

Biodiversity Net Gain Assessment



Pingle Nook Farm

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Where field investigations have been carried out, these have been restricted to a level of detail required to achieve the stated objectives of the work.

This work has been undertaken in accordance with the quality management system of RSK ADAS Ltd.

Contents

Summary	1
1 Introduction	2
1.1 <i>Background and Objectives</i>	2
1.2 <i>Objectives of the report</i>	3
1.3 <i>Structure of the Report</i>	3
1.4 <i>The Author</i>	4
2 Legislation and Policy Background	5
2.1 <i>National Planning Policy Framework</i>	5
2.2 <i>The Environment Act (2021)</i>	5
2.3 <i>Local Policy</i>	6
3 Methods	8
3.1 <i>Baseline Habitat Assessment</i>	8
3.2 <i>The Mitigation Hierarchy</i>	8
3.3 <i>Biodiversity Metric Calculation</i>	9
3.4 <i>Limitations</i>	10
4 Proposed Development	10
5 Baseline Biodiversity Unit Assessment	11
5.1 <i>On-site Baseline</i>	11
5.2 <i>Habitat Baseline Assessment</i>	13
5.3 <i>Trading Rules</i>	13
6 Proposed Biodiversity Unit Assessment	14
6.1 <i>Impacts of the Proposed Development</i>	14
6.2 <i>On-site Habitats</i>	14
6.3 <i>Summary of Habitat Changes</i>	15

7	BNG Good Practice Principles for Development	16
7.1	<i>Consideration of the Mitigation Hierarchy</i>	<i>17</i>
8	Conclusion	19
9	Reference	20
	Appendix 1: UK Habitat Classification Survey Map	21
	Appendix 2: Proposed Development and Landscape Plan	Error! Bookmark not defined.
	Appendix 3: Condition Assessment Tables	Error! Bookmark not defined.
	Appendix 4: Photographs	22

Summary

ADAS were commissioned by Penny Horne to undertake a biodiversity net gain assessment in support of a planning application for a change in land use of an existing agricultural field at Pingle Nook Farm, Hollin Edge, Denby Dale, Huddersfield, HD8 8YW.

The client seeks planning permission for a change in land use from agricultural to a dog exercise park.

The site comprises a single field of modified grassland and compartment of lowland mixed deciduous woodland. The River Dearne is located adjacent to the site's northern boundary.

All baseline habitats and associated units (1.33) would be retained as part of the current proposal.

Biodiversity enhancement recommendations include the planting of ten small trees with a target condition of 'moderate'. This would provide 1.48 habitat units post-application.

Under the current recommended scheme design, post-application habitats and their associated target conditions will achieve a total net change of 0.14 area habitat units, which represents a 10.73% net gain.

Trading rules in relation to area habitat units have also been satisfied.

Justification has been provided in relation to the proposed exclusion of the river's metric requirement.

A management and monitoring plan should be prepared for the site prior to the start of construction to detail how the recommended habitat protection and enhancement measures will be implemented and to detail long-term monitoring requirements in order to secure the targeted net gains.

1 Introduction

1.1 Background and Objectives

ADAS were commissioned Penny Horne to undertake a biodiversity net gain assessment in support of a planning application for a change in land use of an existing agricultural field at Pingle Nook Farm, Hollin Edge, Denby Dale, Huddersfield, HD8 8YW (National Grid Ref.: SE 23581 08874), hereafter referred to as 'the site'.

It is understood that the 0.28 ha site was previously part of an organic poultry farm which in combination with adjacent land housed 500 chickens. In 2022, the poultry farm disbanded, and the site has since been managed as a sheep pasture and cut for hay. The client obtained successful planning permission to open a dog exercise park on land immediately adjacent to the current site in 2023 and now seeks to expand the park by inclusion of the site. An area of lowland mixed deciduous woodland is also present within the application boundary and the River Dearne is present immediately adjacent to the site.

This assessment has been commissioned to provide recommendations to facilitate 10% net gain in biodiversity.

Due to the nature of the proposed development, it is understood that a biodiversity net gain assessment of the proposed works is required, as per local and national policy. Biodiversity net gain occurs in development when the project leaves the natural environment in a better state than it was prior to the project. To achieve biodiversity net gain, the developer is required to ensure that wildlife habitats are created or enhanced. It requires the development to result in a demonstrable increase in habitat value to the baseline (how the site was prior to development). Biodiversity net gain should be demonstrated quantitatively.

