

Preliminary Ecological Appraisal

October 2025

**Land East of Talbot Way
Letchworth**

Prepared by
CSA Environmental

On behalf of
Barratt David Wilson Homes (North Thames)

Report No: CSA/7316/04

This report may contain sensitive ecological information. It is the responsibility of the Local Authority to determine if this should be made publicly available.

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CONTENTS

Page

Executive Summary	1
1.0 Introduction	2
2.0 Legislation, Planning Policy & Standing Advice	3
Legislation	3
National Planning Policy	3
Local Planning Policy	3
Standing Advice	3
3.0 Methods	4
Desk Study	4
Field Survey	5
Limitations	6
4.0 Baseline Ecological Conditions	7
Nature Conservation Designations	7
Habitats and Flora	9
Fauna	14
5.0 Discussion and Recommendations	19
Nature Conservation Designations	19
Habitats and Flora	19
Fauna	19
Opportunities for Ecological Enhancement	20
6.0 References	21

Appendices

Appendix A: Habitats Plan & Habitat Summary Table

Appendix B: Legislation, Planning Policy and Standing Advice

Appendix C: Desk Study Information

Appendix D: Habitats and Flora Species List

Appendix E: Badger

Appendix F: Reptiles

Appendix G: Great Crested Newt

EXECUTIVE SUMMARY

Land East of Talbot Way, Letchworth benefits from outline planning consent for residential development from North Hertfordshire Council (ref: 21/00504/OP) following allocation of the Site in the North Hertfordshire Local Plan 2011-2031 (ref: LG3). A reserved matters application is to be submitted pursuant to this existing consent.

CSA Environmental was instructed by Barratt David Wilson Homes (North Thames) to undertake a Preliminary Ecological Appraisal (PEA) of the Site to confirm current ecological conditions, inform detailed scheme design, highlight opportunities for ecological enhancement and determine the need for any additional investigation/survey. As part of this PEA, a desk study and field survey of the Site were undertaken in May 2025, including a UK Habitat Classification survey.

Survey work conducted to support the outline planning consent identified grassland at the Site as being agriculturally 'modified' and in poor condition for which biodiversity net gain calculations were based. Update survey work in 2025 by CSA confirmed grassland to comprise other neutral grassland in poor condition.

Update badger, reptile and GCN surveys conducted in 2025 confirmed their likely absence from the Site.

No overriding constraints to development of the Site have been identified. Recommendations have been provided for ecological enhancement measures that could be delivered as part of the proposed development. The Biodiversity Net Gain Assessment (BNGA) report should be reviewed alongside this report.

1.0 INTRODUCTION

- 1.1 This report has been prepared by CSA Environmental on behalf of Barratt David Wilson Homes (North Thames). It sets out the findings of a Preliminary Ecological Appraisal (PEA) of Land East of Talbot Way, Letchworth (hereafter referred to as 'the Site'). The Site benefits from the planning consent for residential development from the North Hertfordshire Local Plan 2011-2031, planning application reference 21/00504/OP.
- 1.2 The scope of this appraisal has been determined with due consideration for best-practice guidance provided by the Chartered Institute of Ecology and Environmental Management (CIEEM, 2017), and to the *Biodiversity: Code of practice for planning and development* (BS 42020:2013) published by the British Standards Institution (2013).
- 1.3 The Site occupies an area of c. 5.54ha and is located around central grid reference TL 23251 34120, to the north-east of Letchworth Garden City. It consists of a field, currently grassland, which was previously arable land. An area of young plantation woodland is also present (see Habitats Plan in Appendix A).
- 1.4 This PEA aims to:
- Confirm the baseline ecological conditions of the Site and its wider context
 - Identify any updated ecological constraints to development of the Site
 - Inform detailed scheme design
 - Highlight opportunities for ecological enhancement Biodiversity Net Gain (BNG)
- 1.5 To achieve these aims, an ecological desk study and field survey were undertaken of the Site, alongside further surveys for badger (Appendix E), reptiles (Appendix F) and great crested newt (appendix G), the findings of which are presented herein.

2.0 LEGISLATION, PLANNING POLICY & STANDING ADVICE

Legislation

- 2.1 Legislation relating to wildlife and biodiversity of particular relevance to this PEA includes:
- The Conservation of Habitats and Species Regulations 2017 (as amended)
 - The Wildlife and Countryside Act 1981 (as amended)
 - The Natural Environment and Rural Communities (NERC) Act 2006
 - The Protection of Badgers Act 1992
 - The Environment Act 2021
- 2.2 This above legislation has been addressed, as appropriate, in the production of this report. Further information on the above legislation is provided in Appendix B.

National Planning Policy

- 2.3 The National Planning Policy Framework (NPPF) (Ministry of Housing, Communities & Local Government, 2024) sets out the government planning policies for England and how they should be applied. Chapter 15: Conserving and Enhancing the Natural Environment, is of particular relevance to this report as it relates to ecology and biodiversity. Further details are provided in Appendix B.
- 2.4 The Government Circular 06/2005, which is referred to by the NPPF, provides further guidance in respect of statutory obligations for biodiversity and geological conservation and their effects within the planning system.

Local Planning Policy

- 2.5 A number of local planning policies relate to ecology, biodiversity and/or nature conservation. These are summarised in Table 1 of Appendix B. These policies have been addressed, as appropriate, in the production of this report.

Standing Advice

- 2.6 Natural England and Defra's Standing Advice (Natural England & Defra, 2014) regarding habitats and protected species aims to support local authorities and forms a material consideration in determining applications in the same way as any individual response received from Natural England following consultation. Standing advice has therefore been given due consideration, alongside other detailed guidance documents, in the production of this report.

3.0 METHODS

Desk Study

- 3.1 An ecological desk study was undertaken in May 2025 comprising a review of online resources and biological records centre data as detailed below.
- 3.2 The Multi-Agency Geographic Information for the Countryside (MAGIC) online database was reviewed to identify nature conservation designations within the following search radii:
 - Special Protection Areas (SPA), Special Areas of Conservation (SAC) and Ramsar sites within 10km of the Site (including possible/proposed sites)
 - Sites of Special Scientific Interest (SSSI), National Nature Reserves (NNR), Local Nature Reserves (LNR) within 3km of the Site
 - Other relevant data e.g. Ancient Woodland Inventory within 1km of the Site
- 3.3 A review was undertaken of the location of any such designations, their distance from and connectivity with the Site, and the reasons for their designation. This information was used to determine whether they may be within the proposed development's Zone of Influence (Zol).
- 3.4 Hertfordshire Environmental Records Centre (HERC) was contacted for details of any non-statutory nature conservation designations and records of protected/notable habitats and species. This information was requested for an area encompassing the Site and adjacent land within c. 2km of its central grid reference. This search area was selected to include the likely zone of influence upon non-statutory designations and protected or notable habitats and species.
- 3.5 Further online resources were reviewed for information which may aid the identification of important ecological features. The Woodland Trust's online Ancient Tree Inventory was reviewed for known ancient or veteran trees within the Site and adjacent land. Interactive online mapping provided by the charity 'Buglife' was used to determine whether the Site falls within an Important Invertebrate Area.
- 3.6 In accordance with Natural England's Great Crested Newt Mitigation Guidelines (2001), a desktop search was undertaken to identify ponds within 500m of the Site which may have potential to support breeding great crested newts *Triturus cristatus*, using Ordnance Survey (OS) mapping, the MAGIC database and aerial photography.
- 3.7 Where possible under the terms of the data provider, relevant desk study data are presented in Appendix C.

Field Survey

- 3.8 A UK Habitat Classification ('UKHab') survey was carried out in fine and dry weather conditions on 16 May 2025 by Rhodri Gruffydd ACIEEM, FISC Level 3, encompassing the Site and immediately adjacent habitats that could be viewed.
- 3.9 UKHab is a unified and comprehensive system for mapping and classifying habitats, designed to provide a simple and robust approach to surveying and monitoring, and replaces Phase 1 Habitat survey methods. The method allows for identification of important habitat types, including habitats of Principal Importance under Section 41 (S41) of the NERC Act (2006) and Habitats Directive Annex I habitats. This method also allows for direct translation of habitats into the Statutory Biodiversity Metric (Defra, 2024).
- 3.10 The following parameters were adopted for the UKHab survey undertaken for this PEA:
- UKHab Professional edition (Butcher *et al.*, 2023, commercial End User Licence Agreement (EULA))
 - Minimum Mappable Unit (MMU):
 - 10m²/0.001ha (polygons)
 - 5m (linear)
 - Primary Habitats recorded to a minimum of Level 2 (see below) with UKHab codes provided
 - Mandatory secondary codes used
 - Base-mapping comprising a combination of aerial imagery and topographic information
- 3.11 Primary Habitats are recorded to a minimum of Level 2. Where the survey is conducted at an appropriate time of year (e.g. May to July for grassland) habitats may be recorded to Level 3, 4 or 5, only if conditions and the experience of the surveyor allow.
- 3.12 To assist with classification of grassland habitats quadrat samples were taken during dedicated botanical survey on 16 May 2025 by Rhodri Gruffydd ACIEEM, FISC Level 3. Representative sample locations were identified within each grassland parcel, spread evenly to avoid habitat transitions or ecotones, following a 'W' shape through the parcel and a covering a minimum of five sampling locations. Quadrats of 1m x 1m were used. Both average (mean) species count per m² and peak species counts are reported for comparison.
- 3.13 Identification of habitat stands were made arbitrarily by the surveyor based upon obvious habitat structure, composition or other delineating feature (e.g. field or enclosure).
- 3.14 The abundance of flora species recorded within habitats was measured using the DAFOR scale of abundance. Habitat descriptions below refer

to this generalised scale and use (D) for dominant, (A) for abundant, (F) for frequent, (O) for occasional and (R) for rare abundances.

3.15 Alongside the UKHab survey, additional field survey information was collected, comprising:

- Detailed floral species lists recorded for each identified habitat/parcel
- Evidence of, or potential for, European Protected Species (EPS) (including bats, great crested newt, dormouse and otter)
- Evidence of, or potential for, other protected species (including birds, reptiles, water vole, badger and certain invertebrates)
- Evidence of, or potential for, other notable species (including S41 Species of Principal Importance as well as notable, rare, protected or controlled plants and invertebrates)
- Any other survey information relevant to ecological matters

3.16 Results of the UKHab survey are presented on the Habitats Plan in Appendix A. Appendix D provides a list of floral species recorded in each habitat parcel. Nomenclature for higher plants within this report is consistent with the fourth edition of The New Flora of the British Isles (Stace, 2019).

Limitations

3.17 There were no specific limitations to the desk study or field survey, which was conducted at an optimum time of year and in good conditions.

