

Starwood House, Letchworth Garden City
(1006948)

Biodiversity Net Gain Assessment

April 2025

Quality Management	
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Project:	Starwood House, Letchworth Garden City
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1 Introduction

1.1 Background and Proposals

1.1.1 Aspect Ecology is advising Letchworth Investment LLP in respect of the land at Starwood House, Letchworth Garden City (hereafter referred to as ‘the site’), which is proposed for development to provide new commercial development. The proposals are for the erection of two buildings for Flexible Use Classes including Eg (ii) (iii), B2, B8, including servicing, parking, access and landscaping.

1.1.2 To inform the planning application, Aspect Ecology has undertaken a Biodiversity Net Gain (BNG) assessment to determine the level of BNG that can be achieved under the scheme. This work is based on the Statutory Biodiversity Metric tool¹ issued by Defra and informed by associated guidance issued by Defra, in combination with guidance developed by CIRIA, CIEEM and IEMA.

1.2 Biodiversity Net Gain Legislation, Policy and Best Practice

Legislation

1.2.1 In England, Biodiversity Net Gain has been mandatory since 12th February 2024 under Schedule 7A of the Town and Country Planning Act 1990 (as amended) (as inserted by Schedule 14 of the Environment Act 2021).

1.2.2 Schedule 7A identifies (Part 2) that planning permissions in England (with certain exceptions) are deemed to have been granted subject to a condition requiring the submission of a *Biodiversity Gain Plan* prior to commencement of development. The Biodiversity Gain Plan must include details in regard to Biodiversity Net Gain, demonstrating how the development will achieve a gain in calculated biodiversity value of at least 10%.

1.2.3 Government advice² sets out the information LPAs require in order to consider BNG as part of a planning application, in line with Section 7(1A) of The Town and Country Planning (Development Management Procedure)(England) Order 2015 (as amended). In particular, this sets out that planning applications should be accompanied by the following information (alongside references to where this can be located in this report):

- A statement confirming whether the applicant believes that planning permission, if granted, would be subject to the biodiversity gain condition (see section 1.3 of this report);
- In cases where the applicant believes that planning permission, if granted, would be subject to the biodiversity gain condition:-
 - i. the pre-development (‘baseline’) biodiversity value of the on-site habitat on the date of application (or an earlier date) including the completed Metric calculation tool (showing the calculations, the publication date and version of the Metric used to calculate that value) (see Table 3.3 and Appendix 6948/2 of this report);
 - ii. where the applicant wishes to use an earlier date, the proposed earlier date and the reasons for that date (not applicable to this project);

¹ Statutory Biodiversity Metric – Auditing and Accounting for Biodiversity – Calculation Tool. 23 July 2024

² <https://www.gov.uk/guidance/biodiversity-net-gain-what-local-planning-authorities-should-do> (updated 08/05/24)

- iii. a statement confirming whether the biodiversity value of the on-site habitat is lower on the date of application (or an earlier date) because of the carrying on of activities ('degradation') (see section 3.2 of this report);
- iv. where unauthorised degradation has taken place between 30th January 2020 and the submission of the planning application, the relevant date should be immediately before these activities were carried out (not applicable to this project);
- v. a description of any irreplaceable habitat on the land, that exists on the date of application (or an earlier date) (see section 3.3 of this report); and
- vi. a plan drawn to an identified scale (including the direction of north), showing on-site habitat existing on the date of application (or an earlier date), and any irreplaceable habitat (see Plan 6948/BNG1).

Local Policy

- 1.2.4 Planning policy at the local level is set out within the North Hertfordshire Local Plan (adopted in November 2022).

Policy NE4: Biodiversity and geological sites

Planning permission will only be granted for development proposals that appropriately protect, enhance and manage biodiversity in accordance with the hierarchy and status of designations and features listed in Policy SP12.

All development should deliver measurable net gains for biodiversity and geodiversity, contribute to ecological networks and the water environment, and/or restore degraded or isolated habitats where possible.

Applicants should, having regard to the status of any affected site(s) or feature(s):

a) Submit an ecological survey that is commensurate to the scale and location of the development and the likely impact on biodiversity, the legal protection or other status of the site;

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.

The acceptability of approach(es) to avoidance, mitigation and compensation will be commensurate with the status of the asset(s) likely to be affected by the application; Compensation is unlikely to be an appropriate solution for proposals affecting nationally or internationally designated sites other than in the most exceptional circumstances.

c) Include appropriate measures to manage construction impacts by demonstrating how existing wildlife habitats supporting protected or priority species will be retained, safeguarded and managed during construction;

d) Integrate appropriate buffers of complimentary habitat for designated sites and other connective features, wildlife habitats, priority habitats and species into the ecological mitigation and design. The appropriateness of any buffers will be considered having regard

to the status of the relevant habitat. 12 metres of complimentary habitat should be provided around wildlife sites (locally designated sites and above), trees and hedgerows. It may be necessary to exceed this distance for fragile habitats such as ancient woodland or to provide appropriate root protection for mature trees; and

e) Provide a long-term management and monitoring plan including mitigation measures as necessary. Local Geological Sites are ratified by the Herts & Middlesex Wildlife Trust (HMWT) and are afforded the same protection as Local Wildlife Sites.