To demonstrate biodiversity net gain, the value of the habitats is assessed using a recognized metric tool to calculate biodiversity units. The biodiversity losses or gains resulting from the development are then calculated by subtracting the baseline (pre-development) units from the post development units. The Statutory Biodiversity Metric Calculation tool (Defra 2024a) has been used to demonstrate biodiversity net gain in a quantitative manner.

The *Biodiversity Net Gain Good Practice Principles for Development* (CIEEM, CIRIA, IEMA 2016) are a set of ten principles which have been produced to provide a framework that helps improve the UK's biodiversity by contributing towards strategic priorities to conserve and enhance nature while progressing with sustainable development. To demonstrate that biodiversity net gain has been achieved in a qualitative manner for a development it would need to be shown that the development meets these ten principles which have been listed below:

- *Apply the mitigation hierarchy*
- *Avoid losing biodiversity that cannot be offset by gains elsewhere*
- *Be inclusive and equitable*
- *Address risks*
- *Make a measurable net gain contribution*
- *Achieve the best outcomes for biodiversity*
- *Be additional*
- *Create a net gain legacy*
- *Optimise sustainability*
- *Be transparent*

1.2 Objectives of the report

The BNG assessment has been produced in accordance with the British Standard (BS) for Biodiversity – Code of practice for planning and development, BS42020:2013.

The objectives of this report are as follows:

1. *To identify the planning policy context relevant to BNG matters on the site.*
2. *To describe the baseline biodiversity value of the site based on the UK Habitat condition assessment.*
3. *To evaluate the proposed biodiversity of the site based on the agreed final landscape proposals.*
4. *To calculate the predicted change in the biodiversity unit value of the site post development and demonstrate the potential biodiversity net gain of the proposed development in a qualitative manner.*
5. *To assess if the proposed development meets the requirements of the trading rules and demonstrate how the proposed development does meet those requirements.*
6. *To demonstrate how the proposed development meets the ten principles set out in the ‘Biodiversity Net Gain Good Practice Principles for Development’ and has led with the mitigation hierarchy.*

1.3 Structure of the Report

The remainder of this report is structured in the following manner:

- *Section 2 Planning Policy Context. This describes the national, county and district level planning policy relevant to biodiversity net gain matters in relation to the proposed development.*
- *Section 3 Methods. Describes the methods used to undertake the Biodiversity Net Gain Assessment.*
- *Section 4 Proposed Development. This section describes the proposed development.*

- *Section 5 Baseline Biodiversity Unit Assessment. This section describes the biodiversity baseline information, identifies key habitats, analyses the condition of the baseline habitats, and provides the findings of the baseline biodiversity units.*
- *Section 6 Proposed Biodiversity Unit Assessment. This analyses the effects of the proposed development on the baseline biodiversity units identified in section 5 and details the provision of biodiversity within the proposed development. This section will also assess the proposed development against the mitigation hierarchy and ten principles.*
- *Section 7 BNG Good Practice Principles. This section outlines how each of the BNG Principles have been applied as part of the assessment.*
- *Section 8 Conclusion. This final part of the report summarises the overall effects on biodiversity on the site and if the proposed development can achieve a net gain in biodiversity.*

1.4 The Author

This document has been prepared by Simon Fawcett BSc (Hons) MCIEEM, an ADAS Principal Ecological Consultant. Simon is a professional member of Chartered Institute of Ecology and Environmental Management (CIEEM) and holds a bachelor's degree in ecology. ADAS is a Landscape Institute and CIEEM registered practice, and all work is prepared and reviewed internally by senior highly experienced Landscape Architects and Ecologists.

2 Legislation and Policy Background

2.1 National Planning Policy Framework

The National Planning Policy Framework (NPPF) (Department for Levelling Up, Housing and Communities, 2023), is a policy framework document which provides a range of important principles. Paragraph 180 of the NPPF states that decisions should contribute to and enhance the natural local environment by:

'Minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.'

Paragraph 186 goes on to state:

'... take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.'

When determining planning applications, local planning authorities should aim to conserve and enhance biodiversity by applying the following principles (paragraph 180):

'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.'

2.2 The Environment Act (2021)

Para 2 (3) of Schedule 14 of The Environment Act 2021 makes it mandatory for all new developments (with some limited exceptions) to achieve a biodiversity net gain (BNG) of at least 10% by the time the development is completed compared to the pre-development biodiversity value of the onsite habitat. This percentage may be amended in the future by the Secretary of State. Please note that some Local Policies stipulate a higher target than this.

The Act allows three methods for securing biodiversity net gains:

1. enhancement of the biodiversity of land to which the planning permission relates;
2. the allocation of registered offsite biodiversity gain to any development for which the planning permission is granted; and
3. the purchase of biodiversity credits for any such development.

