BNG Feasibility Report

230-232 Lowerhouses Lane, Huddersfield, HD5 8LA

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Executive Summary

- Oak Ecology were commissioned by Yasir Harfat to conduct a Biodiversity Net Gain assessment on 230-232 Lowerhouses Lane, Huddersfield, HD5 8LA.
- The application was for the erection of two-storey side extension to form 2 additional self-contained flats.
- The baseline biodiversity net gain unit value was 0.10 area units and 0.02 linear units. A 10% net gain would require 0.11 area units, and 0.02 linear units.
- The proposed plan resulted in the post development of 0.03 area units, and 0.01 linear units. The proposed plans would not meet the 10% net gain targets
- The trading rules for the site have not been met.
- It is likely unfeasible that the BNG targets and trading rules can be satisfied on-site. Therefore, off-site units should be secured through government or environment bank services.

	Baseline	10% Target	Post	Target met	Trading rules satisfied
Linear	0.10	0.11	0.03	**No**	**No**
Area	0.02	0.02	0.01	**No**	**No**

This report is valid for up to 12 months after the initial survey date. After this time, a new survey will be required.

The information within this report is based on the information gathered at the time of the survey, the possibility of other ecological issues arising in the cannot be eliminated.

Contents

1. Introduction

1.1. Commission brief

Oak Ecology were commissioned Yasir Harfat to undertake a Biodiversity Net Gain (BNG) assessment of the land adjacent to 230-232 Lowerhouse Lane. Huddersfield, HD5 8LA (hereafter referred to as the “site”).

1.2. Site location

The site (centred at SE 15473 15092) was situated 1.8 Km south of Huddersfield town centre. The surrounding area was predominantly rural.

Figure 1: Red Line Boundary.

Figure 2: 1 Km Buffer zone around site.

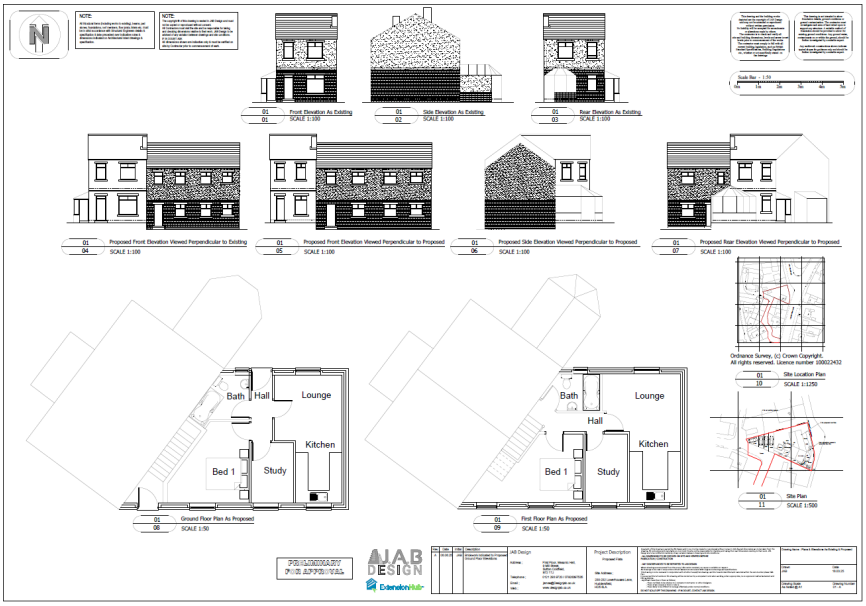

Figure 3: Proposed site plans.

1.3. Proposed development

It is understood that the site would be subject to a planning application for the erection of two-storey side extension to form 2 additional self-contained flats.

1.4. Scope of the survey

The purpose of this survey was to:

- Identify and provide a description of the habitats present on the site.
- Identify potential ecological enhancements on the site.
- Evaluate the biodiversity units of the habitats on site.

