walked carefully and slowly to detect potential reptiles that may be basking away from the artificial refugia supplied.

Between mats the site was also walked carefully and slowly to detect reptiles that may be basking away from the artificial refugia supplied. Other potential refugia/basking sites present within the site e.g. the log and compost piles, were visually checked in addition to the mats during the walkovers.

Timings and conditions

The artificial refugia were deployed on 22nd April 2026. Eight survey visits were conducted between 6th May 2026 and 1st October 2026, seven within the ideal conditions. Survey visits to the site were made when weather conditions were favourable, in accordance with good practice.

Weather during the survey visits was conducive for surveying for reptiles, often being clear, dry and warm, although some days were overcast. Froglife guidelines² recommend that ideal temperatures for reptile surveys are between 9°C and 20°C. The metadata from the survey visits is provided in Table 3.1 below.

Table 3.1 Survey metadata

Survey Visit	1	2	3	4	5	6	7	8
Date	06.05.26	14.05.26	20.05.26	17.06.26	19.06.26	22.06.26	29.09.26	01.10.26
Surveyor	Navin Ramnani	James Manuli	James Manuli	Navin Ramnani	James Manuli	James Manuli	Nadia Sushko and Rita Rau Silva	Emilia Mizielińska and Georgia
Survey timings	10:30 - 12:15	10:23 - 11:12	10:01 - 10:52	11:00 - 11:45	08:01 - 08:44	07:25 - 07:55	12:15 - 13:26	09:40 - 11:00
Temperature (°C) (start and end)	10 - 14	9 - 10	15 - 15	24 - 24	19 - 20	19 - 20	16 - 18	15 - 17
Cloud cover (oktas)	7/8	7/8	6/8	0/8	0/8	3/8	5/8 - 2/8	0
Wind (mph)	0	10	15	7	5	8	7	9
Precipitation	None	None for most of survey. Temporarily light rain shower mid way through survey.	None for most of survey. Light rain shower at end.	None	None	None	None	None

3.2 SURVEYORS

The reptile mats were deployed and checked by Navin Ramani and James Manuli. Reptile surveys were also conducted by Nadia Sushko, Rita Rau Silva, Emilia Mizielińska and Georgia Alfreds.

Navin Ramnani, Assistant Consultant, who conducted the reptile surveys, has a BSc (Hons) in Biomedicine and an MSc in Plant and Fungal Taxonomy Diversity and Conservation. He is an Associate Member of the Royal Society of Biology (AMRSB), a Member of the Kew Guild, and sits on

Committees for the Botanical Society of Britain and Ireland (BSBI). Navin is in his second year of consultancy.

James Manuli, Seasonal Ecologist, who conducted the reptile surveys has a degree in Zoology (BSc Hons) with experience in ecological surveying of bats and badgers.

Nadia Sushko, Survey and Tender Manager, who conducted a reptile survey has a BSc (Hons) in Ecology and an MSc in Environmental Science and is a Qualifying CIEEM Member. Nadia has over 3 years' experience in survey resourcing and consultancy. Her areas of expertise include protected species surveying, natural resource management, and environmental law.

Rita Rau Silva, Survey, Data and Tender Assistant, who conducted a reptile survey holds an undergraduate degree in Biology (BSc) and an MSc in Ecology, Evolution and Conservation. Rita has 1 year of experience in survey resourcing and consultancy. Her survey experience includes bat, bird and reptile.

Emilia Mizielska, Graduate Consultant, who conducted a reptile survey has a BSc (Hons) degree in Arts and Sciences: Health and Environment. Emilia has experience in designing nature-based solutions for wellbeing and climate resilience in urban environments, as well as reporting including BREEAM and Biodiversity Net Gain (BNG).

Georgia Alfreds, Associate Consultant, who conducted a reptile survey has a degree in Geography (BSc Hons), an MSc in Environmental Biology: Conservation and Resource Management and is a Full member of CIEEM with 16 years' experience in ecological survey and assessment. Georgia is a Level 4 botanist as accredited by FISC.