A biodiversity gain statement must set out whether, and if so how, the biodiversity gain objective applies in relation to development where the onsite habitat is irreplaceable, how the development will minimise

any adverse effects to the onsite habitat, and what the evidence must be produced to show how the biodiversity net gain has been met upon completion of the development.

Biodiversity gains will need to be maintained for at least 30 years after the development is completed

2.3 Local Policy

Table 1 details the policies within Kirklees Local Plan (adopted 27 February 2019) which are relevant to the ecological features.

Table 1: Summary of relevant local planning policy – Kirklees Local Plan (adopted 27 February 2019).

Policy	Description
Kirklees Local Plan February 2019	
<p>Policy LP30 Biodiversity and Geodiversity</p>	<p>Biodiversity & Geodiversity</p> <p><i>The council will seek to protect and enhance the biodiversity and geodiversity of Kirklees, including the range of international, national and locally designated wildlife and geological sites, Habitats and Species of Principal Importance and the Kirklees Wildlife Habitat Network.</i></p> <p>South Pennine Moors</p> <p><i>Proposals which may directly or indirectly compromise achieving the conservation objectives of a designated or candidate European protected site will not be permitted unless the proposal meets the conditions specified in Article 6 (3) - (4) of the Habitats Directive.</i></p> <p>Statutory Designated Sites</p> <p><i>Statutory designated sites, including the South Pennine Moors Special Protection Area (SPA) and Special Area for Conservation (SAC) and Sites of Special Scientific Interest, are already highly protected through existing laws and legislation. In accordance with legislation, the Council will seek to ensure that harmful impacts to these areas as a result of development proposals are avoided. Development proposed within or outside a designated Site of Special Scientific Interest, likely to have an adverse effect on the site's special nature conservation features, will not normally be permitted. Exceptionally development will be allowed where the benefits of the development clearly outweigh the impacts on the site's special conservation features and measures are provided to mitigate harmful impacts.</i></p> <p>The Dark Peak Nature Improvement Area</p> <p><i>Proposals that contribute to the aims and objectives of the Dark Peak Nature Improvement Area will in principle be supported, subject to other policies in this plan. Development likely to have an adverse impact on the aims and objectives of the NIA will not be permitted.</i></p> <p>Local Designated Sites & Important Local Ecological Features</p> <p><i>Proposals having a direct or indirect adverse effect on a Local Wildlife Site or Local Geological Site, Ancient Woodland, Veteran Tree or other important tree, will not be permitted unless the benefits of the development can be clearly shown to outweigh the need to safeguard the local conservation value of the site or feature and there is no alternative means to deliver the proposal. In all cases, full compensatory measures would be required and secured in the long term.</i></p> <p>Habitats and Species of Principal Importance</p>

	<p>Proposals will be required to protect Habitats and Species of Principal Importance unless the benefits of the development clearly outweigh the importance of the biodiversity interest, in which case long term compensatory measures will need to be secured.</p> <p>Biodiversity and Development</p> <p>Development proposals will be required to:-</p> <ul style="list-style-type: none"> (i) result in no significant loss or harm to biodiversity in Kirklees through avoidance, adequate mitigation or, as a last resort, compensatory measures secured through the establishment of a legally binding agreement; (ii) minimise impact on biodiversity and provide net biodiversity gains through good design by incorporating biodiversity enhancements and habitat creation where opportunities exist; (iii) safeguard and enhance the function and connectivity of the Kirklees Wildlife Habitat Network at a local and wider landscape-scale unless the loss of the site and its functional role within the network can be fully maintained or compensated for in the long term; (iv) establish additional ecological links to the Kirklees Wildlife Habitat Network where opportunities exist; and (v) incorporate biodiversity enhancement measures to reflect the priority habitats and species identified for the relevant Kirklees Biodiversity Opportunity Zone.
<p>Policy LP31 Strategic Green Infrastructure Network</p>	<p>Within the Strategic Green Infrastructure Network identified on the Policies Map, priority will be given to safeguarding and enhancing green infrastructure networks, green infrastructure assets and the range of functions they provide. Development proposals within and adjacent to the Strategic Green Infrastructure Network should ensure:-</p> <ul style="list-style-type: none"> (i) the function and connectivity of green infrastructure networks and assets are retained or replaced; (ii) new or enhanced green infrastructure is designed and integrated into the development scheme where appropriate, including natural greenspace, woodland and street trees; (iii) the scheme integrates into existing and proposed cycling, bridleway and walking routes, particularly the Core Walking and Cycling Network, by providing new connecting links where opportunities exist; (iv) the protection and enhancement of biodiversity and ecological links, particularly within and connecting to the Kirklees Wildlife Habitat Network. The council will support proposals for the creation of new or enhanced green infrastructure provided these do not conflict with other Local Plan policies.
<p>Policy LP33 Trees</p>	<p>The Council will not grant planning permission for developments which directly or indirectly threaten trees or woodlands of significant amenity. Proposals should normally retain any valuable or important trees where they make a contribution to public amenity, the distinctiveness of a specific location or contribute to the environment, including the Wildlife Habitat Network and green infrastructure networks. Proposals will need to comply with relevant national standards regarding the protection of trees in relation to design, demolition and construction. Where tree loss is deemed to be acceptable, developers will be required to submit a detailed mitigation scheme.</p>