1.5. Legislation and planning policy

UK and European policies and legislation deal with conservation of biodiversity. This section briefly outlines the legal and policy protection afforded to species and habitats scoped into this survey and described within the report.

1.5.1. Priority habitats and species

The NERC Act 2006 places a duty on public authorities to conserve biodiversity. It also states that a list of priority species and actions must be drawn up and contains species and habitats of principal importance for the purpose of conserving biodiversity. These lists of Priority Species and Priority Habitats, which encompass the previous UK Biodiversity Action Plan (BAP) habitats and species, are those identified as being the most threatened and requiring conservation action. Priority habitats and species were chosen based on international importance, rapid decline, and high risk. The list contains over 1000 habitats and species in total.

1.5.2. Biodiversity Net Gain (BNG)

Mandatory BNG is a part of the Environment Act 2021 requiring developments in England to have more or higher quality habitats than prior to the development. From 12th February 2024 all major developments were required to meet a minimum 10% increase in biodiversity units, calculated from the Statutory Biodiversity Metric. On 2nd April 2024, the mandatory 10% was extended to 'small sites'.

1.5.3. Exemptions

The Biodiversity Gain Requirements (Exemptions) Regulations 2024 lists several exemptions for BNG that may be applicable.

Temporary exemption for small developments *—*

The application for planning permission for small development was made before 2nd April 2024; or planning permission is granted for small development which has effect before 2nd April 2024.

De minimis exemption

The biodiversity gain planning condition does not apply in relation to planning permission for development which meets the following conditions:

the development does not impact an onsite priority habitat and,

The development impacts— (a) less than 25 square metres of onsite habitat that has biodiversity value(b) greater than zero; and (b) less than 5 metres in length of onsite linear habitat.

Householder applications

The biodiversity gain planning condition does not apply in relation to planning permission for development which is the subject of a householder application within the meaning of article 2(1) of the Town and Country Planning (Development Management Procedure) (England) Order 2015.

Self-build and custom build applications

The biodiversity gain planning condition does not apply in relation to planning permission for development which— (a) consists of no more than 9 dwellings; (b) is carried out on a site which has an area no larger than 0.5 hectares; and (c) consists exclusively of dwellings which are self-build or custom housebuilding. (2) In this regulation "self-build or custom housebuilding" has the same meaning as in section 1(A1) of the Self-build and Custom Housebuilding Act 2015(a)

2. Methodology

2.1. Surveyors and equipment

The site was attended by Matthew Kirby, an ecologist with over 9 years' experience, on 18th November 2025.

2.2. Survey

The survey consisted of a site walkover to identify the key habitats within the Site. The UK Habitat Classification v2.0 was used to categorize the habitats (UKHAB Ltd, 2023). A minimum mapping units of 5m for linear habitats and 25m^2 for area habitats was used when creating the maps.

Notes and photos were taken throughout the site to document the habitats present. Any habitats or features that would be suitable for protected species were identified and marked with a target note on the maps.

The baseline and proposed habitats were digitally mapped in QGIS software. Details from the site walkover were then inputted into the Small Site Metric BNG Calculation Tool to calculate the feasibility of a 10% BNG.

2.3. Limitations

The site appeared to have been cleared recently, and unauthorised degradation may have taken place.

> *Where unauthorised degradation of the onsite habitat has taken place on the land between 30 January 2020 and the date of relevant date, the biodiversity 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 these degradation activities. The relevant date should therefore be set as a date immediately before these activities. Unauthorised degradation of onsite habitat is any degradation which is not in accordance with a previous planning permission.*

Figure 4: Historic satellite imagery from 16/06/2021. (google earth, 2025)

Figure 5: Photo showing the condition of the site in 2025.

Using satellite imagery from 2021, The site can be seen to be primarily a vegetated garden, with hedgerow, and two trees.

3. Results

3.1. Weather Conditions

Table 1: Weather conditions at the site on 18/11/2025.

