



Biodiversity Net Gain Assessment

Report Ref. ER-8242-02

16/06/2025

Woodhouse Hill Surgery

Report reference	ER-8242-02 - Biodiversity Net Gain Assessment
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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.



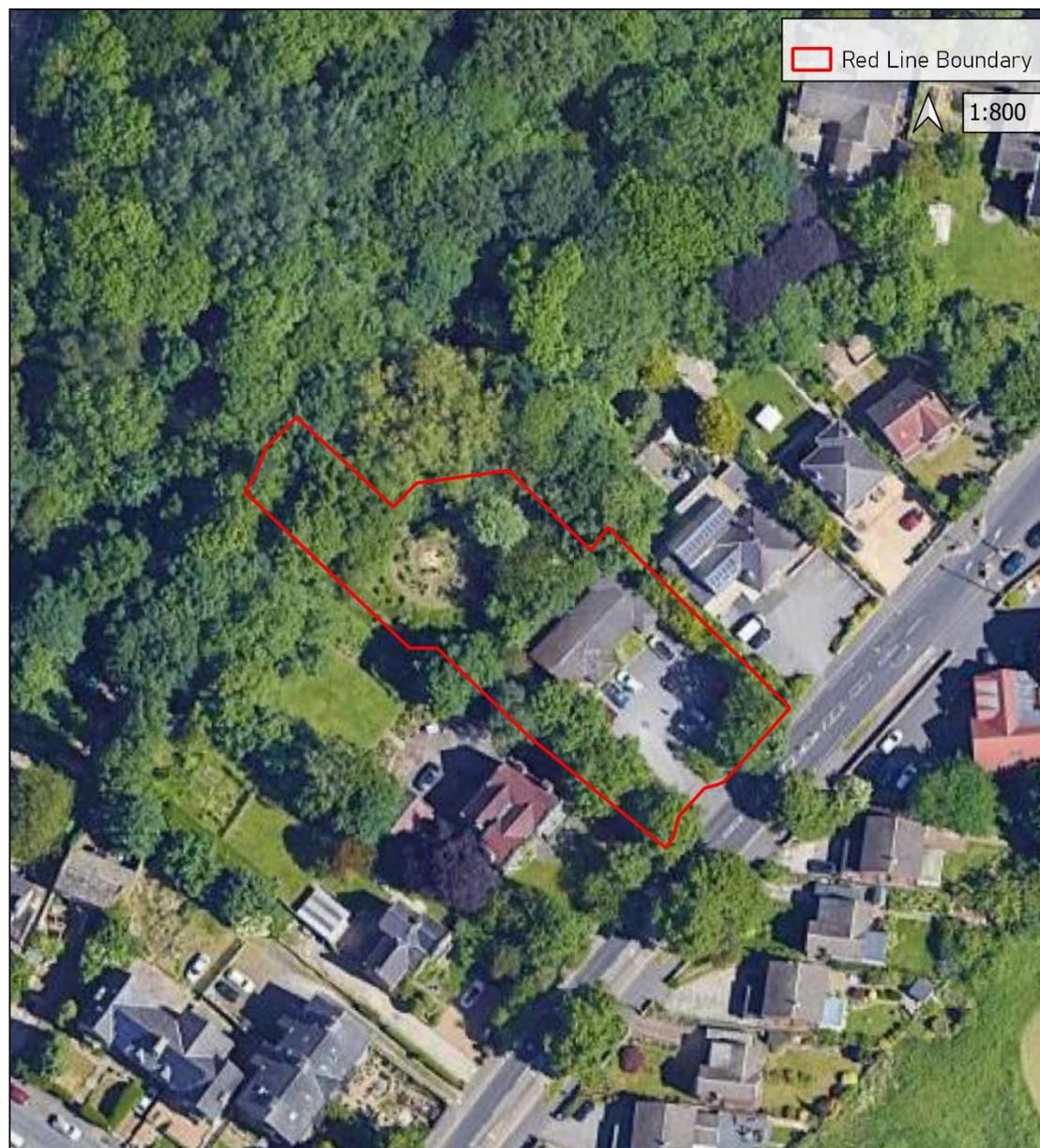
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Introduction

