Brooks Ecological
Grounded advice

Land Adjacent to 33 Brooke Street

Biodiversity Net Gain Assessment (Baseline)

Report Ref. ER-7938-01

21/10/2024

VMA Property Group Ltd

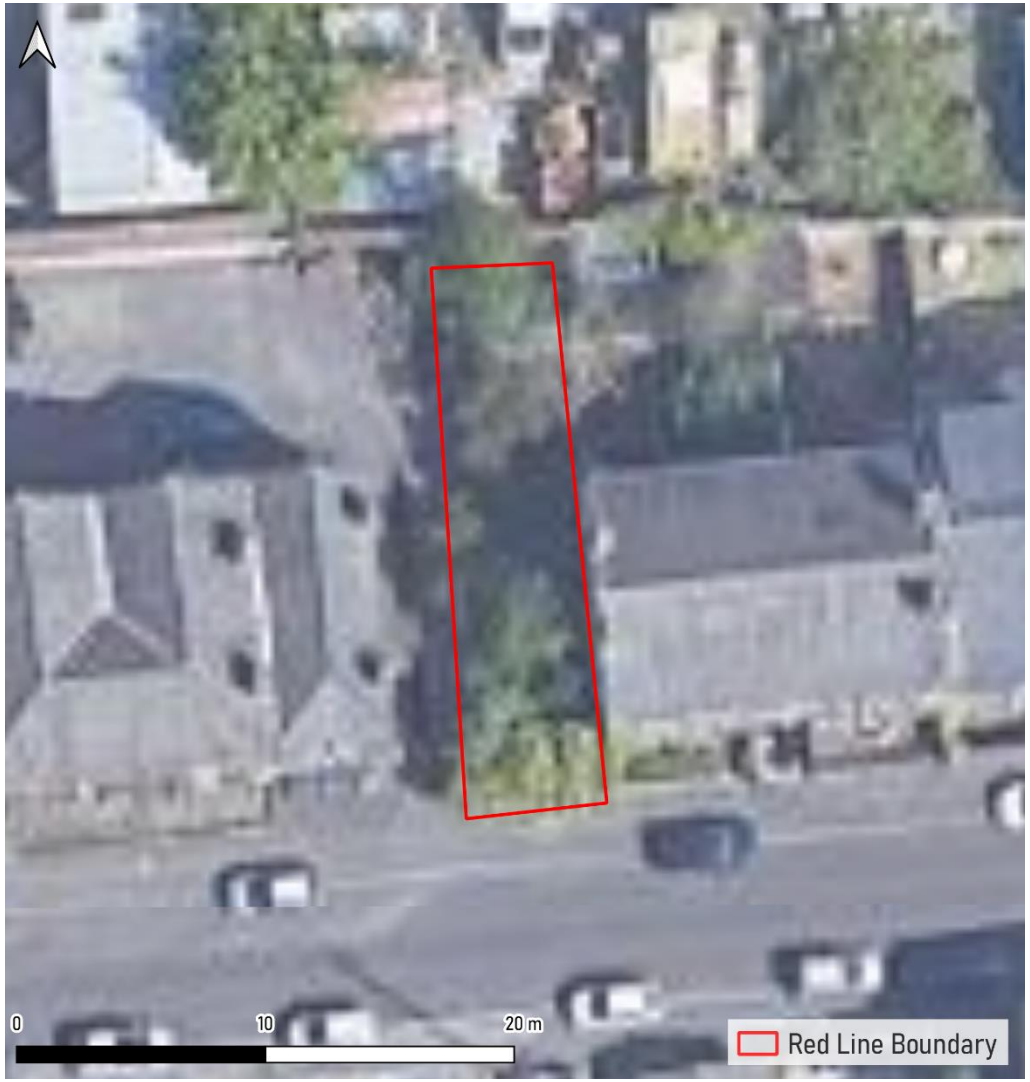
Report reference	**ER-7938-01 – Biodiversity Net Gain Assessment (Baseline)**
Author	Sam Wardle MSci (Hons) Biodiversity Technician
Technical Review	Christopher Shaw BSc (Hons) MCIEEM Principal Ecologist
QA	Ruth Highley MBiol (Hons) Assistant Ecologist
Authorised	Christopher Shaw BSc (Hons) MCIEEM Principal Ecologist
Date	21/10/2024
Report duration	In accordance with CIEEM (2019), unless otherwise stated the findings of this report remain valid for a period of 18 months. After this period advice should be sought on the scope of any updating work required.