Parameter	
Temperature	8 °C
Precipitation	1 – Light rain
Wind speed	2 Beaufort – Light breeze
Cloud cover	70%

3.2. Desk Study

3.2.1. Protected species

A 1km search radius was conducted using Magic (2025), to identify any previous confirmed records of protected or notable species in the area. The search returned one record of licences within a 1 km radius. There were records of invertebrates, birds, and mammals all within a 1 km radius. However, none were identified within the site boundary or the immediate vicinity.

Table 2: summary of EPSM licences.

Ref	Species	Date	Bearing
EPSM2012-1750	Common pipistrelle, Soprano pipistrelle, Brown long-eared	2010 – 2012	720m N

3.2.2. Designated sites and priority habitats

There was one designated site within the 1km search radius of the site, *Castle Hill LNR*.

The priority habitat index (PHI) identified two habitat types: deciduous woodland, and Traditional orchard within the 1km buffer zone. Also identified was ancient woodland.

3.3. Site visit results

3.3.1. Area habitats baseline

A-1.1 Vegetated garden

Area of private garden associated with the property. The area had been clear after Jan 2020 and should be assumed an unauthorised degradation of the habitat. Satellite imagery shows the site still having vegetation in early 2025.

Size: 0.018 Ha, *Distinctiveness: Low,* *Condition: N/A*

A-1.2 Developed land; sealed surfaces

Area which consisted of the main building and garage.

Size: 0.0013 Ha, *Distinctiveness: Very Low,* *Condition: N/A*

A-1.3 Artificial unvegetated, unsealed surface

A small patch of gravel associated with the rear garden of the property.

Size: 0.0052 Ha, *Distinctiveness: Very Low,* *Condition: N/A*

A-1.4 Urban tree

Two assumed small sized trees which had been felled prior to the site visit. The stumps of the tree were still present on site.

Size: 0.0081 Ha,* *Distinctiveness: Medium,* *Condition: Moderate*

*Area not included in total site area.

3.3.2. Linear habitat baseline

B-1.1 Non-native and ornamental hedgerow

A total of 20m of hedgerow along the boundary of the site that had been removed prior to the site visit. Historic street view imagery shows the hedgerow still being present in 2023. The species appeared to be all non-native and ornamental.

Size: 20m, *Distinctiveness: Very Low,* *Condition: Poor*

3.3.3. Area habitats proposed

A-2.1 Developed land; sealed surface

Creation of new building and parking at the rear of the property.

Size: 0.0081 Ha, *Distinctiveness: Very Low,* *Condition: N/A*

A-2.2 Vegetated garden

Extension of the gravel surface across the site. BNG units created through private gardens do not contribute to the total BNG targets as the units cannot be legally secured and maintained for the required time period.

Size: 0.015 Ha, *Distinctiveness: Low,* *Condition: N/A*

3.3.4. Linear habitats proposed

B-2.1 Non-native and ornamental hedgerow

Hedgerow to be planted along eastern boundary.

Size: 14m, *Distinctiveness: Very Low,* *Condition: Poor*

3.4. Baseline units

3.4.1. Habitats

Any discrepancies between the values shown below and the calculations in the metric are due to rounding. The calculations in the metric were completed with unmodified values but rounded to 2 significant figures in the values below for clarity. The values from the metric should be used for any credit purchases.

Table 3: Area habitat summary.

Ref	Habitat	Area (Ha)	BNG units
A-1.1	Urban – Vegetated garden	0.018	0.036
A-1.2	Urban – Developed land; sealed surfaces	0.013	0.00
A-1.3	Urban – Artificial unvegetated, unsealed surfaces	0.0052	0.00
A-1.4	Urban trees	0.0081*	0.065
Total	**4**	**0.036**	**0.10**

* Area not included in total.

Table 4: Linear habitat summary.

Ref	Habitat	Length (m)	BNG units
B-1.1	Non-native and ornamental hedgerow	20	0.020
Total	**1**	**20**	**0.020**

3.5. Post – development units

3.5.1. Habitat creation

Table 5: Area habitat creation summary.

