

**BIODIVERSITY ACCOUNTING
ASSESSMENT REPORT**

at
**Bath Works
Spa Lane
Huddersfield
West Yorkshire
HD7 5QB**

**Client:
AK Planning**

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**Date of Report:
26/02/2025**



Quality Assurance

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	Date	Name	Date	Name	Date	Name	Date	Name
001	N/A	N/A	11/02/25	Alex Donovan	17/02/25	Alex Donovan	18/02/25 24/02/25	Grace Bramley Adam West

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*.



Executive Summary

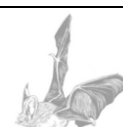
JCA Limited was instructed by **AK Planning** to carry out a Biodiversity Accounting Assessment (BAA) of **Bath Works, Spa Lane** (hereafter referred to as the 'site') to inform a retrospective planning application for a driveway associated with an extension to an existing building ('the Proposed Development').

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 **0.52** habitat BU. On balance of impacts and habitat retention/enhancement/creation, the report concludes that the Proposed Development will result in a **net gain** of **+0.06** habitat BU, equivalent to a **net gain** of **+11.96%**. 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.



Contents

1. Introduction	5
1.1 Purpose of the Report	5
1.2 Terms of Reference	5
1.3 Site Description	5
1.4 Details of Proposed Development	5
2. Biodiversity Accounting in Context	6
2.1 Background	6
2.2 Biodiversity Net Gain Principles	6
2.3 Biodiversity Offsetting Standards	7
3. Policy and Legislation	9
3.1 Introduction	9
3.2 National Policy and Guidance	9
3.3 Regional Policy and Guidance	10
3.4 Local Policy and Guidance	10
4. Methodology	12
4.1 Background	12
4.2 Baseline Data	12
4.3 Impact Assessment	12
4.4 Habitat Creation and Enhancement	13
4.5 Residual Effects	13
5. Statutory Biodiversity Metric	14
5.1 Introduction	14
5.2 Existing Site Value	14
6. Proposed Development Impact Assessment	17
6.1 Description of the Proposed Development	17
6.2 Habitats to be Retained	17
6.3 Habitats to be Enhanced	18
6.4 Habitats to be Lost	20
6.5 Proposed Habitat Creation	20
6.6 Proposed Development Summary of Net Impacts	20
7. Conclusion	22
8. References	23
Appendix 1: Baseline Habitat Map	25
Appendix 2: Proposed Habitat Map	27
Appendix 3: Proposed Development Plan	29
Appendix 4: Kirklees Biodiversity Action Plan (KBAP)	31
Appendix 5: Good Practice Principles for Development	32
Appendix 6: Author Qualifications	33



1. Introduction

1.1 Purpose of the Report

1.1.1 JCA Limited have been instructed by **AK Planning** to undertake a Biodiversity Accounting Assessment (BAA) of a site located at **Bath Works, Spa Lane** (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:

- Colne Valley Design – Proposed Extension to Existing Shed (Dwg no: 21 J 24 01).

1.3 Site Description

1.3.1 The site is located at Ordnance Survey (OS) National Grid Reference **SE 08725 14038**, with nearby postcode **HD7 5QB**. The site is a small industrial unit, surrounded by residential buildings interspersed with pockets of woodland and grassland.

1.4 Details of Proposed Development

1.4.1 The retrospective development proposed at the site is for a driveway associated with an extension to an existing building.



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 February 2024. 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 **Management of Hedgerows (England) Regulations 2024** provides protection by prohibiting the destruction or damage to important countryside



hedges; and

- The **Protection of** **Act 1992** includes the protected of under the act and that it is unlawful to wilfully kill, injure, take, possess or cruelly ill-treat 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 Regional Policy and Guidance

3.3.1 Biodiversity Action Plan (BAP) for Kirklees Council

3.3.2 The BAP for Kirklees (KBAP) (Kirklees Council, n.d) concentrates on species and habitats that had national action plans produced or are of local conservation concern. These include blanket bog, scrubland, reedbed, brown long-eared bats *Plecotus auratus*, otter and brown hare *Lepus europaeus* (**Appendix 5**).

3.4 Local Policy and Guidance

3.4.1 Kirklees Local Plan 2013 - 2031 (Kirklees Council, 2019)

3.4.2 Kirklees Local Plan 2013 - 2031 sets out the council's policies and proposals for land use within the district to 2031. Policy LP30 – Biodiversity and Geodiversity of the Plan is therefore relevant to the Proposed Development.

3.4.3 Policy LP30: Biodiversity and Geodiversity states that 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:

- i. 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;
- ii. minimise impact on biodiversity and provide net biodiversity gains through good design by incorporating biodiversity enhancements and habitat creation where opportunities exist;
- iii. 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;



- iv. establish additional ecological links to the Kirklees Wildlife Habitat Network where opportunities exist; and
- v. incorporate biodiversity enhancement measures to reflect the priority habitats and species identified for the relevant Kirklees Biodiversity Opportunity Zone.



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 Alex Donovan (Assistant Ecologist, JCA Limited) on 11/02/2025.

