

Brooks

Ecological

Grounded advice

The Homestead, Hurst Knowle, Almondbury



Biodiversity Net Gain Assessment

Report Ref. ER-8178-03A

29/05/2025

Highstone Building Services Ltd

Report reference	ER-8178-03A - Biodiversity Net Gain Assessment
Author	Christopher Shaw BSc (Hons), CEcol, MCIEEM Associate Ecologist
Technical Review	Sam Kitching BSc (Hons) MCIEEM Associate Ecologist
QA	Sam Wardle MSci (Hons) Biodiversity Technician
Authorised	Christopher Shaw BSc (Hons), CEcol, MCIEEM Associate Ecologist
Date	29/05/2025
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 Highstone Building Services 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 Highstone Building Services Ltd to carry out a Biodiversity Net Gain (BNG) Assessment of the proposed development Site at The Homestead, Hurst Knowle, Almondbury.
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-8178-01.
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-8178-02. This current report supersedes ER-8178-02 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 0.44ha.
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-8178-01A and should be submitted as part of the application.

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-8178-01 provided alongside this report.

Strategic Significance

- None of the habitats on-Site fall within or close to the WHN, and so all are mapped as 'area/compensation not in local strategy/ no local strategy'.

Irreplaceable Habitat

- Irreplaceable habitats have not been found on-Site

Habitat Degradation¹

- 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 (published 23/07/2024), is provided alongside this assessment, in Excel spreadsheet BM-8178-01A, and may be useful in investigating design options for the Site.

Table 1 Habitat Types.

Habitat	Irreplaceable?	Distinctiveness	Condition	See Condition Assessment sheet
Modified grassland	No	Low	Poor	5A
Bramble scrub	No	Medium	N/A	N/A
Developed Land sealed surface	No	Very low	N/A	N/A
Introduced shrub	No	Low	N/A	N/A
Individual urban trees	No	Medium	Good	9A
Line of Trees (Ecologically valuable)	No	Medium	Moderate	9A

¹ See [Appendices](#) for further information on degradation.

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 2.14 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	N/A	No compensation required.
Low	0.39	Losses must be replaced with area habitat units of the same or higher distinctiveness.
Medium	1.75	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	N/A	Cannot be compensated for.

Hedgerow Unit Score

- 19. The Site has been assessed as having a baseline score of 1.45 Hedgerow Units. These break down as shown in Table 3, below.

Table 3 Hedgerow Units broken down by distinctiveness at this Site.

Distinctiveness	Units	Approach to compensation if lost
Very Low	0	Losses must be replaced with hedgerow units of the same or of a higher distinctiveness.
Low	0	Losses must be replaced with hedgerow units of the same or of a higher distinctiveness.
Medium	1.45	Losses must be replaced with hedgerow units of the same or of a higher distinctiveness.
High	0	Losses must be replaced with hedgerow units of the same habitat type or of a higher distinctiveness.
Very High	0	Losses must be replaced with hedgerow units of the same habitat type.

Post-development value²

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

Proposed habitats

21. Habitats present on-Site post-development have been based on the Landscape plan (Figure 3, opposite) dwg. H24-HS - 016A (Highstone design, May 2025).
22. Planting types specified in the Landscape plan have been assigned a UK Habitat Classification description that best fits the target habitat.
23. Habitats assigned are shown in Figure 3 overleaf.

Condition assessment

24. The condition assessment for each proposed habitat is based on what is realistic and achievable for the Site, based on the Landscape plan.
25. Achieving these conditions scores will be reliant on specific, ecologically-driven management recommendations. These can be outlined in a Biodiversity Enhancement and Management Plan (BEMP) and/or will be set out in a Habitat Management and Monitoring Plan (HMMP), which will be required as a standard condition of planning.

Figure 3 Landscape plan dwg. H24-HS - 016A (Highstone design, May 2025).



² Please see assumptions section at end of report

Post-development habitats

Habitat Score

26. The Site has been assessed as having a post-development score of 0.77 Habitat Units.
27. This score is based on our interpretation of the Landscape Masterplan, as shown in Figure 4 opposite.
28. Calculations for the change in Habitat Units have been based on the entire Site being cleared of existing habitats and land reprofiled, which results in the loss of 2.08 Habitat Units present pre-development. The only retained feature is the ecologically valuable line of trees and introduced shrubs encircling the site.
29. Post-development calculations include Habitat Units gained through the creation of wildflower rich grassland in communal spaces, and private vegetated gardens.
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 hedgerows are to be planted and are classed here as *native hedgerows* in moderate condition and non-native ornamental hedgerows.
32. The loss of Medium-distinctiveness *bramble scrub* and *individual trees* is not compensated for by the creation of new habitats on-Site (ONG, *modified grassland* and *vegetated garden*). This means that the trading rule cannot be satisfied. Explanation of this and the implications in terms of Units required is set out overleaf.

Figure 4 Post-development habitats.



Change in Unit Value

- 33. The Statutory Metric has been used to calculate the net unit change for the Site; this has been predicted an overall net loss of 1.37 Habitat Units (-63.95%) and a gain of 0.15 Hedgerow Units (10.46%)³.
- 34. A copy of the Statutory Biodiversity Metric Calculation Tool Excel spreadsheet (ref. BM-8178-01A) and Condition Assessment sheets (CA-8178-01) have been provided with this report and should be submitted digitally as part of the application.