Good Practice Principles for Development

1.2.5 CIRIA, CIEEM and IEMA have developed a set of principles on good practice to achieve Biodiversity Net Gain³, accompanied by a practical guide⁴. These principles provide a framework that helps improve the UK's biodiversity by contributing towards strategic priorities to conserve and enhance nature while progressing with sustainable development. They also provide a way for industry to show that projects follow good practice. Ten key principles are identified:

- 1) **Apply the Mitigation Hierarchy.** Do everything possible to first avoid and then minimise impacts on biodiversity. Only as a last resort, and in agreement with external decision-makers where possible, compensate for losses that cannot be avoided. If compensating for losses within the development footprint is not possible or does not generate the most benefits for nature conservation, then offset biodiversity losses by gains elsewhere.
- 2) **Avoid losing biodiversity that cannot be offset by gains elsewhere.** Avoid impacts on irreplaceable biodiversity - these impacts cannot be offset to achieve No Net Loss or Net Gain.
- 3) **Be inclusive and equitable.** Engage stakeholders early, and involve them in designing, implementing, monitoring and evaluating the approach to Net Gain. Achieve Net Gain in partnership with stakeholders where possible, and share the benefits fairly among stakeholders.
- 4) **Address risks.** Mitigate difficulty, uncertainty and other risks to achieving Net Gain. Apply well-accepted ways to add contingency when calculating biodiversity losses and gains in order to account for any remaining risks, as well as to compensate for the time between the losses occurring and the gains being fully realised.
- 5) **Make a measurable Net Gain contribution.** Achieve a measurable, overall gain for biodiversity and the services ecosystems provide while directly contributing towards nature conservation priorities.
- 6) **Achieve the best outcomes for biodiversity.** Achieve the best outcomes for biodiversity by using robust, credible evidence and local knowledge to make clearly-justified choices when:
 - Delivering compensation that is ecologically equivalent in type, amount and condition, and that accounts for the location and timing of biodiversity losses

³ CIEEM, CIRIA, IEMA (2016) *Biodiversity Net Gain: Good practice principles for development*.

⁴ CIEEM, CIRIA, IEMA (2019) *Biodiversity Net Gain: Good practice principles for development. A practical guide*.

- Compensating for losses of one type of biodiversity by providing a different type that delivers greater benefits for nature conservation
 - Achieving Net Gain locally to the development while also contributing towards nature conservation priorities at local, regional and national levels
 - Enhancing existing or creating new habitat
 - Enhancing ecological connectivity by creating more, bigger, better and joined areas for biodiversity
- 7) **Be additional.** Achieve nature conservation outcomes that demonstrably exceed existing obligations (i.e. do not deliver something that would occur anyway).
- 8) **Create a Net Gain legacy.** Ensure Net Gain generates long-term benefits by:
- Engaging stakeholders and jointly agreeing practical solutions that secure Net Gain in perpetuity
 - Planning for adaptive management and securing dedicated funding for long-term management
 - Designing Net Gain for biodiversity to be resilient to external factors, especially climate change
 - Mitigating risks from other land uses
 - Avoiding displacing harmful activities from one location to another
 - Supporting local-level management of Net Gain activities
- 9) **Optimise sustainability.** Prioritise Biodiversity Net Gain and, where possible, optimise the wider environmental benefits for a sustainable society and economy.
- 10) **Be transparent.** Communicate all Net Gain activities in a transparent and timely manner, sharing the learning with all stakeholders.

1.3 Statement on Whether Biodiversity Gain Condition Applies and Purpose of this Report

- 1.3.1 Based on the site proposals and habitats present, it is considered that a planning permission, if granted in respect of the proposals, would be subject to the Biodiversity Gain planning condition under the legislation. Accordingly, this report provides a BNG assessment, including details of the existing calculated biodiversity value(s) and associated information, accompanied by a completed Metric calculation tool (Excel workbook) in line with the legislative requirements. In addition, going beyond the scope of the statutory BNG requirements, this report provides an assessment of the likely net change in biodiversity value under the proposed development, and a consideration of how a 10% gain can be delivered.

2 Methodology

2.1 Baseline Habitat Survey

- 2.1.1 The site was surveyed in October 2024 in order to ascertain the general ecological value of the land contained within the boundaries of the site and to identify the main habitats and ecological features present.
- 2.1.2 The site was surveyed based on standard Phase 1 Habitat Survey methodology⁵, whereby the habitat types present are identified and mapped, together with an assessment of the species composition of each habitat. The site was classified into areas of similar botanical community types, with a representative species list compiled for each habitat identified. Habitats were classified in accordance with the UK Habitat Classification system, version 2.0⁶, and condition assessed in accordance with the methodology set out in the Metric Technical Annex⁷ and using professional judgement. In line with guidance⁸, the fine scale minimum mapping unit (MMU) of 25sqm or 5m in length has been used where possible / relevant.

2.2 Survey Constraints and Limitations

- 2.2.1 All of the species that occur in each habitat would not necessarily be detectable during survey work carried out at any given time of the year, since different species are apparent during different seasons. The Phase 1 habitat survey was undertaken outside the optimal season, albeit the nature of the habitats within the site allowed for the broad habitat types to be identified and for an adequate assessment of the intrinsic ecological interest of the site to be made. Nonetheless, where appropriate, a conservative approach has been utilised when inputting conditions into the metric, in order to reflect the survey information and associated seasonal timescales (as detailed below).

2.3 Biodiversity Net Gain Assessment

- 2.3.1 To quantify the level of BNG that can be delivered under the proposed development, the change in biodiversity value resulting from the scheme has been calculated using the Metric calculation tool, as informed by the associated User Guide⁹. This takes account of the size, distinctiveness and ecological condition of existing and proposed habitat areas to provide a proxy measure of the present and forecast biodiversity value of a site, and therefore determine the overall change in biodiversity value.
- 2.3.2 In line with the 'information that LPA's require' (see paragraph 1.2.3. above), the pre-development ('baseline') biodiversity value of the on-site habitat has been calculated based on the habitat survey information collected during the baseline habitat survey (see 2.1 above).
- 2.3.3 Going beyond the minimum statutory requirements (which only require the baseline habitat value to be defined at the planning application stage – see paragraph 1.2.3 above), the post-development biodiversity value has also been calculated, based on drawing 'RG-

⁵ Joint Nature Conservation Committee (2010, as amended) '*Handbook for Phase 1 habitat survey: A technique for environmental audit.*'

⁶ UKHab Ltd (2023). UK Habitat Classification Version 2.0 (at <https://www.ukhab.org>)

⁷ Statutory Biodiversity Metric - Technical Annex 1 - Condition Assessment Sheets and Methodology

⁸ The UK Habitat classification User Manual. Version 1.1. 2020

⁹ Defra (Feb 2024) The Statutory Biodiversity Metric – User Guide

LD-100-01 P1'. A number of assumptions have been made in terms of the landscaping and management proposals, based on comparative developments and what is realistic and feasible under the proposed land uses and landscape space types. Further details of assumptions made in populating the metric are provided in Chapter 4 below.

