



FUTURESECOLOGY

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Our Ref: FE385 / KEH / AGE

Louise Bearcroft
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Planning and Development Service
Place Directorate
PO Box 1720
Huddersfield
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6th May 2025

By email: Louise.Bearcroft@kirklees.gov.uk

Dear Louise,

PROVIDENCE STREET, EARLSHEATON (PLANNING REF: 2024/60/92779/E) – BIODIVERSITY NET GAIN DEGRADATION STATEMENT

Following comments from yourself via email on 24th April 2025 regarding the submitted outline planning application (2024/60/92779/E (Kirklees Council)), this document provides additional information regarding habitat degradation at the site.

Futures Ecology were commissioned to produce an Ecological Impact Assessment, which included a baseline Biodiversity Net Gain (BNG) assessment at the above-named site (Futures Ecology Ltd., FE385/EcIA01, August 2024).

The following are the comments relating to the BNG assessment:

“2. The submitted Biodiversity Metric does not comply with the statutory requirements. It requires a statement and updated baseline metric which satisfies the degradation rules. The pre-development value of the onsite habitat should be calculated as the biodiversity value of the habitat on the date immediately before the carrying out of degradation activities. Please can you provide the following;

- a statement setting out that these degradation activities have been carried out;*
- confirmation of the date immediately before these activities were carried out;*
- the pre-development biodiversity value of the site on this date;*
- the completed metric calculation tool showing the calculations, and*
- any available supporting evidence of this.*

For further details on degradation as part of the Biodiversity metric, please see paragraph 36 of: Biodiversity net gain - GOV.UK”



Degradation activities

Habitat degradation has occurred at the site, comprising the removal of trees / woodland, as stated in the submitted Ecological Impact Assessment (Futures Ecology Ltd., FE385/EcIA01, August 2024). Paragraph 5.30 states “An area in the centre of the Site had been subject to clearance prior to the Site visit, this has been marked as felled woodland, from the tree stumps / wood chip evident in this area and also from reviewing aerial imagery (Photograph 9).”



Photograph 9: Evidence of recently felled woodland was present in the centre of the Site.

Date of degradation activities

It is understood that the landowner cleared the trees in February 2024. This is two months prior to the baseline ecology survey was undertaken in April 2024. This is consistent with a review of Google Earth historic imagery, which shows the woodland intact in September 2023. The relevant date for degradation is therefore 1st February 2024.

Pre-development biodiversity value of the site

Although no ecology baseline data, or arboriculture information is available for the site prior to 1st February 2024, the baseline value of the degraded area has been provided within the Ecological Impact Assessment (Futures Ecology Ltd., FE385/EcIA01, August 2024) using all available evidence. This was worked out based on the assessment of the remaining woodland within the site, undertaken on 11th April 2024, an assessment of the stumps by JCA in June 2024 and from a review of aerial imagery, as per Paragraph 36 of the .GOV.UK guidance¹, which states:

“If there has been degradation and there is insufficient evidence about the biodiversity value of the onsite habitat immediately before the degradation, the pre-development biodiversity value of the onsite habitat must be taken to be the highest biodiversity value of the habitat which is reasonably supported by any available evidence relating to it.”

Within the baseline metric calculation, the cleared areas were all assumed to be woodland, despite the fact that aerial imagery shows clearings within the trees which would likely have been discrete areas of lower value habitats, such as bramble scrub, poor-semi improved grassland and/or tall ruderal vegetation, habitats which were also mapped within the site, adjacent to cleared areas. In this case, the highest biodiversity value broad habitat ‘Woodland & forest’ was selected.

¹ <https://www.gov.uk/guidance/biodiversity-net-gain#para36>



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JCA prepared an Arboricultural Impact Assessment for the site, based on their survey in June 2024 after the tree removal in February 2024. Stumps reveal that the felled trees were Sycamore, Ash, Wild Cherry, Lime and Goat Willow. Most were in poor condition with either dying stems or decay (now visible at their bases). Google imagery for the site is not brilliant but the nature of the trees can be seen to be scrubby coppice rather than mature woodland.

Evidence from the remaining woodland within the site was used to inform the habitat type (Other broadleaved woodland) and condition (Moderate) as aerial imagery shows the felled woodland to be of similar age and structure as the remaining woodland within the site. This is deemed to be an appropriate baseline as it assumes the highest biodiversity value broad habitat, with the type and condition supported by the available evidence.

Completed metric calculation tool showing the calculations

This was provided as Appendix B of the Ecological Impact Assessment (Futures Ecology Ltd., FE385/EcIA01, August 2024), but has been included again with this letter for ease of reference. The metric shows the baseline values only, with more detailed post-development calculations to follow at full / reserved matters stage.

I trust you will find the above satisfactory, however, if you would like to discuss anything please don't hesitate to contact me.

Yours sincerely,

Kate Haymes

Senior Ecologist

Futures Ecology

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