4.0 BASELINE ECOLOGICAL CONDITIONS

Nature Conservation Designations

Statutory

- 4.1 There are no statutory designations covering any part of the Site, or within 10km of the Site.
- 4.2 No national statutory designations were identified within 3km of the Site. However, four local statutory designations were identified within 3km of the Site. These statutory designations are described in Table 1 below.
- 4.3 The Site falls within the river catchment for the River Ivel which is located c. 0.6km east of the Site. The River Ivel is considered of 'good ecological status' and is protected by the Nitrates Directive.

Non-Statutory

- 4.4 Within 2km of the Site, 12 non-statutory designations, were identified comprising 11 Local Wildlife Sites (LWSs) and a single County Wildlife Site (CWS). These non-statutory designations are described in Table 1 below.

Table 1. Statutory and Non-Statutory Designations within search radii

Site Name & Designation	Distance & Direction from Survey Area	Special Interests or Qualifying Features
International Designations within 10km		
-		
National Designations within 3km		
-		
Local Designations within 3km		
Ivel Springs LNR	c. 0.5km east	Designated for chalk springs which sustain a diverse range of habitats and form the source of the River Ivel. The springs also sustain a diverse mosaic of habitats including wildflower meadows, reedbeds, wetlands, and woodlands. The diverse habitats support a wide array of species of plant, bird and invertebrate species as well as evidence of water vole.
Norton Common LNR	c. 1.1km south-west	The site comprises woodland, meadows and rare marshland habitats which support a wide range of species. The site features high levels of biodiversity, including black squirrel, as well as regionally rare/absent plants species including sulphur clover <i>Trifolium ochroleucon</i> which is the reason for designation.
Weston Hill LNR	c. 1.9km south-east	The site is composed of a mixture of broadleaved woodland, chalk grassland and scrub. The chalk grassland here is

		ancient and species rich giving the area significant biodiversity value.
Stotford Mill Meadows LNR	c. 2.2km north	The site is composed of woodland, hedgerows and woodland. Numerous ponds of varied depth are present, which supports a variety of bird, insect, reptilian and amphibian species. The LNR is designated due to its high biodiversity value.
Non-Statutory Designations within 2km		
Norton Pond LWS	c. 0.2km west	Ancient farm pond bordered with fen and swamp creates a important wetland habitat, which supports valuable invertebrate and vertebrate species.
Icknield Way Railway Bank LWS	c. 0.3km south	Designated due to the presence of protected and regionally vulnerable species including great pignut <i>Bunium bulbocastanum</i> .
Ivel Springs LWS	c. 0.5km east	The site is composed of a mix of habitats along the banks of the River Ivel, with patches of former watercress beds, reed marshes and damp woodland. These habitats support several protected species including reptiles and water vole <i>Arvicola amphibius</i> , as well as grassland indicator species.
Radwell Meadows Northwestern Field LWS	c. 0.8km north	LWS comprised of a field of semi-improved neutral grassland. Designated due to the grassland indicator species present within, including, lady's bedstraw <i>Galium verum</i> and cowslip <i>Primula veris</i> .
Blackhorse Farm Meadow LWS	c. 0.9km north-east	Meadow located on the alluvium deposits of the River Ivel creating a habitat of marshy grassland. This site is designated due to grassland indicator species including, lesser spearwort <i>Ranunculus flammula</i> , marsh marigold <i>Caltha palustris</i> (priority floodplain meadow indicator), fen bedstraw <i>Galium uliginosum</i> and marsh speedwell <i>Veronica scutellate</i> .
Blackhorse Farm Stormdrain LWS	c. 0.9km north-east	Site consists of a flood pond constructed to take flood water from the A1 (M) with embankment bordering on three sides. A wet area to the north contains important grassland, fen and swamp indicator species, including, blunt-flowering rush <i>Juncus subnodulosus</i> , wild angelica <i>Angelica sylvestris</i> , and greater bird's-foot trefoil <i>Lotus pedunculatus</i> .
River Ivel LWS	c. 1.0km north	The River Ivel is a chalk stream fed by an aquifer, designated due to the priority of the river type as well as the species it supports, including, the protected species water vole, and the schedule 1 bird species, kingfisher <i>Alcedo atthis</i> .

Norton Common LWS	c. 1.1km west	See Norton common LNR above.
Radwell Lake LWS	c. 1.5km north	Site composed of small lake with marshy grounds, ornamental gardens, and copped woodland. The area is designated for its value to species, particularly wildfowl.
Radwell (A507) Road Banks LWS	c. 1.7km north-east	Banks of road form areas of species-rich calcareous grassland. Site designated for grassland indicator species and orchid species, including bee orchid <i>Ophrys apifera</i> and pyramidal orchid <i>Anacamptis pyramidalis</i> .
Pryor Way Allotments and School Grounds LWS	c. 1.7km south	This LWS is designated due to being important for protected species (reptiles).
River Ivel CWS	c. 1.8km north	This section of the river is under the LPA of Bedfordshire and is therefore, under the designation of county wildlife site. Designated for priority habitats along the banks of the river including fen, marsh and swamp, as well as the presence of water vole.

Habitats and Flora

- 4.5 Habitats recorded on-site are illustrated in Appendix A with detailed species lists provided in Appendix E. Relevant UKHab codes are provided within parentheses for each habitat type recorded [e.g. Other Neutral Grassland (g3c)].

Irreplaceable Habitats

- 4.6 There is no ancient woodland, as shown on the ancient woodland inventory, covering any part of the Site or immediately adjacent land. No trees on or adjacent to Site are listed on the Ancient Tree Inventory. The nearest parcel of ancient woodland is an unnamed woodland of c. 1.8ha, located c. 1.6km south-east of the Site.

Notable Flora Records

- 4.7 The HERC and BRMC provided 224 records of 78 notable plant species from within the search area dating from 1629 to 2023. A total of 124 of these records are historic, dating pre-2000.
- 4.8 Those of potential relevance to the Site incorporate species associated with arable habitats and field margins including corn mint *Mentha arvensis*, cornflower *Centaurea cyanus*, and dwarf spurge *Euphorbia exigua*. A review of broad soil mapping (Soilscapes) indicates that the Site is split across two soil types, with the south of the Site comprising 'shallow lime-rich soils over chalk or limestone' and the north comprising 'lime-rich loamy and clayey soils with impeded drainage'. Records of potential relevance include species associated with calcareous

grassland including common eyebright *Euphrasia nemorosa*, devil's-bit scabious *Succisa pratensis*, field scabious *Knautia arvensis*, green-winged orchid *Anacamptis morio*, hoary plantain *Plantago media*, lizard orchid *Himantoglossum hircinum*, and quaking-grass *Briza media*.

- 4.9 Other species of notes include 28 records of nine species listed within the Wildlife and Countryside Acts's Schedule 9 (WCA9) list of invasive non-native species dating from 1987 to 2019. A total of 13 of these records are historic, dating from pre-2000. These species include giant hogweed *Heracleum mantegazzianum*, Himalayan balsam *Impatiens glandulifera*, Himalayan cottoneaster *Cotoneaster simonsii*, Japanese knotweed *Fallopia japonica*, *Lamiastrum galeobdolon* subsp. *argentatum*, New Zealand pigmyweed *Crassula helmsii*, parrots feather *Myriophyllum aquaticum*, *Rhododendron ponticum*, water fern *Azolla filiculoides*. No invasive non-native species were identified on or adjacent to the Site during the survey.

'Modified grassland' (g4)

- 4.10 The Site is dominated by a single grassland field. Previous reporting identified this field to comprise modified grassland, which historical aerial imagery shows to have formally been arable cropland to at least 2020. The grassland remains dominated by rye grass species, with both perennial rye-grass *Lolium perenne* and Italian rye-grass *L. multiflorum*, with hybridisation occurring. The sward also includes frequent rough meadow-grass *Poa trivialis*.
- 4.11 More occasional grass species include cock's-foot *Dactylis glomerata* and soft brome *Bromus hordeaceus* with rare occurrences of barren brome *Anisantha sterilis*, false oat-grass *Arrhenatherum elatius*, red fescue *Festuca rubra*, and timothy *Phleum pratense*. Herb species abundant across the grassland include dandelion *Taraxacum* sp. and white clover *Trifolium repens* (cultivar) with occasional occurrences of creeping buttercup *Ranunculus repens* and red clover cultivar *Trifolium* sp.
- 4.12 Across the grassland, indicator species were present including bulbous buttercup *Ranunculus bulbosus*, early forget-me-not *Myosotis ramosissima* and common bird's-foot-trefoil *Lotus corniculatus*, which could indicate the grassland, particularly the northern section, is developing towards a neutral grassland sward.
- 4.13 The grassland had a noticeably taller sward towards the north of the field as appose to the south, likely due to the difference in the soil in the north as identified in the broad soil mapping (Soilscapes) being wetter, more fertile ground, as well as the increased camber of the landscape sloping down at an angle as the field continues south.
- 4.14 Quadrats of the grassland identified the following species-abundance:

- Total number of species: 32
- Peak species-richness: 12 species per m²
- Average (mean) species-richness: 7.2 species per m²

4.15 The grassland appears to be under a cutting regime but with little other management, evidenced by aerial imagery and on-site evidence.



Figure 1. Modified grassland (g4), from north-east corner of the Site, looking south.

'Other woodland, broadleaved' (w1g) 'plantation' (29)

4.16 Woodland W1 is an area of young plantation woodland that is c. 1.19 ha which borders the south of the Site and continues up the eastern boundary of the Site c. 240m. Historical aerial imagery shows the woodland was planted around 2000. The woodland structure is largely uniform in tree age and height, with most trees being young to semi-mature. A wide range of woodland species have established within the plantation, with the most frequent being ash *Fraxinus excelsior*, field maple *Acer campestre*, pedunculate oak *Quercus robur*, silver birch *Betula pendula*, and hornbeam *Carpinus betulus*.

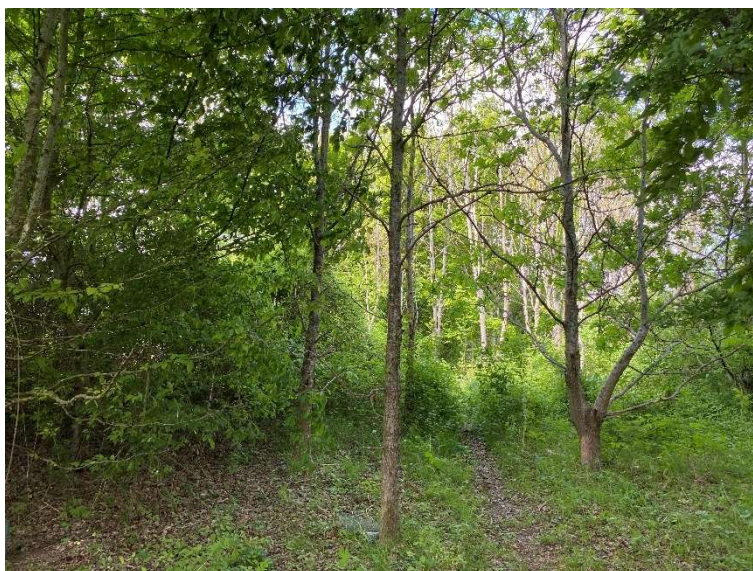


Figure 2. Woodland W1.

