

**BIODIVERSITY ACCOUNTING
ASSESSMENT REPORT**

**at
2A East Bath Street
Batley
West Yorkshire
WF17 5NP**

**Client:
Mohammed Seedat**

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**JCA Ref:
22545a/JF**

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08/01/2025**



Quality Assurance

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							08/01/25	Alex Donovan

This report has been prepared and provided in accordance with the *British Standard 42020: Biodiversity – Code of practice for planning and development 2018* and the *CIEEM’s Code of Professional Conduct*.

Risk Assessment Completed	
Bio-security Procedure Completed	
Lone Worker Procedure Completed	



Executive Summary

JCA Limited was instructed by **Mohammed Seedat** to carry out a Biodiversity Accounting Assessment (BAA) of **2A East Bath Street**, (hereafter referred to as the 'Site') to inform a planning application for the demolition of the existing bungalow and garages and the construction of two detached three storey residential units with associated garages and driveways ('the Proposed Development').

The purpose of the assessment is to determine the baseline biodiversity value of the Site and to assess if there are sufficient biodiversity enhancement opportunities available within the Site boundary to compensate for any residual biodiversity losses as a result of the Proposed Development.

To fulfil the brief, the Statutory Biodiversity Metric (February 2024) was used to calculate the baseline biodiversity value of all existing habitats on-Site. The metric was then used to provide a comparative measure of any habitat creation and enhancements associated with the Client's Proposed Development. The resulting balance determines the extent of Biodiversity Units (BU) generated through the proposed habitats post development.

The site has a baseline value of 0.33 habitat BU and 0.05 hedgerow BU. On balance of impacts and habitat retention/enhancement/creation, the report concludes that the Proposed Development will result in a net gain of +0.04 habitat BU, equivalent to a net gain of +12.39% and a net gain for hedgerows of +0.02 BU, equivalent to a net gain of +35.91%. In addition, the Proposed Development has satisfied the trading rules.

This executive summary is intended as a summary of the assessment of the Site based on information received by the client at the time of production. This executive summary should be read in conjunction with the full Report.

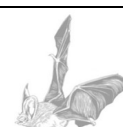


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1. Introduction

1.1 Purpose of the Report

1.1.1 JCA Limited have been instructed by **Mohammed Seedat** to undertake a Biodiversity Accounting Assessment (BAA) of a site located at **2A East Bath Street**, hereafter referred to as the 'Site'.

1.1.2 The purpose of this report is to:

- Assess the baseline biodiversity value of the Site through the total sum of the habitats within the Site, and their calculated biodiversity value.
- Assess if there are sufficient biodiversity enhancement and/or creation opportunities available within the Site boundary to compensate for any residual biodiversity losses as a result of the Proposed Development.
- To determine the level of overall residual biodiversity gains or losses associated with the Proposed Development.

1.1.3 The Site location and red line / survey area are shown in **Appendix 1**.

1.2 Terms of Reference

1.2.1 The principal source documents used to inform this BAA include:

- Proposed Development Plan (Drawing number: 24.2756.02H).
- Preliminary Ecological Appraisal (JCA Ref: 22545b/JF).

1.3 Site Description

1.3.1 The site is located at Ordnance Survey (OS) National Grid Reference SE 24868 24319, with nearby postcode WF17 5NP. The site is situated on the edge of an urban area and is bordered to the north, south and west by residential properties and to the east by lines of trees, a railway line and Howley Beck.

1.4 Details of Proposed Development

1.4.1 The development proposed at the site is the demolition of the existing bungalow and garages and the construction of two detached three storey residential units with associated garages and driveways.



2. Biodiversity Accounting in Context

2.1 Background

- 2.1.1 Biodiversity is complex and so it is impossible to measure in its entirety. Therefore metrics, which incorporate measures of different biodiversity attributes, are used to provide surrogate measures of overall biodiversity. This report uses the 'Statutory Biodiversity Metric', which was designed by Defra (2024) to define the biodiversity impacts and compensation requirements associated with development proposals. The metric works by providing a comparative measure of each habitat on-Site in biodiversity units (BU) by multiplying its area (hectares), distinctiveness (habitat type) and current condition (quality). The relative impacts (habitat loss) of the development, taking into account any additional on-Site habitat creation or enhancement, can then be calculated to determine if a measurable biodiversity net gain will be achieved on-Site. If a measurable net gain is unable to be achieved on-Site, then the process of biodiversity offsetting must be undertaken.
- 2.1.2 Biodiversity offsets are conservation activities designed to deliver biodiversity benefits in compensation for residual losses, in a measurable way. Biodiversity offsetting is distinguished from other forms of compensation by the requirement for measurable outcomes. This is achieved by quantifying net biodiversity impacts caused by development; using the same metric to assess direct and indirect negative impacts to habitats and the value of any on-Site compensation, to set the framework of off-site compensation (offset) requirements and the biodiversity net gain generated by these offsets. Biodiversity offsetting ensures that off-site compensation proposed is both proportionate to the development concerned and that a measurable net gain for biodiversity can be achieved.
- 2.1.3 Biodiversity offsetting, like other forms of compensation, is the last step of the mitigation hierarchy (first avoid, then reduce, and finally, compensate) and is applied as a last resort to otherwise policy-compliant development proposals. 'Offsetting' – i.e. creating or restoring new wildlife habitat in a measurable way and in a different place to where it was lost.
- 2.1.4 In addition to providing a mechanism for quantifiable compensation and net gain, biodiversity offsets provide reliable biodiversity outcomes as they are long-term (30 years), monitored and enforceable with adaptable management plans for optimised success.



2.2 Biodiversity Net Gain Principles

2.2.1 Biodiversity Net Gain: Good Practice Principles for Development published by CIEEM et. al (2016) states that delivering biodiversity net gain goes beyond balancing relative gains and losses. It also involves doing everything to avoid biodiversity losses in the first instance. The application of the Defra metric detailed in this report supports developments to adopt this approach by:

- a) Providing a habitat balance sheet which can be used to identify those habitats with the greatest value and subsequently those with the greatest impacts if lost;
- b) Supporting and incentivising the mitigation hierarchy by quantifying the benefits of avoiding and mitigating impacts on high value features;
- c) Promoting the value of biodiversity enhancements and demonstrating the potential for additionality on retained habitats;
- d) Providing a balance of losses, enhancements or on-Site compensation to determine if a measure net gain contribution can be achieved;
- e) Providing transparent, robust and credible evidence to help inform the best possible Site options for biodiversity; and,
- f) Ensuring that any residual off-Site compensation required (e.g. through biodiversity offsetting) is proportionate to the impacts and can secure a measurable net gain contribution for biodiversity overall.

