

Biodiversity Net Gain Assessment: Design Stage

November 2025

**Land East of Talbot Way
Letchworth**

Prepared by
CSA Environmental

On behalf of
Barratt David Wilson (North Thames)

Report No: CSA/7316/05

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

Report Reference	Revision	Date	Prepared by	Approved by	Comments
CSA/7316/05	-	05/09/2024	DW/JW	JW	
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EXECUTIVE SUMMARY

Land East of Talbot Way, Letchworth benefits from outline planning consent for residential development through the North Hertfordshire Local Plan 2011-2031 (LG3). The planning consent will not be subject to the Biodiversity Gain Condition in accordance with Schedule 14 of the Environment Act (2021) given planning permission was sought prior to 12 February 2024. Matters set out herein relate to compliance with local and national policy, and to address condition 14 of planning permission.

CSA Environmental was instructed by Barratt David Wilson Homes (North Thames) to undertake a 'Design Stage' Biodiversity Net Gain Assessment (BNGA) of the proposed development. The Statutory Biodiversity Metric Calculation Tool was used to determine pre- and post- development biodiversity values and predict the net effect of the proposed development upon biodiversity.

Baseline habitats at the Site comprise modified grassland, dense scrub and other broadleaved woodland. A line of trees is present in the south-west of the Site. No irreplaceable habitats are found on site.

Existing woodlands and some scrub will be retained and enhanced as part of development proposals. The majority of modified grasslands will be lost to development. Created post-development habitats at the Site will comprise built form (houses, roads, garages and pavement), vegetated gardens, amenity grassland and SuDS feature of very low to low distinctiveness. Created habitats of greater interest will include other neutral grassland, new woodland planting and individual trees.

A net gain of biodiversity is predicted for the proposed development of 1.96 Habitat Units (13.58%). A net gain in 0.91 Hedgerow Units (824%) is also anticipated. This is subject to measures set out in the accompanying Habitat Management & Monitoring Plan (HMMP) which should be read alongside this report.

Subject to securing the above through relevant legal mechanisms the Biodiversity Gain Condition could be discharged following grant of consent through submission of a Biodiversity Gain Plan template as drafted herein.

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 'Design Stage' Biodiversity Net Gain (BNG) Assessment 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. This report details the predicted net effect of the proposed development upon biodiversity.
- 1.2 This report has been prepared with due consideration for the Chartered Institute of Ecology and Environmental Management's guidance for design stage reporting on Biodiversity Net Gain (CIEEM, 2021). The report also takes into account wider CIEEM best-practice guidance (2017 & 2018), Biodiversity Net Gain: Good Practice Principles for Development (Baker et al., 2019) and the Biodiversity: Code of Practice for Planning and Development, published by the British Standards Institute (BS 42020:2013).
- 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 and area of mixed scrub are also present (see Habitats Plan in Appendix A).
- 1.4 This report should be read in conjunction with the Preliminary Ecological Appraisal (CSA/7316/04) prepared for the proposed development which provides full baseline habitat information upon which the post-development biodiversity value set out herein is based.
- 1.5 This 'Design Stage' BNG Assessment aims to:
 - Confirm whether planning permission sought for the development, if granted, would be subject to the Biodiversity Gain Condition as set out within the Environment Act (2021).
 - Address Condition 14 of planning consent for the Site.
 - Establish the following using the Statutory Biodiversity Metric Calculation, which uses habitat as a proxy for biodiversity and comprises three separate modules (Habitat Units, Hedgerow Units & Watercourse Units):
 - 'pre-development' (baseline) biodiversity value of the Site
 - 'post-development' (post-intervention) biodiversity value of the Site
 - Any off-site biodiversity values (baseline & post-intervention)
 - Net effect of the proposed development
 - Whether relevant 'trading' rules and other controls have been accorded with
 - Whether the Biodiversity Gain Objective (10%) is met or not