- 4.17 Ground flora varied across the woodland with areas of bare ground, stands of dense bramble *Rubus fruticosus* agg. and, in areas of open canopy an open grassland sward including frequent cock's-foot *Dactylis glomerata*, common agrimony *Agrimony eupatoria* and meadow buttercup *Ranunculus acris*. Occasional cowslip *Primula veris*, cleavers *Galium aparine*, and dandelion *Taraxacum* agg. were also recorded.
- 4.18 Additionally, stands of non-native garden plants were recorded, including traveller's-joy *Clematis vitalba* and non-native goldenrod species *Solidago* sp. found within the eastern section of the woodland. These species are not listed under Schedule 9 of the WCA 1981 [as amended].
- 4.19 There appeared to be no evidence of management to the woodland with natural canopy growth and a variety of scrub and ground flora growing between the trees. There were several clearings within the woodland, confined to the southern section of the Site, where the trees were less dense, creating areas of differing ground flora.

'Other woodland-broadleaved' (w1g)

- 4.20 Woodland W2 is a small area of woodland which is situated near the south-west corner of the Site. The woodland is young and uniform in canopy structure. At the time of surveying no intensive management regime was evident for this area. It has a different composition to W1, with very few species present. Sycamore *Acer pseudoplatanus*, and cherry *Prunus avium* dominate the canopy layer with elder and bramble present as a shrub layer beneath the trees. Limited ground flora was present at the time of survey, with cow parsley *Anthriscus sylvestris* and cleavers *Galium aparine* forming the majority of the woodland floor.

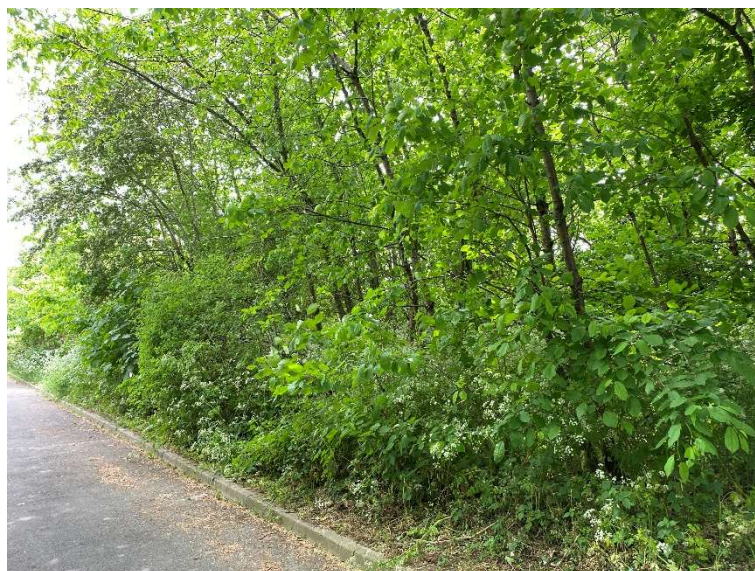


Figure 3. Woodland W2.

'Mixed scrub' (h3d)

- 4.21 An area of mixed scrub is situated in the far south-west corner of the Site. Aerial imagery suggests that this is likely to have previously been grassland, which has developed into scrub from c. 2007, likely due to a lack of management.
- 4.22 The scrub is c. 2-3m high and forms a continuous block. The dominant species is bramble *Rubus fruticosus* agg., with the occasional elder *Sambucus nigra*, hawthorn *Crataegus monogyna* and ash.



Figure 4. Mixed scrub.

Line of Trees (w1g6)

- 4.23 Situated on the south-western boundary of the grassland a short line of trees c. 60m long is present on Site. The species composition consists of

semi-mature to mature sycamore *Acer pseudoplatanus*, plum *Prunus domestica*, and hawthorn trees.

Fauna

Bats

- 4.24 A total of 100 bat records were identified within the search area, dating from 1920 to 2022. These include the following species: barbastelle *Barbastella barbastellus*, serotine *Eptesicus serotinus*, Daubenton's bat *Myotis daubentonii*, noctule *Nyctalus noctula*, common pipistrelle *Pipistrellus pipistrellus*, soprano pipistrelle *P. pygmaeus* and brown long-eared bat *Plecotus auritus*. Records were also provided for 'bat' *Chiroptera* sp., pipistrelle *Pipistrellus* sp. and long-eared bats *Plecotus* sp. which were not identified to species level. Of these records seven are considered historic, dating to pre-2000. The majority of records were given to a grid reference accuracy of 1km or less meaning the exact location of records in relation to the Site could not be determined.
- 4.25 A total of 11 records describe a 'roost', dating from 2013 to 2022. The majority of these records are in relation to Radwell Church in Baldock, associated with surveys undertaken in July and October 2017. This location supports roosts of brown long-eared bats, common pipistrelle and serotine. Remaining records are for roosts of brown long-eared bat (2013 and 2022), common pipistrelle (2022), an unspecified pipistrelle species (2014), and an unspecified bat species (2015). The record of a roost of an unspecified species of bat dating from 2015 was in association with a building in Radwell. The remaining records were only provided to an accuracy of 1km and therefore the exact location of these records could not be determined.
- 4.26 A review of the European Protected Species licences obtained from Natural England and available on the MAGIC website has identified a single bat licence record located within 1km of the Site. This licence (EPSM2011-3393) is for a location c. 0.9km south-east of the Site, dating from 2011. This allowed for the destruction of a common pipistrelle and brown long-eared bat resting place.
- 4.27 The on-site grassland, woodland, and scrub provide suitable opportunities for foraging bats. The woodland provides additional navigational features for bats within the area. However, due to the age of the woodlands on-site, roosting opportunities are likely to be limited. The potential of the on-site woodlands to support roosting bats is likely to increase with age, dependent on management practices. Within the wider landscape the closest parcel of ancient woodland is c. 2.6km south-east of the Site and with large areas of developed land acting as barriers of dispersal. The developed land which surrounds the Site on the north, south and western boundaries provides limited opportunities for bats.

Badger

- 4.28 The HERC and BRMC have provided 38 records of badger *Meles meles* from within the search area, dating from 1964 to 2020 of which four are considered historic records. The majority of records were given to a grid reference accuracy of 1km or less meaning the exact location of species in relation to the Site could not be determined.
- 4.29 Five records describe setts, all provided to an accuracy of 1km so an accurate location could not be determined. Records provided with greater accuracy were all for badgers on roads, associated with road traffic accidents, located in Radwell.
- 4.30 The records confirm badger are active within the wider landscape. The grassland, woodland and scrub parcels on Site provides suitable opportunities for badger setting digging as well as good foraging opportunities.
- 4.31 No signs of badger or their setts were recorded anywhere within the Site or on adjacent land during dedicated surveys undertaken in 2025 (see Appendix E).

Dormouse

- 4.32 No records of dormouse *Muscardinus avellanarius* were identified within the search area. Dormice have historically been present within Hertfordshire, although their current distribution is known to be very limited due to fragmentation of suitable habitat for this species within the county. Recent records referenced in the Hertfordshire Biodiversity Action Plan show the closest population to the Site to be within Stevenage more than 7km south of Site, with the A1 (M) creating barrier for dispersion.
- 4.33 Habitats on-site are suitable for dormouse with the woodland, bramble scrub and mixed scrub parcels providing some foraging and nesting opportunities. The limited extent of these parcels, unsuitable dietary species composition, poor structural quality for dormice, as well as the insufficient wider habitat connectivity makes the overall suitability of the Site sub-optimal. Considering the above it is likely dormice are absent from the Site and have not been considered further.

Riparian Mammals

- 4.34 A total of 12 records of water vole *Arvicola amphibius* were identified within the search area, the majority of which date from 1974 to 1994, with just three recent records dating from 2014 and 2021. The two most recent records, dating from 2021, were provided to a grid reference accuracy of 1km. However, these records are associated with the River Ivel CWS, which at its closest point is c. 1.8km north of Site. In addition to the above, three records were provided for American mink *Neovison vison* dating from 1995, 2001 and 2022. Mink are known to predate water

vole, often resulting in significant impacts on populations and therefore their presence within the search area may account for the reduction in records of water voles from 1994.

- 4.35 A total of six records of otter *Lutra lutra* were identified within the search area, dating from 2008 to 2020, with two historic records dating from 1914 and 1999. Three of the records provided were in association with Stotfold Mill and the River Ivel, c. 2.7km north-west of the Site.
- 4.36 The majority of records for riparian mammal are associated with the river Ivel, the nearest major watercourse to the Site. At its closest point, it runs c. 0.6km from the Site. However, no waterbody connections between the river and the Site exist. Additionally, the Site does not provide any suitable habitats for water vole or otter and these species are therefore considered absent from the Site.

Other Mammals

Brown Hare

- 4.37 There were 33 records of brown hare *Lepus europaeus* identified within the search area, dating from 1974 to 2023.
- 4.38 The Site provides suitable habitat for brown hare with grassland habitats providing opportunities for this species to lay-up and forage. The surrounding arable and woodland habitats offer additional habitat suitable to support this species which is known to have a large home range.

Hedgehog

- 4.39 A total of 115 records of hedgehog *Erinaceus europaeus* were identified within the search area, dating from 1966 to 2022. A single record is provided for the Site, of an individual dating from 2019. There were hotspots of high numbers of records of hedgehog from within northern Letchworth Garden City and Baldock, two areas in close proximity to the Site.
- 4.40 All habitats on Site provide good opportunities for hedgehog foraging and commuting. Additionally, the proximity of allotments and residential gardens mean it is considered that hedgehogs are likely to make use of the Site.

Harvest Mouse

- 4.41 No records of harvest mouse *Micromys minutus* were identified within the search area. No evidence of harvest mouse was recorded during surveys. The grassland and scrub on Site do provide suitable habitat for harvest mouse foraging and nest building. Within the wider landscape the arable fields and associated network of field margins, located east of the Site, provide suitable habitat for harvest mouse to nest and forage as well as opportunities to commute onto the Site itself. The urban land

which borders the Site on three sides, the north, south and west, are unsuitable for harvest mouse and isolate the Site from wider habitat connectivity. The woodland and field margins within the Site provide suitable, but limited opportunities for field mouse nest building and foraging.