2.3 Biodiversity Offsetting Standards

2.3.1 Good practice standards for biodiversity offsetting are set out by the Business and Biodiversity Offsets Programme (BBOP, 2012). These standards inform the approach for selection and development of suitable Offset Sites and projects. Of these standards, the following provide the most relevant UK framework for the preliminary offset site search:

- The proposed offset site should be identified as suitable for the creation and/or enhancement of a target habitat within the vicinity of where the impact occurs;
- The site must be available and managed for a minimum specified term (typically 30 years).
- The landowner must agree to an enforceable delivery mechanism to secure the long-term management.



- The site must be available for monitoring to ensure appropriate management is being undertaken and to report biodiversity progress back to the local planning authority.

2.3.2 Further standards, with regards to offset site surveys and ensuring that appropriate target habitats and units can be achieved, will form part of the detailed site search that will precede the preliminary site search.

2.3.3 In addition to biodiversity net gains achieved on-Site, off-Site enhancements can also achieve positive outcomes for nature in the local area.



3. Policy and Legislation

3.1 Introduction

3.1.1 Planning guidelines, international commitments, legislation and planning policies relevant to the protection, conservation and enhancement of nature conservation interests are detailed below.

3.2 National Policy and Guidance

3.2.1 Specific habitats and species of relevance to the Site receive legal protection in the United Kingdom under various pieces of policy and legislation, including:

- The **Environment Act 2021** mandates that all planning applications will be required to demonstrate how a development will enhance biodiversity and protect habitats from November 2023. This is to be achieved through a measurable 10% Biodiversity Net Gain (BNG), in association with development through the use of the most up to date DEFRA Metric (currently Statutory Biodiversity Metric);
- **National Planning Policy Framework (NPPF)**, as revised 2024) sets out how planning policies and decisions should contribute to and enhance the natural and local environment through amongst other things, ensuring BNG through development and protect ecological important sites and networks;
- The **Conservation of Habitats and Species Regulations 2017 (as amended)** (retained in UK law by **CHSR (Amendment) (EU Exit) 2019**) details the regulations for the protection of European Protected Habitat and Species. Such European Protected Species (EPS) of animals (**Schedule 2**) and plants (**Schedule 5**) include all species of bats, great crested newt *Triturus cristatus*, dormouse *Muscardinus avellanarius*, and European otter *Lutra lutra*, amongst others;
- The **Wildlife and Countryside Act (WCA) 1981 (as amended)** covers the legislation for endangered species in England and the framework for the designation of Sites of Special Scientific Interest (SSSIs);
- The **Countryside and Rights of Way (CROW) Act 2000** reinforces the wildlife legislation listed in the WCA and places a duty of government departments to consider biodiversity, and provides governmental department powers for the protection and maintenance of SSSIs;
- The **Natural Environment and Rural Communities Act (NERC) 2006** places a duty upon local authorities to promote and enhance biodiversity in all their functions. Specifically, habitats and species of principal importance



to the conservation of biodiversity in regards to the planning process;

- The **Hedgerow Regulations 1997** provides protection by prohibiting the destruction or damage to important countryside hedges; and
- The **Protection of Badgers Act 1992** includes the protected of badgers under the act and that it is unlawful to wilfully kill, injure, take, possess or cruelly ill-treat badgers or attempt to do so.

3.2.2 Where relevant, this appraisal takes account of the legislative protection afforded to specific habitats and species.

3.3 Local Policy and Guidance

3.3.1 Kirklees Local Plan 2013 – 2031 (Kirklees Council, Adopted February 2019)

Policy LP24: Design, Policy LP30: Biodiversity and Geodiversity and Policy LP31: Strategic Green Infrastructure Network, of the Kirklees Local Plan apply to the Proposed Development.

Policy LP24: Design

Good design should be at the core of all proposals in the district and should be considered at the outset of the development process, ensuring that design forms part of pre-application consultation of a proposal. Development briefs, design codes and masterplans should be used to secure high quality, green, accessible, inclusive and safe design, where applicable. Where appropriate and in agreement with the developer schemes will be submitted for design review.

Proposals should promote good design by ensuring:

- a. the form, scale, layout and details of all development respects and enhances the character of the

townscape, heritage assets and landscape;

- b. they provide a high standard of amenity for future and neighbouring occupiers; including maintaining

appropriate distances between buildings and the creation of development-free buffer zones

between housing and employment uses incorporating means of screening where necessary;

- c. extensions are subservient to the original building, are in keeping with the existing buildings in



terms of scale, materials and details and minimise impact on residential amenity of future and neighbouring occupiers;

d. high levels of sustainability, to a degree proportionate to the proposal, through:

- i. The re-use and adaptation of existing buildings, where practicable;
 - ii. design that promotes behavioural change, promoting walkable neighbourhoods and making walking and cycling more attractive;
 - iii. considering the use of innovative construction materials and techniques, including reclaimed and recycled materials;
 - iv. Where practicable, minimising resource use in the building by orientating buildings to utilise passive solar design. This includes encouraging the incorporation of vegetation and tree planting to assist heating and cooling and considering the use of renewable energy;
 - v. providing charging points to encourage the use of electric and low emission vehicles;
 - vi. incorporating adequate facilities to allow occupiers to separate and store waste for recycling and recovery that are well designed and visually unobtrusive and allows for the convenient collection of waste;
 - vii. designing buildings that are resilient and resistant to flood risk, where such buildings are acceptable in accordance with flood risk policies and through incorporation of multi-functional green infrastructure where appropriate;
 - viii. designing places that are adaptable and able to respond to change, with consideration given to accommodating services and infrastructure, access to high quality public transport facilities and offer flexibility to meet changing requirements of the resident / user.
- e. the risk of crime is minimised by enhanced security, and the promotion of well-defined routes, overlooked streets and places, high levels of activity, and well-designed security features;
- f. the needs of a range of different users are met, including disabled people, older people and families with small children to create accessible and inclusive places; any new open space is accessible, safe, overlooked and strategically located within the site and well-integrated into wider green infrastructure networks;
- g. development contributes towards enhancement of the natural environment, supports biodiversity and connects to and enhances ecological networks and green infrastructure;



- h. the retention of valuable or important trees and where appropriate the planting of new trees and other landscaping to maximise visual amenity and environmental benefits; and
- i. the provision of public art where appropriate.