Ref	Habitat	Area (Ha)	BNG units
A-2.1	Urban – Developed land; sealed surfaces	0.0081	0.00
A-2.2	Urban – Vegetated garden**	0.015	0.03
Total	**2**	**0.023**	**0.03**

** Vegetated garden gains cannot be secured

Table 6: Linear habitat creation summary.

Ref	Habitat	Length (m)	BNG units
B-2.1	Non-native and ornamental hedgerow	14	0.014
Total	**1**	**14**	**0.014**

3.6. Habitat change

Table 7: Area habitat change.

Ref	Enhanced Ha	Lost Ha	Retained Ha	BNG unit change
A-1.1	0.00	0.018	0.00	-0.036
A-1.2	0.00	0.00	0.013	0.00
A-1.3	0.00	0.0016	0.0036	0.00
A-1.4	0.00	0.0081*	0.00	-0.065
Total	**0**	**0.020**	**0.017**	**-0.10**

Table 8: Linear habitat change.

Ref	Enhanced m	Lost m	Retained m	BNG unit change
B-1.1	0	20	0	-0.020
Total	**0**	**20**	**0**	**-0.020**

Table 9: Area distinctiveness change.

Distinctiveness	Lost	Created	Trading rules satisfied
Very High	N/A	N/A	N/A
High	N/A	N/A	N/A
Medium	0.06	0.00	**No**
Low	0.04	0.03	**No**

Table 10: Linear distinctiveness change.

Distinctiveness	Lost	Created	Trading rules satisfied
Very High	N/A	N/A	N/A
High	N/A	N/A	N/A
Medium	N/A	N/A	N/A
Low	N/A	N/A	N/A
Very Low	0.02	0.01	**No**

Table 11: BNG breakdown, rounded to 2 decimal places.

Unit Type	a) Base unit	b) Units lost	c) Units created	d) Post unit	e) 10% Target(a*1.1)	f) Net Change (d-a)	g) Unit deficit/surplus (d-e)
Habitat	0.10	0.10	0.03	0.03	0.11	**-0.07**	**-0.08**
Linear	0.02	0.02	0.01	0.01	0.02	**-0.01**	**-0.01**

BNG targets **have not** been met.

