

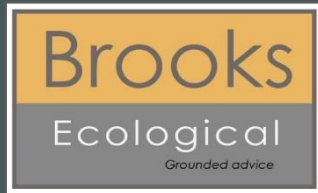


## Biodiversity Net Gain Assessment

Report Ref. ER-7197-04

09/07/2024

Phoenix Textiles Ltd



|                         |                                                                                                                                                                                                                    |
|-------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Report reference</b> | <b>ER-7197-04 - Biodiversity Net Gain Assessment (Baseline)</b>                                                                                                                                                    |
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| <b>Authorised</b>       | Peter Brooks BSc (Hons), MA CIEEM, CEnv<br>Managing Director                                                                                                                                                       |
| <b>Date</b>             | 09/07/2024                                                                                                                                                                                                         |
| <b>Report duration</b>  | 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. |



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## Introduction

1. Brooks Ecological Ltd was commissioned by Phoenix Textiles Ltd to carry out a Biodiversity Net Gain (BNG) Assessment of the proposed development Site at Wood Street, Scissett.
2. The assessment applies to the parcel of land shown in Figure 1 opposite.
3. The assessment is informed by a Preliminary Ecological Appraisal Survey of the Site detailed in our report ER-7197-01.
4. At this time Brooks Ecological also carried out an assessment of the baseline value of the Site in relation to BNG, and presented this alongside advice on achieving the best BNG position in our report ER-7179-03. This current report supersedes ER-7197-03 and reproduces the relevant information on the Site's baseline.
5. Biodiversity Accounting metrics are used to quantify the value of a site in Biodiversity Units. This helps in assessing the ecological impacts of the proposed development and 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 0.50ha.
7. Our assessment has made use of the Statutory Biodiversity Metric Calculation Tool, and extracts from this have been used throughout the report. The full spreadsheet has been provided digitally as file BM-7197-01, and should be submitted as part of the application.

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



## Pre-development baseline

### Habitats Identified

8. 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

9. Habitat condition has been assessed as part of the Preliminary Ecological Appraisal of the Site. Information on condition assessments is provided in the Excel spreadsheet CA-7197-01 provided alongside this report.

### Strategic Significance

10. Part of the Site overlaps with habitat designated in the Kirklees Wildlife Habitat Network (KWHN), and so is mapped as 'formally identified in local strategy'.
11. Woodland adjacent to the KWHN is mapped as 'location ecologically desirable but not in local strategy'.

### Irreplaceable Habitat

12. Irreplaceable habitats have not been found on-Site.

### Habitat Degradation

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

### Biodiversity Metric

14. Habitat types, conditions, and areas have been entered into the Statutory Biodiversity Metric Calculation Tool, alongside information on their strategic significance. The Statutory Biodiversity Metric Calculation Tool is provided alongside this assessment, in Excel spreadsheet BM-7197-01, and may be useful in investigating design options for the Site.

**Table 1** Habitat Types.

| Habitat                        | Irreplaceable? | Distinctiveness | Condition   | See Condition Assessment sheet |
|--------------------------------|----------------|-----------------|-------------|--------------------------------|
| Developed land; sealed surface | No             | Very Low        | N/A         | N/A                            |
| Other broadleaved woodland     | No             | Medium          | Moderate    | 24A                            |
| Culvert                        | No             | Low             | Poor        | N/A                            |
| Other rivers and streams       | No             | High            | Fairly Poor | MoRPh                          |

**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 1.72 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     | Losses must be replaced with area habitat units of the same or higher distinctiveness.                                                                                                                |
| Medium          | 1.72  | 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.                                                                                                                                                                            |

**Watercourse Unit Score**

- 18. The Site has been assessed as having a baseline score of 0.55 Watercourse Units. These break down as shown in Table 3, below.

**Table 3** Watercourse Units broken down by distinctiveness at this Site.

| Distinctiveness | Units | Approach to compensation if lost                                                              |
|-----------------|-------|-----------------------------------------------------------------------------------------------|
| Low             | 0.04  | Losses must be replaced with watercourse units of a higher distinctiveness.                   |
| Medium          | 0.50  | Losses must be replaced with watercourse units of the same habitat type.                      |
| High            | 0     | Losses must be replaced with watercourse units of the same habitat type.                      |
| Very High       | 0     | Priority should be given to replacing losses with watercourse units of the same habitat type. |

## Post-development value

19. This section calculates the Biodiversity Unit value of the post-development Site and quantifies any gain or shortfall in Units.