3.3.2 Policy LP30: Biodiversity and Geodiversity

Proposals the council will support proposals that 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. that protect and enhance features of ecological and geological interest and provide net gains in biodiversity will be supported.

Proposals will be required to:

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;

- ix. minimise impact on biodiversity and provide net biodiversity gains through good design by incorporating biodiversity enhancements and habitat creation where opportunities exist;
- x. 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;
- xi. establish additional ecological links to the Kirklees Wildlife Habitat Network where opportunities exist; and

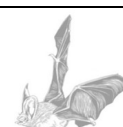
incorporate biodiversity enhancement measures to reflect the priority habitats and species identified for the relevant Kirklees Biodiversity Opportunity Zone.

3.3.3 Policy LP31: Strategic Green Infrastructure Network

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:-

- 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. (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.

3.3.4 Biodiversity Action Plan (BAP) for Kirklees

The BAP for Kirklees (Kirklees Metropolitan Council, No Date) concentrates on species and habitats that had national action plans produced or are of local conservation concern.

Species listed on the Kirklees BAP include.

- Common bullfinch *Pyrrhula pyrrhula*
- Common grasshopper warbler *Locustella naevia*
- Linnet *Linaria cannabina*
- Starling *Sturnus vulgaris*
- Corn bunting *Miliaria calandra*
- Curlew *Numenius Arquata*
- Tree sparrow *Passer montanus*
- Turtle dove *Streptopelia turtur*
- Red grouse *Lagopus lagopus*
- Reed bunting *Emberiza schoeniclus*
- Ring ouzel *Turdus torquatus*
- Skylark *Alauda arvensis*
- Song thrush *Turdus philomelos*
- Spotted flycatcher *Muscicapa striata*
- Tree pipit *Anthus trivialis*
- Twite *Carduelis flavirostris*
- Grey partridge *Perdix perdix*
- Hawfinch *Coccothraustes coccothraustes*
- Dunnock *Prunella modularis*
- House sparrow *Passer domesticus*
- Lapwing *Vanellus vanellus*
- Willow tit *Parus montanus*
- Wood warbler *Phylloscopus sibilatrix*



- Yellow wagtail *Motacilla flava*
- Yellowhammer *Emberiza citronella*
- Atlantic salmon *Salmo salar*
- European eel *Anguilla Anguilla*
- Common lizard *Lacerta vivipara*
- Common toad *Bufo bufo*
- Great crested newt *Triturus cristatus*
- Brown hare *Lepus europaeus*
- Brown long-eared bat *Plecotus auratus*
- Mountain hare *Lepus timidus*
- Noctule *Nyctalus noctule*
- Otter *Lutra lutra*
- Soprano pipistrelle *Pipistrellus pygmaeus*
- Water vole *Arvicola amphibius*
- Hedgehog *Erinaceus europaeus*
- Northern wood ant *Formica lugubris*

Habitats listed on the Kirklees BAP include.

- Arable field margins
- Blanket bog
- Hedgerow
- Inland rock outcrop and scree habitats
- Lowland dry acid grassland
- Lowland heathland
- Hay meadows
- Lowland mixed deciduous woodland
- Open mosaic habitats on previously developed land
- Other semi-natural grassland
- Ponds
- Reedbeds
- Rivers and riverine
- Scrub



4. Methodology

4.1 Background

4.1.1 Biodiversity accounting of existing and post-development habitats and linear features on-Site was carried out using the Statutory Biodiversity Metric Calculator Tool, following guidance set out in the metric user guide (Defra 2024). The process for data collation and analysis associated with the assessment is detailed in Sections 4.2 – 4.3 below.

4.2 Baseline Data

4.2.1 A baseline analysis of the existing habitats on-Site was carried out from the information gathered during the Site's ecological assessment visit carried out by James Foster (Assistant Ecologist, JCA Limited) on 11/12/2024.

4.2.2 To undertake the Biodiversity Metric calculations, the following information was recorded for each habitat parcel and/or linear feature:

- Habitat type;
- Area/Length (ha/km) (using the Minimum Mappable Unit of 25m² and 5m);
- Habitat condition;
- Strategic significance; and
- Whether that habitat will be lost, retained, enhanced, succeeded and/or created, and at what scale.

4.2.3 The habitat map for the Site was digitised and interpreted using QGIS Version 3.23.3 to calculate habitat area.

4.3 Impact Assessment

4.3.1 The existing baseline habitat plan for the Site was overlain with the Proposed Landscape Plan (Dwg number: 24.2756.02H) of the Proposed Development using GIS software to provide an area (Ha) of temporary and permanent habitat loss.

4.3.2 The area of any retained/enhanced or created habitats proposed as part of the development was also mapped to provide an area (Ha) (or length (Km) for linear features) of the on-Site compensation proposals being provided. An estimate of future condition, time until establishment and the likelihood of success was then



calculated using landscaping data provided by the client and professional judgement.

4.4 Habitat Creation and Enhancement

- 4.4.1 The area of any retained/enhanced or created habitats proposed on-Site as part of the Proposed Development was mapped using the Proposed Landscape Plan (Dwg number: 24.2756.02H) of the final development, to provide an area (Ha) (or length (Km) for linear features) estimate of on-Site compensation provided. This includes areas of developed land, which are assigned a very low (or null) value, notably, areas of buildings and/or roads.
- 4.4.2 Condition and strategic significance for each habitat or linear feature were projected using available ecological data or professional opinion about the likely value.

4.5 Residual Effects

- 4.5.1 The residual effects of the Proposed Development scheme were calculated using the Biodiversity Metric Calculator Tool. This subtracts the pre-development baseline values from that of the post-development values to determine the change in overall habitat value for the Site, taking into account any habitat trading.
- 4.5.2 Habitat trading is where the loss of a habitat must be compensated for through the creation or restoration of areas of equivalent or greater distinctiveness value. Guidance by Defra is that the loss of high distinctiveness areas, such as Habitats of Principal Importance (HPI, NERC Act, S41), require compensation in a like-for like manner (creation or restoration of habitat of the same habitat classification as that impacted). Within the Biodiversity Metric 'trading up' (where compensation through creation of a higher distinctiveness habitat) can occur, however, 'trading down' (compensation through creation of lower distinctiveness habitats) is not permitted. Therefore, if present, despite gains in lower distinctiveness habitats, these will not reduce the net gain requirement for the development. This also applies to the different habitat features i.e. habitats, hedgerows and rivers and streams. Hedgerow creation gains will not reduce net gain requirements for either rivers and streams or habitats.
- 4.5.3 Where the resulting biodiversity balance is negative, a residual net loss of biodiversity is recorded. Where the balance is positive a residual net gain of biodiversity is recorded.