This report was written by Kezia Myles, Seasonal Ecologist, who has a BSc (Hons) in Environmental Science and Sustainability. Kezia has experience in assisting with bat, badger, and newt surveys, QGIS mapping, and report writing.

Maxine Hendy, Senior Consultant, who was PM for this project and reviewed this report, has a BSc (Hons) degree in Biological Sciences, and an MSc in Environmental Diagnosis and Management. Maxine has been working in environmental consultancy for 5 years, with a focus in Biodiversity Net Gain, GIS, and habitat management. She has worked across large and small projects, including transport, urban redevelopments, residential new construction, and natural habitats enhanced for biodiversity.

Paul White has a Bachelor's degree in Marine Biology (BSc Hons), a Natural England Great Crested Newt Licence and Dormouse Licence, and is an Associate member of CIEEM. Paul has over 16 years' experience in ecological surveying and has undertaken and managed numerous ecological surveys and assessments.

This report was written by Kezia Myles, reviewed by Maxine Hendy and verified by Paul White who confirms in writing (see the QA sheet at the front of this report) that the report is in line with the following:

- Represents sound industry practice;

- Reports and recommends correctly, truthfully and objectively;
- Is appropriate given the local site conditions and scope of works proposed; and
- Avoids invalid, biased and exaggerated statements.

3.3 LIMITATIONS TO SURVEY

Brief spells of very light rain were noted during surveys 1 and 2. These were not considered sufficient to represent a significant constraint to the survey.

Survey four was conducted in a temperature of 24°C, which is above recommended levels. Following this, due to the persistent hot weather in June, a survey visit was postponed, to ensure that the survey was conducted in suitable temperatures. Additional surveys were added to have a full suite of seven surveys within recommended ideal temperature ranges.

During survey seven, two mats could not be located, with one mat being covered by wooden pallets and unable to be checked. However, since there was a further 47 mats, this was not considered significant constrain.

4.0 RESULTS

4.1 PRESENCE/ABSENCE SURVEY

Only a single common lizard has been recorded, during the fourth survey on 17.06.26, under mat 15. The location is shown in Appendix A. No reptiles were recorded during any of the other survey visits in 2026. During survey 3, on 20.05.26, one common frog (*Rana temporaria*) was observed under mat 50. Table 4.1 indicates the population size categories as per the Froglife guidance³.

Table 4.1 Key Reptile Register Scoring System

	Low Population Score 1	Good Population Score 2	Exceptional Population Score 3
Common lizard	<5	5-20	>20
Slow worm	<5	5-20	>20

The single common lizard represents a 'low' population score in accordance with the above table.

5.0 MITIGATION & ENHANCEMENT RECOMMENDATIONS

5.1 MITIGATION

The presence of a single common lizard recorded across the entire site does not warrant a reptile translocation exercise prior to site clearance, which would be considered disproportionate.

A Precautionary Method of Works is therefore recommended, detailing the measures to be taken to ensure that the risk of potential harm to any reptiles present is minimised.

These measures are as follows:

- Prior to any clearance, a toolbox talk should be given to the site team to inform them of the potential presence of reptiles and the precautionary measures to be taken.
- Clearance should be undertaken during a period when amphibians would be active (typically March to October, with little or no rain and temperatures above 10°C). If this involves clearing vegetation that could be suitable for nesting birds, the area should be checked for any active nests prior to commencement. Should an active nest be found, clearance in that area would need to be paused, and an appropriate buffer put in place by the appointed ecologist. Clearance could commence after the ecologist had confirmed that the nest was no longer active, i.e. after the chicks had fledged.
- Vegetation should initially be cut to 30 centimetres (cm), then to ground level 24-48 hours later, using hand tools. This is to allow reptiles (if present) to move away from the footprint of works of their own volition. All arisings should be removed from the development areas. The ecologist should conduct a search after the first cut, and supervise the cut to ground level. In the event that a reptile is encountered, the ecologist will request a temporary halt to clearance works so that dispersal off site can be confirmed, or the ecologist will relocate the animal.
- Clearance should progress from south and east and progress towards the north and west to enable any animals to move to adjacent retained habitats.
- Given the low numbers of reptiles recorded (single common lizard), the use of reptile exclusion fencing is not considered necessary. General good practice measures relating to wildlife should be followed, such as:
 - Any construction excavations or trenches left overnight should be covered or have a ramp inserted e.g. scaffold board, to allow any animals to escape;
 - Excavations or trenches should be inspected each morning and evening to ensure no animals have become trapped;
 - Pipework should be covered or capped at the end of the working day to avoid animals becoming trapped; and
 - Chemicals should be in a sealed container and stored in a secure storage area.