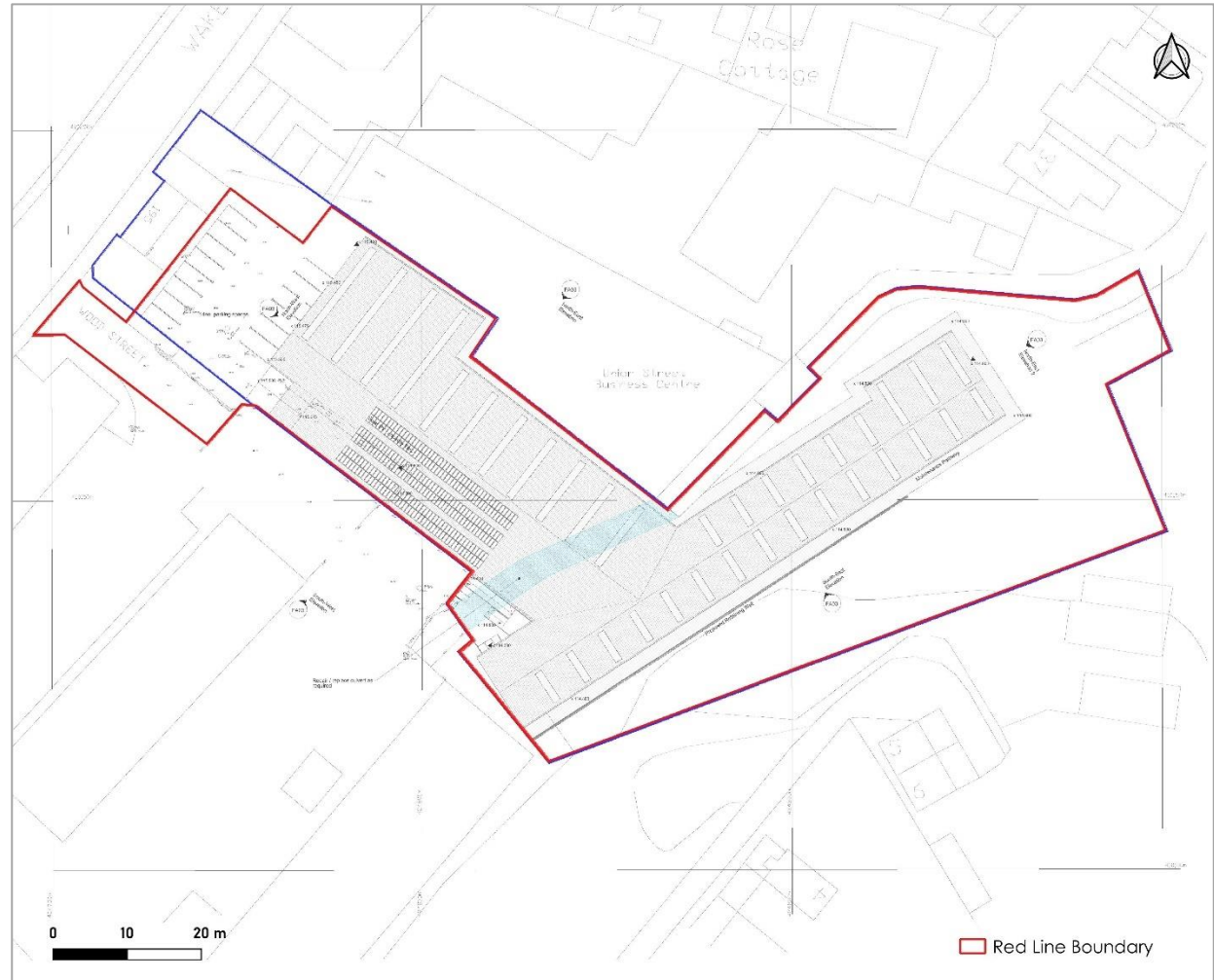
### Proposed habitats

20. Habitats present on-Site post-development have been based on the Proposed Site Plan (Figure 4, opposite) dwg. PTWS-MWA-XX-XX-DR-A-0011 Rev. P1 (Martin Walsh Architectural, Feb. 2024).
21. Planting types specified in the Proposed Site Plan have been assigned a UK Habitat Classification description that best fits the target habitat.
22. Habitats assigned are shown in Figure 5 overleaf.

### Condition assessment

23. The condition assessment for each proposed habitat is based on what is realistic and achievable for the Site, based on the Proposed Site Plan.
24. Achieving these conditions scores may be reliant on specific, ecologically-driven management recommendations. These can be outlined in a Biodiversity Enhancement and Management Plan (BEMP) or similar.

**Figure 3** Proposed Site Plan (Martin Walsh Architectural, Feb. 2024).



## Post-development habitats

### Habitat Score

25. The Site has been assessed as having a post-development score of 1.28 Habitat Units and 0.38 Watercourse Units.
26. This score is based on our interpretation of the Landscape Masterplan, as shown in Figure 5 opposite.
27. Calculations for the change in Habitat Units have been based on the existing buildings being demolished, and a new building created over a slightly larger footprint.
28. A circa. 3m working area is shown around the construction footprint, in which existing vegetation will be lost to facilitate new levels and the creation of a new retaining wall. Land within this area will then be reseeded/ planting as woodland once construction is completed. Within 30 years, this new woodland planting, together with surrounding woodland, is thought possible to reach Moderate Condition.
29. A minor increase to developed surface within the 10m riparian zone, together with woodland clearance and replanting will have no impact to the rivers condition score.

