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8th September 2026

Ref: HDC consultation on application DC/25/2114

Dear Mr Holmes,

I write further to our consultation responses dated 14th August 2026 and 18th August 2026.

I now write following the consultation document provided to ECE Planning on 26th August 2026 regarding this application. I have set out responses to each point below, in order to provide any necessary clarifications.

1. The presence of trees within the EclA is not identified in the Biodiversity Metric

Please note that the most recent version of the statutory biodiversity metric, which indicates a habitat unit change of 52.67%, accounts for this tree at row 5 of tab 'A-1 On-Site Habitat Baseline'. The tree has therefore been accounted for; its original omission was due to its position within a shared boundary, and as a precautionary measure it is included in the current calculations.

2. The mapping of grassland habitat as Modified grassland and not coastal and floodplain grazing marsh

Floodplain grazing marsh is not a mappable habitat within the biodiversity metric, which is based on UKHab codes. The Modified grassland habitat code has been applied on the basis of the site assessment and the botanical composition recorded. The habitat notes held on our project file record perennial ryegrass as dominant, with cock's-foot abundant and Yorkshire fog frequent, which fits this habitat characterisation. The area itself lies upslope of the wetland features associated with the LWS, within a dry part of the site.

3. Post-development off-site proposals under BNG

The overlap in the off-site woodland has been identified and adjusted, with all habitats within the blue line now categorised as retention, creation or enhancement in a revised metric calculation and accompanying report. The HMMP has been produced as an illustration; the Natural England template document is yet to be prepared and will support the Biodiversity Gain Plan to be submitted prior to commencement.

4. Strategic significance and the HMMP

We will ensure that any necessary updates are made to the HMMP to meet the planning condition suggested in your consultation note, and that it incorporates detailed habitat creation and management prescriptions. The delivery of these proposals is not in question, and it is welcomed that the creation of new woodland habitat is deemed acceptable in this context. Further, as the LNRS has been published since the application was submitted, the off-site metric inputs have been updated accordingly in the revised metric calculation.

5. Herbicide use and use of flails for hedgerow management

I am unsure where this concern has arisen, as the HMMP provided does not recommend the use of herbicides. A clear instruction that herbicides must not be used can, however, be included in the final version submitted to meet a pre-commencement condition.

Please note that the HMMP presently states, at section 6.4: *"Hedges should be cut in rotation, cutting only a third of all hedgerows in one year. Flails should be avoided and the use of a circular saw is required."*

Within separate correspondence, I note the feedback received from the Ecology Officer regarding the method of establishing the drainage works and creating a connection to a nearby ditch. I would highlight that a reinstatement method such as that proposed here is clearly possible without creating a high degree of disturbance, through the use of a trencher, although there is not presently a detailed Construction Method Statement for this work. Any such disturbance would be extremely localised and, in the terms of the Statutory Metric User Guide published by Defra, constitutes a temporary impact that does not result in any measurable change in biodiversity value following reinstatement.

As this work is proposed within an area of Modified grassland, the proposed disturbance to a habitat of this low distinctiveness does not present a challenge to rapid habitat recovery. The low species diversity of this grassland means that re-seeding or turfing would not be necessary; simple measures to store soil and reinstate it within the trench following construction would, however, be followed. The outfall and any structure required to support it would be of such a size that it would not be mappable within the metric (less than 1 square metre in area).

I hope that these clarifications assist you in determining this application.

Kind regards



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