2.4 Strategic Significance

2.4.1 Strategic significance refers to the local significance of habitat parcels based on their location and the habitat type. The Metric gives additional unit value to habitat parcels that are mapped within a published Local Nature Recovery Strategy (LNRS) or, where no LNRS has been published, to habitats mapped / listed in alternative documents specified by the Local Planning Authority (e.g. Draft LNRS, Local Plans, Biodiversity Action Plans, Green Infrastructure Strategies, etc.). Strategic significance has been assigned to the pre- and post-development habitats in accordance with the methodology set out in Tables 7 and 8 of the User Guide, as follows:

- High (formally identified in local strategy);
- Medium (location ecologically desirable but not in local strategy);
- Low (area / compensation not in local strategy).

3 Pre-development ('Baseline') Habitats

3.1 Overview

- 3.1.1 Consideration of the classification and condition rationale for the pre-development ('baseline') habitats is set out below. In addition, consideration is given to the relevant date at which the pre-development biodiversity value should be taken (noting any relevant activities carried out that may have resulted in a lower biodiversity value being recorded than would otherwise be the case), along with the presence of any irreplaceable habitats and strategic significance awarded under BNG guidance.
- 3.1.2 Detailed condition assessment sheets are provided at Appendix 6948/1, with habitat locations depicted on Plan 6948/BNG1.

3.2 Degradation

- 3.2.1 During the survey work undertaken in October 2024, no evidence was recorded to suggest that any activities of the type mentioned in paragraph 6 or 6A of Schedule 7A to the Town and Country Planning Act 1990 (as amended) have occurred since 30th January 2020. Accordingly, the baseline habitat value is considered to be as recorded during the survey work, which remains up to date at the current time in line with standard guidance¹⁰.

3.3 Irreplaceable Habitats

- 3.3.1 No irreplaceable habitats are present within the site.

3.4 Strategic Significance

- 3.4.1 No strategic significance has been applied as the scheme is not located in any particular area of recognised strategic significance as defined under the Technical Supplement, such as Biodiversity Opportunity Areas, or other strategic biodiversity areas such as those that might be defined under Local Plan Policy or regional Biodiversity Actions Plans. The 'strategic significance' of all habitats included within the calculation is therefore given as 'Area/Compensation not in Local Strategy/no local strategy'.

3.5 Baseline Habitats

- 3.5.1 A summary of the classification and condition rationale for the pre-development ('baseline') habitats is set out at Table 3.1 below, with pre-development hedgerows set out at Table 3.2. below. Descriptions of the existing habitats are set out in detail within the Ecological Appraisal prepared by Aspect Ecology, dated April 2025 (ref. 1006948 EcoAp vf1).

Table 3.1. Pre-development Habitats

Habitat	Recorded Condition	Condition Rationale
Grassland - Other lowland acid grassland	Moderate	Grassland G1 comprises an unmanaged, abandoned area on shallow soils. The sward structure was recorded as variable, with some open, shorter sward areas maintained by the shallow soils and occasional rabbit grazing, and other taller

¹⁰ CIEEM (April 2019) On the lifespan of ecological reports and surveys

		sward areas with colonising scrub, especially low Bramble which was frequent throughout. The south-western part of G1 was very open and dominated by bryophytes, with patchier vascular plant cover. Assessed as being in moderate condition due to passing four out of the five condition assessment criteria. See relevant condition assessment sheet for further information.
Woodland - Other woodland; mixed	Poor	A tree group is present on site which previously functioned as landscaping planting on site, classified as a mixed secondary woodland with a canopy dominated by Scots Pine <i>Pinus sylvestris</i> . Assessed to be in poor condition due to scoring 29 out of 39 in the condition assessment criteria sheet. See relevant condition assessment sheet for further information.
Heathland and shrub – Mixed scrub	Poor	Bands of scrub present around the margins of the site. Assessed to be in poor condition due to failing to pass more than two of the five condition assessment criteria. See relevant condition assessment sheet for further information.
Urban – Introduced shrub	Condition Assessment N/A	A condition assessment is not applicable for this habitat type.
Urban – Developed land; sealed surface	N/A - other	A condition assessment is not applicable for this habitat type.
Individual trees – Urban tree	Moderate	All trees assessed to be in moderate condition due to passing three or four of the condition assessment criteria.

Table 3.2. Pre-development Hedgerows

Habitat	Recorded Condition	Condition Rationale
Native Hedgerow (H1)	Moderate	See relevant condition assessment sheet.
Non-native and ornamental hedgerow (ORN1)	Poor	See relevant condition assessment sheet.

3.6 Pre-development Biodiversity Value of On-site Habitats

- 3.6.1 The pre-development biodiversity value of the on-site habitat has been calculated using the Statutory Biodiversity Metric. A full copy of the Metric is provided as a separate Excel workbook. The overall pre-development biodiversity value of the on-site habitat is set out within Table 3.3 (below).