Trading Rules

- 35. Habitat types are separated out into distinctiveness categories (Very Low to Very High) which dictate what mitigation/compensation is required for their loss. This is assessment is separate to the 'net unit change' score quoted above.
- 36. To satisfy Trading Rules, specific mitigation is only required for the loss of Medium distinctiveness habitat types and above. Trading Rules will automatically be satisfied for the loss of any Low distinctiveness habitat types once a no net loss position is reached. For the scheme assessed here, specific compensatory units will need to be generated from the broad Habitat Types outlined in table opposite.

Requirements for Planning

- 37. There is mandatory requirement for all developments to demonstrate at least a 10% net gain in each unit measurement, as well as to satisfy Trading rules. A standard planning condition will be imposed on all decision notices to ensure this is met.
- 38. To achieve this here, a further **1.64 Habitat Units** will need to be generated within the broad habitats shown in Table 5. In meeting the Trading Rules, the required 10% net gain will be achieved.
- 39. 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 before submission to the LPA. A

³Our 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 latest version of DEFRA's Biodiversity Metric Tool, the UK Habitats Classification, and relevant guidance. This assessment requires subjective judgments to be made in terms of habitat type and

Net Gain Plan and Habitat Monitoring and Management Plan are likely to be required to discharge relevant pre-start planning conditions.

- 40. Provision should be made by the LPA and developer to secure the necessary gains through legal agreement - planning condition (for on Site gains), planning obligation or conservation covenant (for off-Site gains) - see further information section at the end of the report for more information on this.
- 41. A 30-year Habitat Monitoring and Management Plan (HMMP) may be required to discharge relevant pre-start planning conditions.

Figure 5 Biodiversity Metric Summary.

FINAL RESULTS				
Total net unit change <small>(Including all on-site & off-site habitat retention, creation & enhancement)</small>	Habitat units	-1.37		
	Hedgerow units	0.15		
	Watercourse units	0.00		
Total net % change <small>(Including all on-site & off-site habitat retention, creation & enhancement)</small>	Habitat units	-63.95%		
	Hedgerow units	10.46%		
	Watercourse units	0.00%		
Trading rules satisfied?		No - Check Trading Summaries ▲		
Unit Type	Target	Baseline Units	Units Required	Unit Deficit
Habitat units	10.00%	2.14	2.35	1.58
Hedgerow units	10.00%	1.45	1.59	0.00
Watercourse units	10.00%	0.00	0.00	0.00

Table 4 Trading rule summary

Distinctiveness	Broad Habitat Type	Habitat Units required
Medium*	Heathland and Shrub	0.15
Medium*	Individual Trees	1.49
Total Units		1.64 Units

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

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.

Assumptions

42. 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>

	Factor	Information Required
	<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>	

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/>

Ministry of Housing, Communities & Local Government. 2024. *National Planning and Policy Framework*. London: Her Majesty's Government. [Online]. Available from: <https://assets.publishing.service.gov.uk/media/675abd214cbda57cacd3476e/NPPF-December-2024.pdf>

The Statutory Biodiversity Metric User Guide. 2024. 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). 2024. 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 Condition Assessments. 2024. 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-8178-01A - Statutory Biodiversity Metric Calculation Tool
- CA-8178-01 - Statutory Biodiversity Metric Condition Assessments
- ER-8178-01 - Preliminary Ecological Appraisal

Habitat degradation

Within Schedule 14 of the Environment Act, which sets out the biodiversity gain condition for development, measures are included that allow planning authorities to recognise any habitat degradation since **30th January 2020** and to take the earlier habitat state as the baseline for the purposes of biodiversity net gain. In order to ascertain the habitats present and their condition on 30th January 2020, aerial imagery or data sets from that time could be used. 30th January 2020 is the relevant date as it was the day the Bill entered Parliament.

In 2023, the Levelling Up and Regeneration Act 2023 (LURA), introduced additional wording further tightening the law regarding degradation by extending the circumstances in which degradation can be addressed. This wording covered both authorised and unauthorised activity on onsite and offsite habitats, on or after **25th August 2023**.

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>Clearance of the Medium-distinctiveness habitats - namely the bramble scrub, individual trees and ecologically valuable line of trees - should be avoided wherever possible, and minimised where it is not avoidable.</p> <p>It should be possible to retain the line of trees along the site boundary, given their positioning. Should any of these trees be removed, they would need to be mapped as individual trees, which would then increase the baseline Habitat Unit score.</p> <p>Individual trees within the Site may be harder to retain, but every effort should be made during the design process.</p>	<p>The line of trees situated along the Site boundary is shown as retained on the Landscape plan provided, although four of the trees along the southern boundary are shown as removed and thus are mapped separately as Individual trees.</p> <p>All other trees and baseline habitats are shown as lost under the proposals.</p>	<p>Landscape Masterplan</p> <p>Arboricultural Impact Assessment</p>
<i>then</i> Enhance	<p>Retained habitats on-Site should be enhanced where possible as an important source of Habitat Units post-development.</p> <p>The bramble scrub presents the greatest opportunities for enhancement, as this is currently in Poor condition. By planting this up with native woody species, the scrub could be enhanced to 'Mixed Scrub' in moderate condition.</p>	<p>It is not feasible to enhance the retained Line of Trees.</p>	
<i>then</i> Create	<p>Any 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, tree planting and native scrub creation.</p> <p>A score will also be generated from more ornamental landscaping, such as standard amenity grassland and ornamental shrubs.</p>	<p>New habitats have been proposed within communal gardens, including individual trees, hedgerows, flowering lawns and wildflower grassland.</p>	<p>Landscape Masterplan</p>
<i>then</i> Offset	<p>If a 10% Net Gain cannot be achieved on-Site, any remaining deficit will need to be compensated for off-Site.</p>	<p>A net loss in Habitat Units has been predicted on Site; offsetting will be required in order to achieve a 10% net gain position.</p>	