As noted above, a single common frog was also recorded on a single occasion. Whilst not afforded the same level of legal protection as reptiles, the above measures would also serve to minimise risk of harm to common amphibians and other animals, should they be present.

To avoid the killing or injuring of wildlife during development, best practice should keep any areas of grass as short as possible and any longer, ruderal vegetation should be cleared by hand. To avoid creating refugia that may be utilised by wildlife, materials should be carefully stored on-site on raised zone pallets and away from the boundary habitats. Any trenches on site should be covered at night or have ramps to ensure that any animals that enter can safely escape, and this is particularly important if excavations fill with water. Any open pipework with an outside diameter greater than 120mm must be covered at the end of each working day to prevent animals entering / becoming trapped.

5.2 ENHANCEMENT

Habitat enhancements designed for reptiles are likely to benefit a range of other species, notably diverse assemblages of invertebrates, which share similar habitat requirements. The proposed development offers opportunities to enhance the site for reptiles, and the following measures are therefore recommended:

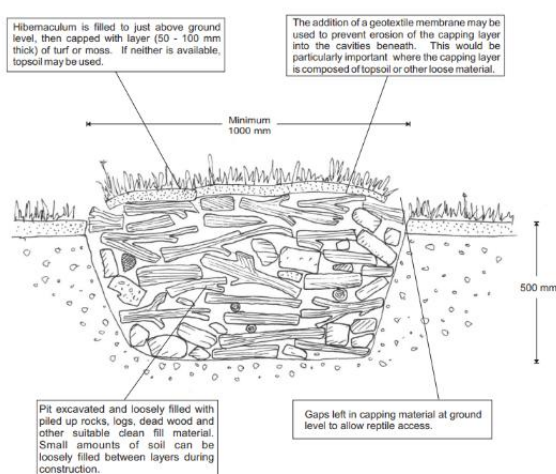
- A variety of native and wildlife-friendly planting including tree and shrub planting and wildflower areas should be incorporated into the proposed landscaping to increase the suitable foraging and basking habitat available.
- Installation of a minimum of at least 2 x log piles, and 2 x hibernacula. These should be placed in areas of suitable, well-connected habitat.

An example hibernaculum and log pile design are provided in Figures 5.1 and 5.2 below.

Figure 5.1 Examples of hibernacula

Hibernaculum on free-draining ground

Where ground conditions allow, the hibernaculum should be incorporated into a shallow pit. This design is more likely to remain frost-free, and will be less obtrusive and thus unlikely to be subject to interference.



Hibernaculum on impermeable ground

Where ground conditions are impermeable, then an 'above-ground' or mounded design should be utilised in order to prevent the hibernaculum from flooding. This design should also be used if it is not possible to excavate a pit for any other reason.

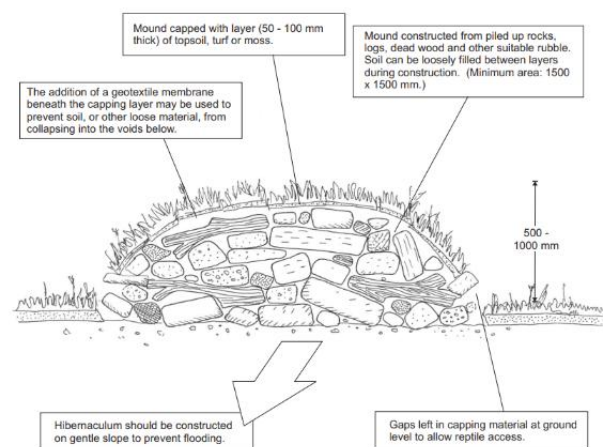


Figure 5.2 Example of log piles and hibernaculum



Logs should be ideally around 1 - 2m in length, and piled to a height of around 0.75m to 1m, and width of around 1.5m. If any tree removal is required to facilitate the development, this would be the best source of logs, otherwise they should be sourced locally.