Table 3.3. Pre-development ('baseline') biodiversity value of the on-site habitat based on the Statutory Biodiversity Metric

Onsite baseline	Overall Units
Habitats	9.32
Hedgerows and tree lines	0.39
Watercourse	N/A

4 Post-development Habitats and BNG Assessment Result

4.1 Introduction

4.1.1 The BNG legislation places a duty on Local Planning Authorities to request the pre-development biodiversity value of the on-site habitat on the date of application (or an earlier date) as part of qualifying planning applications. This information is provided in the previous chapter of this report. Going beyond the scope of the statutory requirements, this chapter considers the likely change in biodiversity value as a result of the proposed development. Such information is not required under the legislation until planning has been approved (to be set out within a Biodiversity Gain Plan), but this information is provided now in order to provide the LPA with information as to how a 10% gain in biodiversity can be delivered.

4.2 Assumptions

4.2.1 When inputting the post-development habitat areas and condition to the Metric, the following assumptions have been made:

- Newly created habitat under the proposals will be managed appropriately to reach the assigned target condition (anticipated to be defined by a future management plan).
- No watercourses are present in the site or within 10m of its boundary, and therefore watercourse habitats do not need to be considered in the BNG calculation.
- Proposed new trees that would be planted are assessed as small size and would target moderate condition (this assumes native species and/or at least 20% vegetation provided below the tree canopy). Tree areas have been estimated according to the tree calculator within the metric.
- Other assumptions are detailed below and within the metric.

4.3 Strategic Significance

4.3.1 No strategic significance has been applied to the post-development habitats within the site.

4.4 Habitat Type and Condition

4.4.1 Summaries of the proposed post-development habitat creation / enhancement are set out in Tables 4.1 to 4.3 below. Post-development habitat locations are shown on Plan 6948/BNG2.

Table 4.1. Post-development onsite Habitat Creation

Habitat	Target Condition	Condition Rationale
Urban – Artificial unvegetated; unsealed surface	N/A - Other	An artificial unvegetated and unsealed area will be established in the northeastern corner of the site to provide amenity outdoor space to be utilised by occupants.

Urban - Developed Land; sealed surface	N/A – Other	This includes all roads, parking and buildings within the site. No assessment for the condition of this habitat is required.
Urban – Introduced shrub	Condition Assessment N/A	Areas of introduced shrub will be planted surrounding the development footprint and frontages of the site as a resilient urban flora species.
Heathland and shrub – Mixed scrub	Moderate	Areas of proposed native scrub planting, to include a minimum of three woody species, will be planted across the site. No invasive or undesirable species to be included. A well-developed edge and good age range can be developed over time. The scrub is therefore expected to achieve a minimum of ‘moderate’ condition. The scrub planting is expected to be utilised to form an additional buffer between the existing industrial estate and the proposed development footprint. This will also increase ecotone diversity on site, provide additional foraging resources and increase habitat connectivity with the wider landscape.
Grassland – Modified grassland	Moderate	Areas of amenity grassland to be created near to the built development. Through planting of an appropriate species-rich mix, management to prevent encroachment of scrub and bracken as well as an absence of non-native species this habitat is anticipated to achieve at least moderate condition within one year.
Grassland – Other neutral grassland	Moderate	Areas of other neutral grassland are to be created. These are classified as ‘Other Neutral Grassland’ since they will be sown with a species-rich grass seed mix and are expected to achieve ‘Moderate’ condition. These areas will be subject to management like that of ‘Other neutral grassland’ in the form of over-seeding with a suitable wildflower mix and implementation of traditional hay-meadow management. It is anticipated that this habitat will support a high species diversity (>10) and structure; with Bracken, scrub and physical damage to be kept to a minimum and provide further suitable reptile habitat in site.
Urban – Rain garden	Good	Rain Gardens will be provided within the central spine running through the site. It is assumed that all three condition criteria will be met; providing a varied vegetation structure, a diverse range of native flowering plants and invasive non-native species use is to be kept below 5% cover. Assuming this, the Rain Gardens provided throughout the site will reach ‘Good’ condition.
Individual trees - Urban Trees	Moderate	A total of 76 Native trees to be planted throughout the site adjacent to the built development, expected

		to achieve moderate condition within 30 years with suitable management.
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Table 4.2. Post-development onsite Habitat Enhancement.

Habitat	Target Condition	Condition Rationale
Introduced shrub → Mixed scrub	Moderate	Areas of ornamental planting along the site boundaries to be enhanced with supplementary native shrub planting/ gap filling. Furthermore, where Cotoneaster is present, specimens will be removed and replaced with native planting. Once enhanced, area expected to reach three of the five condition assessment criteria
Mixed scrub → Mixed scrub	Poor → Moderate	Areas of retained scrub will be protected and enhanced with supplementary native woody species planting, along with the removal of non-native invasive species. Once enhanced, areas are expected to reach at least three of the five condition assessment criteria.

Table 4.3. Post-development onsite Linear Feature (Hedgerow) Creation.

Habitat	Target Condition	Condition Rationale
Native Hedgerow	Moderate	Native hedgerow will be created along sections of the northern and southern boundaries. Through suitable management this habitat would be expected to reach moderate condition within 5 years.

4.5 Anticipated Change in Biodiversity

4.5.1 The anticipated change in biodiversity value as a result of the proposals has been calculated using the Statutory Biodiversity Metric, based on the assumptions and considerations set out above. A copy of the Metric is provided separately as an Excel workbook and relevant extracts from the completed calculator tool are provided at Appendix 6948/2.

4.5.2 When considering the current proposals, the Metric calculates that the development will likely result in the following changes in biodiversity, summarised in Table 4.4 (below):

Table 4.4. Anticipated change in biodiversity

	Change in Units	% Change	Trading Rules Satisfied?
Onsite Habitats	-0.55	-5.93%	No
Onsite Hedgerows and tree lines	+0.39	+315.97%	Yes
Onsite Watercourses	N/A – No watercourses present		

4.5.3 On the basis of the considerations and proposals set out (including the assumptions and limitations set out above and within the comments in the spreadsheet tool), the Statutory Metric calculator indicates a net habitat biodiversity unit change for the proposals within the site boundary of -0.55 Habitat Units (representing a calculated loss of -5.93%) and +0.39 Hedgerow Units (representing a calculated gain of 315.97%) within the site boundary.