5. Statutory Biodiversity Metric

5.1 Introduction

5.1.1 The assessment was carried out by JCA Limited using the ecological data gathered during the Site's ecological assessment survey carried out on 11/12/2024.

5.2 Habitat Degradation

5.2.1 Historical imagery reveals that no habitat degradation has taken place on this site.

5.3 Irreplaceable Habitats

5.3.1 There are no irreplaceable habitats on-Site.

5.4 Existing Site Value

5.4.1 The existing biodiversity value for each habitat, together with the cumulative value of all habitats is provided in Table 1. Existing on-Site habitats can be found in **Appendix 1**.

Table 1: Baseline habitats on site and their ecological value as categorised by the Biodiversity Metric calculator.

Biodiversity Metric Reference Number	Biodiversity Metric Habitat Type	Total Area on Site (Ha)	Distinctiveness	Condition	Strategic Significance	Ecological Baseline Habitat Unit
1	Modified grassland	0.1266	Low	Poor	Area/compensation not in local strategy/ no local strategy	0.25
2	Bramble scrub	0.0035	Medium	Condition Assessment N/A	Formally identified in local strategy	0.02
3	Developed land; sealed surface	0.037	V.Low	N/A - Other	Area/compensation not in local strategy/ no local strategy	0.00
4	Urban tree	0.0081	Medium	Moderate	Area/compensation not in local strategy/ no local strategy	0.06
	Total (area excl. trees)	0.17	–	–	–	0.33



5.4.2 The modified grassland habitat on-Site has been judged to have a condition of 'Poor' as the habitat failed the following condition assessment criteria.

- Criteria A: There are 6-8 vascular plant species per m² present, including at least 2 forbs. **Note - this criterion is essential for achieving Moderate or Good condition.**
- Criteria B: Sward height is varied (at least 20% of the sward is less than 7 cm and at least 20% is more than 7 cm) creating microclimates which provide opportunities for vertebrates and invertebrates to live and breed.

5.4.3 Bramble scrub has an automatic condition value equivalent to a poor condition scrub habitat.

5.4.4 The two urban trees on site were judged to be of 'Moderate' condition, as the trees failed three of the following condition assessment criteria.

- Criteria A: The tree is a native species (or at least 70% within the block are native species) – **failed by one tree.**
- Criteria C: The tree is mature (or more than 50% within the block are mature) – **failed by both trees.**
- Criteria D: There is little or no evidence of an adverse impact on tree health by human activities (such as vandalism, herbicide or detrimental agricultural activity). And there is no current regular pruning regime, so the trees retain >75% of expected canopy for their age range and height – **failed by both trees.**
- Criteria E: Natural ecological niches for vertebrates and invertebrates are present, such as presence of deadwood, cavities, ivy or loose bark – **failed by one tree.**

5.4.5 The bramble scrub habitat on-Site is listed in the Local Biodiversity Action Plan and is therefore listed as "Formally identified in local strategy" within the strategic significance section.

5.4.6 The other habitats on-Site are not included within the Local Wildlife Habitat Network, the Local Biodiversity Action Plan or priority habitats (under S41 NERC) and are therefore listed as 'Area/compensation not in local strategy/ no local strategy' within the strategic significance section.

5.4.7 The existing biodiversity value for each hedgerow, together with the cumulative value of all hedgerows is provided in Table 2.



Table 2: Baseline hedgerows on site and their ecological value as categorised by the Biodiversity Metric calculator.

Biodiversity Metric Reference Number	Biodiversity Metric Habitat Type	Total Length on Site (Km)	Distinctiveness	Condition	Strategic Significance	Ecological Baseline Habitat Unit
1	Non-native and ornamental hedgerow	0.043	V.Low	Poor	Formally identified in local strategy	0.05

5.4.8 The non-native and ornamental hedgerow on-Site is given an automatic score of 'Poor' by the Statutory Biodiversity Metric Calculation Tool.

5.4.9 The non-native and ornamental hedgerow on-Site is listed in the Local Biodiversity Action Plan and is therefore listed as "Formally identified in local strategy" within the strategic significance section.

5.4.10 To ensure a 10% net gain in biodiversity is achieved as part of the Proposed Development the following measures can be employed:

- Habitat retention; and/or
- Habitat enhancement; and/or
- Habitat creation.



6. Proposed Development Impact Assessment

6.1 Description of the Proposed Development

- 6.1.1 The Proposed Development involves the demolition of the existing bungalow and garages and the construction of two detached three storey residential units with associated garages and driveways.
- 6.1.2 The Proposed Development will see the partial removal of the modified grassland habitat on-Site. The bramble scrub and urban trees on-Site will be retained.
- 6.1.3 The Proposed Development will see the retention of all on-Site hedgerows.

6.2 Habitats to be Retained

- 6.2.1 Any development should apply the Mitigation Hierarchy (British Standards Institution (BSI), 2013; shown below in Figure 1).
- 6.2.2 Development proposals should first seek to **avoid** impacts by retaining habitats. Second, development proposals should look to **minimise** the impact by producing plans that are designed to limit habitat disturbance, damage, and loss, thereby mitigating against any unavoidable impacts. Third, proposals should look to **restore** any damaged or degraded habitats. Then, only as a last resort should proposals **compensate** for unavoidable residual impacts to damaged or lost habitats that remain after avoidance and mitigation measures.