4.2.2 To undertake the Statutory 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 3.38.0-Grenoble to calculate habitat area.

4.3 Impact Assessment

4.3.1 The existing baseline habitat plan for the site was overlain with the Proposed Plan (Dwg no: 21 J 24 01) 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 Plan (Dwg no: 21 J 24 01) 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 Statutory 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 11/02/2025.

5.2 Existing Site Value

5.2.1 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 Statutory Biodiversity Metric calculator.

Biodiversity Metric Reference Number	Statutory Biodiversity Metric Habitat Type	Total Area on-site (Ha)	Distinctiveness	Condition	Strategic Significance	Ecological Baseline Habitat Unit
1	Mixed scrub	0.0279	Medium	Poor	Formally identified in local strategy	0.13
2	Artificial unvegetated, unsealed surface	0.1967	V.Low	N/A – Other	Area/compensation not in local strategy/ no local strategy	0.00
3	Bare ground	0.0332	Low	Poor	Area/compensation not in local strategy/ no local strategy	0.07
4	Developed land, sealed surface	0.1597	V.Low	N/A – Other	Area/compensation not in local strategy/ no local strategy	0.00
5	Introduced shrub	0.0059	Low	Condition Assessment N/A	Area/compensation not in local strategy/ no local strategy	0.01
6	Other woodland, broadleaved	0.009	Medium	Poor	Area/compensation not in local strategy/ no local strategy	0.04
7	Other woodland, broadleaved	0.0461	Medium	Poor	Area/compensation not in local strategy/ no local strategy	0.18
8	Urban Tree	0.0122	Medium	Moderate	Area/compensation not in local strategy/ no local strategy	0.10
	Total (area excl. trees)	0.48	-	-	-	0.52

5.2.2 The mixed scrub mixed scrub was classified as **poor** condition. This habitat failed the following condition assessment criteria:

- Criteria A – The parcel represents a good example of its habitat type, the appearance and composition of the vegetation closely matches its UKHab description (where in its natural range): at least 80% of scrub is native, there are



at least three native woody species, no single species compromises more than 75% of the cover (except for hazel *Corylus avellana*, common juniper *Juniperus communis*, sea buckthorn *Hippophae rhamnoides* (only in its native range), or box *Buxus sempervirens*, which can be up to 100% cover).

- Criteria B – Seedlings, saplings, young shrubs, and mature (or ancient or veteran) shrubs are all present.
- Criteria C – There is an absence of invasive non-native plant species (as listed on Schedule 9 of WCA) and species indicative of suboptimal condition make up less than 5% of ground cover.
- Criteria D – The scrub has a well-developed edge with scattered scrub and tall grassland and or forbs present between the scrub and adjacent habitat.
- Criteria E – There are clearings, glades, or rides present within the scrub, providing sheltered edges.

5.2.3 The bare ground was classified as **poor** condition. This habitat failed the following condition assessment criteria:

- Criteria A – Vegetation structure is varied, providing opportunities for vertebrates and invertebrates to live, eat and breed. A single structural habitat component or vegetation type does not account for more than 80% of the total habitat area.
- Criteria B – The habitat parcel contains different plant species that are beneficial for wildlife, for example flowering species providing nectar sources for a range of invertebrates at different times of year.

5.2.4 The two broadleaved woodlands (W1 and W2) were classified as **poor** condition. They achieved a score of poor (1) or moderate (2) score for the following condition assessment criteria (see **Table 3** for full details of assessment criteria):

- Criteria A – Age distribution of trees: 2 (W1), 1 (W2)
- Criteria D – Number of native tree species: 2 (W2)
- Criteria E – Cover of native tree and shrub species: 2 (W1)
- Criteria G – Woodland regeneration: 1 (both)
- Criteria I – Vegetation and ground flora: 1 (both)
- Criteria J – Woodland vertical structure: 1 (both)
- Criteria K – Veteran trees: 1 (both)



- Criteria L – Amount of deadwood: 1 (both)
- Criteria M – Woodland disturbance: 2 (W2)

5.2.5 The three individual trees were classified as **moderate** condition. The following condition assessment criteria were failed:

- Criteria A – The tree is a native species (or at least 70% within the block are native species) – Failed by T3 only.
- Criteria C – The tree is mature (or more than 50% within the block are mature) – Failed by all three.
- Criteria E – Natural ecological niches for vertebrates and invertebrates are present, such as presence of deadwood, cavities, ivy or loose bark) – Failed by all three.

5.2.6 Scrub is listed as a priority habitat on the KBAP, therefore, the mixed scrub is listed as 'Formally identified in local strategy' in the Strategic Significance section. All other habitats are listed as 'Area/compensation not in local strategy/ no local strategy'.

5.2.7 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 will see the removal of bare ground habitats to facilitate the development.

6.1.1 The result of the metric calculation indicates that a total of **0.07** habitat units lost as a result of the development, with **0.27** habitat units retained and **0.18** units enhanced (**Table 2**).

Table 2: Summary of baseline habitat biodiversity value through retention and enhancement.