1. Brooks Ecological Ltd was commissioned by Woodhouse Hill Surgery to carry out a Biodiversity Net Gain (BNG) Assessment of the proposed development Site at Woodhouse Hill Surgery, 71A Woodhouse Hill, Huddersfield HD2 1DH, grid reference SE 15205 18974.
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-8242-01.
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 this report.
5. Following the PEA survey, the red line boundary was amended to exclude areas of scrub, woodland, the pond, and some individual trees, as detailed in report ER-8242-01.
6. 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.
7. For the purposes of metric calculations, the Site area has been measured using GIS against the provided red line boundary as 0.20ha.
8. 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-8242-01, and should be submitted as part of the application.

Figure 1 Extent of BNG assessment (red line boundary).



Pre-development baseline

Habitats identified

9. 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

10. Habitat condition has been assessed as part of the Preliminary Ecological Appraisal of the Site.
11. Information on condition assessments is provided in the Excel spreadsheet CA-8242-01 provided alongside this report.

Strategic Significance

12. Part of the Site lies within (i.e. woodland, rhododendron scrub) or adjacent to (neutral grassland, introduced shrubs) the Kirklees Wildlife Habitat Network, and so is mapped as 'formally identified in local strategy' or 'location ecologically desirable but not in local strategy'. The vegetated garden, introduced shrubs and individual tree within the vegetated garden have been excluded as in private ownership and/or their low contribution value to the network.

Irreplaceable habitat

13. Irreplaceable habitats have not been found on-Site.

Habitat Degradation¹

14. An area of vegetation has been cleared to enable Site investigation. No tree stumps were present, leaf litter and surrounding habitats strongly suggested rhododendron/cherry laurel scrub prior to clearance, and thus the area was mapped and

recorded as such (cross reference PEA report ER-8242-01, Figure 9).

Biodiversity Metric

15. Habitat types, conditions, and areas have been entered into the Statutory Biodiversity Metric Calculation Tool, alongside information on their strategic significance.
16. The Statutory Biodiversity Metric Calculation Tool (published 23/07/2024), is provided alongside this assessment, in Excel spreadsheet BM-8242-01, and may be useful in investigating design options for the Site.

Table 1 Habitat Types.

Habitat	Irreplaceable?	Distinctiveness	Condition	See Condition Assessment sheet
Other neutral grassland	No	Medium	Poor	6A
Rhododendron scrub	No	Low	N/A	N/A
Developed land; sealed surface	No	Very Low	N/A	N/A
Introduced shrub	No	Low	N/A	N/A
Vegetated garden	No	Low	N/A	N/A
Other woodland; broadleaved	No	Medium	Moderate	24A
Urban trees (9 medium, 6 small)	No	Medium	Moderate	9B

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

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

Habitat Unit Score

19. The Site has been assessed as having a baseline score of 1.99 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	0.22	Rhododendron scrub, vegetated garden, introduced shrub. 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	1.77	Other broadleaved woodland, other neutral grassland, individual trees. <u>Cannot</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 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 value²