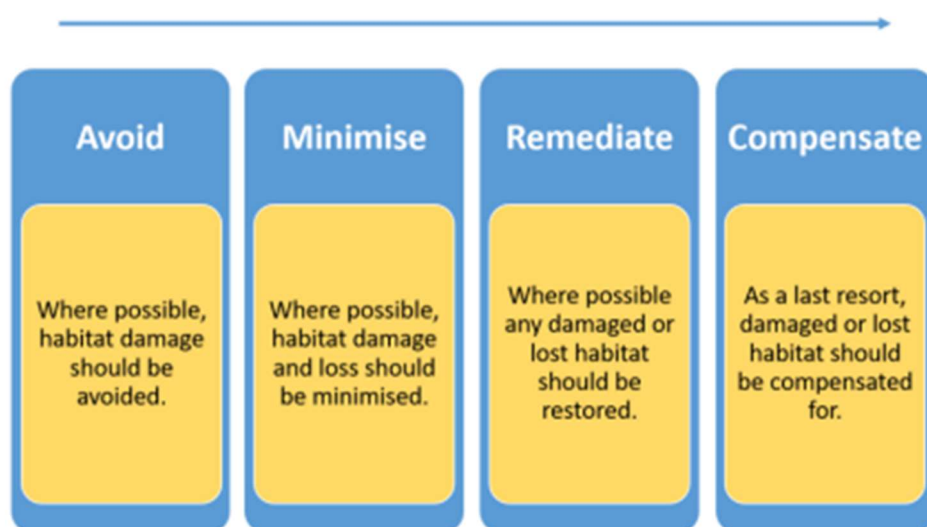


Figure 1: The mitigation hierarchy (BSI, 2013)



6.2.3 The Proposed Development will see the retention of the bramble scrub and urban trees habitats. The retention of these habitats will avoid any direct impacts of loss of habitat.

6.2.4 The Proposed Development will see the retention of all hedgerows. The retention of this hedgerows will avoid any direct impacts of loss of habitat.

6.3 Habitats to be Enhanced

6.3.1 The Proposed Development will not see the enhancement of the habitats or hedgerows on-Site.

6.4 Habitats to be Lost

6.4.1 The Proposed Development will see the partial loss of the modified grassland habitat on-Site. the modified grassland habitat on-Site is a low distinctiveness habitat of 'Poor' condition. The loss of this habitat is considered to be very minor.

6.5 Overall Impacts

6.5.1 The retention, enhancement and loss of habitats as a result of the Proposed Development are quantified in Table 3.

6.5.2 The results of the metric calculation indicates that a total of 0.08 BU for habitats are to be lost as a result of the Proposed Development, with 0.26 BU retained and 0.00 BU generated through habitat enhancement (Table 3).

Table 3: Summary value of baseline habitat biodiversity value through retention, creation and enhancement

Biodiversity Metric Habitat	Retained		Enhanced		Lost	
	Area (Ha)	Unit	Area (Ha)	Unit	Area (Ha)	Unit
Modified grassland	0.0882	0.18	0.00	0.00	0.04	0.08
Bramble scrub	0.0035	0.02	0.00	0.00	0.00	0.00
Developed land; sealed surface	0.0162	0.00	0.00	0.00	0.02	0.00
Urban tree	0.0081	0.06	0.00	0.00	0.00	0.00
Total (area excl. urban trees)	0.11	0.26	0.00	0.00	0.06	0.08



6.5.3 The loss, retention and enhancement of hedgerows as a result of the Proposed Development are quantified in Table 4.

6.5.4 The results of the metric calculation indicates that a total of 0.00 BU for hedgerows are to be lost as a result of the Proposed Development, with 0.05 BU retained and 0.00 BU generated through habitat enhancement (Table 4).

Table 4: Summary value of baseline hedgerow biodiversity value through retention, creation and enhancement

Biodiversity Metric Habitat	Retained		Enhanced		Lost	
	Length (Km)	Unit	Length (Km)	Unit	Length (Km)	Unit
Non-native and ornamental hedgerow	0.043	0.05	0.00	0.00	0.00	0.00

6.6 Proposed Habitat Creation

6.6.1 It is proposed that the following habitats be created as part of the Proposed Development:

- Developed land; sealed surface.
- Vegetated garden
- Eight small sized urban trees of 'Moderate' condition.

6.6.2 The proposed habitats on-Site can be found within **Appendix 2**.

6.6.3 Table 5 below summarises the value of all habitats that are to be created as part of the Proposed Development.

6.6.4 In total, +0.12 BU for habitats are to be created within the Proposed Development.

Table 5: Summary value of on-Site habitat proposals.

Biodiversity Metric Reference Number	Biodiversity Metric Target Habitat Type	Total Area on Site (Ha)	Distinctiveness	Target Condition	Strategic Significance	Biodiversity Unit Value
1	Developed land; sealed surface	0.0496	V.Low	N/A - Other	Area/compensation not in local strategy/ no local strategy	0.00



Biodiversity Metric Reference Number	Biodiversity Metric Target Habitat Type	Total Area on Site (Ha)	Distinctiveness	Target Condition	Strategic Significance	Biodiversity Unit Value
2	Vegetated garden	0.0096	Low	Condition Assessment N/A	Area/compensation not in local strategy/ no local strategy	0.02
3	Urban tree	0.0326	Medium	Moderate	Area/compensation not in local strategy/ no local strategy	0.10
	Total (area excl. trees)	0.06	–	–	–	0.12

6.6.5 The urban trees to be planted on site have a target condition of 'Moderate'. At least three of the following condition assessment criteria must be passed to achieve this.

- Criteria A: The tree is a native species (or at least 70% within the block are native species).
- Criteria B: The tree canopy is predominantly continuous, with gaps in canopy cover making up <10% of total area and no individual gap being >5 m wide (individual trees automatically pass this criterion).
- Criteria C: The tree is mature (or more than 50% within the block are mature).
- Criteria D: There is little or no evidence of an adverse impact on tree health by human activities (such as vandalism, herbicide or detrimental agricultural activity). And there is no current regular pruning regime, so the trees retain >75% of expected canopy for their age range and height.
- Criteria E: Natural ecological niches for vertebrates and invertebrates are present, such as presence of deadwood, cavities, ivy or loose bark.
- Criteria F: More than 20% of the tree canopy area is oversailing vegetation beneath.

6.6.6 The habitats to be created on site are not included within the Local Wildlife Habitat Network, the Local Biodiversity Action Plan or priority habitats (under S41 NERC) and are therefore listed as 'Area/compensation not in local strategy/ no local strategy' within the strategic significance section.

6.6.7 Table 6 below summarises the value of all hedgerows that are to be created as part of the Proposed Development.



6.6.8 In total, +0.02 BU for hedgerows are to be created within the Proposed Development.

Table 6: Summary value of on-Site hedgerow proposals.