3 Methods

3.1 Baseline Habitat Assessment

This assessment was carried out as a desk-based exercise, using the results of the UK Habitat Classification Survey (UKHab 2023) shown in Appendix 1 and Statutory Biodiversity Metric Condition Assessment (Defra 2024b) undertaken by ADAS in June 2024.

3.2 The Mitigation Hierarchy

The aim of the BNG assessment is to identify, predict and evaluate potential key effects arising from the proposed development and assess them against the mitigation hierarchy. The mitigation hierarchy requires that developers first take steps to avoid and then to minimise impacts on biodiversity. Only after these steps are taken should developers look to compensate for losses that cannot be avoided. Finally, if compensation within the development footprint is not possible or does not generate the most benefits for nature conservation, the losses should be offset elsewhere. The proposals have been developed in accordance with the British Standard for 'Process for designing and implementing Biodiversity Net Gain – Specification', BS8683:2021 to reduce risk to harm of biodiversity and maximise the potential gains on the site.

3.3 Biodiversity Metric Rules

The rules set out in the table must be followed, otherwise a biodiversity net gain cannot be claimed for the project.

Table 2: Metric rules.

Rule	Details
1	The trading rules of the biodiversity metric must be followed.
2	Biodiversity unit outputs, for each type of unit, must not be summed, traded, or converted between types. The requirement to deliver at least a 10% net gain applies to each type of unit.
3	To accurately apply the biodiversity metric formula, you must use the statutory biodiversity metric calculation tool or small sites biodiversity metric tool (SSM) for small sites. The tools remove the need for a user to manually calculate the change in biodiversity value. The tool will summarise the results of the calculation and inform a user whether the biodiversity net gain objective has been met.
4	In exceptional ecological circumstances, deviation from this biodiversity metric methodology may be permitted by the relevant planning authority.

3.4 Biodiversity Metric Calculation

Biodiversity metrics (units) were calculated for the site using the “Statutory Biodiversity Metric” and guidance available on the DEFRA Website in June 2024 (Defra 2024a, 2024b). The biodiversity metric spreadsheet is provided as an Excel file which sits alongside this report.

The metric uses area and linear habitat features as a proxy measure for capturing the value and importance of biodiversity. It uses a calculation in MS Excel to allow for the importance of these features for nature: their size, ecological condition, distinctiveness and location. The metric enables assessments to be made of the baseline (pre-intervention) biodiversity value of a site in terms of ‘biodiversity units’ and calculates the projected post-development (post-intervention) biodiversity value. The metric can also be used to measure off-site biodiversity changes for a project or development and can be applied from the level of an individual field to, for example, an entire river catchment.

The calculator uses the following variable elements to determine biodiversity units, based on the information collected in the field:

Habitat type: The original survey of the proposed development site was based on the UK Habitat Classification System (UKHab 2023), shown in Appendix 1.

Area (Hectares): The area has been measured based on the digitized UK Habitat Classification map using ArcView Geographical Information System (GIS). Measurements have been rounded up or down to the nearest two decimal places to achieve a minimal mapping unit (MMU) of 0.01 ha. Mapping habitats at different times of year may lead to variation between where one habitat finishes, and another begins as there is potential overlap between habitats (the ecotone). The actual field mapping is based on both field survey and aerial imagery to achieve the best representation of the areas covered by each habitat identified onsite. Photographs of each habitat on and off-site are provided in Appendix 2.

Condition: The condition is a means to measure the quality of a habitat based on a series of physical characteristics and typical species of a particular habitat type. To aid the process, the Statutory Biodiversity Metric Technical Annex 1 (Defra 2024b), provides ‘condition sheets.’ Condition sheets provide a list of positive indicators for each habitat and dependent on how many positive indicators a particular habitat meets, will equate to the relevant condition for that specific habitat. In order that this process can be followed, in relation to this calculation, the number of positive indicators that are met for each habitat type are presented in the accompanying excel document for each habitat found onsite.