Birds

- 4.42 A total of 12,498 records of 128 bird species were identified within the search area, dating from 2001 to 2023. Those of potential relevance to the Site include species listed under Schedule 1 of the Wildlife and Countryside Act (1981) and could make potential use of the Site, including; barn owl *Tyto alba*, bittern *Botaurus stellaris*, black redstart *Phoenicurus ochruros*, brambling *Fringilla montifringilla*, cetti's warbler *Cettia cetti*, fieldfare *Turdus pilaris*, firecrest *Regulus ignicapilla*, hen harrier *Circus cyaneus*, hobby *Falco subbuteo*, merlin *Falco columbarius*, montagu's harrier *Circus pygargus*, peregrine *Falco peregrinus*, quail *Coturnix coturnix*, red kite *Milvus milvus*, redwing *Turdus iliacus*, stone-curlew *Burhinus oedicnemus*.
- 4.43 Other species of interest include those listed as 'red' under the BTO's Birds of Conservation Concern 5 (BoCC5) that would make potential use of the habitats on Site including; corn bunting *Emberiza calandra*, cuckoo *Cuculus canorus*, greenfinch *Chloris chloris*, grey partridge *Perdix perdix*, herring gull *Larus argentatus*, house martin *Delichon urbicum*, house sparrow *Passer domesticus*, lapwing *Vanellus vanellus*, linnet *Linaria cannabina*, mistle thrush *Turdus viscivorus*, ring ouzel *Turdus torquatus*, skylark *Alauda arvensis*, spotted flycatcher *Muscicapa striata*, starling *Sturnus vulgaris*, swift *Apus apus*, tree pipit *Anthus trivialis*, tree sparrow *Passer montanus*, turtle dove *Streptopelia turtur*, whinchat *Saxicola rubetra*, yellow wagtail *Motacilla flava*, yellowhammer *Emberiza citrinella*.
- 4.44 Habitats on Site provide foraging and nesting opportunities for a range of bird species. The grassland could provide habitat for grassland specialists. The woodlands and scrub provide opportunities for a range of woodland species to forage, nest and seek shelter.

Reptiles

- 4.45 A total of 74 records of four reptile species were identified within the search area including adder *Vipera berus*, common lizard *Zootoca vivipara*, grass snake *Natrix helvetica*, and slow worm *Anguis fragilis*. A single record of 20 slow worm was provided dating from 2007, in association with Pryor Way Allotments and School Grounds. This site is located on the south-east of Letchworth, c. 2.0km south-east of the Site and separated by residential and commercial development. The remaining records date between 1920 and 1999, with the majority associated with Icknield Way Railway Bank, Bygrave Road Banks and habitats adjacent to Norton Road.

- 4.46 The grassland on Site provides opportunities for foraging reptiles and the scrub and woodland provide additional opportunities for shelter.
- 4.47 Reptile surveys undertaken in 2025 did not identify any populations to be present at the Site (see Appendix F).

Amphibians

- 4.48 A total of 53 records of three amphibian species were identified within the search area, including common frog *Rana temporaria*, common toad *Bufo bufo* and great crested newt *Triturus cristatus*, dated 1955 to 2021. Of these 37 are considered historic, dated pre-2000.
- 4.49 Twenty-four records are of great crested newt, dating from 1974 to 2021. All records are provided to an accuracy of 1km or less and therefore a precise location cannot be determined, with the exception of a single record dating from 1997. This record is in association with an individual GCN found in a pitfall trap, in a garden on Norton Road.
- 4.50 The terrestrial habitats provide terrestrial opportunities for amphibians within the grassland and scrub. Wooded habitats also provide opportunities for refuge and hibernation for any GCN which may be present within ponds in the surrounding area.
- 4.51 No potential amphibian breeding ponds were identified on-site during the site survey. Four ponds (P1-P4) appear to be present within a dispersible range (500m) of the Site for GCN, based on OS mapping. Of these two (P3 and P3) are over 250m from the Site and beyond significant dispersal barriers of existing developed land.
- 4.52 No access was possible to survey pond P2. However, pond P1 was surveyed, assessed to have below average suitability (HSI= 0.56) and with eDNA sampling confirming the likely absence of GCN breeding. Based upon these findings GCN are considered likely absent from the Site.

Invertebrates

- 4.53 A total of 804 records of 119 invertebrate species were identified within the search area. Those of potential relevance to the Site include those listed under the Herts Biodiversity Action Plan such as, grizzled skipper *Pyrgus malvae* and chalk hill blue *Polyommatus coridon*.
- 4.54 The Site does not fall into any important invertebrate areas (IIAs). However, the Site does fall within a Buglife B-Line (a network of insect pathways which have been designated to create connective corridors of wildflower-rich habitat which benefits pollinators). The grassland present on Site and young plantation woodland are unlikely to support a locally important assemblage of invertebrates. However, the habitats on Site likely provide good opportunities and support a range of common and widespread species.

5.0 DISCUSSION AND RECOMMENDATIONS

Nature Conservation Designations

Local Nature Reserves

- 5.1 Ivel Springs LNR is located c. 0.5km from Site and has been designated for its chalk springs and diverse range of habitats including wildflower meadows, reedbeds, wetlands, and woodlands. Norton Common LNR is located 1.1km from Site and is designated due to the LNRs woodland, meadows and rare marshland habitats which support a wide range of species. Both are accessible via public footpaths and via vehicle. It is acknowledged that the proposals could result in an increase in recreational pressure on these LNRs. However, LNRs are managed in part for their use by the public. On-site natural greenspace will seek to minimise potential recreation pressures beyond the Site.

Local Wildlife Sites (LWS)

- 5.2 Twelve non-statutory LWS designations are present within 2km of the Site. The majority of these sites are designated for their wetland habitats and the protected species they support. Accessibility of these designations varies with some accessible via footpaths from the Site. Therefore as above there is some limited potential for indirect adverse effects arising from increasing recreational pressure as a result of the proposals. However, it is anticipated again, that the provision of natural greenspace on Site would direct recreational use away from these designations.

Habitats and Flora

- 5.3 The Site does not support any habitats or flora of significant ecological interests, with grassland, scrub and young woodland falling short of criteria for priority habitat. The net effect on biodiversity of the proposed development is addressed separately within the Biodiversity Net Gain Assessment (BNGA) report which should be read in conjunction with this report.

Fauna

- 5.4 Surveys conducted in 2025 confirmed the likely absence of badger, reptiles and GCN from the Site. Precautions in respect of nesting birds are set out below.

Nesting birds

- 5.5 All wild birds are protected from killing and injury, and their nests and eggs are protected from damage and destruction, under the Wildlife and Countryside Act 1981 (as amended). Therefore, any clearance of nesting habitat or features required to facilitate the development should avoid the period between March and August (inclusive) when nesting

birds are most likely to be present. If this is not possible, habitat will need to be checked for nesting birds by a suitably qualified ecologist prior to clearance with works only proceeding if no nesting evidence or behaviour are observed.

Opportunities for Ecological Enhancement

5.6 The following ecological enhancement have been included within the proposed scheme.

- Sustainable Drainage Systems (SuDS) features designed to include a combination of periodically wet and dry habitats on ecological interest, including grasslands.
- A range of native plants and those of wildlife importance have been included within the landscaping scheme to provide foraging opportunities for birds, invertebrates and bats
- The following are proposed to be integrated within new dwellings (as shown on accompanying plan):
 - 40 bat boxes (Sergovia Build-In Woodstone Boxes)
 - 40 bird boxes (Swift S-bricks)
- Provision of hedgehog gaps in new fencing to promote habitat connectivity across and within the Site

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Appendix A

Habitats Plan



- Site Boundary
- Modified grassland (g4)
- Other woodland-broadleaved (w1g)
- Mixed scrub (h3h)
- Bramble scrub (h3d)
- Developed land - sealed surface (u1b)
- Line of trees (w1g6)



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Drawing Title	Habitat Plan	Scale	Refer to scale	Rev	-
Client	Barratt David Wilson Homes (North Thames)	Drawn	DJW	Checked	JW

Appendix B

Legislation and Planning Policy

- 1.1. The **Conservation of Habitats and Species Regulations 2017** (as amended) make prescriptions for the designation and protection of Sites of Community Importance ('European sites', i.e. Special Areas of Conservation and Special Protection Areas) and European Protected Species (EPS). The latter include all native bats, great crested newts, dormice, otters and certain reptiles, listed under Annex II of the Regulations. Following the UK's departure from the European Union, the provisions of the Regulations have been retained through enactment of the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019, which came into force on 31 December 2020.
- 1.2. The **Wildlife and Countryside Act 1981** (as amended, principally by the Countryside and Rights of Way Act 2000) forms the basis for protection of statutory designated sites of national importance (e.g. Sites of Special Scientific Interest; SSSIs) and native species that are rare and vulnerable in a national context. Additionally, badgers are protected under the **Protection of Badgers Act 1992**.
- 1.3. The **Environment Act 2021** received Royal Assent in November 2021. Through an amendment to the Town and Country Planning Act 1990 the Environment Act introduced a mandatory requirement for all planning permissions to be conditional upon the submission of a Biodiversity Gain Plan for approval by the Local Planning Authority. The Plan will need to demonstrate a net gain of at least 10% in the biodiversity value of the development site.
- 1.4. Section 40(1) of the **Natural Environment and Rural Communities (NERC) Act 2006** (as amended) states that each public authority, "must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving and enhancing biodiversity." This legislation makes it clear that planning authorities should consider impacts to biodiversity when determining planning applications, with particular regard to the Section 41 (S41) lists of 56 habitats and 943 species of principal importance. The UK Biodiversity Action Plan (BAP) has been superseded by the Biodiversity 2020 Strategy, however Local BAPs continue to influence biodiversity management and conservation effort, including through the spatial planning system, at the local scale.
- 1.5. The **National Planning Policy Framework (2024)** (NPPF) sets out government planning policies for England and how they should be applied. With regards to ecology and biodiversity, Chapter 15: Conserving and Enhancing the Natural Environment, paragraph 187, states that the planning system and planning policies should minimise impacts on and provide net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.