6.0 SUMMARY & CONCLUSION

Greengage was commissioned by Howarth Contractors Ltd to undertake a reptile presence / likely absence survey of an area of land known as Codicote Development in Hertfordshire.

Seven surveys were conducted within the ideal temperature range set out by Froglife², with one common lizard being recorded. Therefore, works can proceed following a precautionary method of works, which can also serve to minimise risk of harm to other species, should they be present.

Enhancement recommendations have also been provided, to increase the site's value to reptiles.

As long as these recommendations are followed, the risk of harm to reptiles from the proposed development is considered negligible.

APPENDIX A REPTILE MAT LOCATIONS AND SURVEY RESULTS

Figure A.1 Reptile mat locations and survey results

553944 - CODICOTE DEVELOPMENT, REFUGIA REPTILE SURVEY LOCATIONS

Legend

- Common frog
- Common lizard recorded
- Refugia locations
- Site boundary

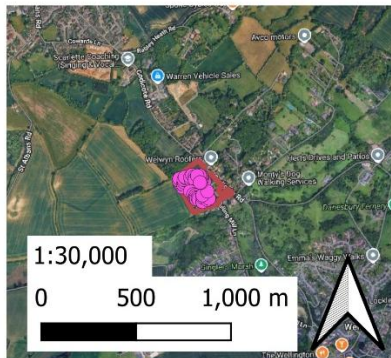
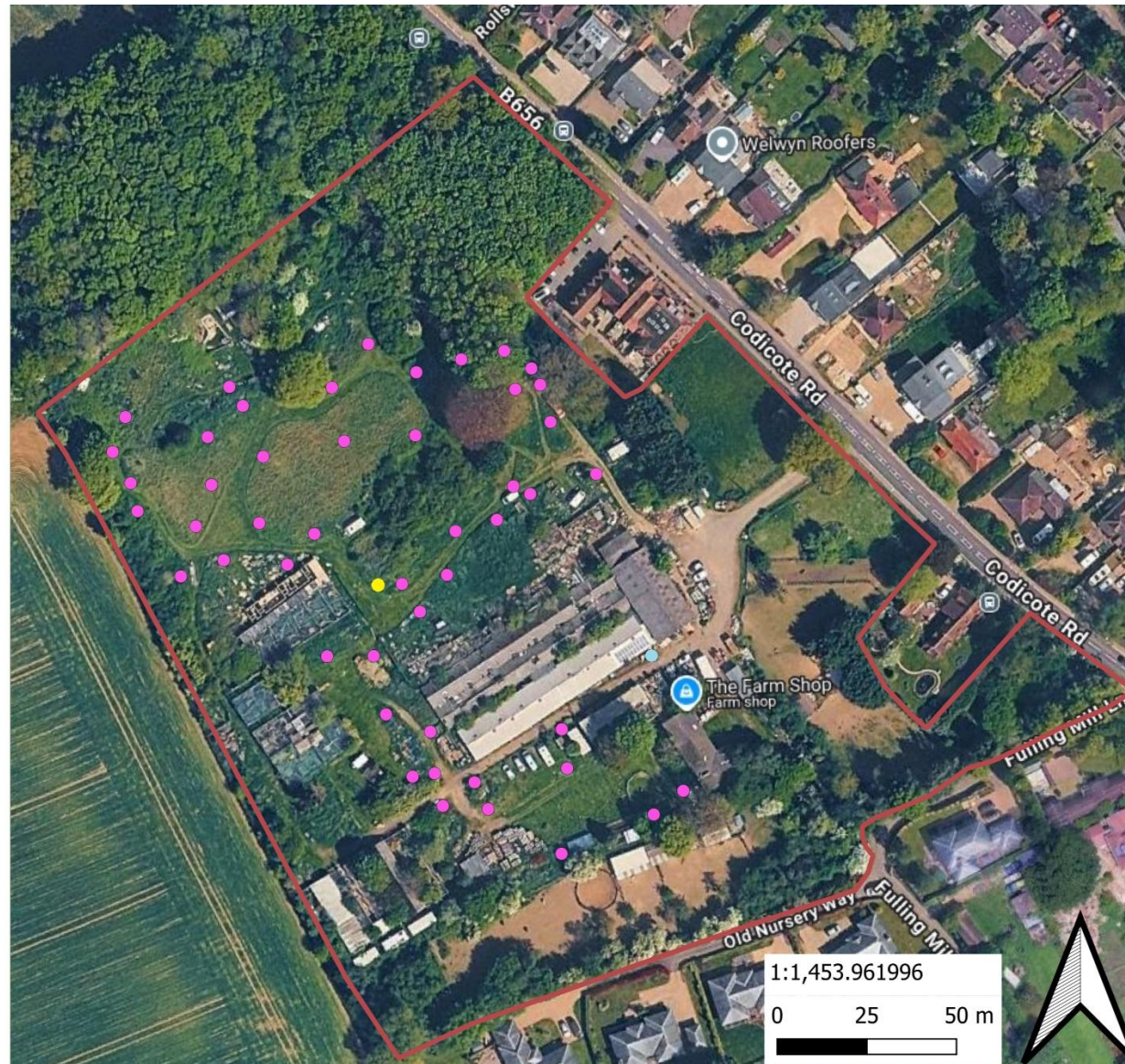