Strategic significance: This element is to assess the habitats on site in relation to the geographical location in which they are located. Information to determine the significance of a habitat within a specific landscape can be found in Local Nature Recovery Strategies (LNRS) as well as a variety of sources that include local plans, local biodiversity and National Character Areas. The strategic significance is based on

three categories which equate to a different score, which are as follows: High – 1.15; Medium – 1.1 and Low - 1.

3.5 Limitations

Measurements are based on a two-dimensional mapping and would assume the site is completely flat and therefore certain habitats may be greater in extent if they occur on a slope.

In the field the surveyor will have judged the approximate area of each of the habitat type and where appropriate used aerial imagery to assist with mapping of the habitats as accurately as possible.

At the time of the survey, the land parcel had been recently cut for hay and therefore it was not possible to identify all the species which could be present. However, areas of the field which had been cut longer provided opportunities to identify dominant species. In addition, field margins remained and therefore reasonable assumptions with regards to habitat type and condition could be made. In addition, the history of the site is known (poultry farm), evidenced by photographs provided by the client which also aided in the determination of habitat types and associated conditions.

4 Proposed Development

Proposals include a change of land use from agricultural land to a dog exercise park. No development is proposed with access routes to the site already in place as part of the adjacent park. The client proposes to remove the current fence between the site and existing park. In addition, an existing fence currently excluding a compartment of lowland mixed deciduous woodland would be removed to allow dogs access into the woodland. A new fence would be constructed along the site's eastern boundary.

This assessment has been commissioned to provide recommendations to facilitate 10% net gain in biodiversity.

5 Baseline Biodiversity Unit Assessment

5.1 On-site Baseline

The primary habitats identified within the UK Habitat Classification Survey on site are listed and described below. All habitats are marked on the UK Habitat Classification survey map in Appendix 1 and each habitat type is illustrated with a photograph in Appendix 2.

5.1.1 Modified grassland (g4)

The site comprised a single fenced field of modified grassland (Appendix 2: Photograph 1 – 2). As discussed in section 3.5, the grassland, at the time of the survey, had recently been cut for hay and therefore the identification of all species which could be present was not available. However, areas which had been cut longer clearly revealed the dominant grass species. A strip of longer grassland running east – west adjacent to the northern boundary of the site (Appendix 4: Photograph 3) was dominated by Perennial Ryegrass (*Lolium perenne*) with frequent Creeping Buttercup (*Ranunculus repens*). In addition, a strip of longer grassland running east – west within the centre of the site (Appendix 2: Photograph 4) was dominated by Yorkshire Fog (*Holcus Lanatus*) with frequent Cocksfoot (*Dactylis glomerata*) and occasional Rough Meadow-grass (*Poa trivialis*), Creeping Buttercup, White Clover (*Trifolium repens*). Other grasses identified occasionally throughout the grassland included Meadow-foxtail (*Alopecurus pratensis*) and Red Fescue (*Festuca rubra*). Meadow Buttercup (*Ranunculus pratense*) and Common Sorrel (*Rumex acetosa*) were also present occasionally.

Quadrats of intact, marginal vegetation were undertaken which also concluded a modified grassland habitat type based on a similar combination of the species detailed above with some areas dominated entirely by False Oat-grass (*Arrhenatherum elatius*) (Appendix 2: Photograph 5). Table 3 presents the results of the quadrat survey.

Table 3: Results of the quadrat survey.

Quadrat	Grid Reference	Species and cover (DAFOR)	Number of species	Bare ground (%)	Sward height (cm)	Physical damage (%)
1	SE 23546 08837	Yorkshire Fog (D), Perennial Ryegrass (F), Rough Meadow-grass (O), Sweet Vernal-grass (R)	4	0	30	0
2	SE 23532 08849	Yorkshire Fog (D), Meadow Foxtail (O), Perennial Ryegrass (O) Rough Meadow-grass (O), Meadow Buttercup (R)	5	0	30	0
3	SE 23522 08860	Red Fescue (F), Cocksfoot (O), Yorkshire Fog (O), Perennial Ryegrass (A), Common	7	0	20	0

		Sorrel (O), Rough Meadow-grass (F), Meadow Buttercup (R)				
4	SE 23573 08852	False Oat-grass (D), Cocksfoot (A), Rough Meadow-grass (A), Yorkshire Fog (A), Creeping Buttercup (O).	5	0	35	0
5	SE 23601 08868	False Oat-grass (D), Rough Meadow-grass (F), Yorkshire Fog (O), Cocksfoot (O), Meadow Buttercup (R)	5	0	40	0
Species per m ²			5.2			

Based on grassland criteria set out in the UK Habitat Classification V2.0 methodology, the grassland on site would be considered 'modified grassland'. This classification is attributed to the low cover of broadleaved herbs (<20%), number of species (< 8 m²) and cover of Perennial Ryegrass and White clover which is considered to be likely >30% within the sward.