Trading standards **have not** been met

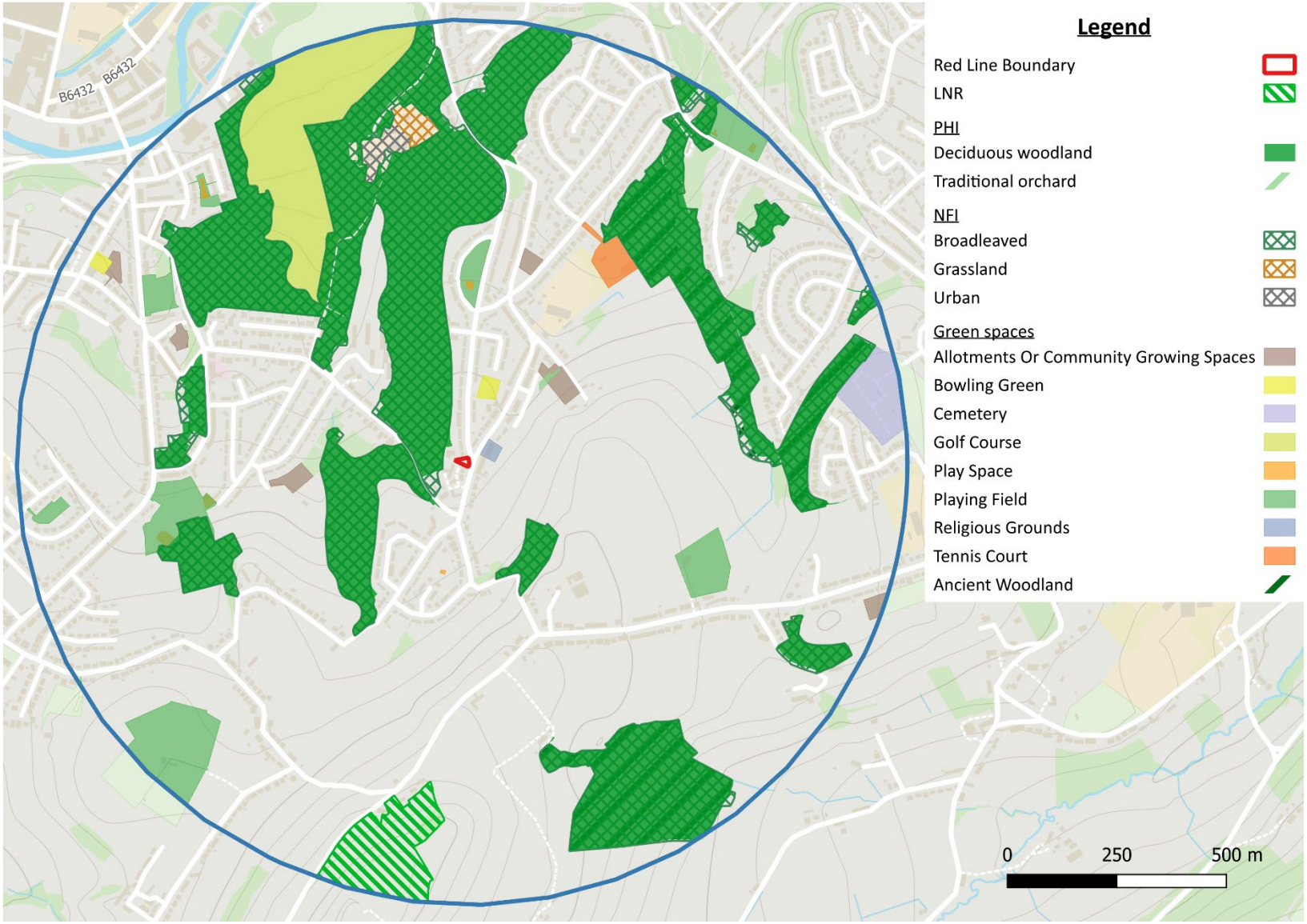

Figure 6: Wider landscape map.