- State whether "...the biodiversity value of the on-site habitat will be lower on the date of application (or an earlier date) because of the carrying on of activities ('degradation') in which case the value is to be taken as immediately before the carrying on of the activities, and if degradation has taken place supporting evidence of this".
 - Clearly identify any assumptions made or deviation from the Statutory Biodiversity Metric Guidance.
- 1.6 Planning consent for the Site is not subject to the Biodiversity Gain Condition as set out within the Environment Act (2021) given consent was sought prior to 12 February 2024. Nonetheless, the following drawings have also been that would otherwise be required:
- Baseline Habitats Plan (CSA/7316/109) provided in Appendix A
 - Proposed Habitats Plan (CSA/7316/110) provided in Appendix B
- 1.7 This report should be viewed in conjunction with the Habitat Management and Monitoring Plan (HMMP) prepared for the Site.

2.0 PLANNING POLICY & LEGISLATION

2.1 The following legislation brings into force Schedule 14 of the Environment Act (2021), making Biodiversity Net Gain (BNG) a condition of planning permission in England from 12 February 2024:

- The Biodiversity Gain (Town and Country Planning) (Consequential Amendments) Regulations 2024
- The Biodiversity Gain Site Register (Financial Penalties and Fees) Regulations 2024
- The Biodiversity Gain Site Register Regulations 2024
- The Biodiversity Gain Requirements (Exemptions) Regulations 2024
- The Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024
- The Biodiversity Gain (Town and Country Planning) (Modifications and Amendments) (England) Regulations 2024

2.2 **As planning consent was sought prior to 12 February 2024, these requirements are not applicable to existing planning consent for the Site.**

2.3 The National Planning Policy Framework (NPPF) (Department for Levelling Up, Housing & Communities, 2023) sets out existing government planning policies for England and how they should be applied. Chapter 15: Conserving and Enhancing the Natural Environment, paragraph 180, states that the planning system and planning policies should minimise impacts on and provide net gains for biodiversity.

2.4 Accompanying the NPPF, central government guidance on the implementation of planning policies is set out within online Planning Practice Guidance (PPG). That relating to the protection and enhancement of the Natural Environment was most recently updated in February 2024. 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.

2.5 The following policy from the North Herts Local Plan 2011-2031 makes reference to biodiversity and the protection and enhancement of priority habitats and species:

- Policy NE4: Biodiversity and geological sites
- Policy SP12: Green infrastructure, landscape and biodiversity

3.0 METHODS

Biodiversity Calculations

- 3.1 The Statutory Biodiversity Metric (Defra, 2024) was used to determine baseline (pre-development) and post-intervention (post-development) biodiversity values, and to calculate the net effect of the development upon biodiversity. Specifically, the Statutory Biodiversity Metric Calculation Tool was populated and used to run all calculations present herein, and in accordance with the Statutory Metric User Guide (Defra, 2024).
- 3.2 The Statutory Biodiversity Metric uses habitat (vegetation and edaphic conditions) as a proxy for measuring biodiversity more widely. This reductive approach allows for the relative biodiversity 'value' of land to be calculated and expressed as transferrable 'Biodiversity Units'. The metric adopts the UK Habitat Classification (UK Hab; Butcher et al., 2023) system with some minor deviation.
- 3.3 The metric consists of a primarily 'Area' module which calculates 'Habitat Units' such as grassland, woodland and urban habitats, as well as two linear modules for 'Hedgerow Units' (including lines of trees) and 'Watercourse Units' (including rivers, canals and ditches). The separate Biodiversity Unit types cannot be converted between these modules and are addressed separately herein. For the purposes of this report hedgerows +/- watercourses modules were not populated given the absence of these linear features from the Site.
- 3.4 'Habitat trading' controls are integrated into the Statutory Metric to ensure any losses of habitat are mitigated or compensated for appropriately, in respect of conservation priorities and ecological functionality. Any deviation from habitat trading is cleared flagged within the Statutory Metric, and justifications, where necessary, are set out herein.
- 3.5 Any consideration of temporary impacts, those where habitats can be reinstated within 2 years of impacts as set out within the User Guide, will be explained in full herein.
- 3.6 A Statutory Biodiversity Metric Calculation Tool has been prepared for the proposed development and is provided separately in full for interrogation by North Herts District Council, relevant consultees and stakeholders.
- 3.7 All metric calculations have been reviewed by Jamie Woolam CEcol MCIEEM (BNG Lead) who has completed numerous net gain assessments

