



Re: Ecological Statement of Biodiversity Net Gain – Baseline

Old Water Hall,
29 Huddersfield Road,
Mirfield,
WF14 8AE

FAO: Heneghan Architecture

17th October 2025

In relation to the above site, a survey was conducted on the 24th of September 2025 to assess the biodiversity baseline of the proposed development area. The Statutory Metric was used to provide advice regarding the indicative post-development application with respects to the 10% net gain requirements.

The survey site covers an approximate area of 0.869 hectares and comprises a mix of buildings, vegetated garden areas, modified grassland, scattered trees, a section of native hedgerow, and areas of bramble scrub. The site forms part of a private property with maintained garden areas immediately surrounding the buildings, transitioning into more informally managed and currently disused land toward the wider boundaries.

The baseline survey was conducted within the growing season (April to September inclusive); therefore, condition assessments were able to be conducted. No limitations were observed during the baseline assessment.

The site has a calculated baseline value of **7.77 habitat units** and **0.17 hedgerow units**, with no watercourse units recorded within the site boundary. Although no watercourse habitats are present on-site, a canal and its associated banks are located approximately 10 metres south of the boundary. It is essential that this buffer is maintained to preserve the ecological integrity of the adjacent habitat and ensure the validity of the Biodiversity Net Gain assessment. No irreplaceable habitats were identified within the baseline survey area.

The baseline units can be divided into the following habitats:

Area Habitats	Condition assessment	Strategic Significance	Area Size (ha) (4.dp)	Baseline Units (2.dp)
Building (u1b5)	N/A	None	0.0285	0.00
Developed Land Sealed Surface (u1b)	N/A	None	0.0722	0.00
Bramble Scrub (h3d)	N/A	None	0.0134	0.05
Modified Grassland (g4)	Poor: Failing critical criterion A	None	0.5539	1.11
Ruderal or ephemeral (u, 81)	Poor: Failing criteria A and B	None	0.0343	0.07
Vegetated garden (u, 828)	N/A	None	0.1671	0.33
Individual Trees – Urban (u, 32)	Good, failing only criterion D	Formally Identified	One X-large tree	1.06
Individual Trees – Urban (u, 32)	Good, failing only criterion D.	Formally Identified	Three large trees	1.52



Individual Trees – Urban (u, 32)	Moderate, passing criteria A, B, E and F.	Formally Identified	Twenty medium trees	3.00
Individual Trees – Urban (u, 32)	Moderate, passing criteria A, B and F. <small>*trees of a small size within the vegetated garden were not included within the assessment in alignment with BNG guidelines</small>	Formally Identified	Seventeen small trees	0.64
Total:			0.8694	7.77

To achieve the target 10% net gain for area habitat units, the site post-development will need to have a biodiversity value of 8.55 units, minimum. The site will also need to provide 0.19 linear (hedgerow) units, minimum.

To satisfy the requirements of the Trading Rules, the proposal must demonstrate no net loss of biodiversity units for medium-distinctiveness habitats that are not offset by habitats within the same broad habitat group or of a higher distinctiveness value. For this application, this requirement specifically applies to:

- **6.21 area habitat units** associated with the *Individual Tree* habitat type,
- **0.05 area habitat units** associated with *Heathland and Shrub (scrub)*, and
- **0.17 hedgerow (linear) units** of a low distinctiveness.

These habitats must be appropriately replaced or enhanced within the proposed scheme or compensated for through equivalent or higher distinctiveness habitat creation to ensure compliance with Biodiversity Net Gain (BNG) trading principles.

Indicative Habitat Requirements

At this outline stage, review of the indicative post-development layout has been reviewed to predict whether achieving 10% net gain and satisfying the trading summaries on site is achievable.

To balance the trading summaries and ensure no net loss of biodiversity for specific habitat groups, the following indicative habitat provisions are required as a minimum:

- **Tree Provision:** Based on the indicative site layout, a substantial number of existing trees are proposed for retention. From the baseline map and illustrative scheme, it is estimated that 38 out of 41 trees would be retained. Using this information, approximately 24 newly planted native trees (equivalent to 0.0977 habitat units) would be required to achieve a position of no net loss. This calculation is indicative and based on the outline design; it should be reviewed and refined as the detailed scheme and planting proposals are developed.
- **Mixed Scrub:** Based on the indicative scheme, it appears that areas of bramble scrub will be lost. To achieve no net loss, it is estimated that a minimum of 0.009 habitat units, equivalent to approximately 90 m², of mixed native scrub should be created within or adjacent to the proposed habitat zones. This provides an indicative figure for compensation and can be refined once the detailed design is developed.
- **Native Hedgerow:** Based on the indicative scheme, it appears that some hedgerow will be lost. While detailed calculations have not been undertaken at this stage, it is expected that the lost hedgerow will need to be replaced. Opportunities for



reinstatement have been identified to the north of the site and potentially elsewhere within the scheme layout.

This assessment is indicative at this stage but demonstrates that appropriate mitigation and replacement planting can feasibly be delivered within the development to provide a balanced outcome in biodiversity terms. The measures outlined—retention and replacement of trees, scrub, and hedgerow—are intended to **offset losses and balance the trading summaries**, rather than to achieve a formal 10% Biodiversity Net Gain.

Based on the extent of proposed habitat zones and available open green space within the current layout, the site is considered to have sufficient capacity for on-site habitat compensation. A detailed landscaping and habitat creation scheme will be required at the reserved matters stage to confirm the precise habitat types, quantities, and management measures necessary to deliver the required biodiversity compensation.

The retention of significant existing trees, combined with proposed replacement planting, indicates that achieving a substantial proportion of the required BNG on-site is feasible, subject to careful design and implementation at the detailed stage.

Once a detailed post-development landscaping plan is completed, a full BNG assessment can be finalised and the percentage net gain for the project calculated.

If after the full assessment of the proposed post-development landscaping scheme providing the biodiversity unit requirements are deemed not to be possible using the onsite areas with the current proposed scheme, suitable offsetting providers such as the LPA, Local Wildlife Trusts, the Environment Bank, or any other should be consulted to discuss whether offsetting is achievable. If offsetting is not achievable for the required units, a S106 agreement may be achievable following discussions with the LPA.

Should the redline area of the application area change from as assessed, the BNG should need to be revised to match.

Yours faithfully,

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Junior Ecologist



Appendix One: Baseline Used within the Metric Calculations.





Appendix Two: Indicative Outline Post-Development Scheme

