

14 November 2025

Our Ref: 7345/20251114

Naomi Reynard
Planning Department
North Hertfordshire District Council
Development and Conservation
PO Box 10613
Nottingham
NG6 6DH

BY EMAIL ONLY

**RE: 25/01696/OP LAND SOUTH EAST OF HOLWELL ROAD AND NORTH OF HAMBRIDGE WAY, PIRTON, HERTS
OUTLINE APPLICATION FOR THE ERECTION OF UP TO 130 DWELLINGS WITH PUBLIC OPEN SPACE,
LANDSCAPING, SUSTAINABLE DRAINAGE SYSTEM (SUDS), AND ASSOCIATED WORKS WITH ALL MATTERS
RESERVED SAVE FOR ACCESS.**

Dear Ms Reynard,

This letter provides a response to ecology comments provided by the Ecology Officer for North Herts Council, Liz Anderson on 26 August 2025 in respect of the above planning application. Each comment is dealt with in turn below.

Ecology: Surveys

The EcIA report includes protected species surveys undertaken in 2025 below, with the level of importance of the Site for these species confirmed.

Completed surveys in 2025:

- Bat activity surveys (night-time bat walkovers) – May-September 2025
- Bat activity surveys (automated monitoring) – April-October 2025
- Badger survey – March 2025
- Breeding bird surveys – March-July 2025
- Reptile surveys – April-May 2025
- Great crested newt Habitat Suitability Index (HSI) assessment and eDNA survey – March-April

Ecology & BNG: Field margins

The majority of field margins are narrow (<1m), species poor and are considered to comprise part of the arable field habitat and associated management. However, it is acknowledged that the field margins along the northern boundary and the southern end of the western boundary are wider (c. 2-3m) and managed as more permanent grassland as per the UK Habitat Classification (2.0) (UKHab) guidance. Therefore, the statutory biodiversity metric has been amended to include these margins as separate 'other neutral grassland' habitat. The Habitats Plan has been updated to show the extent of the grassland margins.

Ecology & BNG: Bramble scrub

The reference to 'frequent bramble' within the grassland field margins refers to the encroachment of bramble within the grassland due to a lack of appropriate grassland management. The extent of bramble within the grassland sward is not sufficient to meet the minimum mappable unit (MMU) for the survey (10m²), or the definition of h3d Bramble scrub as per UKHab (continuous >75% cover). It is therefore not considered appropriate to map or record this scrub as a separate habitat.

BNG: Strategic significance

Habitat Baseline

The Herts Ecological Networks (HEN) Map as available online via the North Herts Council website has been reviewed. It should be noted that for the application Site this map varies from the Hertfordshire Ecological Network Mapping provided by Herts Environmental Record Centre only in the definitions used for strategic significance categories, with no difference in the mapped areas.

The majority of the Site falls within the 'non-strategic zone'/3c category. However, it is acknowledged that part of the site falls within the 'semi-strategic zone' as shown on the North Herts Council HEN mapping tool. This zone is identified as '3b' on the Hertfordshire Ecological Network map which, according to the Hertfordshire County Council website

<https://www.hertfordshire.gov.uk/services/recycling-waste-and-environment/bio-diversity-wildlife/ecology-advisory-service.aspx>), is defined as:

"3b (yellow on the map) = No mapped existing habitats present (medium priority for habitat creation). These include all areas of the county where there are no mapped existing ecologically important habitats present and where it is predicted there will be medium potential contribution to the restoration of ecological networks."

The HEN mapping tool does not provide any guidance on which strategic significance category 'semi-strategic zones' should fall under in the statutory biodiversity metric. In reviewing the Statutory Biodiversity Metric User Guide (Defra, 2024¹), it is clear that the 'medium' significance category should not be used where the LPA has identified a suitable document for assessing strategic significance.

Table 8. Biodiversity Metric User Guide, Medium Category: *"This category can be applied when the LPA has not identified a suitable document for assessing strategic significance."*

Whilst this area of the site is formally identified within a local strategy ('high'), survey work has confirmed that there is no existing ecologically important habitat on site. It is therefore concluded

¹ Defra, 2024. *The Statutory Biodiversity Metric User Guide*. London: Defra.

that the strategic significance should be recorded as 'low' for baseline habitats.

Table 8. Biodiversity Metric User Guide, Low Category: *"Where the definitions for high or medium strategic significance are not met."*

Habitat Creation

The area covering the site is given the Digitise ID M06834 which has a target habitat of chalk grassland. This habitat is not currently present on site.