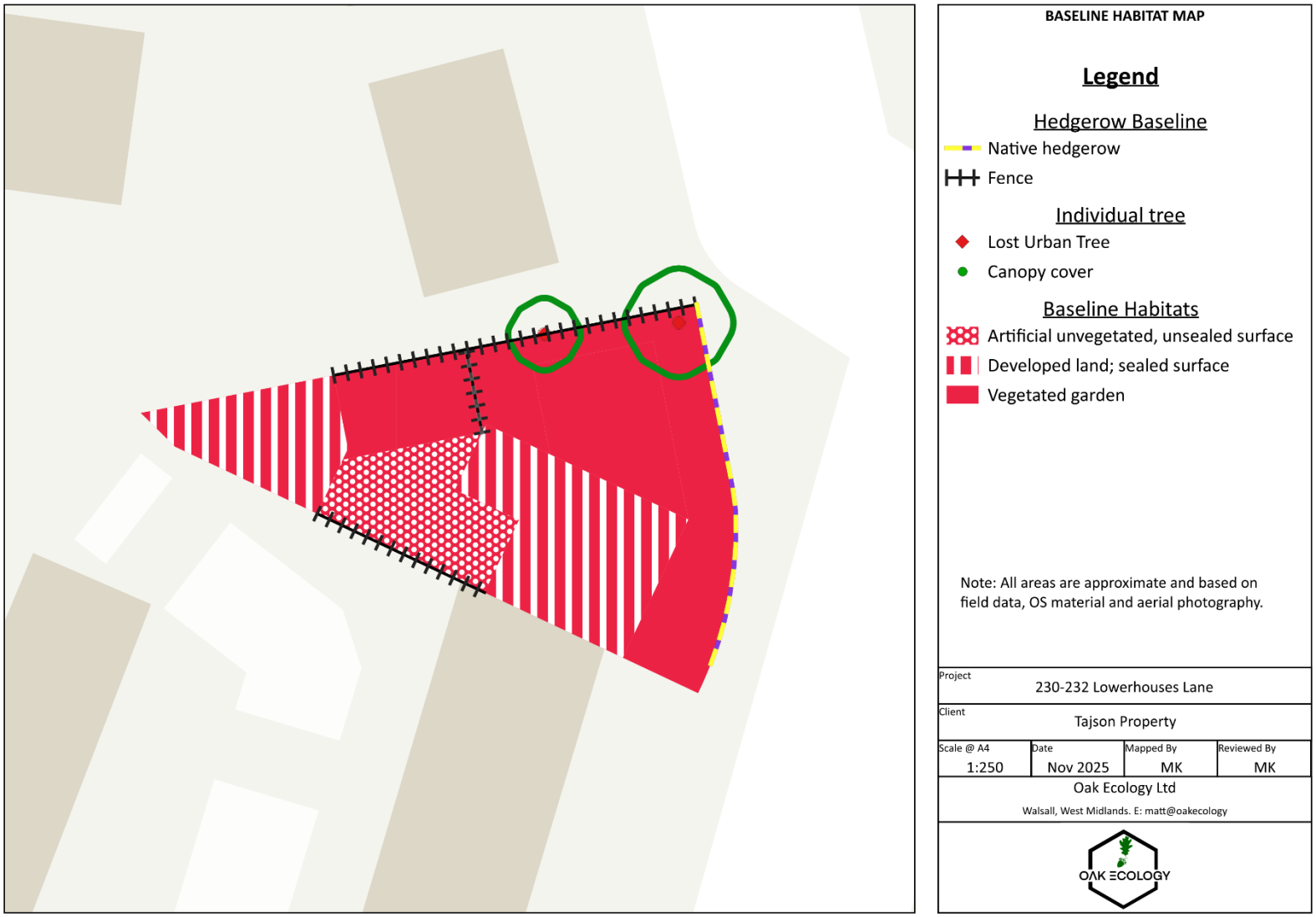

Figure 7: Baseline Habitat Map.