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

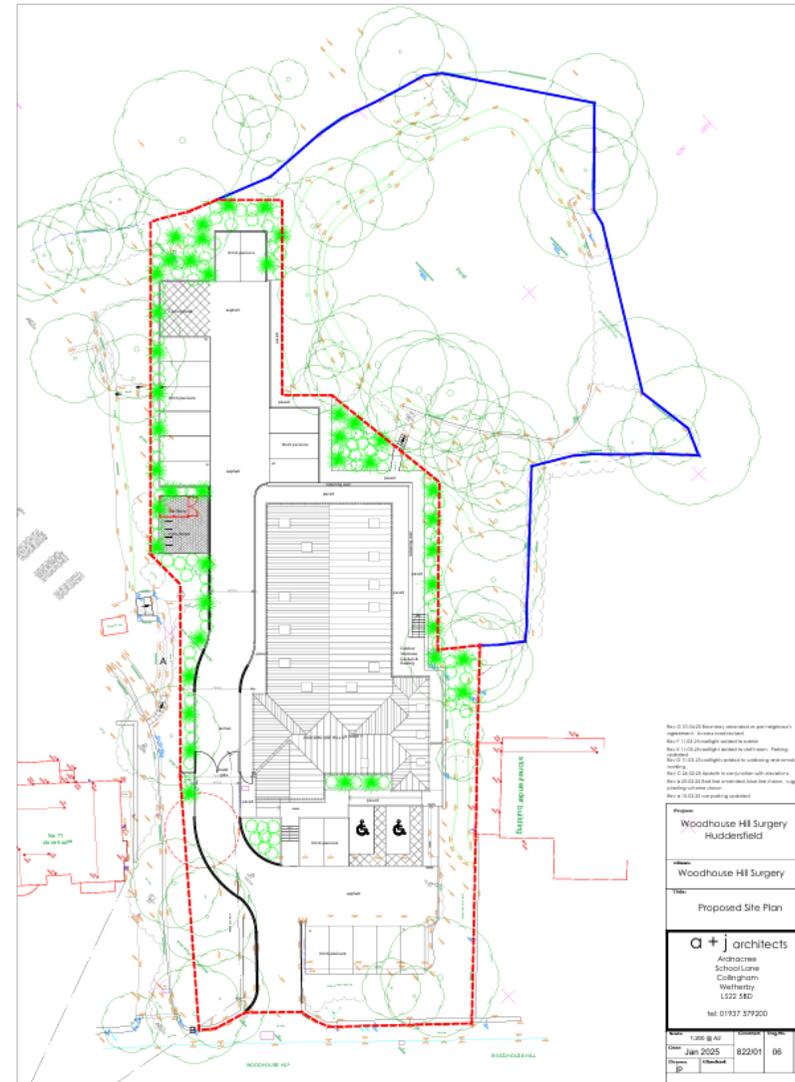
Proposed habitats

21. Habitats present on-Site post-development have been based on the Proposed Site Plan 06G (Figure 3, opposite) (a + j Architects, January 2025).
22. Planting types will consist of shrubs (of unknown species at time of writing), and have been assigned a UK Habitat Classification description that best fits the target habitat.
23. Habitats assigned are shown in Figure 4 overleaf.

Condition assessment

24. Retained trees are expected to remain in their current condition.
25. Remaining post-development habitats created will consist exclusively of introduced shrubs, which are not subject to condition assessments and therefore management recommendations are not relevant in the context of BNG/ecological assessments. A Biodiversity Enhancement and Management Plan (BEMP) and/or a Habitat Management and Monitoring Plan (HMMP) are therefore not expected to be required as a standard condition of planning.

Figure 3 Proposed Site Plan 06G (a+j architects, January 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 0.75 Habitat Units.
27. This score is based on our interpretation of the Proposed Site Plan, as shown in Figure 4 opposite.
28. Calculations for the change in Habitat Units have been based on the clearance of the woodland, other neutral grassland, and the loss of 9 individual trees (4 small, 5 medium), as well as loss of small areas of introduced shrubs, and rhododendron scrub, altogether amounting to a loss of 1.25 units.
29. Remaining areas include the expected retention of 6 individual trees (2 small, 4 medium) as well as existing areas of introduced shrub, totalling 0.71 Habitat Units.
30. Post-development calculations also include Habitat Units gained through the creation of small areas of introduced shrubs, contributing a total of 0.04 Habitat Units.
31. New buildings, footpaths and car parking areas have all been mapped as *developed land; sealed surface*, which contribute no Habitat Units to the post-development score.
32. The loss of Low-distinctiveness *introduced shrub* and *rhododendron scrub* as well as Medium-distinctiveness *individual trees*, *other neutral grassland* and *other broadleaved woodland*, is not compensated for by the creation of new habitats on-Site (*introduced shrubs*). 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.