In addition, this habitat condition is consistent in light of the condition of the grassland up to 2022 due to impacts from management as a poultry farm which resulted in large areas of bare ground and disturbance as shown in a photograph provided by the client (Appendix 2: Photographs 6).

5.1.2 Lowland mixed deciduous woodland (w1f)

An area of the site comprised lowland mixed deciduous woodland, a habitat of principle importance under the Natural Environment and Rural Communities (NERC) Act 2006 (Appendix 2: Photograph 7 - 8). The woodland comprised a predominantly closed canopy with few areas of open space, dominated by mature stands of Sessile Oak (*Quercus petraea*), and Sycamore (*Acer pseudoplatanus*) with frequent Silver Birch (*Betula pendula*) and rare Ash (*Fraxinus excelsior*). No distinctive understorey was present which predominately comprised scattered stands of Holly (*Ilex aquifolium*), Hawthorn (*Crataegus monogyna*) and low numbers of Sessile Oak and Sycamore saplings (Appendix 2: Photograph 9). A field layer was present and comprised a combination of bare ground (Appendix 2: Photograph 10), leaf litter, common grasses with occasional herbs including Bluebell (*Hyacinthoides non-scripta*), Meadow Buttercup, Creeping Buttercup, Wood Avens (*Geum urbanum*), Common Nettle (*Urtica dioica*), Hedge Woundwort (*Stachys sylvatica*) and Bramble (*Rubus fruticosus agg*) which was locally abundant (Appendix 2: Photograph 11 – 12). Low levels of deadwood were noted across the woodland parcel which was generally limited to few fallen and attached tree limbs. A footpath runs through the woodland (Appendix 2: Photograph 13) which was bare and appeared compacted and evidence of structures could be seen including stone walling (Appendix 2: Photograph 14). No significant evidence of browsing damage was noted.

5.2 On-site Habitat Baseline Assessment

The condition of each habitat has been assessed against the relevant positive indicators. Summaries of the habitat units for each baseline habitat are provided in Table 4. A full breakdown of the condition assessments is provided in the accompanying excel document for each habitat found on-site.

For strategic significance, Kirklees District have not currently compiled a Local Nature Recovery Strategy. However, the site is located within the Pennine Foothill Kirklees Biodiversity Opportunity Zone (Kirklees 2007) which states:

‘The Pennine Foothills encompass the wards of Denby Dale, Kirkburton and those of North Kirklees. The zone is characterised by gently rolling countryside with a mix of woodland (some ancient woodland sites), hedgerows and agricultural land – primarily pasture (mostly agriculturally improved) but with some arable cropping. Both Lowland Deciduous Woodland and Hedgerows are UK Habitats of Principal Importance and the latter especially are widely distributed across the non-urban areas. Arable Field Margins, another UK Habitat of Principal Importance, is also present’.

Habitats on site correspond with the above description and are therefore considered formally identified within a local strategy.

Table 4: Baseline assessment – on-site area habitats.

Habitat type	Area (hectares)	Condition	Strategic significance	Total habitat units
Modified grassland	0.22	Poor	Formally identified within a local strategy.	0.51
Lowland mixed deciduous woodland	0.06	Moderate	Formally identified within a local strategy.	0.83
Total	0.28	-	-	1.33

5.2.1 Trading Rules

For habitat trading purposes the following is required for each baseline habitat:

- *Modified grassland: Low distinctiveness. Replace with same distinctiveness or better habitat.*
- *Lowland mixed deciduous woodland: High distinctiveness. Same habitat required.*

6 Proposed Biodiversity Unit Assessment

6.1 Impacts of the Proposed Development

All baseline habitats, equating to 1.33 units will be retained as part of current proposals which includes a change in land use from agricultural land (sheep grazed pasture) to a dog exercise park. Fencing which currently isolates the woodland on site would be removed to allow dogs access into this area. The expected change in land use is not considered likely to impact the current condition of the habitats present. The existing modified grassland has been classified in a 'poor' condition and this change in land use would be unable to result in a reduction of condition. In addition, the presence of dogs intermittently within the woodland, in the expected daily quantities, would unlikely result in a negative condition change given the specific criteria attributed to the assigned 'moderate' condition score.