Baseline Habitats

- 3.8 The accompanying PEA report (Ricardo Energy and Environment) provides details of the UKHab survey undertaken at the Site on 16 January 2020 including full survey methods. Update surveys are presented in the PEA report prepared by CSA Environmental (CSA/7316/04).
- 3.9 Baseline (pre-development) habitat areas were taken from the Baseline Habitats Plan (Appendix A) prepared in mapping software Quantum Geographic Information Systems (QGIS). Mapping is based upon field survey, topographical survey, aerial photography, and OS mapping to an accuracy of 10m² (polygons).

Habitat Condition Assessment

- 3.10 An assessment of habitat condition was undertaken on 16 January 2020 by Ecologist Ben Jones and updated 15 May 2020 and 26 January 2023 by Ricardo Energy and Environment Ltd in accordance with the Biodiversity metric 3.1.
- 3.11 Update Habitat Condition Assessments from 2026.

Post-Development Habitats

- 3.12 Post-development habitat areas and linear measurements were taken from the Proposed Habitats Plan (Appendix B) prepared in mapping software QGIS. This plan is based upon the Landscape Masterplan (Pegasus Group; Drawing Reference: P25-0636_EN_0005) prepared by Pegasus Group on behalf of Barratt David Wilson Homes, along with indicative landscape designs. Wider consideration of construction methods, future land-use and management were used to determine the extent of existing habitat loss/deterioration, retention/enhancement and creation which would occur-post development.
- 3.13 Professional judgement was required throughout the calculation process to ensure target habitats were reasonable, achievable and ecologically justified. Habitat condition for both enhanced and created habitats was assigned taking a precautionary approach and with consideration of biotic and operational phase conditions (i.e. those which may limit the extent to which 'good' condition is likely to be reached).

Strategic Significance

- 3.14 A desktop assessment was undertaken to determine relevant strategic significance multipliers for pre- and post-development habitats in accordance with Table 7 of the Statutory Metric User Guide (Defra, 2024) with particular consideration of Local Nature Recovery Strategies (LNRS).

Additionality & Wider Considerations

3.15 In accordance with the good practice principles as set out above, the following additional considerations have been given:

- Wider consideration of ecological functionality, with a qualitative ecological assessment presented herein
- Consideration of non-ecological stakeholders, such as end-users (e.g. residents) of the scheme and choices with regard to access and multi-functionality
- Identification of opportunities to deliver wider environmental gain (e.g. carbon sequestration, water quality and climate resilience) guiding habitat/design choices beyond certain ecological outcomes

Assumptions & Limitations

3.16 Effort has been taken to ensure mapping, and measurements taken from mapping, are accurate to the level stated. However, given the nature of habitats, methods of field survey and the potential for inaccuracies in aerial photography and some other mapping, there remain some potential for errors in the calculations presented herein.

3.17 Professional judgement and a precautionary approach are required to establish baseline and post-development scenarios to assess current habitat type and condition, and to predict future changes. Accordingly, outcomes for habitats and biodiversity more widely may differ from those presented herein.

3.18 Specific assumptions with regard to certain existing and proposed habitats have been identified where relevant throughout the report.

4.0 BASELINE BIODIVERSITY

- 4.1 For full habitat descriptions and species lists, please refer to the PEA (Ricardo Energy and Environment) with baseline habitats illustrated on the Habitats Plan (Appendix A). Appendix D sets out full details of habitat condition assessment including completed standard templates.

Strategic Significance

- 4.2 There is no published Local Nature Recovery Strategy (LNRS) for North Herts District Council. The following relevant alternative documents have been reviewed in respect of assigning significant strategic significance:
- North Hertfordshire Local Plan 2011-2031
 - Biodiversity Action Plan for Hertfordshire 2006
 - Herts Ecological Networks
 - Hertfordshire Green Infrastructure Strategy 2022
 - Catchment Plans and Catchment Planning System
- 4.3 Based on the above, the majority of baseline Habitat Units are assigned as 'Low' strategic significance with the exception of the following:
- Other woodland; broadleaved
- 4.4 The above approach has also been adopted for post-intervention (post-development) habitat units as set out below.

