



Biodiversity Net Gain Assessment – Part 2

Report Ref. ER-7172-03C

09/12/2024

Strata Homes/Thirteen Group Ltd



Report reference	ER-7172-03B - Biodiversity Net Gain Assessment (Post-Development)
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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.

Amendment	Date	Author	QA	Summary of changes
ER-7172-03A	11/12/2024	SW/DL	MF	Updated to reflect red line boundary and proposed layout changes.
ER-7172-03B	19/08/2025	SW	DL	Updated to reflect new landscape plan and redline boundary
ER-7172-03C	24/09/2025	SW	DL	Updated to reflect new landscape plan



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Introduction

1. Brooks Ecological Ltd was commissioned by Strata Homes/Thirteen Group Ltd to carry out a Biodiversity Net Gain (BNG) Assessment of the proposed development Site at Main Avenue, Kirklees.
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-7172-01.
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-7172-02. This current report supersedes ER-7172-02 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 2.14ha
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-7172-01E 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.
10. Information on condition assessments is provided in the Excel spreadsheet CA-7172-01 provided alongside this report.

Strategic Significance

11. Part of the Site lies adjacent to an area of the WHN, and so some habitats have been 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.
15. The Statutory Biodiversity Metric Calculation Tool (published 23/07/2024), is provided alongside this

assessment, in Excel spreadsheet BM-7172-01E, and may be useful in investigating design options for the Site.

Table 1 Habitat Types.

Habitat	Label ref.	Irreplaceable?	Distinctiveness	Condition	See Condition Assessment sheet
Other neutral grassland	ONG1, ONG2, ONG4, ONG5	No	Medium	Good	6B
	ONG3			Poor	
Other lowland acid grassland	AG1	No	Medium	Poor	6B
Mixed scrub	MS	No	Medium	Poor	20A
Bramble scrub	BS	No	Medium	N/A	N/A
Vegetated garden	VG	No	Low	N/A	N/A
Individual trees	-	No	Medium	Good	9B
Developed land; sealed surface	DL	No	Very low	N/A	N/A
Artificial unvegetated, unsealed surface	AU	No	Very low	N/A	N/A
Introduced shrub	IS	No	Low	N/A	N/A
Other woodland; broadleaved	WO	No	Medium	Moderate	24A

Figure 2 The Site's habitats assigned to types used in the Biodiversity Metric. Labelled codes cross-reference to our condition assessment and description in the PEAR, which should be read in conjunction with this report.



Trading Rules

16. 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.
17. Once trading rules are complied with, the 'gain' component can come from any distinctiveness category.

Habitat Unit Score

18. The Site has been assessed as having a baseline score of 34.99 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	0.06	Can be replaced with <u>any</u> habitat of the same distinctiveness (low) or any habitat from a higher distinctiveness (Medium, High or Very High)
Medium	34.93	<u>Can not</u> be replaced with habitats from a lower distinctiveness. Compensation needs to be like for like, or like for better. This means it can only be replaced by habitat from the same broad categories in Medium distinctiveness (in this case grassland, scrub, woodland and individual trees), or any habitat from a higher distinctiveness category (High or Very High).
High	0	Can only be replaced with the same habitat.
Very High	0	Can only be replaced with the same habitat; bespoke compensation required.
Irreplaceable	0	Bespoke compensation required, outside of BNG.

Post-development value¹

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

Proposed habitats

- Habitats present on-Site post-development have been based on the Landscape Masterplan (Figure 3) 500@A1 dwg. R/2784/1M (FDA Landscape, September 2025).
- Planting types specified in the Landscape Masterplan have been assigned a UK Habitat Classification description that best fits the target habitat.
- Habitats assigned are shown in Figure 4 overleaf.

Condition assessment

- The condition assessment for each proposed habitat is based on what is realistic and achievable for the Site, based on the Landscape Masterplan.
- 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 Landscape Masterplan 500@A1 dwg. R/2784/1M (FDA Landscape, September 2025).