Biodiversity Metric Reference Number	Biodiversity Metric Target Habitat Type	Total Length on Site (Km)	Distinctiveness	Target Condition	Strategic Significance	Biodiversity Unit Value
1	Native hedgerow	0.008	Low	Poor	Formally identified in local strategy	0.02

6.6.9 The native hedgerow to be created on site has been given a target condition of 'Poor'. None of the relevant condition assessment criteria are needed to be passed in order to achieve this target condition. However, the habitat must meet its definition as per the UKHab Habitat classification system (2023): a hedgerow with >80% canopy cover of native species.

6.6.10 The native hedgerow to be created on site is listed in the local biodiversity action plan and is therefore listed as "Formally identified in local strategy" within the strategic significance section.

6.7 Proposed Development Summary of Net Impacts

6.7.1 Table 7 & 8 below summarises the BU value of the Proposed Development together with the unit value of any biodiversity impacts or on-Site habitat creation/enhancement proposals.

6.7.2 This shows that on balance, the Proposed Development would result in a net gain of +0.04 habitat BU, equivalent to a net gain of +12.39% and a net gain for hedgerows of +0.02 BU, equivalent to a net gain of +35.91%.

6.7.3 The Proposed Development satisfies the Trading Rules as unit deficits have not been generated across distinctive units.

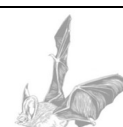


Table 7: Summary of Biodiversity Metric results for habitats and hedgerows

Biodiversity Units (BU)	
Existing Site habitat biodiversity value	0.33
Value of gross habitat biodiversity loss	0.08
Value of retained and proposed on-Site habitat creation and enhancement	0.38
Net habitat biodiversity balance	+0.04

Table 8: Summary of Biodiversity Metric results for habitats and hedgerows

Biodiversity Units (BU)	
Existing Site habitat biodiversity value	0.05
Value of gross hedgerow biodiversity loss	0.00
Value of retained and proposed on-Site hedgerow creation and enhancement	0.07
Net hedgerow biodiversity balance	+0.02



7. Conclusion

- 7.1.1 In accordance with the NPPF, where a biodiversity impact cannot be avoided or mitigated then compensation measures must be provided. If this cannot be achieved on-Site through further avoidance, mitigation or compensatory habitat creation or enhancement measures, then off-Site compensation measures will be required.
- 7.1.2 The BAA identified that the Proposed Development would have a net gain of +0.04 habitat BU, equivalent to a net gain of +12.39% and a net gain for hedgerows of +0.02 BU, equivalent to a net gain of +35.91%. The Proposed Development satisfies Trading Rules.
- 7.1.3 The Proposed Development has achieved a biodiversity net gain in habitat and a net gain in hedgerow BU. Therefore, no off-Site compensatory habitat creation and/or enhancement measures are required.
- 7.1.4 Further details of the Biodiversity Metric calculations and associated condition assessments can be found within the Statutory Biodiversity Metric Calculator Tool excel spreadsheet and the Statutory Biodiversity Metric Habitat Condition Assessment Sheets accompanying this report.
- 7.1.5 Should the Proposed Development be subject to future change, the conclusions and recommendations in this report will need to be revised. This is to be undertaken via the recalculation of the impact assessment element through the most up-to-date biodiversity metric.



8. References

JCA 2024, *Preliminary Ecological Appraisal*, Ref: 22545b/JF

Biodiversity Metric Guidance:

Business and Biodiversity Offsets Programme (BBOP). (2012). *Standard on Biodiversity Offsets*.

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<https://www.omegawestdocuments.com/media/documents/43/43.35%20BSI%20Biodiveristy%20Code%20of%20Practice.pdf>.

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<https://cieem.net/resource/biodiversity-net-gain-good-practice-principles-for-development/>.

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Ministry for Housing Communities and Local Government. (2021). *National Planning Policy Framework*. Available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2>.

UKHab. (2023). *The UKHab Classification System Version 2.01*. Available at: <https://ukhab.org/>.

Relevant Legislation:

Wildlife and Countryside Act (WCA) 1981 (as amended)

- <http://jncc.defra.gov.uk/page-3614>
- <https://www.legislation.gov.uk/ukpga/1981/69/contents>

The Conservation of Habitats and Regulations (CHSR) 2017.

- <https://www.legislation.gov.uk/uksi/2017/1012/contents/made>

The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019.

- <https://www.legislation.gov.uk/uksi/2019/579/contents/made>

Natural Environment and Rural Communities (NERC) Act 2006

- <https://www.legislation.gov.uk/ukpga/2006/16/contents>

Environment Act 2011

- <https://www.legislation.gov.uk/ukpga/2021/30/contents/enacted>

Protection of Badgers Act 1992



Appendices

Appendix 1: Baseline UKHab Habitat Map



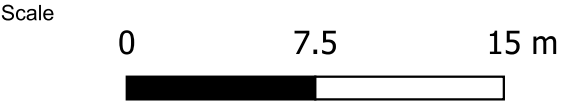
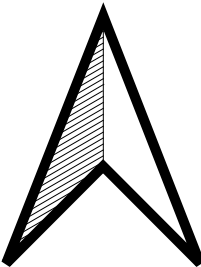


Site name & address

**2A East Bath Street, Batley,
West Yorkshire, WF17 5NP**

Key

- Red Line Boundary
- Individual tree Baseline
 - Existing Small Urban Tree
- Hedgerow Baseline
 - Non-native and ornamental hedgerow
 - To be created
- Habitats Baseline
 - Bramble scrub
 - Developed land; sealed surface
 - Modified grassland



Site 2A East Bath Street	Client Mohammed Seedat
Project Biodiversity Accounting Assessment	Author JF
Plan ref 22545a/JF	Revision 0