Baseline Biodiversity Units

- 4.5 A summary of the on-site habitat areas and baseline Biodiversity Units, as calculated using the accompanying Statutory Biodiversity Metric are set out in Table 1 below.

Table 1. Summary of On-site Baseline Biodiversity Units

HABITATS		
Habitat Type (Condition)	Area (ha)	Habitat Units
Modified grassland (Poor)	4.02	8.04
Other woodland; broadleaved (Poor)	1.21	5.32
Mixed scrub (Poor)	0.14	0.56
Bramble scrub (n/a)	0.12	0.48
Developed land; sealed surface (n/a)	0.04	-
Total	5.54ha	14.40
HEDGEROWS		
Hedgerow Type	Length (km)	Hedgerow Units
Line of trees	0.05	0.11
Total	0.05	0.11

- 4.6 The majority of the Site area comprises habitats of 'low' distinctiveness, principally agriculturally modified grasslands, contributing the majority of its overall -biodiversity value (85%). Smaller areas (8%) of 'medium' and

'high' distinctiveness habitats are present and contribute a modest proportion (18%) of overall biodiversity value.

- 4.7 A line of trees is present on the south-western boundary; it is of 'low' distinctiveness.

5.0 POST-INTERVENTION BIODIVERSITY

- 5.1 The proposed development comprises the construction of 120 dwellings with associated private gardens, access infrastructure, Sustainable Drainage System (SuDS) features and Public Open Space.
- 5.2 Post-intervention habitats are illustrated on the Proposed Habitats Plan in Appendix B. This drawing is based upon development parameters set out within proposed layout prepared on behalf of BDW and the Landscape Masterplan. The following assumptions have been made with regard to these plans in line with the Statutory Metric User Guide (Defra, 2024) and professional judgement taking a precautionary approach where necessary:
- All individual trees are assumed to be 'small' in size, and in poor condition for 'urban'/street contexts and moderate condition for 'rural' contexts
 - SuDS features assumed to have sufficient areas of seasonally wet habitat to support some wetland species
- 5.3 On-site habitat retention, enhancement/restoration and creation set out below would be secured through a Habitat Management & Monitoring Plan (HMMP) as provided.

Habitat Retention & Enhancement

- 5.4 The majority of area habitats at the Site will be lost to development, comprising principally modified grassland. The following habitats will be retained and/or enhanced:
- Woodland to east and south
 - Mixed scrub to south
- 5.5 As set out within the accompanying PEA the retention of these habitats will require protections during construction and in operation through the following:
- Tree protection measures in line with standard arboricultural practice (BS5837: 2012)
 - Construction Environmental Management Plan, to include standard pollution control measures to be implemented during construction
 - Landscape and Ecology Management Plan

Habitat Creation

- 5.6 As part of the proposed development a range of habitats will be created including vegetated gardens and incidental greenspace, as well as planted individual trees, ornamental hedgerows, other neutral grassland, new woodland planting and SuDS features.

Strategic Significance

- 5.7 An equivalent approach to strategic significance as been taken for post-intervention Biodiversity Units as for baseline units above, with all habitats having 'low' strategic significance.

6.0 NET EFFECT ON BIODIVERSITY

Biodiversity Units

- 6.1 The net effect on biodiversity as a result of the proposed development is set out within the accompanying Statutory Biodiversity Metric and summarised below in Tables 2A and 2B.

Table 2A. Net Effect on Biodiversity: Habitat Units

	Habitat Units	% Change
On-site baseline	14.42	
On-site post-intervention	16.38	
On-site net change	+1.96	+13.58%
Total net change	+1.96	+13.58%
<i>Trading Rules Satisfied</i>		

Table 2B. Net Effect on Biodiversity: Hedgerow Units

	Hedgerow Units	% Change
On-site baseline	0.11	
On-site post-intervention	1.02	
On-site net change	0.91	824.26%
Total net change	0.91	824.26%
<i>Trading Rules Satisfied</i>		

- 6.2 It is demonstrated that the proposed development will result in a net gain in excess of 10% for Habitat Units with all relevant trading rules satisfied.