¹ Please see assumptions section at end of report

Post-development habitats

Habitat Score

25. The Site has been assessed as having a post-development score of 9.41 Habitat Units and 0.25 Hedgerow Units.
26. This score is based on our interpretation of the Landscape Masterplan, as shown in Figure 4 opposite.
27. Calculations for the change in Habitat Units have been based on the majority of the Site being cleared of existing habitats. An area of other neutral grassland, acid grassland and trees will be retained, accounting for 6.86 Habitat Units.
28. The rest of the Site will be cleared of existing habitats and land reprofiled, which results in the loss of the remaining Habitat Units.
29. Post-development calculations include Habitat Units gained through the creation of small areas of grassland (mapped either as *modified grassland* in moderate condition and other neutral grassland in moderate condition), *vegetated gardens*, *introduced shrub* and *mixed scrub*.
30. Roads, driveways, footpaths, houses and patios have all been mapped as *developed land; sealed surface*, which contribute no Habitat Units to the post-development score.
31. New tree planting along streets have been mapped as individual *urban trees* in moderate condition.
32. New hedgerows are to be planted and are classed here as *native hedgerows* in poor condition. As no hedgerows are present on-Site currently, this satisfies the Metric in terms of Hedgerow Units.
33. The loss of Medium-distinctiveness *other neutral grassland*, *mixed scrub*, *bramble scrub*, *other woodland*; *broadleaved* and *individual rural trees*,

are not compensated for by the creation of new habitats on-Site (*modified grassland*, *mixed scrub*, *introduced shrub*, *vegetated garden* and *individual trees*). This means that trading rules cannot be satisfied. Explanation of this and the implications in terms of Units required is set out overleaf.

Figure 4 Post-development habitats.



Habitat Retention

34. 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.
35. 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.
36. 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.

The BNG Hierarchy

37. The project's engagement with the Mitigation Hierarchy is set out in Appendix 1.

Figure 5 Habitat retention.



Final Results

38. The Statutory Metric has been used to calculate the net unit change for the Site, which has predicted an overall net loss of 25.58 Habitat Units (-73.11%) and a gain of 0.25 Hedgerow Units.
39. A copy of the Statutory Biodiversity Metric Calculation Tool Excel spreadsheet (ref. BM-7172-01E) and Condition Assessment sheets (CA-7172-01) have been provided with this report and should be submitted digitally as part of the application.
40. 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 3.50 Habitat Units, on top of the current deficit of 25.88 Habitat Units, to demonstrate a 10% net gain (29.08 Habitat Units total).

Trading Rules

41. 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.
42. To satisfy Trading Rules for this development, compensatory units will need to be generated from the following broad Habitat Types, as outlined in Table 3, opposite.
43. A total of 26.55 Habitat Units will need to be generated through offsetting to meet Trading Rules. These units can, in part, make up those required to meet the required net unit change.

Requirements for Planning

44. 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, **29.08 Habitat Units** will need to be generated including the broad habitats shown in Table 3.
45. 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-7172-01E) before submission to the LPA.
46. 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 <small>(Including all on-site & off-site habitat retention, creation & enhancement)</small>	Habitat units			-25.58
	Hedgerow units			0.25
	Watercourse units			0.00
Total net % change <small>(Including all on-site & off-site habitat retention, creation & enhancement)</small>	Habitat units			-73.11%
	Hedgerow units			N/A
	Watercourse units			0.00%
Trading rules satisfied?			No - Check Trading Summaries ▲	
Unit Type	Target	Baseline Units	Units Required	Unit Deficit
Habitat units	10.00%	34.99	38.49	29.08
Hedgerow units	10.00%	0.00	0.00	0.00
Watercourse units	10.00%	0.00	0.00	0.00

Table 3 Trading Rules summary

Distinctiveness	Broad Habitat Type	Habitat Units required
Medium*	Heathland and Shrub	0.91
Medium*	Grassland	17.17
Medium*	Trees	8.21
Medium*	Woodland and forest	0.26
Total Units		26.55 Units

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

Assumptions

47. Establishment of the post development value of the Site at this stage is necessarily based on several assumptions which we have set out below, please provide the additional information required against each if this is available:

	Factor	Information Required
1	<p><u>Timing</u></p> <p>The BNG metric includes options to identify habitat creation which is deferred (by x years after it is lost) or habitat which is created in advance (elsewhere prior to its loss from Site). These are subject to multipliers and will affect your ultimate BNG score.</p> <p>Unless you have told us otherwise, we have assumed a 2-year build programme and a delay of 2 years between loss of habitat and creation of new. Calculations will need to be re-run if changes to the project plan result in a change to this figure.</p>	<p>Please provide a realistic timescale for the period between loss of habitat (Site clearance) and the completion of new on-Site habitat areas.</p>
2	<p><u>Phasing</u></p> <p>Unless you have told us otherwise, we have assumed that development will not be phased (in planning terms) and that habitat will be lost and created in a single phase.</p>	<p>Please confirm whether development will be phased.</p>
3	<p><u>Habitat Retention</u></p> <p>Unless you have provided a habitat retention plan showing areas where habitat can be retained undisturbed, we have assumed that all mapped habitat will be lost from the Site and then replaced.</p>	<p>Please provide a habitat retention plan showing area which can be retained unaffected by clearance, excavation, storage, compounds etc. Identify also any areas of temporary impacts - these may be impacted by the above but can be returned to the same habitat within 2 years.</p>
4	<p><u>Other limiting factors</u></p> <p>Ecological conditions are likely to be the primary factors determining the potential of the site to deliver Biodiversity Units, these would normally be established through a Preliminary Ecological Appraisal (PEA). Where a PEA has not been carried out, we have assumed that ecological factors are not limiting. Where a PEA has been carried out by a third party, we have assumed that the information provided is suitable and accurate.</p> <p>There are other limiting factors falling outside of the remit of ecological assessment which could also affect delivery, these may not be apparent to us at this stage. As part of any future management plans produced to deliver Biodiversity Units it will be necessary to assess information on (though not limited to) the following factors - any of which could have a bearing on the site's potential:</p> <ul style="list-style-type: none"> • Designated Sites (these may have been considered if desk-study has been part of the scope) • Protected and Notable Species (these may have been considered if desk-study has been part of the scope) 	<p>Provide information and reports or references any of the factors which you know will be, or could be, limiting in terms of habitat creation.</p>