Biodiversity Metric Reference Number	Statutory Biodiversity Metric Habitat Type	Retained		Enhanced		Lost	
		Area (ha)	Unit	Area (ha)	Unit	Area (ha)	Unit
1	Mixed scrub	0.0279	0.13	0.00	0.00	0.00	0.00
2	Artificial unvegetated, unsealed surface	0.1967	0.00	0.00	0.00	0.00	0.00
3	Bare ground	0.00	0.00	0.00	0.00	0.03	0.07
4	Developed land, sealed surface	0.1597	0.00	0.00	0.00	0.00	0.00
5	Introduced shrub	0.0059	0.01	0.00	0.00	0.00	0.00
6	Other woodland, broadleaved	0.009	0.04	0.00	0.00	0.00	0.00
7	Other woodland, broadleaved	0.00	0.00	0.0461	0.18	0.00	0.00
8	Urban Tree	0.0122	0.10	0.00	0.00	0.00	0.00
	Total (area excl. trees)	0.40	0.27	0.05	0.18	0.03	0.07

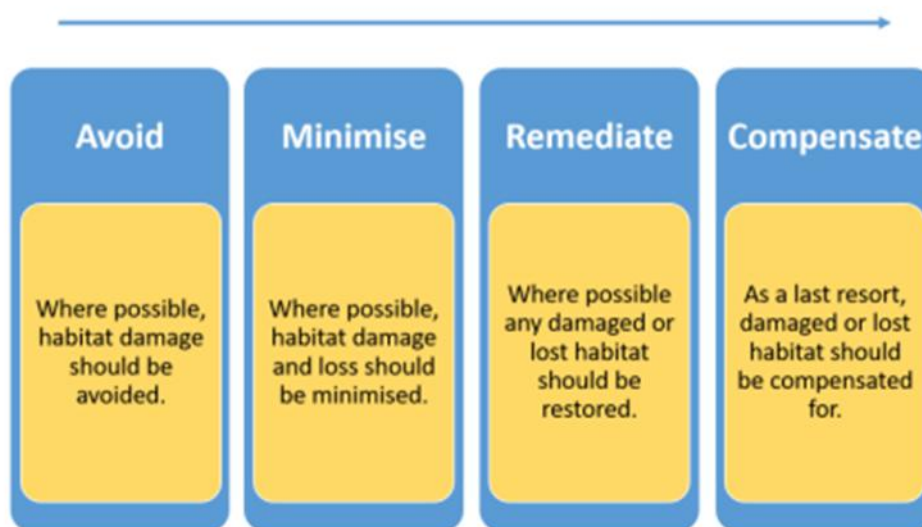
6.2 Habitats to be Retained

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 most habitats on-site to facilitate the development; mixed scrub, other broadleaved woodland (W2), individual trees, and introduced shrubs. The retention of these habitats will avoid any direct impacts of loss of habitat.

6.3 Habitats to be Enhanced

6.3.1 The Proposed Development will see the enhancement of other broadleaved woodland habitat (W1) on-site to facilitate the development, involving the enhancement from **poor** condition to **moderate**. this can be achieved by getting a score of **26 to 32 out of 39** from the following criteria:

Table 3: Condition assessment criteria for woodlands, taken from the Statutory Biodiversity Metric Condition Assessment spreadsheet (Tab 24A).

Condition Assessment Criteria - Woodlands				
Indicator		Good (3 points)	Moderate (2 points)	Poor (1 point)
A	Age distribution of trees	Three age-classes present.	Two age-classes present.	One age-class present.
B	Wild, domestic and feral herbivore damage	No significant browsing damage evident in woodland.	Evidence of significant browsing pressure is present in less than 40% of whole woodland.	Evidence of significant browsing pressure is present in 40% or more of whole woodland.
C	Invasive plant species	No invasive species present in woodland.	Rhododendron <i>Rhododendron ponticum</i> or cherry laurel <i>Prunus laurocerasus</i> not	Rhododendron or cherry laurel present, or other invasive species ≥10% cover.