Unit A, 1 Station Road, Guiseley, Leeds, LS20 8BX
Phone: 01943 884451
01943 879129
www.brooks-ecological.co.uk
Registered in England Number 5351418

Introduction

1. Brooks Ecological Ltd was commissioned by VMA Property Group Ltd to carry out a Biodiversity Net Gain (BNG) Assessment of the proposed development Site at Land Adjacent to 33 Brooke Street.
2. The assessment applies to the parcel of land shown in Figure 1 opposite.
3. The assessment is informed by a Site walkover in October 2024.
4. Biodiversity Accounting metrics are used to quantify the value of a site in Biodiversity Units, which helps in assessing the ecological impacts of the proposed development on the Site.
5. Biodiversity Units can help to inform avoidance, or on-Site mitigation levels required; or as a last resort can translate to a direct monetary value where compensation (off-Site) is required.
6. For the purposes of metric calculations, the Site area has been measured using GIS against the provided red line boundary as 0.012ha.

Figure 1 Extent of BNG assessment (red line boundary).



Pre-development baseline

Habitats identified

7. Habitats present on-Site are outlined in Table 1, opposite. These are shown in relation to location and extent in Figure 2 overleaf.

Condition Assessment

8. Habitat condition has been assessed as part of the walkover of the Site.

9. Information on condition assessments is provided in the Excel spreadsheet CA-7938-01 provided alongside this report.

Strategic Significance

10. None of the habitats on-Site fall within or close to the WHN, and so all are mapped as 'area/compensation not in local strategy/ no local strategy'.

Irreplaceable Habitat

11. Irreplaceable habitats have not been found on-Site

Habitat Degradation

12. There is no evidence on Site or in aerial mapping of the Site which suggests that it has been deliberately degraded.

Biodiversity Metric

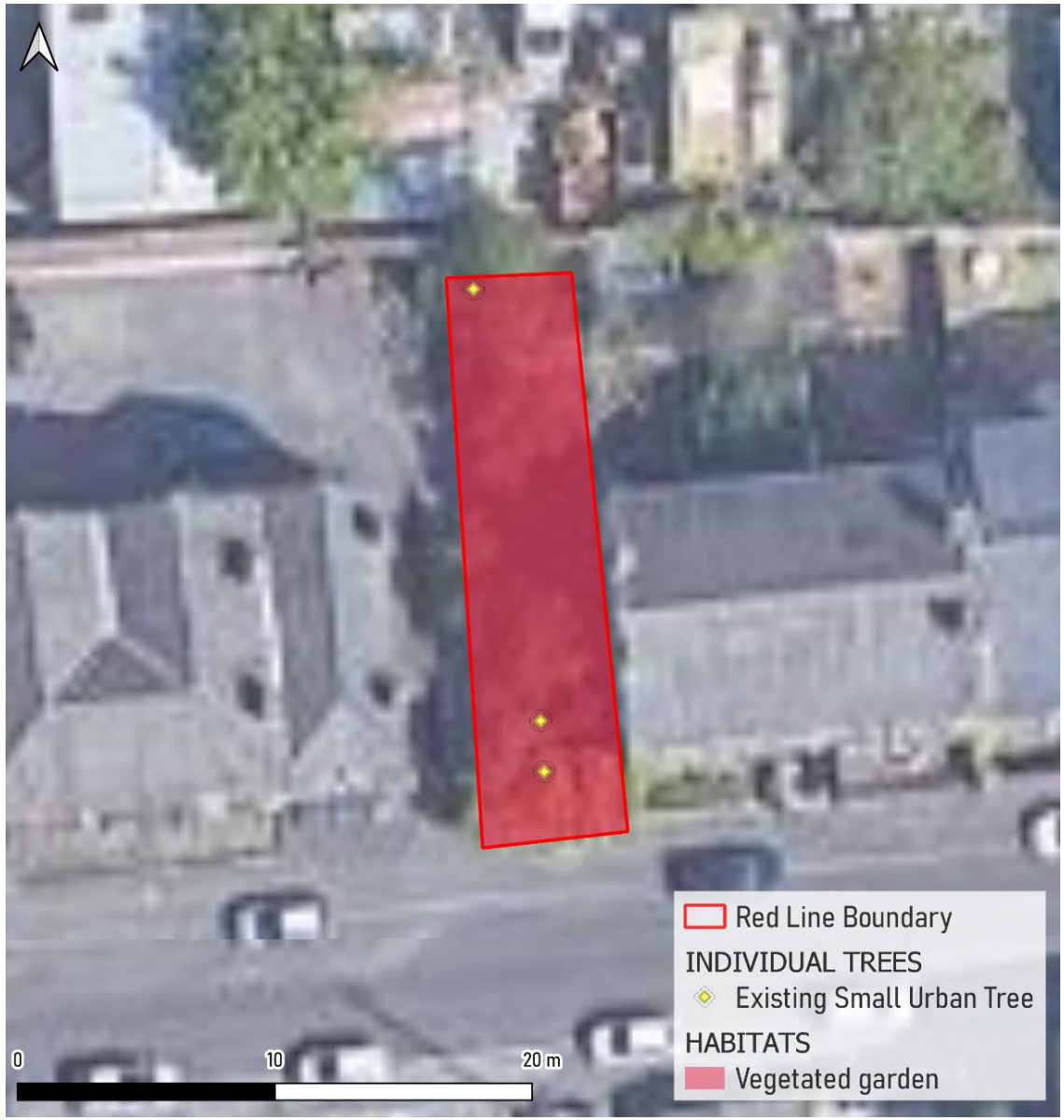
13. Habitat types, conditions, and areas have been entered into the Statutory Biodiversity Metric Calculation Tool alongside information on their strategic significance.

