

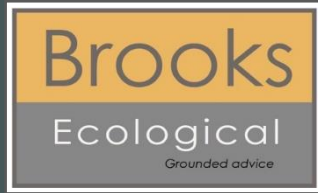


Biodiversity Net Gain Assessment (Baseline)

Report Ref. ER-7197-03

20/05/2024

Phoenix Textiles Ltd



Report reference	ER-7197-03 - Biodiversity Net Gain Assessment (Baseline)
Author	Christopher Shaw BSc (Hons) MCIEEM Principal Ecologist
Technical Review	Peter Brooks BSc (Hons), MA CIEEM, CEnv Managing Director
QA	Serena Teasdale BSc (Hons) MSc PhD Ecological Data Assistant
Authorised	Peter Brooks BSc (Hons), MA CIEEM, CEnv Managing Director
Date	20/05/2024
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.



Brooks Ecological Ltd has prepared this report for the sole use of Phoenix Textiles Ltd. The information which we have prepared and provided is in accordance with the CIEEM's Code of Professional Conduct. We confirm that the opinions expressed are our true and professional bona fide opinions. This report does not constitute legal advice. The report is in accordance with the agreement under which our services were performed. No warranty, express or implied, is made as to the advice in this report or any other service provided by us. This report may not be relied upon by any other party except the person, company, agent or any third-party for whom the report is intended without the prior written permission of Brooks Ecological Ltd. This report presents a snapshot of the site at the date it was surveyed; the conditions and the species recorded present, or likely absent, can change rapidly. Resurvey is recommended to any third-party seeking reliance on this report. The content of this report may, in part, be based upon information provided by others and on the assumption that all relevant information has been provided by those parties from whom it has been requested. Information obtained from any third-party has not been independently verified by Brooks unless otherwise stated in the report. This report is the copyright of Brooks Ecological Ltd. Unauthorised reproduction or usage by any person is prohibited.

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 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. 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 0.50ha.

Limitations

7. The timing of the survey meant that it was possible to confidently classify the type and condition of habitats present on this Site.

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



Pre-development baseline

Habitats Identified

- 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

- 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

- 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'.
- Woodland adjacent to the KWHN is mapped as 'location ecologically desirable but not in local strategy'.

Irreplaceable Habitat

- Irreplaceable habitats have not been found on-Site.

Habitat Degradation

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

Biodiversity Metric

- 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	Moderate	MoRPh*

* A Modular River Physical survey has been undertaken to collect information of the rivers baseline condition. The results of this survey are presented in ER-7197-02.

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



Figure 3 Extract from the Statutory Biodiversity Metric Calculation Tool showing entered information and resultant Habitat Units¹.

Existing area habitats					Distinctiveness	Condition	Strategic significance	Required Action to Meet Trading Rules	Ecological baseline
Ref	Broad Habitat	Habitat Type	Irreplaceable habitat	Area (hectares)	Distinctiveness	Condition	Strategic significance		Total habitat units
1	Urban	Developed land; sealed surface	No	0.2968	V.Low	N/A - Other	Area/compensation not in local strategy/ no local strategy	Compensation Not Required	0.00
2	Watercourse footprint	Watercourse footprint	No	0.0139	V.Low	N/A - Other	Formally identified in local strategy	Compensation Not Required	0.00
3	Woodland and forest	Other woodland; broadleaved	No	0.1601	Medium	Moderate	Formally identified in local strategy	Same broad habitat or a higher distinctiveness habitat required (≥)	1.47
4	Woodland and forest	Other woodland; broadleaved	No	0.0286	Medium	Moderate	Location ecologically desirable but not in local strategy	Same broad habitat or a higher distinctiveness habitat required (≥)	0.25
5									
6									
7									
8									
9									
				Total habitat area	0.50				
				Site Area (Excluding area of individual trees, green walls, intertidal hard structures)	0.50				1.72

Figure 4 Extract from the Statutory Biodiversity Metric Calculation Tool showing entered information and resultant Watercourse Units

Existing watercourse type			Distinctiveness	Condition	Strategic significance	Watercourse encroachment	Riparian encroachment	Required Action to Meet Trading Rules	Ecological baseline
Ref	Watercourse type	Length (km)	Distinctiveness	Condition	Strategic significance	Extent of encroachment	Extent of encroachment for both banks		Total watercourse units
1	Culvert	0.032	Low	Poor	Area/compensation not in local strategy/ no local strategy	N/A - Culvert	N/A - Culvert	Better distinctiveness habitat required	0.04
2	Other rivers and streams	0.076	High	Moderate	Formally identified in local strategy	Minor	Major/Minor	Same habitat required =	0.70
3									
4									
5									
		0.11							0.75

¹ Our report provides an estimate of the Site’s value in Biodiversity Units. This is based on thorough assessment at the time of survey and using the information available at this time. In this assessment we have used the Statutory Biodiversity Metric Calculation Tool, the UK Habitats Classification, and relevant guidance. This assessment requires subjective judgments to be made in terms of habitat type and condition and could be open to other interpretations. Reliance on the Unit Score, or conversion of this into a monetary value, would be at the developer’s own risk. Where conversion to monetary value is required, it is always advisable to get calculations checked independently.

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 0.75 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	0.70*	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.

**Discrepancy in Unit values due to rounding up in DEFRA metric excel.*

Planning your development

Mitigation Hierarchy

19. To engage with the Biodiversity Gain process, a project must be able to demonstrate that it has complied with the Mitigation Hierarchy of Avoid - Mitigate - Compensate. Its relevance to this Site is set out in Table 4 below.

Table 4 Mitigation hierarchy summary.

Level of Hierarchy	Requirement at this Site
<i>First</i> Avoid	The River Dearne is habitat of High Distinctiveness and a feature of high ecological value; with the potential to support and attract a range of notable faunal species/ groups. To comply with the mitigation hierarchy, the project must be able to demonstrate that impacts upon this feature can be avoided. The Site layout will need to show this feature as retained, whilst a CEMP: Biodiversity will be required to outline how indirect impacts during construction can be avoided. The woodland is a feature of Medium distinctiveness, and impacts on this should be avoided wherever feasible, or kept to a minimum where this is not feasible for a viable scheme.
<i>then</i> Mitigate	Some loss of woodland may be required to provide a viable scheme for the project. Should this be the case, woodland loss will need to be kept to a minimum, and losses mitigated through enhancement works to retained woodland.
<i>then</i> Compensate	The existing buildings may support nesting/ roosting habitat for groups such as birds and bats. Should this be the case, replacement nesting/ roosting features should be incorporated into the new build.

20. Assuming the recommendations set out above can be followed, it seems likely that the mitigation hierarchy can be complied with. These recommendations should be a consideration of any design work.

Summary & Recommendations

Baseline value

21. The Site’s baseline value is measured as 1.72 Habitat Units and 0.75 Watercourse Units.

Trading Rules

22. Although most of the Site’s baseline value is accounted for by Medium distinctiveness habitat types (woodland), satisfying Trading Rules should be relatively straightforward, as most of the woodland will be retained, with opportunities available to uplift the condition score and generate an uplift.

Recommendations

23. The following recommendations are made.

Table 5 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 <u>any</u> 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.
R2 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.
R3 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.

Recommendation	Rationale
Required during the design stage process	
To be completed once a fixed Site Layout is agreed	
R4 Calculate the final Biodiversity Impact Score	Once the Site Layout is fixed and a Habitat Retention Plan is produced, the DEFRA 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/>

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