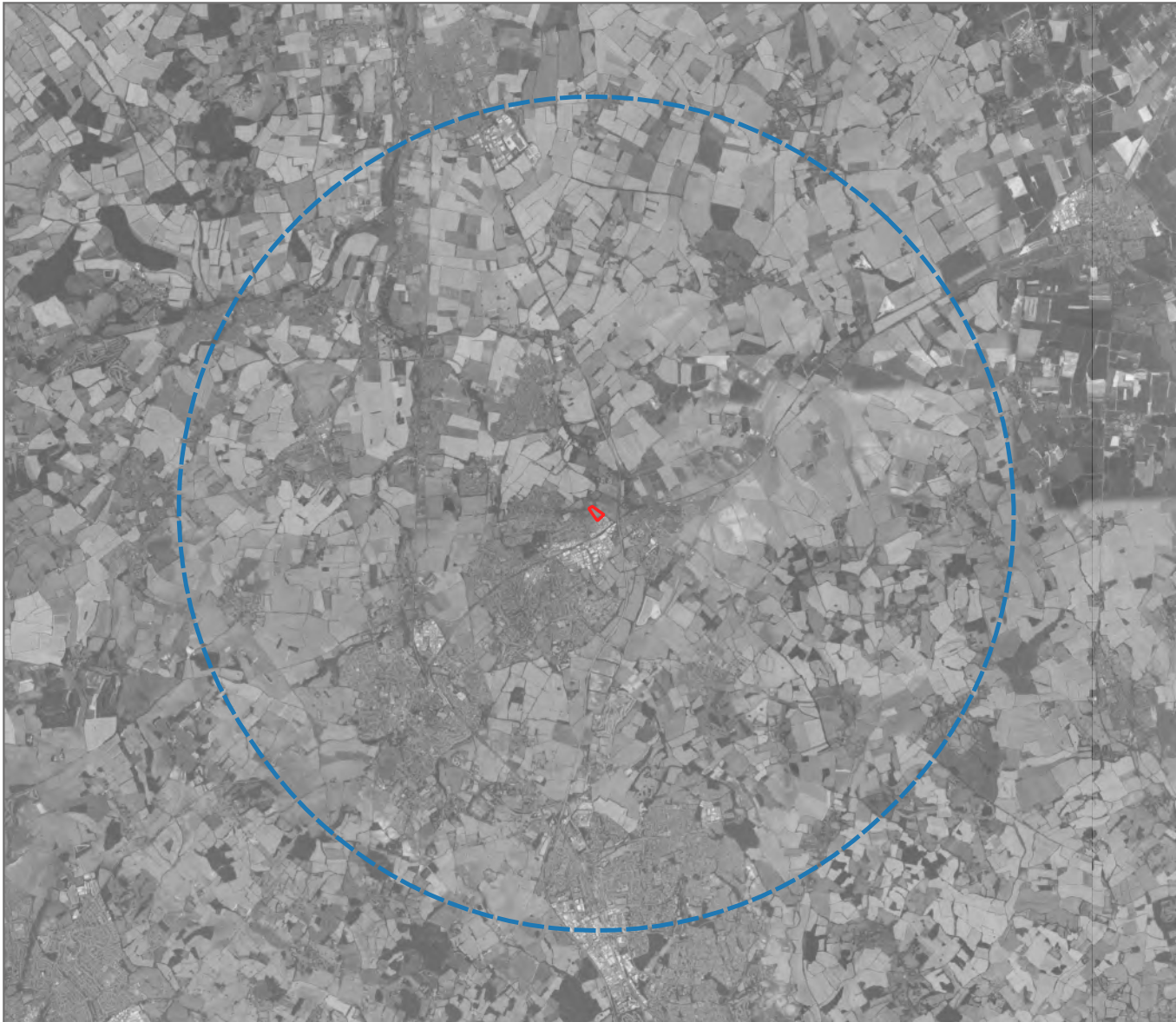
- 1.6. Paragraph 193 sets out the principles that local planning authorities should apply when determining planning applications:
- If significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused.
 - 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.
 - 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 and a suitable compensation strategy exists.
 - 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.
- 1.7. Accompanying the NPPF, central government guidance on the implementation of planning policies is set out within online Planning Policy Guidance (PPG). The Natural Environment PPG addresses principles across a broad spectrum of topics targeting biodiversity conservation, from individual site and species protection through to the supporting of ecosystem services, and the use of local ecological networks to support the national Nature Recovery Network. In particular, the PPG promotes the delivery of measurable Biodiversity Net Gain through the creation and enhancement of habitats alongside development.
- 1.8. The **Government Circular 06/2005**, which is referred to within the NPPF, defines statutory nature conservation sites and protected species as a material consideration in the planning process.
- 1.9. Local planning policies of relevance to ecology, biodiversity and/or nature conservation have been set out in Table 1 below.

Table 1. Summary of regional and local planning policy relating to ecology

Policy	Summary
North Hertfordshire Local Plan 2011-2031	
Policy SP12: Green infrastructure, landscape and biodiversity	We will accommodate significant growth during the plan period whilst ensuring the natural environment is protected and enhanced. We will: a) Protect, identify, manage and where possible enhance a strategic multi-functional network of green infrastructure; b) Consider and respect landscape character, scenic beauty and locally sensitive features, particularly in relation to the Chilterns Area of Outstanding Natural Beauty; c) Protect, enhance and manage designated sites in accordance with the following hierarchy of designations and features: • Internationally designated sites • Nationally designated sites • Locally designated sites; • Non-designated sites that include important habitats and species d) Protect, enhance and manage biodiversity networks including wildlife corridors, ancient woodlands and hedgerows, wetland and riverine habitats, Local Geological Sites, protected species, priority species and habitats, and non-designated sites of ecological value and ensure measurable net gains for biodiversity; and e) Protect other open spaces and support provision of new and improved open space.
Policy: LG3	• Structural planting to reinforce Green Belt boundary along northeastern perimeter of site; • Appropriate mitigation measures for noise associated with motorway and / or adjoining employment are to potentially include insulation and orientation of living spaces; • Ensure appropriate residential amenity for any properties adjoining employment area, especially if access to the site is via Flint Road; • Re-provision of allotments if access to the site is from the west. Re-provision prior to commencement of development, within the vicinity of the site and the same or better quality; • Proposals to be informed by a site-specific landscape assessment; • Retention of Public Right of Way Letchworth Garden City 026 and diversion if necessary; • Sensitive design and / or lower density housing where the site affects setting of the Norton Conservation Area and nearby Grade II Listed Buildings on Church Lane and Norton Road; and • Archaeological survey to be completed prior to development.

Appendix C

Desk Study Information



 Site boundary

 10km buffer

*No International Statutory Designations were found within the 10km search area.



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Drawing Title	International Statutory Designations	Scale	Refer to scale	Rev	-
Client	Barratt David Wilson Homes (North Thames)	Drawn	DJW	Checked	JW



 Site Boundary (moved)

 3km buffer

 LNR

*No National Statutory Designation were found within the 3km search area.



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Project	Land East of Talbot Way, Letchworth	Date	May 2025	Drawing No.	CSA/7316/102
Drawing Title	Local & National Statutory Designations	Scale	Refer to scale	Rev	-
Client	Barratt David Wilson Homes (North Thames)	Drawn	DJW	Checked	JW

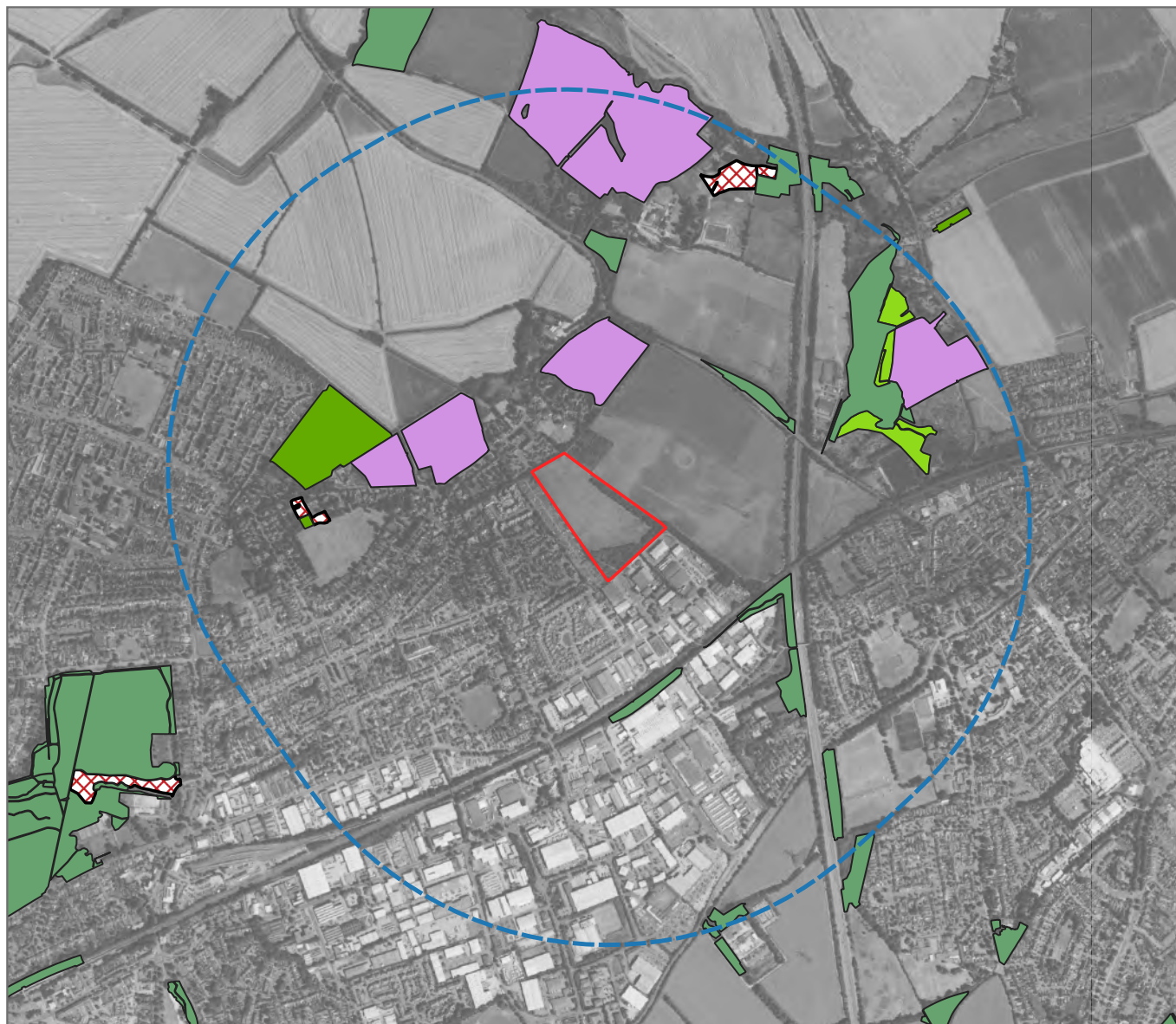


- Site boundary
- 2km buffer
- Local Wildlife Sites
- Local Wildlife Sites (Linear)

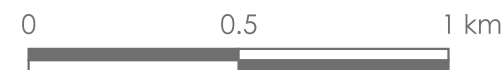


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Project	Land East of Talbot Way, Letchworth	Date	May 2025	Drawing No.	CSA/7316/103
Drawing Title	Non-Statutory Designations	Scale	Refer to scale	Rev	-
Client	Barratt David Wilson Homes (North Thames)	Drawn	DJW	Checked	JW



- Site boundary
- 1km buffer
- Deciduous woodland
- Good quality semi improved grassland
- Lowland meadows
- No main habitat but additional habitats
- Traditional orchard



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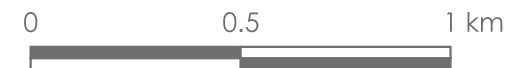
Project	Land East of Talbot Way, Letchworth	Date	May 2025	Drawing No.	CSA/7316/104
Drawing Title	Priority Habitats	Scale	Refer to scale	Rev	-
Client	Barratt David Wilson Homes (North Thames)	Drawn	DJW	Checked	JW



 Site boundary

 1km buffer

*No ancient woodland was identified within the 1km search area.