Contains Ordnance Survey data © Crown copyright and database right 2024

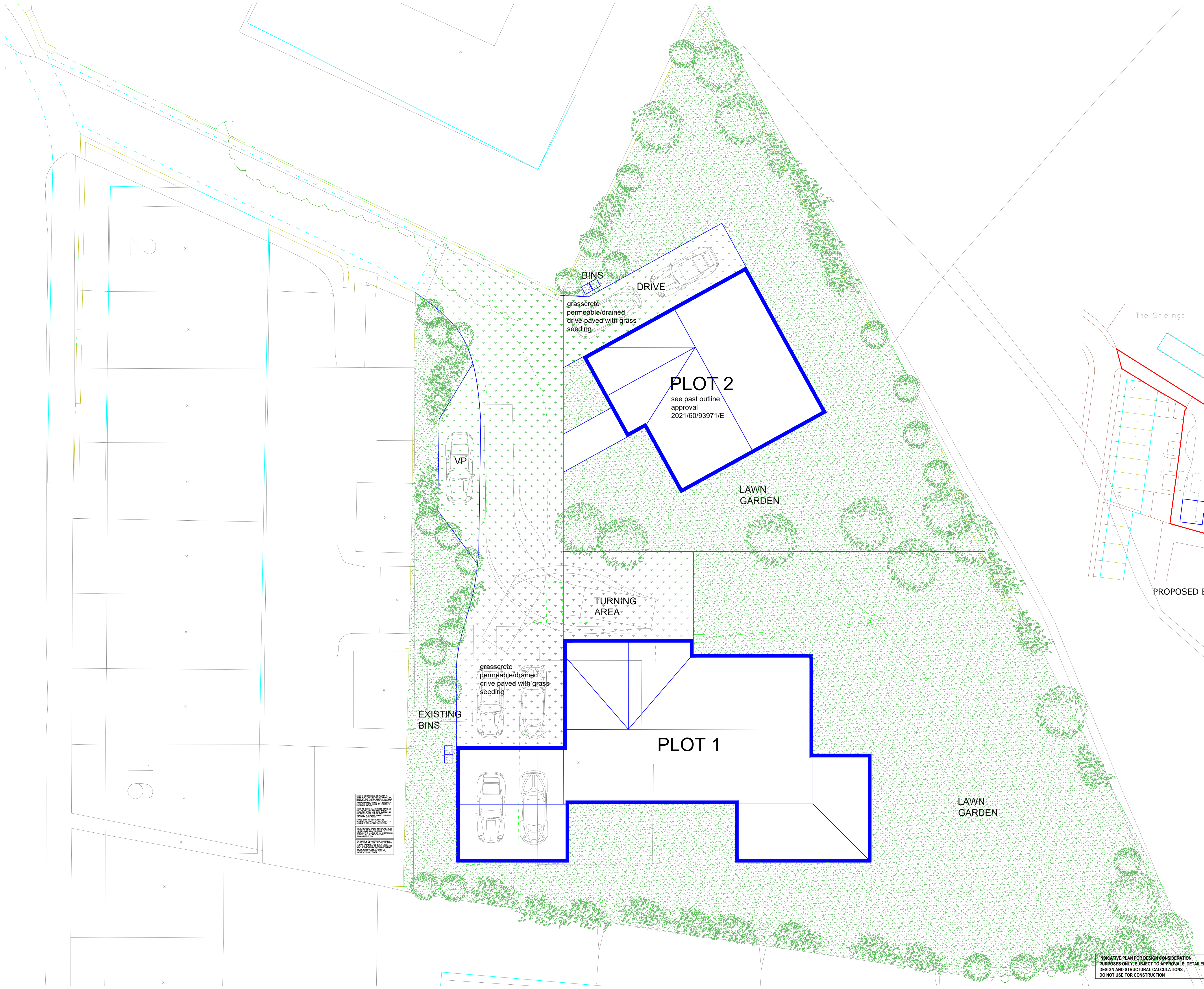
Appendix 2: Proposed UKHab Habitat Map



Scale 0 7.5 15 m

Appendix 3: Proposed Development Plan





NO CONSTRUCTION WORK SHOULD COMMENCE UNTIL PLANNING PERMISSION, BUILDING REGULATION APPROVAL, YORKSHIRE WATER H4 CONSULTATION (WHERE APPLICABLE) APPROVALS HAVE BEEN OBTAINED IN WRITING.

ALL PLANS ISSUED MARKED PRELIMINARY DO NOT CONSTITUTE INSTRUCTION TO PROCEED WITH WORKS ON SITE AND ARE PROVIDED FOR DESIGN CONSIDERATION. ALL WORKS CARRIED OUT ON SITE SHOULD FOLLOW THE PLANNING APPROVAL, DRAWINGS AND CONDITIONS ATTACHED AND THE BUILDING REGULATION APPROVED PLANS, STRUCTURAL ENGINEERS REPORT/CALCULATIONS AND ANY CONDITIONS ATTACHED.

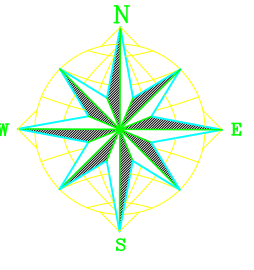
CLIENT TO ENSURE ALL INFORMATION/ STATUTORY PERMISSIONS /APPROVAL DOCUMENT ARE PROVIDED TO THE CONTRACTOR EXECUTING THE SITE WORKS. ALL WORKS TO BE INSPECTED AND TO THE APPROVAL OF THE BUILDING INSPECTOR. ENSURE YORKSHIRE WATER INSPECTOR APPROVAL/SITE VISIT FOR ALL WORKS CARRIED OUT TO OR NEAR PUBLIC DRAINS OR DRAINS IN RESPECT TO YWA DESIGNATED INTEREST.

CLIENT TO ENSURE ALL PROPOSED WORKS ARE BUILT ON AND OVER OWN LAND. ENSURE FOUNDATION SPREAD AND EAVES OVERHANG DO NOT PROJECT OVER ADJACENT LAND OWNERSHIP. IF IN DOUBT CONSULT NEIGHBOUR AND OBTAIN LEGAL ADVICE.

ALL DETAILS SHOWN ON THE DRAWINGS ARE INDICATIVE DUE TO NATURE OF WORKING WITH EXISTING BUILDINGS. SUBJECT TO SITE OPENING UP AND SETTING OUT. CONFIRM ALL SIZES AND DIMENSION TO DKA. ALL DIFFERENCE, UNUSUAL OR DIFFERING DETAILS TO BE REPORTED TO DKA FOR FURTHER GUIDANCE.

CDM REGULATIONS – THE CLIENT & CONTRACTOR MUST ABIDE BY THE CONSTRUCTION DESIGN AND MANAGEMENT REGULATIONS 2015 WHICH RELATE TO ANY BUILDING WORKS WHICH: (A) LASTS LONGER THAN 30 WORKING DAYS AND HAS MORE THAN 20 WORKERS WORKING SIMULTANEOUSLY AT ANY POINT IN THE PROJECT OR (B) EXCEEDS 500 PERSON DAYS. PLEASE REFER TO [HTTP://WWW.HSE.GOV.UK/PUBNS/INDG411.HTM](http://www.hse.gov.uk/pubns/INDG411.htm) FOR GUIDANCE AND COMPLIANCE. FOR THE CDM REGULATION THE CLIENT WILL BE EMPLOYING ONE CONTRACTOR AND DKA RESPONSIBILITY FOR THE PROJECT WILL BE FOR THE DESIGN ONLY AND DOES NOT INCLUDE ANY PROJECT MANAGEMENT.