- 4.5.4 As can be seen from the above, under the proposed development a 10% net gain in biodiversity will not be delivered within the site itself. To achieve a 10% net gain in habitat units, a total of 1.47 off-site units are required, of which units must comprise Other woodland; mixed and Other neutral grassland or a higher distinctiveness habitat type. However, in order to satisfy the trading rules and validate the metric calculation, a total of 1.97 units will be required, again, comprising a mix of medium distinctiveness grassland, medium distinctiveness woodland and individual trees.
- 4.5.5 Under the relevant legislation, consideration of how the 10% gain will be delivered offsite is determined post-planning, via a Biodiversity Gain Plan. However, at this stage it is helpful to highlight that there are local offsetting options available, and Hertfordshire County Council does run a BNG Site Matching Service. Given the low number of habitat units and the low distinctiveness of the existing on-site habitats, offsetting through the creation of offsite habitats is expected to be readily achievable. Alternatively, the offsite BNG units could be delivered through a national BNG broker, subject to a application of the relevant spatial risk multiplier, where relevant. Finally, as a last resort, the offsite BNG units can be delivered by purchasing the government's statutory biodiversity credits. The exact approach to be pursued can be confirmed by way of a Biodiversity Gain Plan following grant of planning permission.

4.6 Biodiversity Gain Hierarchy

- 4.6.1 The Biodiversity Gain Hierarchy and its effect for the purpose of the statutory framework for BNG is set out in Articles 37A and 37D of the Town and Country Planning (Development Management Procedure) (England) Order 2015. This hierarchy (which does not apply to irreplaceable habitats) sets out a list of priority actions:
- i. firstly, in relation to on-site habitats which have a medium, high and very high distinctiveness (a score of four or more according to the Statutory Biodiversity Metric), the avoidance of adverse effects from the development and, if they cannot be avoided, the mitigation of those effects; and
 - ii. secondly, in relation to all on-site habitats which are adversely affected by the development, the adverse effect should be compensated by prioritising in order, where possible, the enhancement of existing onsite habitats, creation of new on-site habitats, allocation of registered offsite gains and finally the purchase of biodiversity credits.
- 4.6.2 In relation to point (i), there are no high or very high distinctiveness habitats within the site. The only medium distinctiveness habitat present is other lowland acid grassland. It has not been feasible to avoid adverse effects on this habitat, therefore mitigation is provided.
- 4.6.3 In relation to point (ii), adverse effects have been compensated by enhancing existing on-site habitats and creating new on-site habitats.

5 Summary and Conclusions

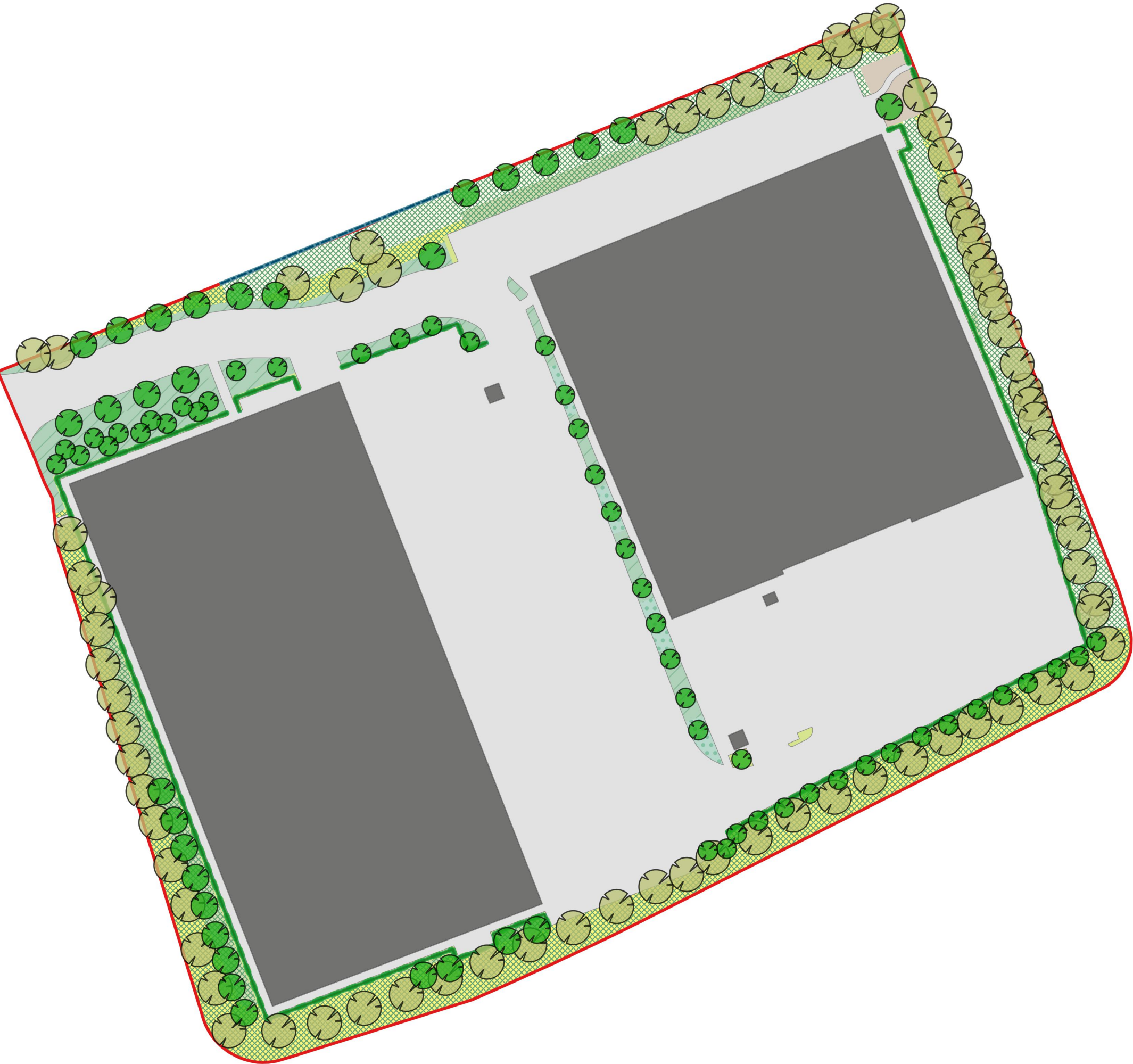
- 5.1 Aspect Ecology is advising Letchworth Investment LLP in respect of the land at Starwood House, Letchworth Garden City, which is proposed for development to provide commercial development units.
- 5.2 BNG is a process that is considered both during the determination of planning applications, and then post planning via a number of set documents (including a Biodiversity Gain Plan and, where required, a Habitat Management and Monitoring Plan). Following on from the amendments to Schedule 7A of the Town and Country Planning Act 1990, government advice has been published which sets out the information that LPAs require in order to consider BNG as part of a planning application. The necessary information is included within this report, therefore the LPA's statutory requirements under the BNG legislation have been satisfied.
- 5.3 In addition, going beyond the scope of the statutory requirements (which only require the baseline habitat value to be defined at the planning application stage – see paragraph 1.2.3 above), a preliminary BNG assessment of the post-development value has been undertaken, which concludes that the proposed development will result in a net loss in habitat units amounting to 0.55 units (-5.93%). To achieve a 10% net gain in habitat units, a total of 1.47 off-site units would therefore be required, whilst a total of 1.97 units would be required to satisfy the metric trading rules.