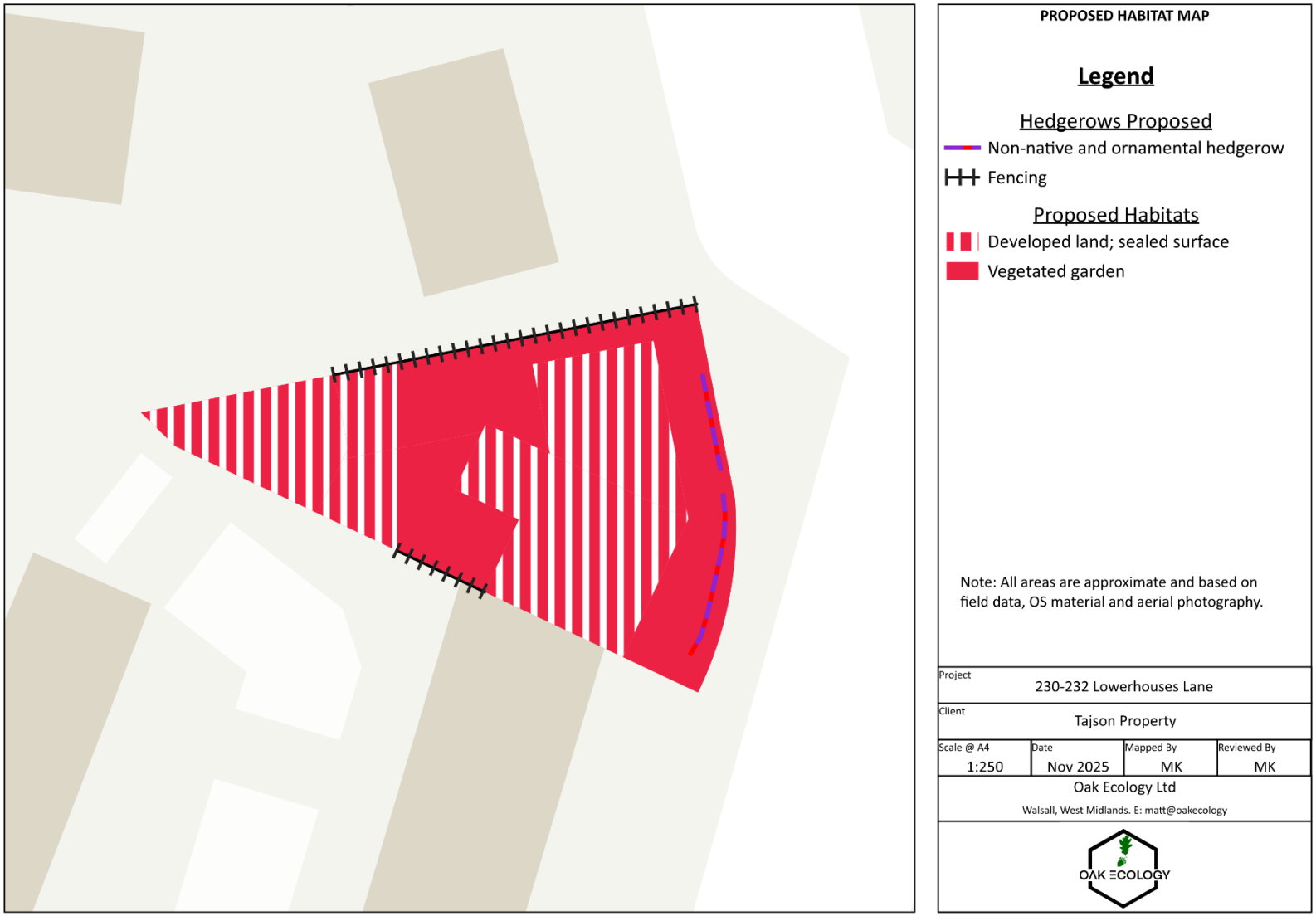

Figure 8: Proposed Habitat map based on clients proposed plans.