It is recommended that 10 small trees with a target condition of 'moderate' are planted on site as shown in Appendix 3.

6.2 On-site Habitats

The new on-site area habitats are based on the development and recommended plan in Appendix 3 and are summarised in Table 5.

Table 5: Summary of on-site habitat creation.

Habitat type	Area (hectares)	Condition	Strategic significance	Total habitat units
Retention				
Modified grassland	0.22	Poor	Formally identified within a local strategy.	0.51
Lowland mixed deciduous woodland	0.06	Moderate	Formally identified within a local strategy.	0.83
Creation				
Rural trees (10 x small trees)	0.0407	Moderate	Formally identified within a local strategy.	0.14
Total	0.28			1.48

**The metric calculator does not include the area measurement for urban street trees in the total due to the overlap in habitats*

6.3 Summary of Habitat Changes

The total biodiversity value of the on-site habitats prior to development was 1.33 units, all of which will be retained as part of current proposals. Post-application, 0.14 habitat units will be created on site through the planting of ten small trees with a target condition of ‘moderate’.

Under the recommended scheme design, post-application habitats and their associated target conditions will achieve a total net change of 0.14 area habitat units, which represents a 10.73% net gain. Trading rules in relation to area habitat units have also been satisfied.

Table 6: Summary of the Statutory Biodiversity Metric results.

On-site baseline	Habitat units	1.33	
	Hedgerow units	0.00	
	Watercourse units	0.00	
On-site post-intervention <small>(Including habitat retention, creation & enhancement)</small>	Habitat units	1.48	
	Hedgerow units	0.00	
	Watercourse units	0.00	
On-site net change <small>(units & percentage)</small>	Habitat units	0.14	10.73%
	Hedgerow units	0.00	0.00%
	Watercourse units	0.00	0.00%
Off-site baseline	Habitat units	0.00	
	Hedgerow units	0.00	
	Watercourse units	0.00	
Off-site post-intervention <small>(Including habitat retention, creation & enhancement)</small>	Habitat units	0.00	
	Hedgerow units	0.00	
	Watercourse units	0.00	
Off-site net change <small>(units & percentage)</small>	Habitat units	0.00	0.00%
	Hedgerow units	0.00	0.00%
	Watercourse units	0.00	0.00%
Combined net unit change <small>(Including all on-site & off-site habitat retention, creation & enhancement)</small>	Habitat units	0.14	
	Hedgerow units	0.00	
	Watercourse units	0.00	
Spatial risk multiplier (SRM) deductions	Habitat units	0.00	
	Hedgerow units	0.00	
	Watercourse units	0.00	
FINAL RESULTS			
Total net unit change <small>(Including all on-site & off-site habitat retention, creation & enhancement)</small>	Habitat units	0.14	
	Hedgerow units	0.00	
	Watercourse units	0.00	
Total net % change <small>(Including all on-site & off-site habitat retention, creation & enhancement)</small>	Habitat units	10.73%	
	Hedgerow units	0.00%	
	Watercourse units	0.00%	
Trading rules satisfied?	Yes ✓		

7 BNG Good Practice Principles for Development

Table 7 outlines the justification of how each of the BNG Principles has been applied as part of the biodiversity net gain assessment.

Table 7: Good practice principles and their consideration within the scheme.

Good Practice Principle	Site Considerations
Apply the mitigation hierarchy	Impacts to all habitats on site have been avoided as this application concerns a change in land use only.
Avoid losing biodiversity that cannot be offset elsewhere	The project will not result in losses to any statutory designated sites, ancient woodland or other irreplaceable habitat.
Compensate / Offset	Compensation not required.
Be inclusive and equitable	The change in land use and expansion of the dog exercise park will provide benefits to local residents.
Address risk	Proposed habitat creations are practical to achieve on-site in association with the change in land use.
Make a measurable net gain contribution	The Defra Statutory Metric has been used to track the changes from baseline to demonstrate a measurable net gain. See sections 5 and 6 for a detailed summary of the biodiversity metric calculation.
Be additional	It is also recommended that bird nesting boxes be installed in the woodland on site.
Create a net gain legacy	It is recommended that a Biodiversity Net Gain Management and Monitoring Plan is produced for the project, detailing management prescriptions for the proposed habitat creation.
Optimise sustainability	By achieving net gain through recommendations suitable to the site and practical in the long term, ecological enhancements on site will contribute to the overall sustainability of the site.
Be transparent	The LPA will be provided with the PEA report, BNG Assessment report, the Defra Metric calculation and condition assessment sheets and supporting drawings used in the calculations. All biodiversity metric choices have been fully explained and justified.