	<ul style="list-style-type: none">• Invasive and Non-native Species• Land tenure and public access• Climate• Geology / topography• Agricultural land status• Soils and substrates• Contaminated Land• Hydrology and Drainage• Flood Risk• Landscape Character and Designations• Historic Environment and Earth Heritage• Services and Infrastructure• Land ownership <p>These factors may be outside of the remit of this report (especially where a PEA has not been produced) and the expertise of an ecologist. We cannot be responsible for the impact of any of these factors on the potential of the site to deliver Biodiversity Units. Where other information is not made available, we have assumed they are not limiting</p>	
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References

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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>

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Appendices

The following reports/digital documents have been provided alongside this report and should be read in conjunction with it:

- BM-7172-01E – Statutory Biodiversity Metric Calculation Tool
- CA-7172-01 – Statutory Biodiversity Metric Condition Assessments
- ER-7172-01 – Preliminary Ecological Appraisal

Further information

Further useful information is available on legal agreements to secure Biodiversity Gains at:

- <https://www.gov.uk/guidance/legal-agreements-to-secure-your-biodiversity-net-gain>
- <https://naturalengland.blog.gov.uk/2024/03/04/securing-off-site-biodiversity-net-gain-expert-legal-perspectives/>

Appendix 1 - BNG Hierarchy

Level of Hierarchy	Advice provided at PEA/BNG Baseline Stage	Response in designs	Linked documents / plans
<i>First</i> Avoid	<p>In line with the BNG mitigation hierarchy, clearance of Medium-distinctiveness habitats should be avoided wherever possible, and minimised where it is not avoidable.</p> <p>In this case, nearly all onsite habitats are of medium distinctiveness, and thus to develop the Site for residential use, loss of medium distinctiveness habitat will be inevitable.</p> <p>Losses should therefore be kept to a minimum, whilst still enabling a viable scheme to be designed.</p>	<p>A scheme has been developed that will result in the near complete loss of onsite habitat, with the exception of a small area of other neutral grassland.</p> <p>It will be necessary to demonstrate why impacts to a larger area of Medium Distinctiveness habitat could not be avoided.</p>	Landscape Masterplan (Figure 3) 500@A1 dwg. R/2784/1E (FDA Landscape, December 2024).
<i>then</i> Enhance	Retained habitats on-Site should be enhanced where possible as an important source of Habitat Units post-development.	In this case, the retained other neutral grassland on-site is already at Good condition and cannot be enhanced further.	As above.
<i>then</i> Create	Where possible residual loss of Units should be made up for with Habitat Units generated through the creation of new habitats on-Site. Units may be generated through specific ecologically targeted habitat creation, such as wildflower grassland, and standard amenity habitats, such as amenity grassland and ornamental shrub. Woodland buffering could contribute to this process.	Areas of POS have been maximised for BNG purposes, with areas either sown with wildflower seed to create other neutral grassland in Moderate condition or planted up with native shrubs to create mixed scrub in moderate condition. Native trees are to be planted throughout the site, along new roads and paths.	As above.
<i>then</i> Offset	If a 10% Net Gain cannot be achieved on-Site, any remaining deficit will need to be compensated for off-Site.	<p>A residual net loss of 25.95 Habitat Units is predicted, with a total of 28.81 Habitat Units required through offsetting to demonstrate a 10% net gain overall.</p> <p>In order to satisfy Trading Rules, the following broad habitat types are required; 0.93 Heathland and Shrub Units, 17.24 Grassland Units, 8.52 Individual Tree Units and 0.24 Woodland and Forest Units.</p>	As above.