Plan 6948/BNG1:

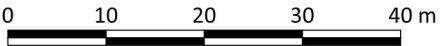
Pre-development Habitat Mapping

Plan 6948/BNG2:

Post-development Habitat Mapping



- Key:
- Site Boundary
 - Introduced shrub Enhanced to Mixed scrub (0.2300ha)
 - Proposed Artificial unvegetated, unsealed surface (0.0100ha)
 - Proposed Developed land; sealed surface: Building (1.1075ha)
 - Proposed Developed land; sealed surface: Hardstanding (0.9850ha)
 - Proposed Mixed scrub (0.0500ha)
 - Proposed Modified grassland (0.0450ha)
 - Proposed Other neutral grassland (0.0850ha)
 - Proposed Rain garden (0.0100ha)
 - Retained Mixed scrub (0.1275ha)
 - Proposed Native hedgerow (0.465km)
 - Retained Non-native and ornamental hedgerow (0.045km)
 - Proposed Urban Tree [77]
 - Retained Urban Tree [79]



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Starwood House

PROJECT

Post-development Habitat Mapping

TITLE

6948/BNG2

DRAWING NO.

F/DO

REV

April 2025

DATE

JW/DO

QC



Appendix 6948/1:

Habitat Condition Assessment Sheets

On-site or off-site, site name and location		Starwood House, Letchworth Garden City	Survey date and Surveyor name	Mark Doughty
Limitations (if applicable)			Survey reference (if relating to a wider survey)	
Grid reference			Habitat parcel reference	G1
Habitat Description				
ukhab – UK Habitat Classification				
Condition Assessment Criteria			Criterion passed (Yes or No)	Notes (such as justification)
A	The parcel represents a good example of its habitat type, with a consistently high proportion of characteristic indicator species present relevant to the specific habitat type (and relative to Footnote 3 suboptimal species which may be listed in the UKHab description). ¹ Note - this criterion is essential for achieving Moderate or Good condition for non-acid grassland types only.		No	
B	Sward height is varied (at least 20% of the sward is less than 7 cm and at least 20% is more than 7 cm) creating microclimates which provide opportunities for insects, birds and small mammals to live and breed.		Yes	
C	Cover of bare ground is between 1% and 5%, including localised areas, for example, rabbit warrens ² .		Yes	
D	Cover of bracken <i>Pteridium aquilinum</i> is less than 20% and cover of scrub (including bramble <i>Rubus fruticosus</i> agg.) is less than 5%.		Yes	
E	Combined cover of species indicative of suboptimal condition ³ and physical damage (such as excessive poaching, damage from machinery use or storage, damaging levels of access, or any other damaging management activities) accounts for less than 5% of total area. If any invasive non-native plant species ⁴ (as listed on Schedule 9 of WCA ⁵) are present, this criterion is automatically failed.		Yes	
Additional Criterion - must be assessed for all non-acid grassland types				
F	There are 10 or more vascular plant species per m ² present, including forbs that are characteristic of the habitat type (species referenced in Footnote 3 and 5 cannot contribute towards this count). Note - this criterion is essential for achieving Good condition for non-acid grassland types only.			
Essential criterion for Good condition achieved (for non-acid grassland) (Yes or No)				
Number of criteria passed				
Condition Assessment Result	Condition Assessment Score	Score Achieved x/√		
Acid grassland types (Result out of 5 criteria)				
Passes 5 criteria	Good (3)			
Passes 3 or 4 criteria	Moderate (2)	Yes		
Passes 2 or fewer criteria	Poor (1)			