Figure A.1 Codicote refugia reptile survey locations

Drawn by: KZM
Date: 16.06.2026

Reviewed by: MH
Date: 16.06.2026

Project number: 553944
Sources: Google Satellite Imagery



APPENDIX B LEGISLATION AND PLANNING POLICY

B.1 LEGISLATION

All species of reptile native to the UK are protected to some degree under national and/or international legislation, which provides mechanisms to protect the species, their habitats and sites occupied by the species.

Sand lizards and smooth snakes are European protected species and are afforded full protection under Section 9 of the Wildlife and Countryside Act 1981⁴ and Regulation 39 of the Habitats Regulations 1994⁵ (and 2017)⁶. However, these species are rare and highly localised. Their occurrence is not considered as relevant in this instance, as the ranges and specialist habitats of these species do not occur at this site.

The remaining widespread species of native reptiles (adder, grass snake, slow worm and viviparous lizard) are protected under part of Section 9(1) and all of Section 9(5) of the Wildlife and Countryside Act 1981⁴. They are protected against intentional killing and injury and against sale, transporting for sale etc. The habitat of these species is not protected. However, in terms of development, disturbing or destroying reptile habitat during the course of development activities while reptiles are present is likely to lead to an offence under the Wildlife and Countryside Act 1981⁴. It is therefore important to identify the presence of these species within a potential development site. If any of these species are confirmed, all reasonable measures must then be taken to ensure the species are removed to avoid the threat of injury or death associated with development activities.

Each species of native reptile has specific habitat requirements, but general shared features include a structurally diverse habitat that provides for shelter, basking, foraging and hibernating.

B.2 NATIONAL POLICY

Guidance on nature conservation within planning is issued by the Government within the National Planning Policy Framework. The National Planning Policy Framework (NPPF) 2025⁷ sets out the Government's planning policies for England, including how plans and decisions are expected to apply a presumption in favour of sustainable development.

The NPPF has replaced, among other planning guidance documents, Planning Policy Statement 9: Biological and Geological Conservation⁸. However, the accompaniment to PPS9, government circular 06/05: Biodiversity and Geological Conservation - Statutory Obligations and Their Impact within the Planning System⁹, remains valid. The prevention of harm to biodiversity through prudent planning decisions is the key principle in the NPPF when considering planning and the natural environment; set out in section 15.

Within the NPPF the Government's vision for conserving and enhancing biological diversity in England within the planning system is set out. The Government's objectives for planning from an ecological perspective are, among others, to recognise the wider benefits of ecosystem services, minimise the impacts on biodiversity and provide net gains in biodiversity where possible, contributing to the

Government's commitment to halt the overall decline in biodiversity, which will include the establishment of coherent ecological networks that are more resilient to current and future pressures.