7.1 Consideration of the Mitigation Hierarchy

Table 8 outlines how the mitigation hierarchy is being considered.

Table 8: Mitigation hierarchy.

Hierarchy Step	Site Considerations
Avoid	The development is avoiding all impacts on any non-statutory or statutory designated sites, ancient woodland or other irreplaceable habitat. All baseline habitat will be retained.
Minimise	All baseline habitats will be retained. The change in land use is not considered likely to impact the current conditions of the existing habitats.
Compensate / Offset	Compensation not required.

8 Rivers Metric

The River Dearne and associated southern bank is located adjacent to northern boundary of the proposed development. Current requirements associated with biodiversity net gain stipulate that any watercourses located on or within 10 m of the application boundary should be subject to a rivers condition assessment and the requirement for a 10% gain applied. However, Rule 4 detailed within the Statutory Biodiversity Metric User Guide (Defra 2023c) states *'in exceptional ecological circumstances, deviation from this biodiversity metric methodology may be permitted by the relevant planning authority'*. The current application is simply a change in land use, from an agricultural field to a dog exercise park with no development requirement except for fence removal and installation. In addition, an existing fence which will be retained in situ is located between the site and the River Dearne and associated riparian habitat. This fence line is located on average 2.5 m from the bank top of the watercourse and the site does not include any of the existing riparian habitat. In addition, habitat present between the fence line and watercourse bank comprises rank grasses characteristic of the grassland on site with scattered mature trees closer to the watercourse itself. The majority of trees present along this stretch of the River Dearne are located on the northern bank.

Current proposals would not result in any impact to the River Dearne or associated riparian habitat. Given the application is concerned with a change in land use and the proposed land use itself is not dissimilar to what the current activity on site is in terms of the presence of animals and grassland management, ADAS considers enforcement of the rivers metric, in this instance, disproportionate and requests that the Local Authority waives this requirement in line with Rule 4 of the Statutory Biodiversity Metric.

9 Conclusion

Current proposals essentially comprise the change in land use of an existing agricultural field at Pingle Nook Farm, Hollin Edge, Denby Dale, Huddersfield, HD8 8YW. The site comprises a single field of modified grassland and compartment of lowland mixed deciduous woodland. The River Dearne is located adjacent to the site's northern boundary.

The client seeks planning permission for a change in land use from agricultural to open a dog exercise park.

All baseline habitats and associated units (1.33) would be retained as part of the current proposal.

Biodiversity enhancement recommendations include the planting of ten small trees with a target condition of 'moderate'. This would provide 1.48 habitat units post-application.

Under the current recommended scheme design, post-application habitats and their associated target conditions will achieve a total net change of 0.14 area habitat units, which represents a 10.73% net gain. Trading rules in relation to area habitat units have also been satisfied.

Justification has been provided in relation to the proposed exclusion of the river's metric requirement.

10 References

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Appendix 1: UK Habitat Classification Survey Map

See following page.



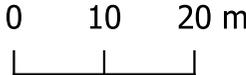
Penny Horne

Pingle Nook Farm,
Hollin Edge Denby Dale, Huddersfield,
Kirklees, HD8 8YW

UK Habitat Classification Survey Map

-  Site boundary
-  Modified grassland - g4
-  Lowland mixed deciduous woodland - w1f
-  Fence

Drawn by Lydia Waite 04/06/2024



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Appendix 2: Photographs



Photograph 1: Modified grassland, recently cut.



Photograph 2: Modified grassland, recently cut.



Photograph 3: Dominant Perennial Ryegrass within modified grassland.



Photograph 4: Dominant Yorkshire Fog within modified grassland.



Photograph 5: False Oat-grass dominating within field margin.



Photograph 6: Condition of the field in 2022.



Photograph 7: Lowland mixed deciduous woodland.



Photograph 8: Lowland mixed deciduous woodland.



Photograph 9: LMDW understorey.



Photograph 10: LMDW bare ground.



Photograph 11: LMDW field layer.



Photograph 12: LMDW field layer.



Photograph 13: Woodland footpath.



Photograph 14: Walls / structure within woodland.

Appendix 3: Post-application Habitats Map

See following page



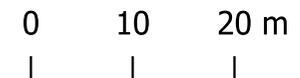
Penny Horne

Pingle Nook Farm,
Hollin Edge Denby Dale, Huddersfield,
Kirklees, HD8 8YW

Post application BNG plan

-  Site boundary
-  Modified grassland - g4
-  Lowland mixed deciduous woodland - w1f
-  Fence
-  Scattered trees

Drawn by Lydia Waite 07/06/2024



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