			present, and other invasive species <10% cover.	
D	Number of native tree species	Five or more native tree or shrub species found across woodland parcel.	Three to four native tree or shrub species found across woodland parcel.	Two or less native tree or shrub species across woodland parcel.
E	Cover of native tree and shrub species	>80% of canopy trees and >80% of understory shrubs are native.	50 - 80% of canopy trees and 50 - 80% of understory shrubs are native.	<50% of canopy trees and <50% of understory shrubs are native.
F	Open space within woodland	10 - 20% of woodland has areas of temporary open space. Unless woodland is <10ha, in which case 0 - 20% temporary open space is permitted.	21 - 40% of woodland has areas of temporary open space.	<10% or >40% of woodland has areas of temporary open space. But if woodland <10ha has <10% temporary open space, please see Good category.
G	Woodland regeneration	All three classes present in woodland; trees 4 - 7 cm Diameter at Breast Height (DBH), saplings and seedlings or advanced coppice regrowth.	One or two classes only present in woodland.	No classes or coppice regrowth present in woodland.
H	Tree health	Tree mortality 10% or less, no pests or diseases and no crown dieback.	11% to 25% tree mortality and or crown dieback or low-risk pest or disease present.	Greater than 25% tree mortality and or any high-risk pest or disease present.
I	Vegetation and ground flora	Recognisable NVC plant community at ground layer present, strongly characterised by ancient woodland flora specialists.	Recognisable woodland NVC plant community at ground layer present.	No recognisable woodland NVC plant community at ground layer present.
J	Woodland vertical structure	Three or more storeys across all survey plots, or a complex woodland.	Two storeys across all survey plots.	One or less storey across all survey plots.
K	Veteran trees	Two or more veteran trees per hectare.	One veteran tree per hectare.	No veteran trees present in woodland.
L	Amount of deadwood	50% of all survey plots within the woodland parcel have deadwood, such as standing and fallen deadwood, large dead branches and or stems, branch stubs and stumps, or an abundance of small cavities.	Between 25% and 50% of all survey plots within the woodland parcel have deadwood, such as standing and fallen deadwood, large dead branches and or stems, stubs and stumps, or an abundance of small cavities.	Less than 25% of all survey plots within the woodland parcel have deadwood, such as standing and fallen deadwood, large dead branches and or stems, stubs and stumps, or an abundance of small cavities.
M	Woodland disturbance	No nutrient enrichment or damaged ground evident.	Less than 1 hectare in total of nutrient enrichment across woodland area, and or less than 20% of woodland area has damaged ground.	1 hectare or more of nutrient enrichment, and or 20% or more of woodland area has damaged ground.
Condition Assessment Result				Condition Assessment Score
Total score >32 (33 to 39)				Good (3)
Total score 26 to 32				Moderate (2)
Total score <26 (13 to 25)				Poor (1)

6.3.2 The woodland parcel has a baseline score of **25**, meaning a minimum of **1** point is required to reach **moderate** condition. Enhancement can be achieved by targeting the following criteria:

- Criteria L – Amount of deadwood: 1 > 3 – placing log piles, branches, etc, across the woodland to allow deadwood to develop.



6.4 Habitats to be Lost

6.4.1 The Proposed Development will see the loss of bare ground habitats on-site to facilitate the development. This will result in the loss of poor condition, low distinctiveness habitat. This will not represent a major loss, as it will be compensated for through on-site enhancements.

6.5 Proposed Habitat Creation

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

- Artificial unvegetated, unsealed surface

6.5.2 The proposed habitats on-site can be found within **Appendix 2**.

6.5.3 **Table 4** below summarises the value of all habitats that are to be created as part of the Proposed Development. In total, **0.00** BU for habitats are to be created within the Proposed Development.

Table 4: Summary value of on-site habitat proposals.

Biodiversity Metric Reference Number	Statutory Biodiversity Metric Target Habitat Type	Total Area on-site (Ha)	Distinctiveness	Target Condition	Strategic Significance	Biodiversity Unit Value
1	Artificial unvegetated, unsealed surface	0.0332	V.Low	NA – Other	Area/compensation not in local strategy/ no local strategy	0.00
	Total (area excl. trees)	0.03	–	–	–	0.00

6.6 Proposed Development Summary of Net Impacts

6.6.1 **Table 5** 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.

6.6.2 This shows that on balance, the Proposed Development would result in a **net gain** of **+0.06** habitat BU, equivalent to a **net gain** of **+11.96%**.

6.6.3 The Proposed Development **satisfies** the Trading Rules as **no** unit deficits have been generated across distinctive units.



Table 5: Summary of Biodiversity Metric results for habitats and hedgerows

Biodiversity Units (BU)	
Existing site habitat biodiversity value	0.52
Value of gross habitat biodiversity loss	-0.07
Value of retained and proposed on-site habitat creation and enhancement	0.59
Net habitat biodiversity balance	+0.06



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 **+0.06** habitat BU, equivalent to a **net gain** of **+11.96%**. 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 Statutory 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

Biodiversity Metric Guidance:

Business and Biodiversity Offsets Programme (BBOP). (2012). *Standard on Biodiversity Offsets*. https://www.forest-trends.org/wp-content/uploads/bbop/bbop_standard_on_biodiversity_offsets_1_feb_2013-pdf.pdf.

The British Standards Institution (BSI). (2013). *Biodiversity — Code of practice for planning and development*. <https://www.omegawestdocuments.com/media/documents/43/43.35%20BSI%20Biodiveristy%20Code%20of%20Practice.pdf>.

CIEEM, CIRIA & IEMA. (2016). *Biodiversity Net Gain: Good practice principles for development*. <https://cieem.net/resource/biodiversity-net-gain-good-practice-principles-for-development/>.

DEFRA (2023). *Statutory biodiversity metric tools and guides*. Includes User Guides, Metric Calculation tools, and Condition Assessment sheets. <https://www.gov.uk/government/publications/statutory-biodiversity-metric-tools-and-guides>

Department for Levelling Up, Housing and Communities & Ministry of Housing, Communities and Local Government. (2019). *Guidance: Natural environment*. Available at: <https://www.gov.uk/guidance/natural-environment>.