Of particular note to ecological impact assessment is paragraph 192 of the Habitats and biodiversity section which states, to protect and enhance biodiversity and geodiversity, plans should:

"(a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity 68 ; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation 69 ; and
(b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity."

Paragraph 193 then goes on to state:

" When determining planning applications, local planning authorities should apply the following principles:

(a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;

(b) development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;

(c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons 70 and a suitable compensation strategy exists; and

(d) development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate."

In accordance with paragraph 187, particular attention is also given to "minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures and incorporating features which support priority or threatened species such as swifts, bats and hedgehogs".

As a result of the NPPF any species or habitats of principal importance found on the application site, in addition to statutorily protected species, are of material consideration in the planning process.

All six reptiles are now listed as priority species in the UK Biodiversity Action Plan (BAP). Action plans have been produced for all of them. All BAP species have been included in Section 41 and 42 lists produced by the Secretary of State of England and the Welsh Assembly. These are lists of species that, as specified under the Natural Environment and Rural Communities Act 2006, are of principal importance for the purpose of conserving biodiversity. As such, all reptile species are of material consideration in the planning process due to the NPPF.

B.3 LOCAL POLICY

Hertfordshire BAP

The Hertfordshire BAP functions to:

- To ensure that national targets for species and habitats, as specified in the UK Action Plan, are translated into effective action at the local level;
- To identify targets for species and habitats appropriate to the local area, and reflecting the values of people locally;
- To develop effective local partnerships to ensure that programmes for biodiversity conservation are maintained in the long-term;
- To raise awareness of the need for biodiversity conservation in the local context;
- To ensure that opportunities for conservation and enhancement of the whole biodiversity resource are fully considered; and
- To provide a basis for monitoring progress in biodiversity conservation, at both local and national level.

Habitats with specific action plans relevant to this site include:

- Woodland;
- Neutral grassland;
- Farmland; and
- Urban.

North Hertfordshire Local Plan

The site falls within the jurisdiction of North Hertfordshire District Council and is therefore subject to the North Hertfordshire Local Plan 2011–2031.¹⁰

Key policies of relevance include:

- Policy NE1: Landscape – seeks to conserve and enhance the natural and scenic qualities of the district's landscapes.
- Policy NE4: Green Infrastructure – requires development to protect and enhance green infrastructure networks and ecological connectivity.

- Policy NE5: Biodiversity and Geological Sites – requires development to minimise impacts on biodiversity, protect designated sites and priority habitats/species, and deliver biodiversity net gain.

These policies support the protection of ecological features on site and require appropriate mitigation, enhancement and compensation measures where impacts cannot be avoided.

REFERENCES

¹ Greengage Environmental Ltd (2026). *Preliminary Ecological Appraisal*, Codicote Development. File ref: 553944eh20Jan26_FV02PEA.

² Froglife (2015). *Surveying for Reptiles: Tips, techniques and skills to help you survey for reptiles*.

³ Froglife (1991). *Advice Sheet 10 An introduction to planning, conducting and interpreting surveys for snake and lizard conservation*.

⁴ UK Government, (1981); *Wildlife and Countryside Act 1981*. TSO, London.

⁵ UK Government, (1994); *The Conservation (Natural Habitats, &c.) Regulations 1994* No. 2716. TSO, London.

⁶ UK Government, (2010); *The Conservation of Habitats and Species Regulations 2010* No. 490. TSO, London.

⁷ GOV.UK. (2025). *National Planning Policy Framework*. [online] Available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2>.

⁸ DCLG (Former ODPM), (2005); *Planning Policy Statement 9: Biodiversity and Geological Conservation*. HMSO

⁹ ODPM, (2005); *Circular 06/2005; Biodiversity and Geological Conservation – Statutory Obligations and their Impact within the Planning System*. TSO

¹⁰ North Hertfordshire District Council (2018) *North Hertfordshire Local Plan 2011–2031*. Letchworth Garden City: North Hertfordshire District Council.