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Project	Land East of Talbot Way, Letchworth	Date	May 2025	Drawing No.	CSA/7316/105
Drawing Title	Ancient Woodland	Scale	Refer to scale	Rev	-
Client	Barratt David Wilson Homes (North Thames)	Drawn	DJW	Checked	JW



 Site Boundary

 1km buffer

Granted European Protected Species Applications

 Bat

*No GCN EPS Class Survey Licence Returns were identified within the 1km search area.

0 0.5 1 km



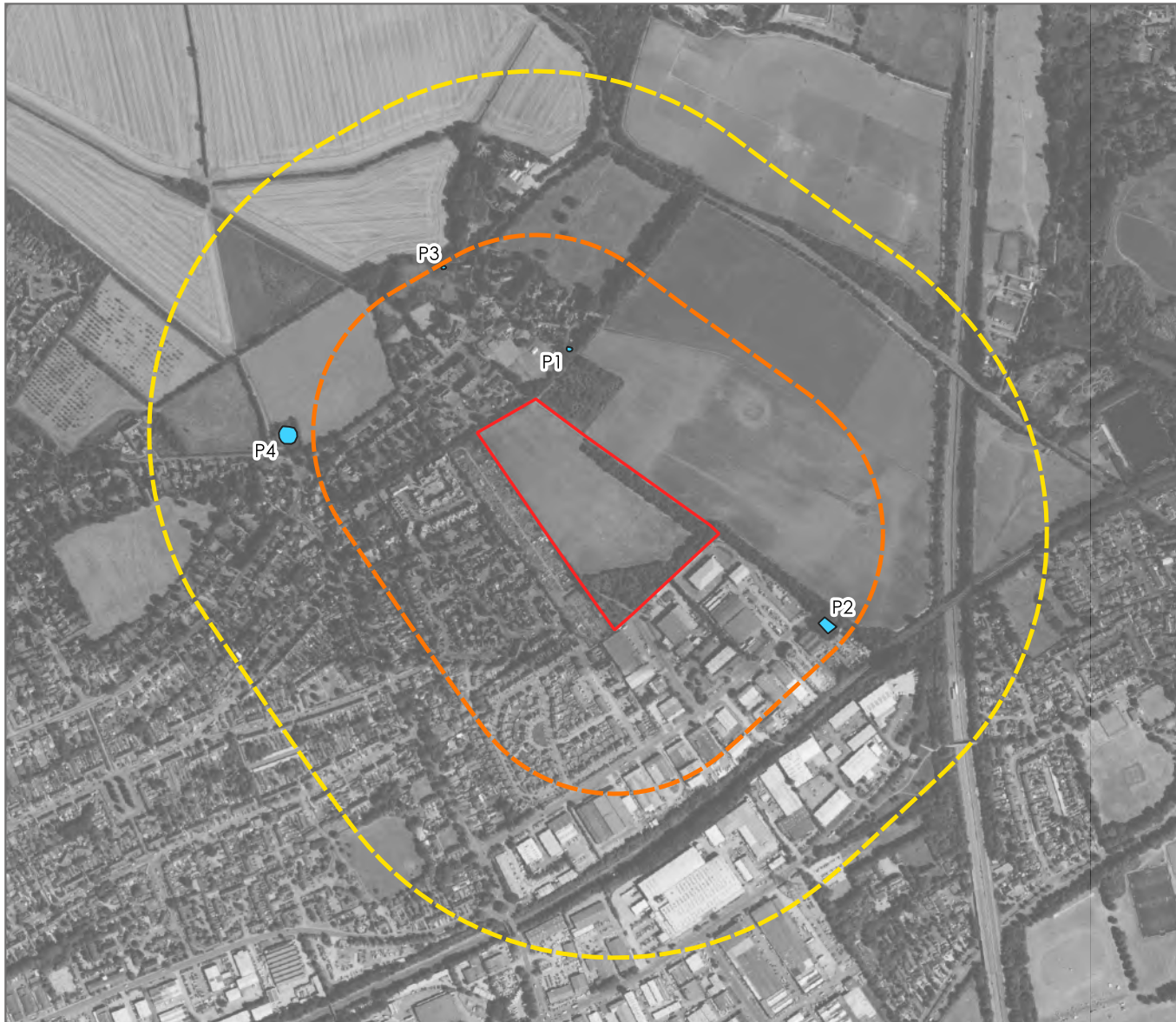
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Project	Land East of Talbot Way, Letchworth	Date	May 2025	Drawing No.	CSA/7316/106
Drawing Title	Granted European Protected Species Licence Applications and GCN Class Survey Licence Returns	Scale	Refer to scale	Rev	-
Client	Barratt David Wilson Homes (North Thames)	Drawn	DJW	Checked	JW



-  Site boundary
-  250m Pond Buffer
-  500m Pond Buffer
-  Pond (with reference)



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Project	Land East of Talbot Way, Letchworth	Date	May 2025	Drawing No.	CSA/7316/107
Drawing Title	Pond Plan	Scale	Refer to scale	Rev	-
Client	Barratt David Wilson Homes (North Thames)	Drawn	DJW	Checked	JW

Appendix D

Habitats and Flora Species List

Table 1. Habitat Polygons

Site Name	7316 Land East of Talbot Way, Letchworth.					
Survey Date and Surveyor(s)	20/05/2025 Rhodri Gruffydd, Daniel Willits					
Scientific Name	Common Name	Habitat Parcel Number/Habitat Type				
		Modified grassland	W1	W2	Line of trees	Mixed scrub
Bryophytes						
Ferns						
Herb Species						
Clinopodium vulgare	Wild basil		x			
Achillea millefolium	Yarrow		x			
Agrimony eupatoria	Common agrimony	x	x			
Anthriscus sylvestris	Cow parsley	x	x	x		
Arum maculatum	Lords-and-ladies		x			
Cerastium sp.	Common mouse-ear	x				
Cirsium vulgare	Spear thistle	x	x			
Clematis vitalba	Traveller's-joy		x			
Cotoneaster sp.	Cotoneaster		x			
Crepis vesicaria	Beaked hawk's-beard	x				
Dipsacus fullonum	Wild Teasel		x			
Epilobium sp.	Willowherb	x				
Fragaria vesca	Wild strawberry		x			
Galium aparine	Cleavers		x	x		
Geranium dissectum	Cut-leaved crane's-bill	x				
Geranium molle	Dove's-foot crane's-bill	x				
Geranium robertianum	Herb Robert		x			
Geum urbanum	Wood avens		x			
Glechoma hederacea	Ground-ivy		x			
Helminthotheca echioides	Bristly oxtongue	x				
Heracleum sphondylium	Hogweed		x			
Hypericum perforatum	Perforate St John's-wort		x			
Lamium album	White dead-nettle	x				
Lathyrus latifolius	Broad-leaved everlasting pea		x			
Lotus corniculatus	Common bird's-foot-trefoil	x				
Myosotis ramosissima	Early forget-me-not	x				
Plantago coronopus	Buck's-horn plantain		x			
Plantago lanceolata	Ribwort plantain	x	x			
Primula veris	Cowslip		x			
Ranunculus acris	Meadow buttercup		x			
Ranunculus bulbosus	Bulbous buttercup	x	x			
Ranunculus repens	Creeping buttercup	x				
Rumex crispus	Curled dock	x				
Rumex obtusifolius	Broad-leaved dock	x				
Senecio jacobaea	Common ragwort	x	x			
Solidago sp.	Non native goldenrod species		x			
Taraxacum agg.	Dandelion	x	x			
Trifolium repens	White clover	x				
Trifolium sp.	Red clover cultivar	x				
Urtica dioica	Common nettle	x				
Veronica chamaedrys	Germander speedwell		x			
Vicia sativa	Common vetch		x			
Sedges and Rushes						
Grasses						
Alopecurus pratensis	Meadow foxtail	x				
Anisantha sterilis	Barren brome	x	x			
Arrhenatherum elatius	False oat-grass	x	x			
Bromus hordeaceus	Soft-brome	x				
Dactylis glomerata	Cock's-foot	x	x			
Festuca rubra	Red fescue	x				
Lolium sp.	Rye-grass hybrid (Perennial-Italian) sp.	x				
Phleum pratense	Timothy	x				
Poa trivialis	Rough meadow-grass	x	x			

Scientific Name	Common Name	Habitat Parcel Number/Habitat Type				
		Modified grassland	W1	W2	Line of trees	Mixed scrub
Crops						
Woody Species						
Coniferous						
<i>Pinus</i> sp.	Pine species		x			
Broadleaved						
<i>Acer campestre</i>	Field maple		x			
<i>Acer pseudoplatanus</i>	Sycamore		x	x	x	
<i>Betula pendula</i>	Silver birch		x			
<i>Buddleja davidii</i>	Butterfly-bush		x			
<i>Carpinus betulus</i>	Hornbeam		x			
<i>Cornus</i> sp.	Dogwood		x			
<i>Corylus avellana</i>	Hazel		x			
<i>Crataegus monogyna</i>	Hawthorn		x		x	x
<i>Fraxinus excelsior</i>	Ash		x			x
<i>Ilex aquifolium</i>	Holly		x			
<i>Ligustrum vulgare</i>	Wild privet		x			
<i>Malus</i> sp.	Apple		x			
<i>Prunus avium</i>	Cherry		x	x		
<i>Prunus cerasifera</i>	Cherry plum					
<i>Prunus domestica</i>	Plum				x	
<i>Prunus spinosa</i>	Blackthorn		x			
<i>Quercus robur</i>	Pedunculate oak		x			
<i>Rosa canina</i> sp.	Dog-rose		x			
<i>Rubus fruticosus</i> agg.	Bramble		x			x
<i>Salix</i> sp.	Willow		x			
<i>Sambucus nigra</i>	Elder		x	x		x
<i>Sorbus aucuparia</i>	Rowan		x			
<i>Viburnum opulus</i>	Guelder-rose		x			

Appendix E

Badger

1.0 Legislation

1.1 Badgers and their setts are protected under the Protection of Badgers Act 1992 which, in part, makes it an offence to:

- Kill, injure or take a badger
- Destroy or damage a badger sett or any part of it
- Obstruct access to, or any entrance of, a badger sett
- Disturb a badger whilst it is occupying a sett

1.2 Impacts to badgers and their setts should be avoided in the first instance by retaining setts and implementing an appropriate buffer distance to limit disturbance. Where this is not possible, a Natural England licensing system exists to permit certain works that would otherwise be illegal. This can include direct or indirect impacts which may result in any of the above offences. Where a licence has been granted, permitted impacts to a badger sett can only be carried out between the months of July and November (inclusive) and following an agreed method statement.