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 2021

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

Protection of Act 1992

-

Countryside and Rights of Way Act 2000

- <https://www.legislation.gov.uk/ukpga/2000/37/contents>



Appendices



Appendix 1: Baseline Habitat Map



Site name & address
Bath Works
Spa Lane
Huddersfield
HD7 5QB

Key


 Red Line Boundary

HABITATS

Habitats - Baseline

 Artificial unvegetated, unsealed surface

 Developed land; sealed surface

 Introduced shrub

 Mixed scrub

 Other woodland; broadleaved

 Bare ground

INDIVIDUAL TREES

Individual trees - Baseline

 Existing Small Urban Tree

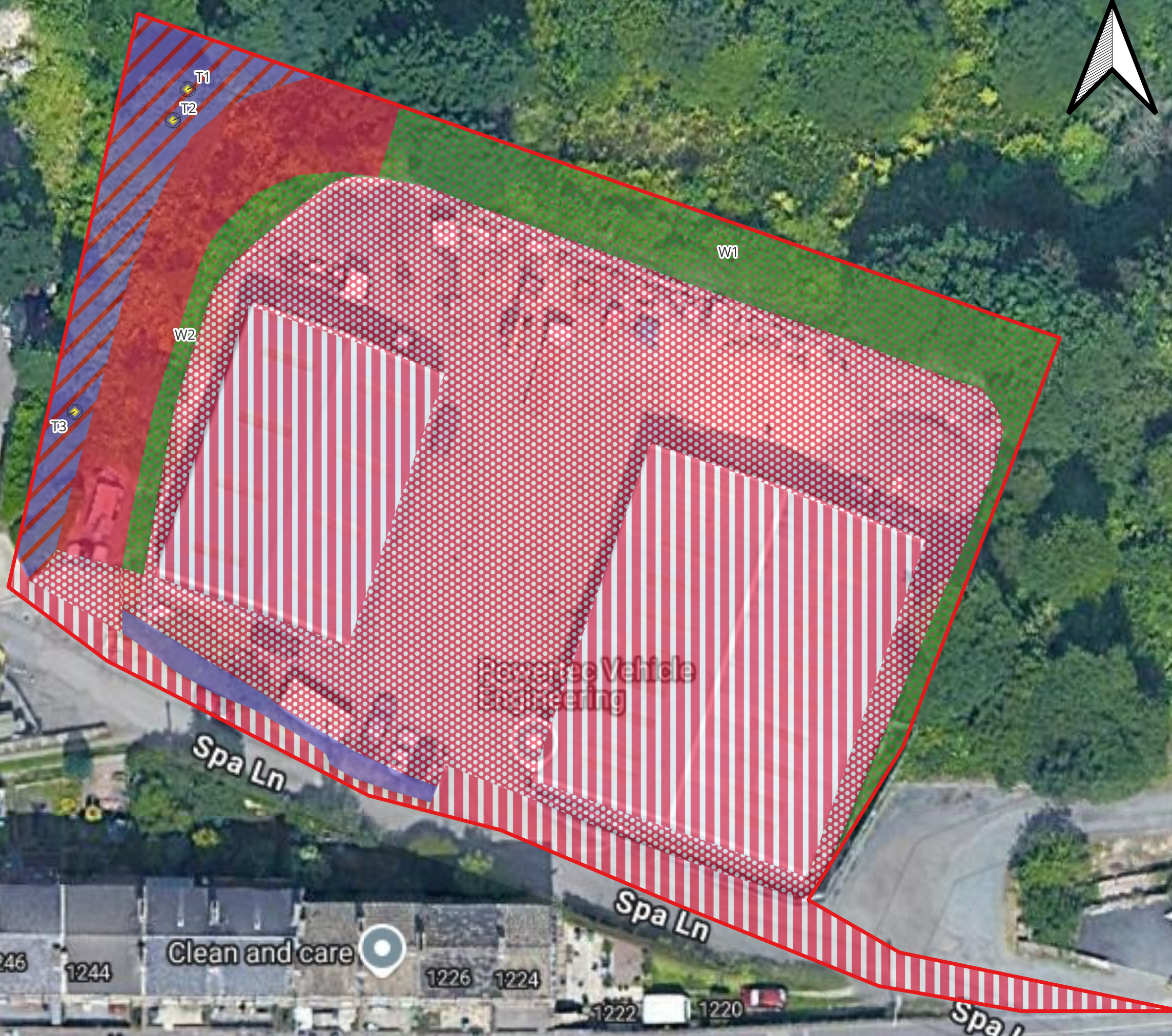
Scale 0 10 20 m



Site Bath Works	Client AK Planning
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Project 22642 BAA	Author ADo
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Plan ref 22642/ADo	Revision 001
-----------------------	-----------------