THE CLIENT & THE CONTRACTOR IS REMINDED OF THE PARTY WALL ACT 1996 AND TO APPOINT / OBTAIN SEPARATE LEGAL ADVICE FROM A PARTY WALL SURVEYOR TO ENSURE COMPLIANCE WITH THE LAW. NOTICES MAY REQUIRE SERVING ON THE ADJACENT OWNER/S PRIOR TO COMMENCEMENT. ENSURE NEIGHBOURS CONSENT IS OBTAINED WHERE WORKS ARE CARRIED OUT TO PARTY WALLS, PARTY FENCE WALLS, EXCAVATIONS ETC. APPOINTED PARTY WALL SURVEYOR TO FULLY ADVISE.



PROPOSED BLOCK PLAN 1:500

PRELIMINARY

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PROJECT:
REPLACEMENT & NEW DWELLING

ADDRESS:
2A EAST BATH STREET, BATLEY, WF17 5NP

DRG:
PROPOSED SITE PLAN

STATUS:
PLANNING APPLICATION
subject to approval

DATE: 23.7.24
SCALE: 1:100 / 500
SIZE: A1

DRAWN: AHD
CHECKED: ANK
DRG NO: 24.2756.02H

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Appendix 4: Good Practice Principles for Development

Taken from CIEEM (2016) Biodiversity Net Gain: Good practice principles for development.

Principal 1. Apply the Mitigation Hierarchy.

Principal 2. Avoid losing biodiversity that cannot be offset by gains elsewhere.

Principal 3. Be inclusive and equitable.

Principal 4. Address risks.

Principal 5. Make a measurable Net Gain contribution.

Principal 6. Achieve the best outcomes for biodiversity.

Principal 7. Be additional.

Principal 8. Create a Net Gain legacy.

Principal 9. Optimise sustainability.

Principal 10. Be transparent.



Appendix 5: Author Qualifications

Adam West, Principal Ecologist

BSc (Hons) Animal and Wildlife Management, ACIEEM.

Adam joined JCA to lead the expanding ecology department. Having returned to education as a mature student, Adam studied Countryside Management for two years before undertaking a Bachelor's degree, for which he was awarded First Class Honours. Adam has many years' experience in ecological consultancy, working on projects ranging from individual planning applications to national infrastructure projects. Adam holds a Natural England Level 1 great crested newt survey class licence and a Natural England Level 2 bat survey class licence.

James Foster, Assistant Ecologist

BSc (Hons) Biology.

James gained his undergraduate degree in biology in 2012 from University of Leeds. James has plenty of experience in ecology, having worked countless projects of different scales all over the north and midlands. James has 11 years of experience surveying anything from reptiles to hedgerows and holds a Great crested newt licence level 1 and is working towards his bat licence and barn owl licence.

Alex Donovan, Assistant Ecologist

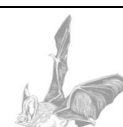
MBIOL, BSc Biology (Industrial).

Alex joined JCA in 2023 after graduating from the University of Leeds with a First Class Honours Integrated Master's degree in Biology. As part of his degree programme, Alex spent an industrial placement year working in the Uplands Research Department of the Game and Wildlife Conservation Trust, assisting on various ecological surveys and projects. Alex is a registered Trainee Bird Ringer, licensed through the BTO and is experienced in conducting preliminary ecological surveys, bat roost assessments and emergence surveys, Biodiversity Net Gain, and has knowledge of wildlife legislation. Alex is a CIEEM Qualifying Member and is currently working towards a Natural England level 1 bat licence, level 1 great crested newt licence, and a barn owl survey licence.

Richard Westwood, Graduate Ecologist

BA (Hons) History and Politics

Rick gained his undergraduate degree in History and Politics in 2001 from Leeds Metropolitan University before going on to complete a PGCE in History at the University of Leeds in 2003. After 18 years in secondary education and the NHS, Rick began assisting on bat emergence surveys in 2023, after which, he gained employment as a Graduate Ecologist at JCA Ltd.



The Information and advice which we have prepared and provided is true and has been prepared and provided in accordance with the CIEEM's Code of Professional Conduct. We confirm that the opinions expressed are our true and bona fide opinions.

.....
James Foster *BSc (Hons)*

07/01/2024

Reviewed by

.....
Richard Westwood *BA (Hons)*

08/01/2024

Approved by

.....
Alex Donovan *MBIOL BSc (Hons)*

08/01/2024



For and on behalf of **JCA Ltd**

Registered Office:

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HX4 0AD**





ECOLOGICAL SERVICES

Ecological Pre-Planning Services

- Phase 1 Habitat Surveys
- Great Crested Newt eDNA Sampling
- Protected species: Bat, Wintering and Nesting Bird, Badger, Amphibian, Otter, Water Vole, White-Clawed Crayfish, Dormice and Reptile Surveys.
- Preparation for Environmental Impact Assessment (EIA)
- Invasive Species Surveys
- Code for Sustainable Homes
- Butterfly & Insect Surveys

Ecological Post-Planning Services

- Biodiversity Enhancement Plans
- Protected Species Mitigation
- Ecological Management (Bat and Bird box installation and inspection)
- Planting Schemes
- Monitoring of bird or bat boxes.

ARBORICULTURAL SERVICES

Guidance for Architects & Developers

- British Standard 5837 Surveys
- Arboricultural Implications Assessments (AIA)
- Arboricultural Method Statements (AMS)

Advice for Engineers, Loss Adjusters and Insurers

- Tree Surveys for Subsidence
- Heave Assessment
- Tree Root Identification

Advice for Local Authorities and Social Housing

- Tree Safety Surveys
- Specialist Decay Detection
- Landscape and Orchard Design

Tree Advice for the Legal Profession

- Subsidence Litigation
- Personal Injury and Accident Investigation
- Expert Witness, Planning Inquiries and Appeals

Veteran Tree Management

- Ancient Woodland Management
- Veteran Tree Management

Tree Health and Pest and Disease Management

- Pest and Disease Surveys
- Tree Health Checks
- Disease Mitigation and Control



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VAT No: 686 4674 78