2.0 Methods

2.1 A dedicated badger survey was conducted on 16 May 2025 by Rhodri Gruffydd ACIEEM, using standard survey methods, searching the Site and immediately adjacent areas for field signs of badger and mapping any present such as:

- Feeding signs such as snuffle entrances made during foraging
- Hairs caught on vegetation or fences
- Latrines, usually positioned on territorial boundaries
- Foraging tracks through vegetation or under fences
- Badger setts

2.2 When badger setts are found the number of entrances are recorded as well as the level of usage. Recording this information gives an indication of the type of sett by categorising it according to the criteria listed in Table 1 below (Harris *et al.* 1989, Cresswell *et al.* 1990, Wilson *et al.* 1997).

Table 1. Criteria for categorising badger sett type.

Sett Type
Main Setts - These usually have a large number of entrances with large spoil heaps, and the sett generally looks well used. There will be well-used paths to and from the sett and between sett entrances. Although normally the breeding sett is in continuous use, it is possible to find a main sett that has become disused due to excessive digging or some other reason; it should be recorded as a disused main sett. In the first survey, the average size of an active main sett was twelve entrances (including all categories of use).
Annexe setts - They are often close to a main sett, usually less than 150 metres away, and are usually connected to the main sett by one or more obvious well-worn paths. They usually have several entrances, but may not be in use all the time even if the main sett is very active. In the first survey the average size was five entrances (including all categories of use).

Subsidiary setts - These often only have a few; four (including all categories of use) was the average number in the first survey. They are usually at least 50 metres from a main sett, and do not have an obvious path connecting with another sett. They are not continuously active.
Outlying setts - These usually have only one or two entrances, often have little spoil outside the entrance, have no obvious path connecting with another sett, and are only used sporadically. When not in use by badgers, they are often taken over by foxes or even rabbits. However, they can still be recognised as badger setts by the shape of the tunnel (not the actual entrance entrance), which is usually at least 250mm in diameter, and is rounded or a flattened oval shape. Fox and rabbit tunnels are smaller and often taller than broad.
Entrance Type
Well used entrances - These are clear of any debris or vegetation, are obviously in regular use, and may or may not have been excavated recently.
Partially used entrances - These are not in regular use and have debris such as leaves and twigs in the entrance, or have moss and/or other plants growing in or around the entrance. Partially used entrances could be in regular use after a minimal amount of clearance.
Disused entrances - These have not been in use for some time, are partially or completely blocked, and could not be used without a considerable amount of clearance. If the entrance has been disused for some time, all that may be visible is a depression in the ground where the entrance used to be, and the remains of the spoil heap, which may be covered in moss or plants.

Limitations

- 2.3 There were no specific limitations to the badger survey, which was conducted at an optimum time of year and in good conditions.

3.0 Results

- 3.1 No evidence of badger including sett digging, footprints, hairs, latrines or feeding signs were identified on the Site during the survey or other site visits.
- 3.2 Mammal tracks were identified on Site, which could be attributed to badger. However, with no badger signs identified it is likely these are a result of other mammals, such as muntjac deer or rabbit, which were incidental sightings whilst on Site.

Appendix F

Reptiles

1.0 Legislation

- 1.1 All native British reptile species are listed within Schedule 5 of the Wildlife and Countryside Act 1981 (as amended) and are afforded protection against killing and injury under parts of sub-section 9(1) of the Act. In addition, all native British reptile species are adopted as Species of Principal Importance for the Conservation of Biodiversity in England in respect of Section 41 of the Natural Environment and Rural Communities Act 2006.

2.0 Methods

- 2.1 A total of 50 reptile refugia, comprising rectangles of roofing felt measuring 1.0 x 0.5m, were installed in areas of suitable habitat present at the Site on 02 May 2025 by Rhodri Gruffydd ACIEEM. The location of these refugia is shown on the Reptile Survey Plan (CSA/7316/108).
- 2.2 Following an initial 2-week 'bedding-in' period for refugia, surveys were carried out on seven occasions during favourable weather conditions (e.g. intermittent or hazy sunshine, not too windy, sunny spells following wet or cloudy weather) between May and July 2025. The surveys were led by Rhodri Gruffydd ACIEEM. Each survey visit comprised a slow walk of the Site to visually and physically check refugia for the presence of reptiles. On each occasion a visual search was also carried out within areas of suitable habitat whilst walking between refugia locations.
- 2.3 The primary aim of the reptile survey was to establish the presence or likely absence of widespread reptile species within the survey area, rather than to estimate abundance or population size. To this end, seven survey checks, an effort generally considered 'reasonable effort' in establishing the presence or likely absence of reptiles at a Site, were carried out.
- 2.4 Given the inherent problems in detecting reptiles, greater survey effort and/or identification or marking of individuals would be required to establish the actual or relative abundance of reptile populations.

Limitations

- 2.5 All surveys were undertaken at the optimal time of the year. Six of the seven surveys were undertaken in good conditions. Towards the end of the survey seven the air temperatures were 22 degrees and as such exceeded the normal temperatures recommended for surveying reptiles. However, the cloud cover was 8 throughout the surveys and the mats were not reaching high enough temperatures, meaning that they were not too hot for reptiles, such that the survey is still valid.

3.0 Results

- 3.1 No evidence of reptiles was identified across the seven reptile surveys or other site visits. Full survey results are provided in Table 1 below.
- 3.2 It should be noted that although the Site is c. 5.54ha, suitable reptile habitat, comprising grassland, scrub and field margins, account for c. 4.2051ha within the Site. Within this area 50 artificial refugia were used to provide a survey refugia density of 11.8 refugia per ha.

Job Name & No.	7316 Land East of Talbot Way, Leichworth							Beaufort Scale: 0. Calm. Vertical smoke. 1. Light air. Smoke drifts. 2. Light breeze. Leaves rustle. 3. Gentle breeze. Small twigs constantly move. 4. Moderate breeze. Small branches begin to move. 5. Fresh breeze. Small trees in leaf begin to sway.																	
Set-up Surveyor/ Project Manager	DJW																								
Set-Up Date	02/05/2025		Total Number of Refugia			50		Precipitation: [Type] No Rain / Light / Moderate / Heavy [Duration] Intermittent / Continuous																	
Date	Start/End Times	Surveyor	Weather				Area/ Field No.	Slow worm <i>Anguis fragilis</i>					Common lizard <i>Zootoca vivipara</i>					Grass snake <i>Natrix helvetica</i>					Other Notes		
			Temp (°C)	Cloud Cover (Okta; n/8)	Wind (Beaufort Scale)	Rain (Type & Duration)		Adult Male (>230mm)	Adult Female (>230mm)	Unidentified Adult	Sub-adult	Newborn	Male	Female	Unidentified Adult	Sub-adult	Newborn	Male	Female	Unidentified Adult	Sub-adult	Newborn			
Survey 1																									
	16/05/2025	DJW+RG	14-14	3-2	4-4	None	A															No reptiles seen			
Survey 2																									
	23/05/2025	RG	15-15	5-4	3-4	None	A															No reptiles seen			
Survey 3																									
	28/05/2025	DJW	17-17	5-7	3-3	None	A															No reptiles seen			
Survey 4																									
	06/06/2025	DJW	14-14	4-7	3-4	None	A															No reptiles seen			
Survey 5																									
	12/06/2025	DJW	17-18	1-4	2-2	None	A															No reptiles seen			
Survey 6																									
	18/06/2025	DJW	19-20	3-4	2-2	None	A															No reptiles seen			
Survey 7																									
	25/06/2025	RG	21-22	8-8	2-1	None	A															No reptiles seen			
								Total Adult					Total Juvenile		Total Adult			Total Juvenile		Total Adult			Total Juvenile		
								0					0		0			0		0			0		



- Site Boundary
- Reptile Refugia (50 Total)



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Project	Land East of Talbot Way, Letchworth	Date	May 2025	Drawing No.	CSA/7316/108
Drawing Title	Reptile Survey Plan	Scale	Refer to scale	Rev	-
Client	Barratt David Wilson Homes (North Thames)	Drawn	DJW	Checked	JW

Appendix G

Great Crested Newt

1.0 Legislation

1.1 Great crested newts *Triturus cristatus* are legally protected as European Protected Species (EPS) under Regulation 43 of the Conservation of Habitats and Species Regulations 2017. These Regulations make it an offence to:

- Deliberately capture, injure or kill a great crested newt
- Deliberately disturb great crested newts, impairing their ability to survive, breed, reproduce or rear/nurture their young
- Damage or destroy a breeding site or resting place used by a great crested newt

1.2 Great crested newts are also fully protected under the Wildlife & Countryside Act 1981 (as amended), making it an offence to:

- Intentionally or recklessly disturb a great crested newt while it is occupying a structure or place of shelter or protection
- Intentionally or recklessly obstruct access to any structure or place of shelter or protection

1.3 Disturbance of great crested newts is covered by both the 2017 Regulations and the 1981 Act. Disturbance that impairs survival or successful reproduction would be covered by the Regulations, while less significant acts of disturbance may only be covered by the Act.

1.4 It is important to note that great crested newts and their habitats (such as breeding ponds) are protected throughout the year, regardless of whether or not newts are present at the time.

1.5 Great crested newts are also listed as a species of principal importance for the conservation of biodiversity in England, under Section 41 (S41) of the Natural Environment and Rural Communities (NERC) Act 2006. The S41 species list is used to guide decision-makers, including planning authorities, in implementing their duty under Section 40 of the NERC Act to have regard to the conservation of biodiversity in England, when carrying out their normal functions.

Licensing

1.6 Where development is proposed that would result in an offence under the Habitats and Species Regulations, a statutory derogation licence may be granted by Natural England to permit an act that would otherwise be unlawful. To obtain an EPS licence for development, it must be demonstrated that the purpose of the act to be licensed is for:

- “preserving public health or public safety or other imperative reasons of overriding public interest including those of social or economic nature and beneficial consequences of primary importance for the environment” (Regulation 55(2)(e))

1.7 In addition, Natural England will not grant an EPS licence unless they are satisfied that:

- "There is no satisfactory alternative" (Regulation 55(9)(a))
- "The action authorised will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in their natural range" (Regulation 55(9)(b))

2.0 Methods

Desk Study

2.1 In accordance with Natural England's Great Crested Newt Mitigation Guidelines (2001), a desktop search was undertaken in May 2025 to identify ponds within 500m of the Site which may have potential to support breeding great crested newts, using Ordnance Survey (OS) mapping, the MAGIC database and aerial photography. 500m is the generally accepted typical maximum dispersal range of this species, with great crested newt most likely to use terrestrial habitat within 250m of breeding ponds.

Habitat Suitability Index (HSI) Assessment

2.2 Where ponds were situated within a 250m radius and connected to the Site by traversable terrestrial habitats, access permission was requested to undertake a Habitat Suitability Index (HSI) assessment, using the standard approach set out by Oldham *et al.* (2000). These assessments were undertaken on 06 June 2025 by Matthew Dale ACIEEM (Natural England Class Licence WML-CL08 – Registration Number 2022-10646-CL08-GCN).