Powersee Vehicle Engineering

Spa Ln

Spa Ln

Spa Ln

1246

1244

Clean and care

1226

1224

1222

1220

Appendix 2: Proposed Habitat Map



Site name & address
Bath Works
Spa Lane
Huddersfield
HD7 5QB

Key

 Red Line Boundary

HABITATS

Habitats - Proposed

 Artificial unvegetated, unsealed surface

 Developed land; sealed surface

 Introduced shrub

 Mixed scrub

 Other woodland; broadleaved

INDIVIDUAL TREES

Individual trees - Proposed

 Retained Small Urban Tree

Scale 0 10 20 m



Site Bath Works	Client AK Planning
Project 22642 BAA	Author ADo
Plan ref 22642/ADo	Revision 001



Powersee Vehicle Engineering

Spa Ln

Spa Ln

Spa Ln

Clean and care

1246

1244

1226

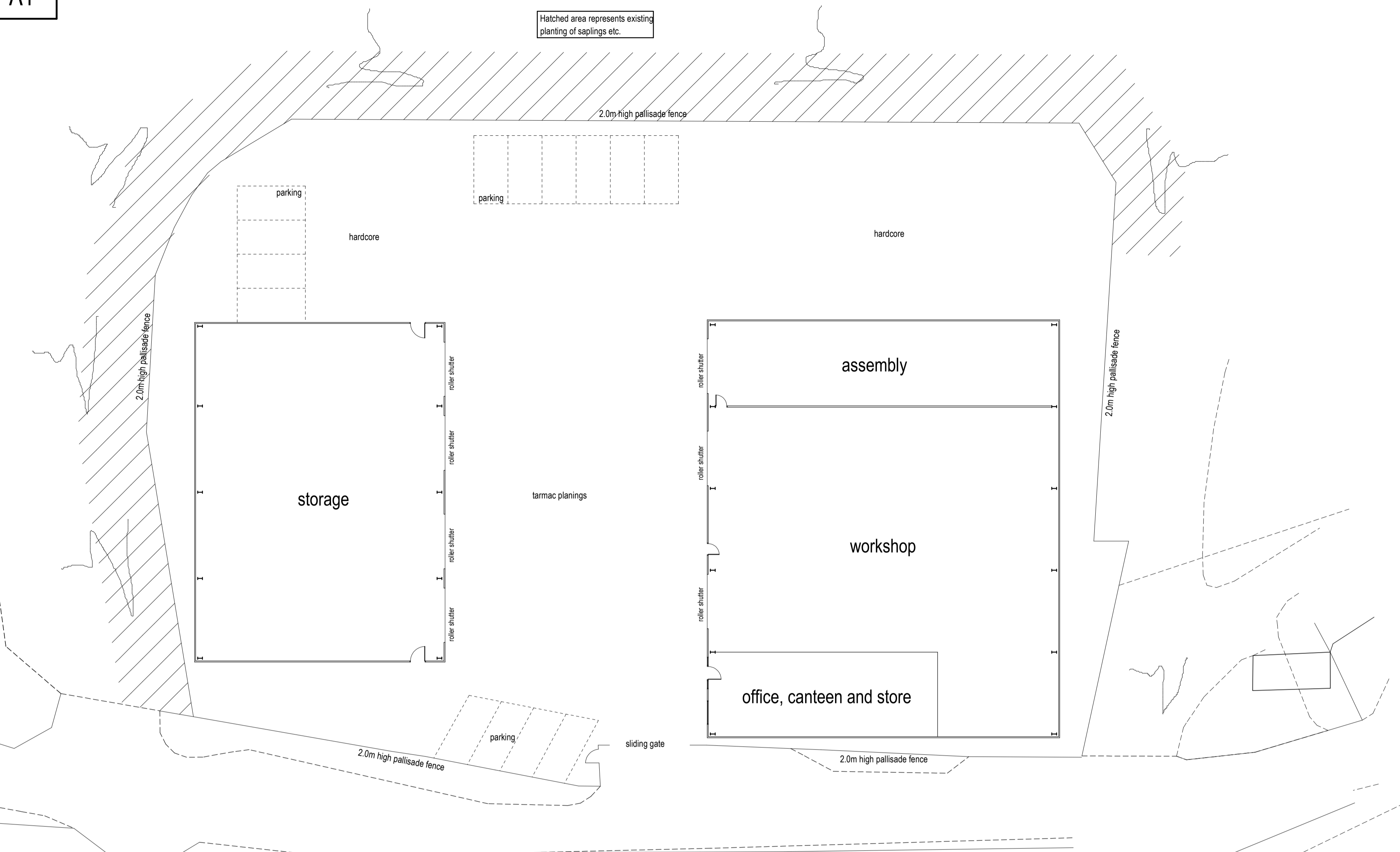
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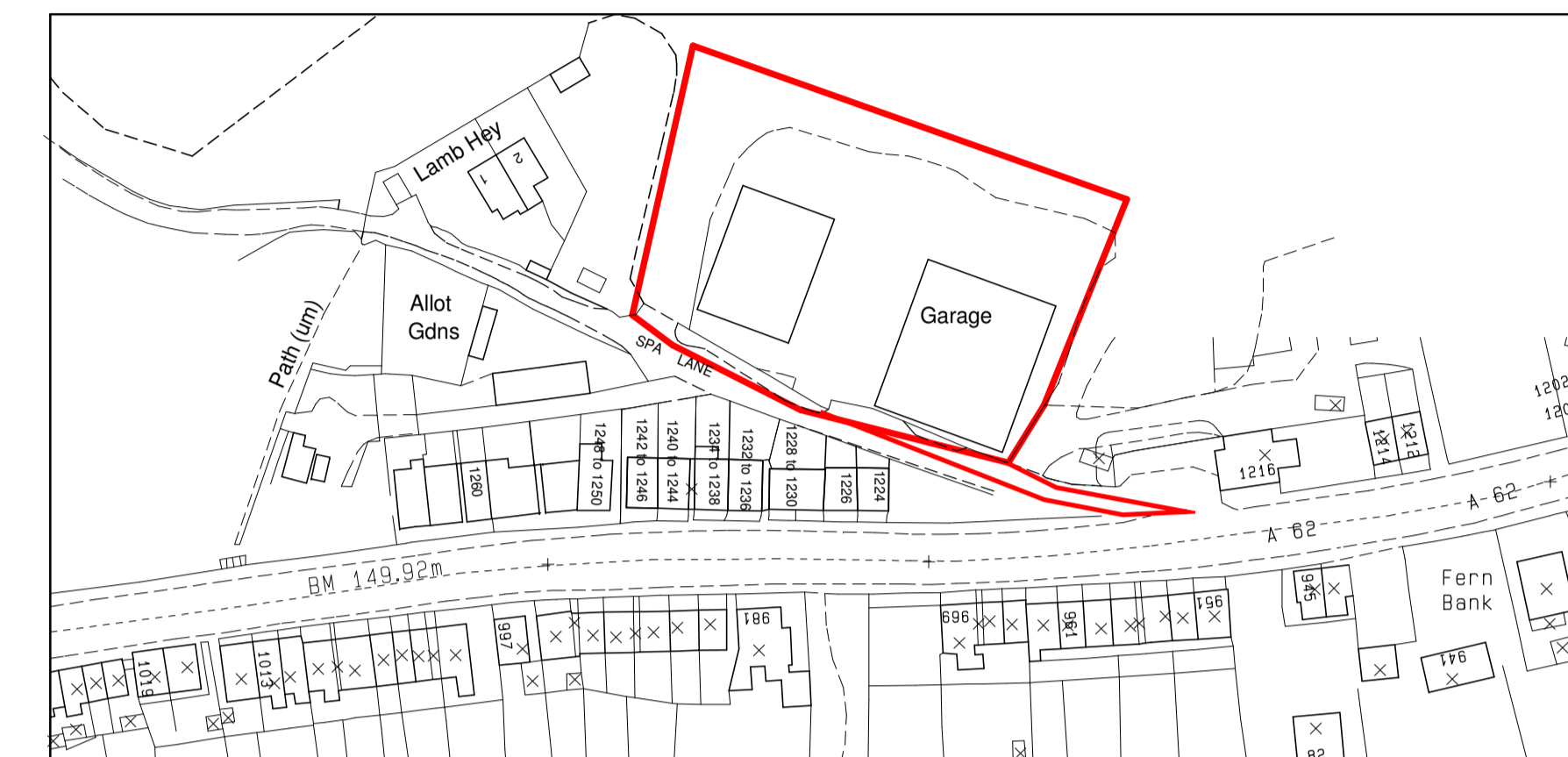
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Appendix 3: Proposed Development Plan