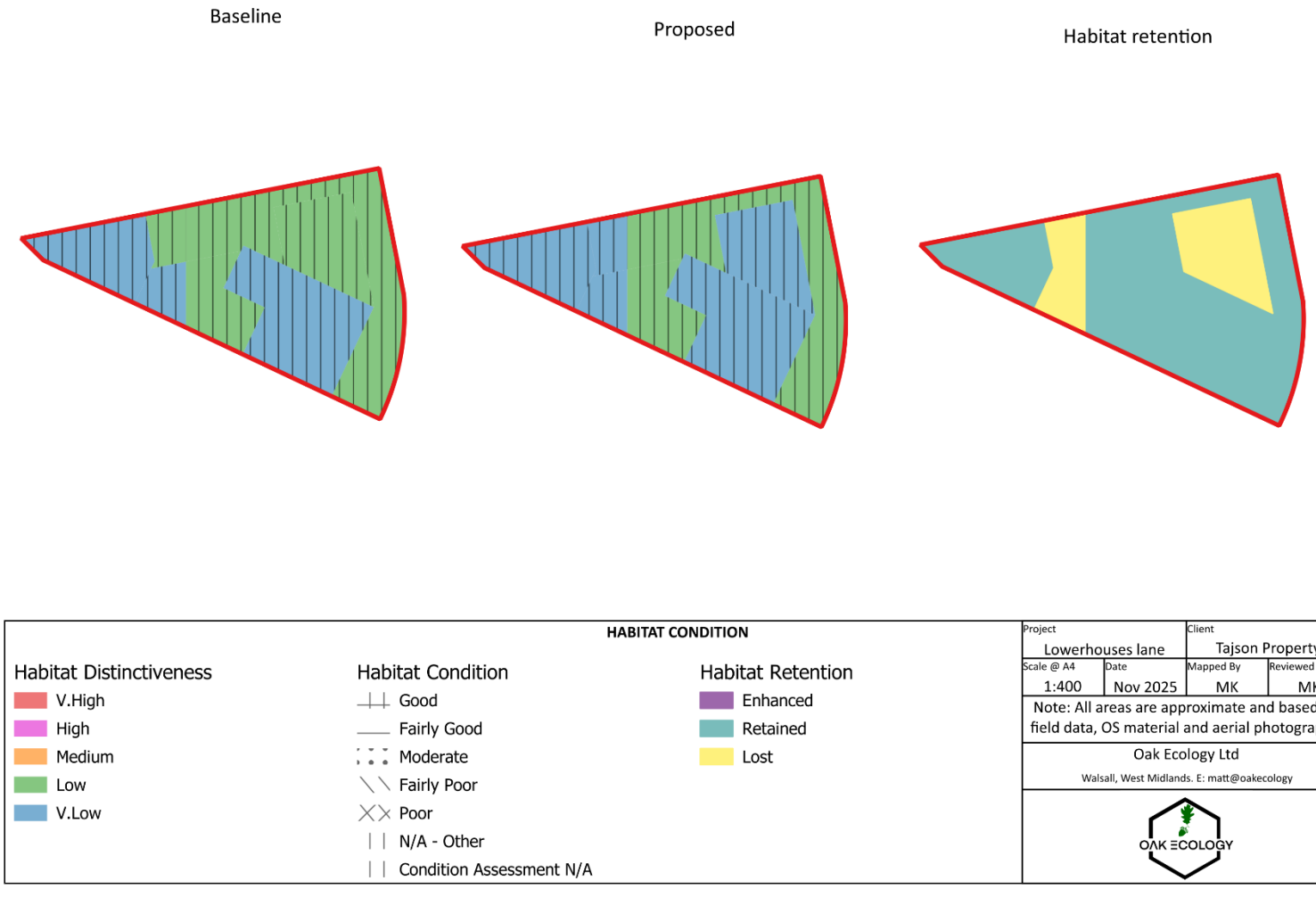

Figure 9: Condition area map.

4. Feasibility of Biodiversity Net Gain

4.1. Area habitats

The site had a baseline BNG unit value of 0.10 and required a total post development unit value of 0.11 to achieve the 10% target. Vegetated gardens gains cannot be secured therefore, cannot receive any enhancements to meet net gains. The post development BNG unit value of the site is 0.03, a 70.90% net loss and deficit of 0.08 BNG units

The site would lose an area of medium and low distinctiveness habitat which would not be replaced with the same or better habitat. Therefore, the trading rules for area habitats **have not** been met.

4.2. Linear habitats

The site had a baseline BNG unit value of 0.02 and required a total post development unit value of 0.02 to achieve the 10% target. Planting non-native and ornamental hedgerow creates a total post-development unit value of 0.01, a 32.45% net loss and deficit of 0.01 BNG units.

The site would loss a section of very low distinctiveness habitat which is not replaced with the same or better habitat. Therefore, the trading rules for linear habitats **have not** been met.

4.3. Conclusion

As the site has not met the BNG targets and the trading rules, the proposed plans do not currently meet all the requirements of BNG and require scheme alterations or securing off-site credits.

A method of achieving the trading rules could be done through purchasing credits through government services or environment banks.

5. Photographs

Figure 10: A-1.1 Vegetated garden (unauthorised degradation.

Figure 11: A-1.2 Developed land.

Figure 12: A-1.3 Artificial unvegetated.

Figure 13: A-1.4 Tree (unauthorised degradation).

Figure 14: B-1.1 Non-native and ornamental hedgerow (unauthorised degradation).

Figure 15: B-1.1 Hedgerow in 2023 (Google Street view, 2025)

6. References

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