Environmental DNA (eDNA) Sampling

2.3 Environmental DNA (eDNA) sampling was used to determine the presence/likely absence of great crested newts from pond P1. This method has been shown to be a highly effective in detecting the presence of great crested newts (Biggs *et al.*, 2014).

2.4 Water samples were collected from P1 on 06 June 2025 by Matthew Dale ACIEEM (Natural England Class Licence WML-CL08 – Registration Number 2022-10646-CL08-GCN) following the recommended procedure. Appropriate biosecurity measures were taken to avoid cross contamination of great crested newt eDNA. Subsequently the samples were sent to ADAS for DNA analysis.

Limitations

2.5 Surveys were conducted at an optimum time of year and in good conditions. There were therefore no limitations to survey methodology. However, access to P2 was not granted. Due to the location of this pond over 250m from the development area it is not anticipated that any

GCN population which may be present within P2 would be able to make use of the Site.

3.0 Results

Desk Study

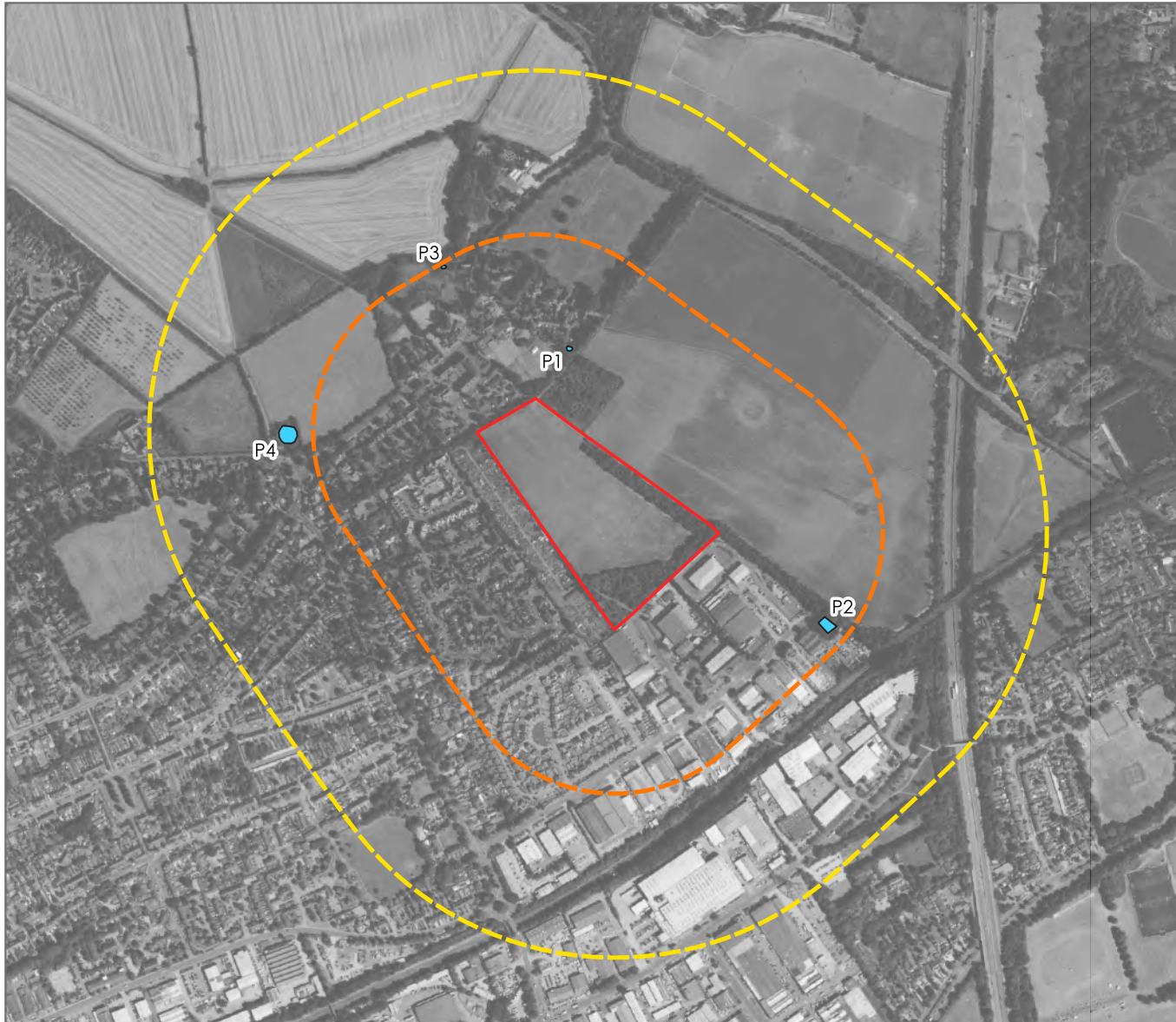
- 3.1 The desktop search for ponds and subsequent site visits did not identify any waterbodies on Site and four water bodies occurring within 500m of the Site. These ponds are identified on the Pond Plan (CSA/7316/107). Pond P1 is near the Site and shares terrestrial habitat connectivity. P2 is further from the Site but still within 250m and does share some limited habitat connectivity to the Site. Ponds P3 and P4 are further from the Site ($\geq 250\text{m}$) and are separated from the Site by residential development which creates a dispersal barrier, limiting potential for access to the Site by any GCN which may be using these ponds.

Habitat Suitability Index (HSI) Assessment & Environmental DNA (eDNA) Sampling

- 3.2 Full results of the HSI and eDNA surveys are included in Table 1 below. Pond P1 received a score of below average (0.56) for GCN and a negative eDNA result.

Table 1. Summary of HSI Assessment and eDNA results

Pond Number	HSI Score	eDNA Result	Additional Notes
P1	Below average (0.56)	Negative	Small lined pond located within school grounds with a child protection plastic framework oversailing the water. Schedule 9 species New Zealand pygmy weed <i>Crassula helmsii</i> present.
P2	-	-	Not surveyed due to lack of access.
P3	-	-	Not surveyed due to separation from Site.
P4	-	-	Not surveyed due to separation from Site.



-  Site boundary
-  250m Pond Buffer
-  500m Pond Buffer
-  Pond (with reference)



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Project	Land East of Talbot Way, Letchworth	Date	May 2025	Drawing No.	CSA/7316/107
Drawing Title	Pond Plan	Scale	Refer to scale	Rev	-
Client	Barratt David Wilson Homes (North Thames)	Drawn	DJW	Checked	JW

Client:
7316, Revae Tilbury, CSA Environmental
1040079-RT-CSA, 7316, version 1



RSK ADAS Ltd
Spring Lodge
172 Chester Road
Helsby
WA6 0AR

Tel: 01159 229249
Email: Helen.Rees@adas.co.uk

www.adas.uk

Sample ID: ADAS-9732

Client Identifier: P1

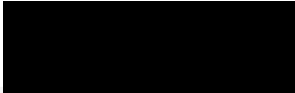
Grid references/coordinates: Not Supplied

Description: pond water samples in preservative

Condition on Receipt: Good

Date of Receipt : 16/06/2025

Volume: Passed

Determinant	Result	Method	Date of Analysis
Inhibition Control [†]	2 of 2	Real Time PCR	18/06/2025
Degradation Control [§]	Within limits	Real Time PCR	18/06/2025
Great Crested Newt*	0 of 12 (negative)	Real Time PCR	18/06/2025
Negative PCR Control (Nuclease Free Water)	0 of 4	Real Time PCR	As above for GCN
Positive PCR Control (GCN DNA 10 ⁻⁴ ng/μL) [#]	4 of 4	Real Time PCR	As above for GCN
Report Prepared by:	Dr Helen Rees	Report Issued by:	Dr Ben Maddison
Signed:		Signed:	
Position:	Director: Biotechnology	Position:	MD: Biotechnology
Date of preparation:	19/06/2025	Date of issue:	19/06/2025

eDNA analysis was carried out in accordance with the stipulated methodology found in the Technical Advice Note (WC1067 Appendix 5 Technical Advice Note) published by DEFRA and adopted by Natural England.

** If all PCR controls and extraction blanks give the expected results a sample is considered: negative for GCN if all of the replicates are negative; positive for GCN if one or more of the replicates are positive.*

[†] Recorded as the number of positive replicate reactions at expected C_t value. If the expected C_t value is not

[§] No degradation is expected within time frame of kit preparation, sample collection and analysis.

[#] Additional positive controls (10⁻¹, 10⁻², 10⁻³ ng/μL) are also routinely run, results not shown here.

Appendix 1: Interpretation of results

Sample Condition

Upon sample receipt we score your samples according to quality: good, low sediment, medium sediment, high sediment, white precipitate, and presence of algae.

There are three reasons as to why sediment should be avoided:

1. It is possible for DNA to persist within the sediment for longer than it would if it was floating in the water which could lead to a false positive result i.e. in this case GCN not recently present but present a long time ago
2. In some cases sediment can cause inhibition of the PCR analysis used to detect GCN eDNA within samples which could lead to an indeterminate result.
3. In some cases sediment can interfere with the DNA extraction procedure resulting in poor recovery of the eDNA which in turn can lead to an indeterminate result.

Algae can make the DNA extraction more difficult to perform so if it can be avoided then this is helpful.

Sometimes samples contain a white precipitate which we have found makes the recovery of eDNA very difficult. This precipitate can be present in such high amounts that it interferes with the eDNA extraction process meaning that we cannot recover the degradation control (nor most likely the eDNA itself) at sufficient levels for the control to be within the acceptable limits for the assay, therefore we have to classify these type of samples as indeterminate.

What do my results mean?

A positive result means that great crested newts are present in the water or have been present in the water in the recent past (eDNA degrades over around 7-21 days).

A negative result means that DNA from the great crested newt has not been detected in your sample.

On occasion an inconclusive result will be issued. This occurs where the DNA from the great crested newt has not been detected but the controls have indicated that either: the sample has been degraded and/or the eDNA was not fully extracted (poor recovery); or the PCR inhibited in some way. This may be due to the water chemistry or may be due to the presence of high levels of sediment in samples which can interfere with the DNA extraction process. A re-test could be performed but a fresh sample would need to be obtained. We have successfully performed re-tests on samples which have had high sediment content on the first collection and low sediment content (through improved sample collection) on the re-test. If water chemistry was the cause of the indeterminate then a re-test would most likely also return an inconclusive result.

The results will be recorded as indeterminate if the GCN result is negative and the degradation result is recorded as:

1. evidence of decay - meaning that the degradation control was outside of accepted limits
2. evidence of degradation or residual inhibition - meaning that the degradation control was outside of accepted limits but that this could have been due to inhibitors not being removed sufficiently by the dilution of inhibited samples (according to the technical advice note)



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