On-site or off-site, site name and location	Starwood House, Letchworth Garden City	Survey date and Surveyor name		Mark Doughty									
		Survey reference (if relating to a wider survey)											
Limitations (if applicable)		Habitat parcel reference											
		SC1	SC2	SC3	SC4								
Condition Assessment Criteria		Grid reference											
		Criterion passed (Yes or No)										Notes (such as justification)	
A	The parcel represents a good example of its habitat type - the appearance and composition of the vegetation closely matches its UKHab description (where in its natural range). ¹ - At least 80% of scrub is native, - There are at least three native woody species ² , - No single species comprises more than 75% of the cover (except hazel <i>Corylus avellana</i> , common juniper <i>Juniperus communis</i> , sea buckthorn <i>Hippophae rhamnoides</i> (only in its restricted native range), or box <i>Buxus sempervirens</i> , which can be up to 100% cover).	No	No	No	No								
B	Seedlings, saplings, young shrubs and mature (or ancient or veteran ³) shrubs are all present.	No	No	No	No								
C	There is an absence of invasive non-native plant species ⁴ (as listed on Schedule 9 of WCA ⁵) and species indicative of suboptimal condition ⁶ make up less than 5% of ground cover.	Yes	No	No	No								
D	The scrub has a well-developed edge with scattered scrub and tall grassland and or forbs present between the scrub and adjacent habitat.	No	Yes	No	No								
E	There are clearings, glades or rides present within the scrub, providing sheltered edges.	No	Yes	No	No								
Number of criteria passed		1	2	0	0								
Condition Assessment Result (out of 5 criteria)	Condition Assessment Score	Score Achieved ×/√											
Passes 5 criteria	Good (3)												
Passes 3 or 4 criteria	Moderate (2)												
Passes 2 or fewer criteria	Poor (1)	Yes	Yes	Yes	Yes								

On-site or off-site, site name and location	Starwood House, Letchworth Garden City	Survey date and Surveyor name	Mark Doughty		
Limitations (if applicable)		Survey reference (if relating to a wider survey)			
Grid reference		Habitat parcel reference	W1		
Condition Assessment Criteria					
Indicator	Good (3 points)	Moderate (2 points)	Poor (1 point)	Score per indicator	Notes (such as justification)
A Age distribution of trees	Three age-classes ¹ present.	Two age-classes ¹ present.	One age-class ¹ present.	2	
B Wild, domestic and feral herbivore damage	No significant browsing damage evident in woodland ² .	Evidence of significant browsing pressure is present in less than 40% of whole woodland ² .	Evidence of significant browsing pressure is present in 40% or more of whole woodland ² .	3	
C Invasive plant species	No invasive species ³ present in woodland.	Rhododendron <i>Rhododendron ponticum</i> or cherry laurel <i>Prunus laurocerasus</i> not present, and other invasive species ³ <10% cover.	Rhododendron or cherry laurel present, or other invasive species ³ ≥10% cover.	1	
D Number of native tree species	Five or more native tree or shrub species ⁴ found across woodland parcel.	Three to four native tree or shrub species ⁴ found across woodland parcel.	Two or less native tree or shrub species ⁴ across woodland parcel.	2	
E Cover of native tree and shrub species	>80% of canopy trees and >80% of understorey shrubs are native ⁵ .	50 - 80% of canopy trees and 50 - 80% of understorey shrubs are native ⁵ .	<50% of canopy trees and <50% of understorey shrubs are native ⁵ .	1	Mostly Portuguese laurel ground cover limited to Roseof Sharon
F Open space within woodland	10 - 20% of woodland has areas of temporary open space ⁶ . Unless woodland is <10ha, in which case 0 - 20% temporary open space is permitted ⁷ .	21 - 40% of woodland has areas of temporary open space ⁶ .	<10% or >40% of woodland has areas of temporary open space ⁶ . But if woodland <10ha has <10% temporary open space, please see Good category ⁷ .	2	
G Woodland regeneration	All three classes present in woodland ⁸ ; trees 4 - 7 cm Diameter at Breast Height (DBH), saplings and seedlings or advanced coppice regrowth.	One or two classes only present in woodland ⁸ .	No classes or coppice regrowth present in woodland ⁸ .	1	Seedlings only
H Tree health	Tree mortality 10% or less, no pests or diseases and no crown dieback ⁹ .	11% to 25% tree mortality and or crown dieback or low-risk pest or disease present ⁹ .	Greater than 25% tree mortality and or any high-risk pest or disease present ⁹ .	2	Some/few dead trees
I Vegetation and ground flora	Recognisable NVC plant community ¹⁰ at ground layer present, strongly characterised by ancient woodland flora specialists.	Recognisable woodland NVC plant community ¹⁰ at ground layer present.	No recognisable woodland NVC plant community ¹⁰ at ground layer present.	1	Virtually no ground flora
J Woodland vertical structure	Three or more storeys across all survey plots, or a complex woodland ¹¹ .	Two storeys across all survey plots ¹¹ .	One or less storey across all survey plots ¹¹ .	2	
K Veteran trees	Two or more veteran trees ¹² per hectare.	One veteran tree ¹² per hectare.	No veteran trees ¹² present in woodland.	1	
L Amount of deadwood	50% of all survey plots within the woodland parcel have deadwood, such as standing and fallen deadwood, large dead branches and or stems, branch stubs and stumps, or an abundance of small cavities ¹³ .	Between 25% and 50% of all survey plots within the woodland parcel have deadwood, such as standing and fallen deadwood, large dead branches and or stems, stubs and stumps, or an abundance of small cavities ¹³ .	Less than 25% of all survey plots within the woodland parcel have deadwood, such as standing and fallen deadwood, large dead branches and or stems, stubs and stumps, or an abundance of small cavities ¹³ .	1	No deadwood
M Woodland disturbance	No nutrient enrichment or damaged ground evident ¹⁴ .	Less than 1 hectare in total of nutrient enrichment across woodland area, and or less than 20% of woodland area has damaged ground ¹⁴ .	1 hectare or more of nutrient enrichment, and or 20% or more of woodland area has damaged ground ¹⁴ .	2	Some damaged ground
Total Score (out of a possible 39)				21	
Condition Assessment Result			Condition Assessment Score	Result Achieved	
Total score >32 (33 to 39)			Good (3)	Poor	
Total score 26 to 32			Moderate (2)		
Total score <26 (13 to 25)			Poor (1)		
Suggested enhancement interventions to improve condition score					