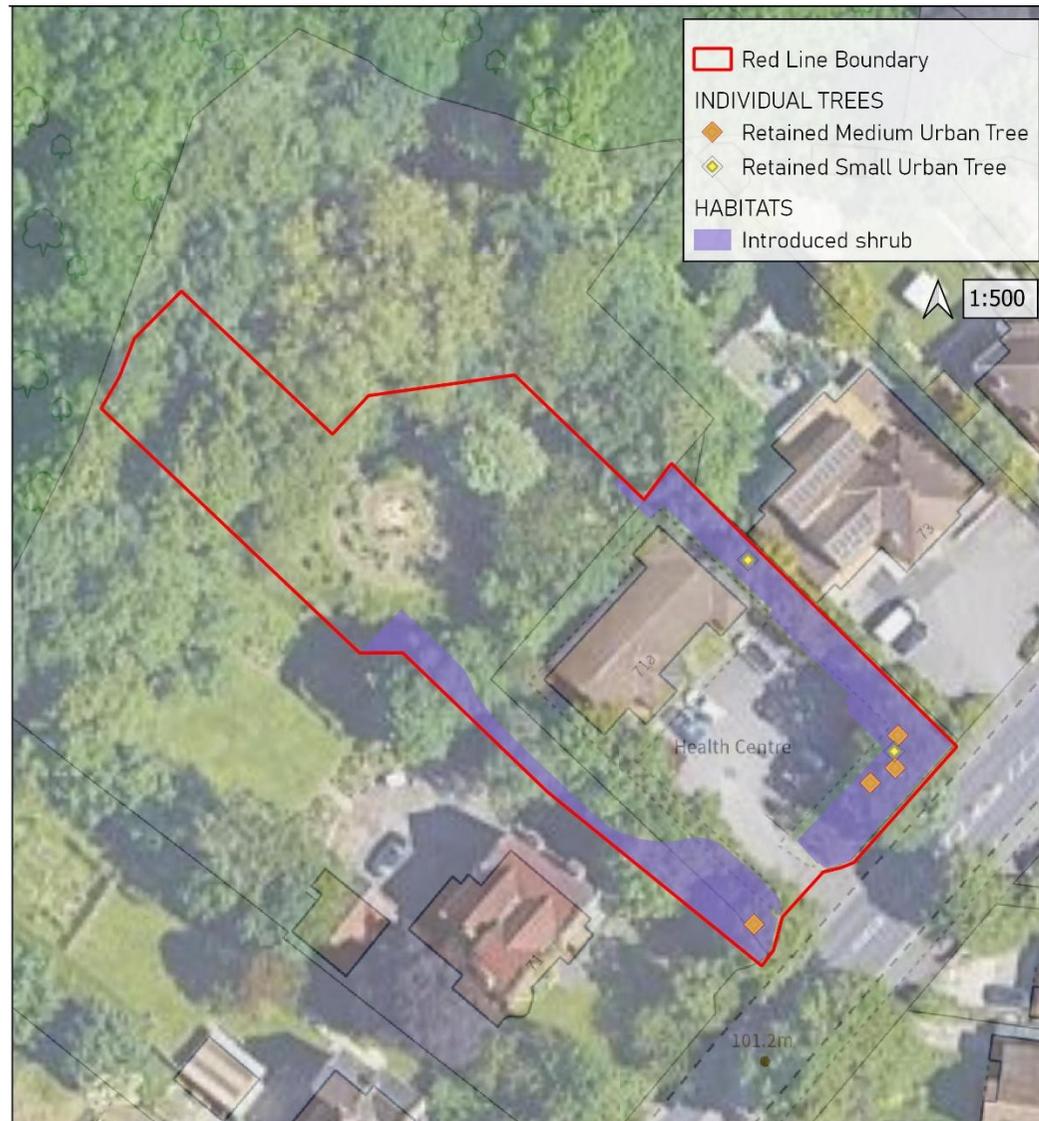
Habitat Retention

33. The plan opposite shows the areas and individual trees 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.
34. 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.
35. 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

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

Figure 5 Habitat retention.



Change in Unit Value

- 37. The Statutory Metric has been used to calculate the net unit change for the Site; this has been predicted an overall net loss of 1.25 Habitat Units (-62.62%).
- 38. A copy of the Statutory Biodiversity Metric Calculation Tool Excel spreadsheet (ref. BM-8242-01) and Condition Assessment sheets (CA-8242-01) have been provided with this report and should be submitted digitally as part of the application.