14. The Statutory Biodiversity Metric Calculation Tool (published 23/07/2024), is provided alongside this assessment, in Excel spreadsheet BM-7938-01, and may be useful in investigating design options for the Site.

Table 1 Habitat Types.

Habitat	Irreplaceable?	Distinctiveness	Condition	See Condition Assessment sheet
Vegetated garden	No	Low	N/A	N/A
Individual Trees	No	Medium	Poor	9B

Figure 2 The Site's habitats assigned to types used in the Biodiversity Metric.



Trading Rules

15. As part of delivering a Net Gain for biodiversity, the BNG process requires that trading rules are complied with, such that loss of habitats is compensated for in a like-for-like or like-for-better fashion. This is based on habitat distinctiveness.
16. Once trading rules are complied with, the 'gain' component can come from any distinctiveness category.

Habitat Unit Score

17. The Site has been assessed as having a baseline score of 0.07 Habitat Units. These break down as shown in Table 2, below.

Table 2 Habitat Units broken down by distinctiveness at this Site.

Distinctiveness	Units	Approach to compensation if lost
Very Low	0	No compensation required.
Low	0.02	Losses must be replaced with area habitat units of the same or higher distinctiveness.
Medium	0.05	Losses must be replaced by area habitat units of either medium distinctiveness habitats within the same broad habitat type, or any habitat from a higher distinctiveness from any broad habitat type.
High	0	Losses must be replaced with area habitat units of the same habitat type.
Very High	0	Priority should be given to replacing losses with area habitat units of the same habitat type.
Irreplaceable	0	Cannot be compensated for.

Hedgerow Unit Score

18. The Site has no Hedgerow Units

Watercourse Unit Score

19. The Site has no Watercourse Units

Planning your development

20. The Biodiversity Gain Hierarchy of Avoid – Enhance – Create – Offset, as set out in the Planning Practice Guidance, is a material consideration of planning, and as such a project should also be able to illustrate how it has complied with this. Its relevance to this Site is set out in Table 3 below.

Table 3 Biodiversity Gain Hierarchy summary.

Level of Hierarchy	Requirement at this Site
First **Avoid**	Clearance of the Medium-distinctiveness habitats – namely urban trees – should be avoided wherever possible, and minimised where it is not avoidable.
then **Enhance**	Retained habitats on-Site should be enhanced where possible as an important source of Habitat Units post-development. The urban trees could be enhanced by planting vegetation underneath their canopy. The urban trees could also possibly be enhanced as they are currently in poor condition.
then **Create**	Any residual loss of Units should be made up for with Habitat Units generated through the creation of new habitats on-Site. Units may be generated through specific ecologically targeted habitat creation, such as wildflower grassland, and standard amenity habitats, such as amenity grassland and ornamental shrub.
then **Offset**	If a 10% Net Gain cannot be achieved on-Site, any remaining deficit will need to be compensated for off-Site.