Due to the difficulty in creating chalk grassland habitat within the timescales imposed by the metric, in addition to the size of the site and requirement for recreational use of open space at the Site, chalk grassland is not proposed. This is to avoid overly inflating the outcome of the metric. Therefore, the strategic significance should remain as 'low' in the post-development section of the metric for post-development habitats.

Despite this, an appropriate seed mix will be used for the creation of other neutral grassland habitat, to contain grassland flora found in both neutral and chalk grassland. This will have benefits for wildlife on site and within the local area. Additionally, enhancement features including chalk banks and scrapes are to be proposed within suitable areas of open space, for example adjacent to the SuDS basin.

Ecology: Dark corridors

At this outline stage, there are no detailed lighting designs. However, dark corridors will be maintained along hedgerows wherever practicable. Where this is not possible, for example where access is required, wildlife-sensitive lighting will be used to mitigate impacts to bats and other nocturnal wildlife. Any detailed lighting design to be informed by GN08 Bats and Artificial Lighting (Institution of Lighting Professionals, 2023).

It should be noted that the hedgerows along the southern and eastern boundaries will remain unlit and will be strengthened with structural planting, including scrub, to widen corridors for terrestrial mammals that use hedgerows dispersing/commuting.

Ecology: Bat activity monitoring

The comments suggest that no monitoring of bat activity was undertaken on the western hedgerow. It is confirmed that the western hedgerow, which will be severed for the proposed access location, was monitored for bat activity during the three night-time bat walkovers, with the vantage point located next to the proposed access. These surveys had not been undertaken at the time the EclA report was written, however, the EclA has been updated to include the results of this monitoring.

Analysis from the night-time bat walkovers shows there is very little bat activity along the western hedgerow, including the proposed access location. It should also be noted that this hedgerow is bound by residential development to the west and is therefore already subject to disturbance including some lighting.

Ecology: Bird disturbance on adjacent land

The Site, although not having any public or permissive footpaths, has no barriers to access from the south-east. This has allowed local people to regularly access the Site for dog walking, increasing levels of disturbance and reducing the suitability of the Site as whole for farmland birds including skylark. One individual skylark, which was neither calling nor singing, was recorded in flight over the Site during

the breeding bird surveys in 2025. Singing male skylarks were recorded within off-site fields to the east and south. The off-site field to the east is less accessible than the Site, with only a small number of small gaps in the hedgerow providing direct access from the Site to this field. Proposed scrub planting along the eastern boundary will prevent direct access to the adjacent field and help reinforce the existing hedgerow in providing a buffer and screening the field to the east from human disturbance, thus reducing potential recreational impacts and disturbance on this field and limiting any 'leapfrog' effect.

BNG: Mandatory 10% net gain

While it is preferable to achieve 10% net gain on site, it is not a legal requirement. Due to the size of the Site and inevitable recreational effects on open spaces, the proposed habitats and their expected condition have been chosen because they can reliably be created and maintained for 30 years under pressures from public access. The proposed habitats also provide benefits to wildlife in the form of wildflower planting in grassland and planting of a variety of native scrub species. It should be noted that whilst 10% net gain has not been achieved, the Site is still expected to achieve a gain in biodiversity of 2.16%. Therefore, following the Biodiversity Gain Hierarchy, off-site units will be purchased from an off-site provider.

BNG: Habitat Management and Monitoring Plan (HMMP)

A HMMP is not a requirement at this stage, with this usually included as a planning condition following consent. HMMP guidance is included on the North Herts Council website within the 'After planning permission is secured' section of the 'Biodiversity planning advice' page: <https://www.north-herts.gov.uk/biodiversity-planning-advice>.

The proposed habitats to be created post-development are not complex habitats and it is not anticipated that the LPA would require a draft HMMP to ensure that they can feasibly be created within the timescales set out in the statutory metric.

Ecology: Woodland and scrub creation

While the provision of woodland habitat on site would be beneficial for biodiversity, the size of the Site and predicted level of access would make this habitat difficult to establish and maintain at the appropriate condition. Therefore, this habitat was not considered in the proposals. The proposed provision of native mixed scrub habitat is more feasible for the Site and still carries some of the benefits provided by woodland. Chalk banks and scrapes are to be proposed within suitable areas of open space. This will provide habitat for plant and invertebrate species associated with chalk grassland habitat.

Kind regards,

Rhodri Gruffydd BSc (Hons) MSc

Ecologist