Trading Rules

- 39. 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.
- 40. 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

- 41. 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.
- 42. To achieve this here, a further **1.45 Habitat Units** will need to be secured, with at least 1.13 Habitat Units generated within the broad habitats shown in Table 3.
- 43. 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.

Figure 6 Biodiversity Metric Summary.

FINAL RESULTS		
Total net unit change <small>(Including all on-site & off-site habitat retention, creation & enhancement)</small>	<i>Habitat units</i>	-1.25
	<i>Hedgerow units</i>	0.00
	<i>Watercourse units</i>	0.00
Total net % change <small>(Including all on-site & off-site habitat retention, creation & enhancement)</small>	<i>Habitat units</i>	-62.62%
	<i>Hedgerow units</i>	0.00%
	<i>Watercourse units</i>	0.00%
Trading rules satisfied?		No - Check Trading Summaries ▲

Table 3 Trading rule summary

Distinctiveness	Broad Habitat Type	Habitat Units required
Medium*	Woodland	0.23
	Grassland	0.04
	Trees	0.86
Total Units		1.13

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

Assumptions

44. 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>Given the small areas of habitat to be created and being limited to introduced shrub, we have assumed that these will be created within a year of the rest of the development at most. Calculations will need to be re-run if changes to the project plan result in a change to this figure.</p>	<p>Please confirm should timescales for the period between loss of habitat (Site clearance) and the completion of new on-Site habitat areas result in a delay beyond a year.</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 (e.g. introduced shrub) 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>Retention of areas of introduced shrub and individual trees has been based on the Proposed Plans 06G. It has been assumed that these habitats will not be impacted by the development in any way, included during its construction phase.</p>	<p>Please confirm as soon as possible should these assumptions prove untenable or should plans change, as this will impact on the BNG score.</p> <p>Identify any areas of temporary impacts - if any. These may be impacted as long as they can be returned to the same habitat within 2 years.</p>
4	<p><u>Other limiting factors</u></p> <p>As established in our PEA assessment (report reference ER-8242-01) ecological factors other than BNG considerations apply to the Site, including considerations with regards to badgers, nesting birds and invasive species prior to Site clearance, and potentially bats and great crested newts (surveys on-going at the time of this report).</p> <p>The PEA established that the woodland is unlikely to fall within a priority habitat type, however several areas have been mapped as part of the Kirklees Wildlife Habitat network. The LPA may require specific mitigation or compensatory measures to offset the impacts the development will incur on these areas.</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>	<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"> • 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 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-8242-01 - Statutory Biodiversity Metric Calculation Tool
- CA-8242-01 - Statutory Biodiversity Metric Condition Assessments
- ER-8241-01 - 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	Clearance of the Medium-distinctiveness habitats - namely other broadleaved woodland, other neutral grassland and individual trees - should be avoided wherever possible, and minimised where it is not avoidable.	The red line boundary was reduced to exclude as much of the broadleaved woodland as possible, four individual trees, and the entirety of the pond. Six individual trees located within the updated red line could be retained, out of a total of 15.	See PEA ER-8242-01 for original site boundary, encompassed as blue line in plans 'Proposed Site Plan 06G' (a+j architects, January 2025).
<i>then</i> Enhance	Retained habitats on-Site should be enhanced where possible as an important source of Habitat Units post-development. The majority of the modified grassland (poor and moderate condition) and mixed scrub (poor condition), present the greatest opportunities for enhancement.	Enhancement options are limited under the current design. Options to improve the condition of adjacent (blue line) pond and woodland were considered but condition assessment thresholds could not reasonably be reached. Plans to improve the pond's turbidity are however under consideration which will likely provide considerable biodiversity benefits to the ponds itself as well as surrounding woodland, despite the lack of BNG units this would generate.	Proposed Site Plan 06G (a+j architects, January 2025).
<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.	Introduced shrub is to be created with native species favoured over non-natives. Scope for further habitat creation and associated management commitments were not feasible for this Site.	Proposed Site Plan 06G (a+j architects, January 2025).
<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.	Off-site biodiversity units are to be purchased.	N/A