21. Assuming the recommendations set out above can be followed, it seems likely that both the Mitigation Hierarchy and the Biodiversity Gain Hierarchy can be complied with. These recommendations should be a consideration of any design work.

Summary & Recommendations

Baseline value

22. The Site's baseline value is measured as 0.07 Habitat Units.

Trading Rules

23. As shown in Table 2, most of the Site's baseline value is accounted for by medium or higher distinctiveness habitat types. Satisfying Trading Rules therefore needs to be a key consideration during the design process.

Recommendations

24. Recommendations are set out in the table opposite.

Biodiversity Offsetting

25. Development of the Site is likely to result in the requirement to offset losses elsewhere. Potential means of achieving this would be:

    - Creating a bespoke offset on land available to the developer, as locally as possible.
    - Making use (through contribution) of any Local Authority habitat banking scheme, if this is available.
    - Purchasing the necessary Units from a broker or habitat banking scheme, again as locally as possible (and ideally within the same Local Authority or National Character area/s as the development).
    - Purchasing Statutory Credits from the UK government scheme. This is the last resort and is deliberately priced to be uncompetitive. Twice as many Credits will be required as there are Units to offset.

Table 4 Summary of Planning Considerations.

Recommendation	Rationale
Required during the design stage process	
R1 Produce a layout which minimises loss of biodiversity	Engage with the recommendations set out above, involve your ecologist in designs at an early stage, as required. The proposals will need to consider the NPPF hierarchy of Avoid – Mitigate – Compensate in minimising any loss of biodiversity.
R2 Produce a Habitat Retention Plan	Make sure your design team follows ecological advice to and make sure there are no design conflicts. The Habitat Retention Plan should identify areas which can be excluded from any impacts of clearance and construction. In producing the Plan you should consider the need to provide (amongst other things) Site compounds, to store and move materials, to install drainage, flood storage, access and services - all with suitable easements.
R3 Biodiversity Gain Strategy (BGS)	Engage an ecologist to work with the design team to maximise available Biodiversity Units on-Site, taking into account Trading rules. Identify opportunities to address any losses off-Site.
R4 Landscape Design	Make sure your landscape architect follows ecological advice or the BGS to maximise Biodiversity Units on-Site and make sure there are no design conflicts.
To be completed once a fixed Site Layout is agreed	
R5 Calculate the final Biodiversity Impact Score	Once the Site Layout is fixed and a Habitat Retention Plan is produced, the Statutory Metric will be used to quantify change in biodiversity unit value at the Site. This report will then be updated to include the post-development scores.

References

Chartered Institute of Ecology and Environmental Management (CIEEM). 2019. *Advice note: on the lifespan of ecological reports and surveys.* Winchester: Chartered Institute of Ecology and Environmental Management. [Online]. Available from: https://cieem.net/resource/advice-note-on-the-lifespan-of-ecological-reports-and-surveys/

Department for Levelling Up, Housing and Communities. 2023. *National Planning and Policy Framework.* London: Her Majesty's Government. [Online]. Available from: https://assets.publishing.service.gov.uk/media/65819679fc07f3000d8d4495/NPPF_December_2023.pdf

The Statutory Biodiversity Metric User Guide. 2024. London: Department for Environment, Food and Rural Affairs (Defra). [Online]. Available from: https://www.gov.uk/government/publications/statutory-biodiversity-metric-tools-and-guides

The Statutory Biodiversity Metric Calculation Tool (macro-enabled). 2024. London: Department for Environment, Food and Rural Affairs (Defra). [Online]. Available from: https://www.gov.uk/government/publications/statutory-biodiversity-metric-tools-and-guides

The Statutory Biodiversity Metric Condition Assessments. 2024. London: Department for Environment, Food and Rural Affairs (Defra). [Online]. Available from: https://www.gov.uk/government/publications/statutory-biodiversity-metric-tools-and-guides

Appendices

The following reports/digital documents have been provided alongside this report and should be read in conjunction with it:

- BM-7938-01 – Statutory Biodiversity Metric Calculation Tool
- CA-7938-01 – Statutory Biodiversity Metric Condition Assessments
- ER-7938-01 – Preliminary Ecological Appraisal