Appendix 6948/2:

Relevant Output from the Statutory Biodiversity Metric
Calculation Tool

Project details			
Planning authority:	North Hertfordshire District Council		
Project name:	Starwood House, Letchworth Garden City		
Applicant:	Letchworth Investment LLP		
Application type:			
Planning application reference:			
Completed by:	Jonathan Wild		
Date of metric completion:	28 April 2025		
Reviewer:	Mark Doughty		
Calculation iteration:	vfl		
Planning authority reviewer:			
Date of planning authority review:			
Target % net gain:	10%		
Irreplaceable habitat present at baseline:	No ✓		
Total site area - including irreplaceable habitat area (hectares):	2.65	Irreplaceable habitat site area (hectares):	0.00
Total off-site area - including irreplaceable habitat area (hectares):	N/A	Irreplaceable habitat area off-site (hectares):	N/A

Cell style conventions	
⚠	Attention required
▲	Input error/rules and principles not met
	Use of this cell is not appropriate
	Enter data
	Automatic lookup
	Result

Starwood House, Letchworth Garden City
Headline Results
Scroll down for final results ▲

Return to
results menu

On-site baseline	Habitat units	9.23
	Hedgerow units	0.39
	Watercourse units	0.00

On-site post-intervention (including habitat retention, creation & enhancement)	Habitat units	8.68
	Hedgerow units	1.60
	Watercourse units	0.00

On-site net change (units & percentage)	Habitat units	-0.55	-5.93%
	Hedgerow units	1.22	315.97%
	Watercourse units	0.00	0.00%

Off-site baseline	Habitat units	0.00
	Hedgerow units	0.00
	Watercourse units	0.00

Off-site post-intervention (including habitat retention, creation & enhancement)	Habitat units	0.00
	Hedgerow units	0.00
	Watercourse units	0.00

Off-site net change (units & percentage)	Habitat units	0.00	0.00%
	Hedgerow units	0.00	0.00%
	Watercourse units	0.00	0.00%

Combined net unit change (including all on-site & off-site habitat retention, creation & enhancement)	Habitat units	-0.55
	Hedgerow units	1.22
	Watercourse units	0.00

Spatial risk multiplier (SRM) deductions	Habitat units	0.00
	Hedgerow units	0.00
	Watercourse units	0.00

FINAL RESULTS

Total net unit change (including all on-site & off-site habitat retention, creation & enhancement)	Habitat units	-0.55
	Hedgerow units	1.22
	Watercourse units	0.00

Total net % change (Including all on-site & off-site habitat retention, creation & enhancement)	Habitat units	-8.93%
	Hedgerow units	315.97%
	Watercourse units	0.00%

Trading rules satisfied?	No - Check Trading Summaries ▲
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Unit Type	Target	Baseline Units	Units Required	Unit Deficit
Habitat units	10.00%	9.23	10.15	1.47
Hedgerow units	10.00%	0.39	0.42	0.00
Watercourse units	10.00%	0.00	0.00	0.00

No additional hedgerow units required to meet target ✓
No additional watercourse units required to meet target ✓

Input errors/rule breaks present in metric ▲

Appendix 6948/3:

Landscape Drawing Ref: RG-LD-100-01 P1

LEGEND

Site Boundary

Soft Landscape Materials

Existing Trees

Existing Vegetation Retained

Proposed Trees
Refer to planting schedule for details

H1- Proposed Native Hedgerow

M1- Proposed Flowering lawn ; Emorsgate:
ELJ Mown Edge with Bulb planting around
the edges. All bulbs to be planted within
mown strips

W1- Proposed Wildflower Grassland
Emorsgate Seed EH1 Wildflower Mix
with Native Bulb Collection

S1- Proposed Ornamental Planting
with Native Bulb Collection

RG- Proposed Rain Garden

Hard Landscape Materials

P0: In-situ Concrete Construction.
To Civil Engineer's spec. HGV Loading.

P1 - Road;
Tarmac road surface to Engineer's detail

P2: Loose Gravel - Porous.
50mm stone type, colour & size to Architects spec.

P3 - Pedestrian footpath;
200 x 100mm Conservation block paving Dark grey;
Stretcher bond

P4 - Parking;
Porous block paving; color: dark grey

P5 - Pedestrian & cycle route;
High quality precast concrete paving setts;
size 100x100x50mm; Finish & color: Golden,
Supplier: Tobermore

P6: Natural Pine Bark Mulch.
Landscape Architects Specification.
Minimum Depth: 150mm; Edging: Softwood Timber.

Retaining Wall to Architects Detail

Boundaries and Furniture

Timber Picnic Set;
Iroko timber, galvanised powder coated steel in
anthracite grey. Bailey streetscene Greengate
Picnic Set, or similar and approved.

Proposed Fencing to Architects Detail

SB - Signage board

Iroko timber Bench; Galvanised powder coated
steel; colour: Grey

Litter bin; galvanised steel with vertical timber
slate; Supplier: Bailey streetscene

FOR PLANNING

Project
Avenue One, Letchworth

Drawing Title
Landscape General Arrangement

Date 08.04.25	Scale 1:500 @A1	Drawn by BA	Check by DS
Project No 333101842	Drawing No RG-LD-100-01	Revision P1	

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