Qualitative Appraisal

- 6.3 A wider appraisal of the proposed development's effects upon biodiversity is set out below in Table 4 below. This includes factors not fully captured through the Statutory Biodiversity Metric, which uses only habitat type and condition as a proxy for biodiversity, omitting important factors such as connectivity and functioning of habitats.

Table 4. Qualitative Appraisal of effects upon Biodiversity

Ecological Features, Functions & Factors	Baseline Conditions	Potential Effects
Habitat Connectivity	Majority of Site (modified grassland) at the Site contributes little to local ecological networks, with greater interest from woodland and scrub retained to the boundaries of the Site.	Residential development will impede habitat connectivity through the Site for many species. Garden habitats provide some ancillary benefits to certain mobile species. New habitats to the peripheries of the Site, including hedgerows and grassland provide some increase in habitat connectivity for certain species, contributing to wider ecological networks.
Structural Diversity	The Site majority (modified) grassland has limited habitat structure with little or no interfaces between broad habitat types. Woodland and scrub edges to the south and east provide greater diversity.	Proposed development and landscaping on-site will increase the structural diversity of habitat at the Site. Interfaces between formal (short mown) and informal habitats, as well as between broad habitat types (grassland, scrub and hedgerow) will provide a greater number of opportunities for biodiversity, at a range of scales.
Habitat Mosaics	The majority of the Site comprises modified grassland, with greater habitat diversity to south and east.	Proposed development and habitats on-site will increase the number of habitat types and their structural diversity. The combination of grassland, scrub, SuDS and trees will provide a medium-scale mosaic of habitat to benefit biodiversity.
Soil Biodiversity	Modified grassland (former arable) which dominates the Site will have been subject to frequent chemical inputs (fertiliser, pH correction and herbicides) and physical disturbance. The soil biota is likely to be significantly impacted by such works, reducing soil carbon, other nutrient cycling and wider environmental benefits.	Residential development will include the loss and damage of soils to built form and will prevent natural functioning of this habitat. Where arable is converted to permanent grassland and other habitats substantive benefits are anticipated to soil environments and biodiversity.

8.0 MANAGEMENT & MONITORING

8.1 Full details of management and monitoring for delivery of on-site biodiversity gains are provided within the accompanying Habitat Monitoring and Management Plan (HMMP) for a 30-year period which should be read alongside this report. The HMMP includes the following principal elements:

- Establishment and management of the following 'significant' biodiversity gains:
 - Other neutral grasslands within informal open spaces and SuDS features
 - Woodland enhancement/Restoration measures
 - Individual trees
- Adaptive management options
- Monitoring regime and reporting process
- Roles and responsibilities
- Processes to ensure remedial measures can be undertaken in the event that target habitat or condition is not achieved

9.0 REFERENCES

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Appendix A

Baseline 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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Project	Land East of Talbot Way, Letchworth	Date	June 2025	Drawing No.	CSA/7316/109
Drawing Title	Habitat Plan	Scale	Refer to scale	Rev	-
Client	Barratt David Wilson Homes (North Thames)	Drawn	DJW	Checked	JW

Appendix B

Proposed Habitats Plan



- Site Boundary
- Other woodland; broadleaved (enhanced)
- Other woodland; broadleaved (proposed)
- Mixed scrub (enhanced)
- Developed land; sealed surface
- Developed land; sealed surface (buildings)
- Artificial unvegetated; unsealed surface
- Mixed scrub (proposed)
- Vegetated garden
- Modified grassland
- Other neutral grassland
- Rain garden
- Sustainable drainage system (swale)
- Sustainable drainage system (SUDs)
- Ornamental hedgerow planting



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Project	Land East of Talbot Way, Letchworth	Date	Nov 2025	Drawing No.	CSA/7316/110
Drawing Title	Proposed Habitats Plan	Scale	Refer to scale	Rev	A
Client	Barratt David Wilson Homes (North Thames)	Drawn	DJW	Checked	JW



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