**Figure 4** Post-development habitats.



## Habitat Retention

30. The plan opposite shows the areas of the Site which it will be possible to retain without impact. This information allows us to see which areas can be identified as retained or enhanced in the metric calculations.
31. This plan is based on information provided by the developer who will have considered / consulted their team on requirements to provide (amongst other things) Site compounds, to store and move materials, to install drainage, flood storage, access and services - all with suitable easements.
32. At this stage metric calculations assume that it will be possible to fence off and protect the areas shown opposite from any impacts of Site clearance and construction and that any enhancement can be carried out alongside relevant phases of the proposed development.

**Figure 5** Habitat retention



## Final Results

33. The Statutory Metric has been used to calculate the net unit change for the Site, which has been predicted an overall net loss of 0.44 Habitat Units (-25.61%) and no change in Watercourse Units.
34. A copy of the Statutory Biodiversity Metric Calculation Tool Excel spreadsheet (ref. BM-7197-01) and Condition Assessment sheets (CA-7197-01) have been provided with this report and should be submitted digitally as part of the application.
35. There is a mandatory requirement for all developments to demonstrate at least a 10% net gain in each unit measurement, as well as to satisfy Trading rules. Notwithstanding Trading Rules, the scheme will need to secure an additional 0.17 Habitat Units and 0.06 Watercourse Units, on top of the current deficit to demonstrate a 10% net gain.

## Trading Rules

36. Habitat types are separated out into distinctiveness categories (Very low to Very High) which dictate what mitigation/ compensation is required for their loss. This assessment is separate to the 'net unit change' score quoted above.
37. To satisfy Trading Rules for this development, at least 0.44 Habitat Units will need to be generated from the creation of medium distinctiveness Woodland habitat, as outline in the Table 4, opposite.

## Requirements for Planning

38. A standard planning condition will be imposed that will require the development to demonstrate (i) a minimum 10% net gain and (ii) that Trading rules have been satisfied. To achieve this, the following is required:
  - An additional **0.61 Habitat Units** will need to be generated, with at least 0.44 Habitat Units arising from a medium distinctiveness Woodland habitat type.
  - An additional **0.05 Watercourse Units** will need to be generated.
39. These Units will need to be secured through offsetting, with offsite land Registered with Natural England. Once this offsetting has been secured, the Biodiversity Metric will need to be finalised (ref. BM-7197-01) before submission to the LPA.
40. A Net Gain Plan and Habitat Monitoring and Management Plan will also be required in order to discharge the planning condition that will be imposed.

**Figure 6** Biodiversity Metric Summary.

| FINAL RESULTS                                                                                                                |                   |                |                                |              |
|------------------------------------------------------------------------------------------------------------------------------|-------------------|----------------|--------------------------------|--------------|
| Total net unit change<br><small>(Including all on-site &amp; off-site habitat retention, creation &amp; enhancement)</small> | Habitat units     |                |                                | -0.44        |
|                                                                                                                              | Hedgerow units    |                |                                | 0.00         |
|                                                                                                                              | Watercourse units |                |                                | 0.00         |
| Total net % change<br><small>(Including all on-site &amp; off-site habitat retention, creation &amp; enhancement)</small>    | Habitat units     |                |                                | -25.61%      |
|                                                                                                                              | Hedgerow units    |                |                                | 0.00%        |
|                                                                                                                              | Watercourse units |                |                                | 0.00%        |
| Trading rules satisfied?                                                                                                     |                   |                | No - Check Trading Summaries ▲ |              |
| Unit Type                                                                                                                    | Target            | Baseline Units | Units Required                 | Unit Deficit |
| Habitat units                                                                                                                | 10.00%            | 1.72           | 1.90                           | 0.61         |
| Hedgerow units                                                                                                               | 10.00%            | 0.00           | 0.00                           | 0.00         |
| Watercourse units                                                                                                            | 10.00%            | 0.55           | 0.60                           | 0.05         |

**Table 4** Trading rule summary

| Distinctiveness    | Broad Habitat Type | Habitat Units required |
|--------------------|--------------------|------------------------|
| Medium*            | Woodland           | 0.44                   |
| <b>Total Units</b> |                    | <b>0.44 Units</b>      |

\* Compensation for habitats of medium distinctiveness must be in the same broad habitat type, or any habitat type in a higher distinctiveness category.

## 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/>

*The Statutory Biodiversity Metric User Guide (draft)*. 2023. 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)*. 2023. London: Department for Environment, Food and Rural Affairs (DEFRA). [Online]. Available from: <https://www.gov.uk/government/publications/statutory-biodiversity-metric-tools-and-guide>

*The Statutory Biodiversity Metric Condition Assessments*. 2023. 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-7197-01 – Statutory Biodiversity Metric Calculation Tool
- CA-7197-01 – Statutory Biodiversity Metric Condition Assessments
- ER-7197-01 – Preliminary Ecological Appraisal