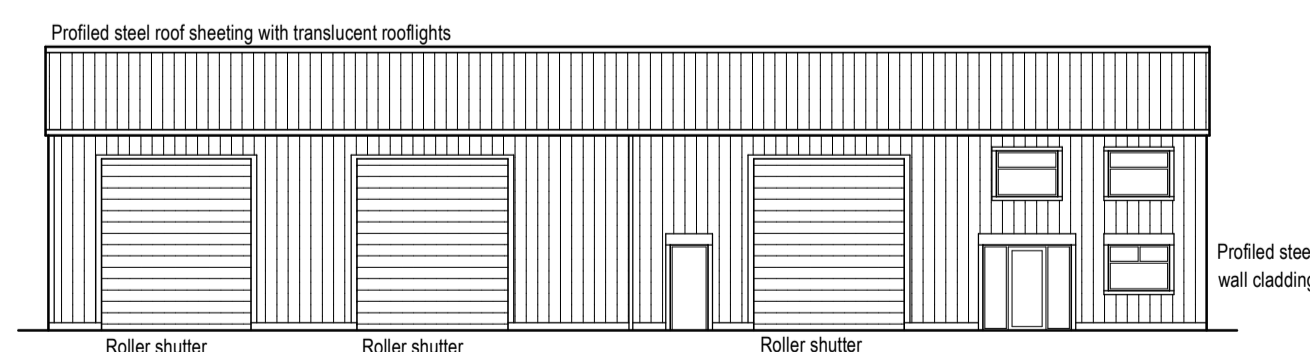




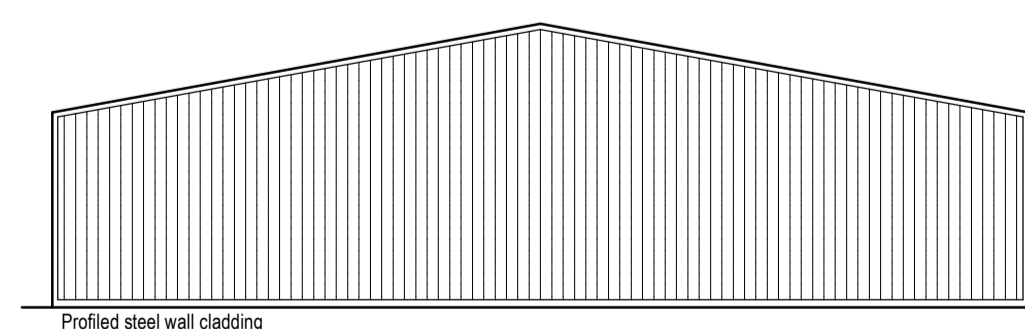
Existing site plan (1:200)



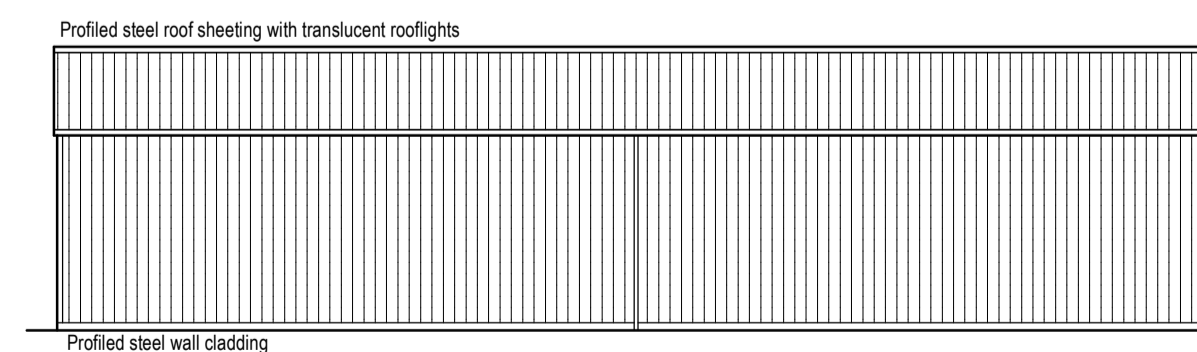
Location plan (1:1250)



Existing front elevation (1:200)



Existing side elevation (1:200)



Existing rear elevation (1:200)



Colne Valley Design
 8 Meadow Lane
 Slaithwaite
 Huddersfield HD7 5EX

Tel: 01484 842097
 Mobile: 07867 803312
 E-mail: mitchell@s homes.co.uk

Proprietor: S.A. Mitchell (ACIOB)

Project
Proposed Extension to Existing Shed.

For
Powertec Ltd.

Address
**Spa Lane
 Linthwaite
 HD7**

Title
Existing layouts and elevations.

Job No. 21 J 24.	Drawing number 01.	Date April 2021.
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Appendix 4: Kirklees Biodiversity Action Plan (KBAP)

Habitats included within the BAP for Kirklees (Kirklees Council, n.d) are as follows;

- Scrub;
- Other semi-natural grassland (wet/rush pasture and rough grassland); and
- Riverine.

Species included within the BAP for Kirklees (Kirklees Council, n.d) are as follows;

- Water vole (*Arvicola terrestris* - recently reclassified as *Arvicola amphibious*);
- White clawed crayfish (*Austropotamobius pallipes*);
- Twite (*Carduelis flavirostris* subsp. *bensonorum/pipilans*);
- Early marsh orchid (*Dactylorhiza incarnate*);
- Marsh helleborine (*Epipactis palustris*);
- Northern wood ant (*Formica lugubris*);
- Floating water plantain (*Luronium natans*); and
- Great crested newt (*Triturus cristatus*).



Appendix 5: 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 6: Author Qualifications

Adam West, Principal Ecologist

BSc (Hons) Animal and Wildlife Management.

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, a Natural England Level 2 bat survey class licence (and the Scottish and Welsh equivalents) and a CSCS card.

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.

Grace Bramley, Graduate Ecologist

BSc (Hons) Design and Innovation with Environmental Science

Grace joined JCA in 2024 after completing her degree from The Open University with a first-class honour's degree in design and environmental science. Prior to this she spent six years working in the automotive industry followed by three years in the chemical industry. She is conducting Preliminary Ecological Appraisal and Biodiversity Net Gain Assessments and working towards her protected species licenses.



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.

Signed

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

17/02/2025

Reviewed by

.....
Grace Bramley

18/02/2025

Approved by

.....
Adam West *BSc (Hons), ACIEEM*

24/02/2025



For and on behalf of **JCA Ltd**

Registered Office:

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ECOLOGICAL SERVICES

Ecological Pre-Planning Services

- Phase 1 Habitat Surveys
- Great Crested Newt eDNA Sampling
- Protected species: Bat, Wintering and Nesting Bird, 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 Condition 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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