



**Former Dewsbury Arena, Land At Boothroyd Lane,  
Dewsbury, West Yorkshire, WF13 2LF**

**Biodiversity Net Gain Report**

## Document Control

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<b>Author:</b>	CJM BSc (Hons), MSc
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## Contents

1. Summary.....	4
2. Introduction .....	5
Background .....	5
Relevant Documents .....	5
Site Description .....	5
Development Proposals .....	5
Planning status of project, certainty of design and assumptions made .....	5
Aims, Objectives & Scope .....	5
Planning Policy and Legislation.....	6
3. Methodology .....	7
Personnel.....	7
Desk Study .....	7
Important Ecological Features .....	7
Field Survey.....	7
UKHab & Condition Assessment Survey.....	7
Biodiversity Net Gain Metric Calculation .....	7
Classification and Measurement of Habitats .....	8
Strategic Significance .....	8
Bespoke Compensation Agreed for Unacceptable Losses .....	9
Temporal Multiplier .....	9
Limitations.....	10
4. Results .....	11
Baseline Habitats.....	11
Proposed Design .....	16
Biodiversity Metric Results .....	18
5. Conclusion .....	19
6. References.....	20
7. Figures .....	21
Appendix 1: Planning Policy & Legislation Summary .....	22
National Planning Policy Framework 2024.....	22
The Environment Act 2021 .....	23
Appendix 2: Photographs.....	24

## Tables

Table 1: Summary .....	4
Table 2: On Site Habitat Baseline Areas .....	12
Table 3: Condition Assessment – Medium Distinctiveness Grassland (Adapted from Defra, 2025)....	13
Table 4: Condition Assessment – Woodland Habitat Type (Adapted from Defra, 2025) .....	14
Table 5: Condition Assessment – Individual Trees (Adapted from Defra, 2024).....	15
Table 6: On Site Habitat Creation .....	17
Table 7: Summary of Biodiversity Metric Output.....	18

## Figures

Figure 1: Site Location Plan (Overleaf).....	21
Figure 2: Baseline Habitat Plan (Overleaf) .....	21
Figure 3: Baseline Habitat Condition Plan (Overleaf) .....	21
Figure 4: Baseline Habitat Retention Plan (Overleaf).....	21
Figure 5: Proposed Habitat Plan (Overleaf).....	21
Figure 6: Proposed Habitat Condition Plan (Overleaf) .....	21

# 1. Summary

*Table 1: Summary*

Report Purpose	The objective of the present Biodiversity Net Gain (BNG) report is to provide an assessment as to whether the proposed development can deliver BNG or not for the design option(s) being considered.
Methodology	<ul style="list-style-type: none"> <li>• A UKHab and condition assessment survey was carried out of the site on the 6<sup>th</sup> June 2025 with reference to best practice guidelines by a suitably qualified ecologist.</li> <li>• A biodiversity metric calculation was made, using the prevailing biodiversity metric calculation spreadsheet at the time of writing (DEFRA Statutory Metric).</li> </ul>
Results & Conclusions	<p>Following best practice guidelines for use of the Statutory Biodiversity Metric, assessment has shown a total net loss post-development of -1.24 habitat units (-65.51%), this equates to a deficit of 1.42 habitat units below the biodiversity net gain target of 10%. Trading rules were not satisfied.</p> <p>It is considered that the on-site delivery of the 1.42 habitat units to deliver a 10% net gain would not be feasible. It is therefore recommended that off-site habitat compensation options are explored, such as exploring habitat creation/enhancement on land also under the ownership of the applicant, or via purchasing the biodiversity units from a third-party habitat bank.</p>

## 2. Introduction

### Background

- 2.1. Elton Ecology Ltd was commissioned by Horizon Healthcare Homes Ltd to conduct a Biodiversity Net Gain (BNG) Study of the site known as Former Dewsbury Arena, Land At Boothroyd Lane, Dewsbury, West Yorkshire, WF13 2LF, hereinafter referred to as 'the site'.

### Relevant Documents

- 2.2. The present assessment has been informed by the following documents:
- Plan No 24-0131 (Received via email: 8<sup>th</sup> July 2025)
  - Topographical Survey (Drawing No: HW HSC 001A) (Urban Contours, 31<sup>st</sup> March 2025)
  - Site Layout (Received via email: 15<sup>th</sup> April 2025)
  - Assessment of Existing Trees (Drawing No. 1 Rev A) (Martin F Holland, April 2025)
  - Landscape Proposals (Drawing No. 2 Rev A) (Martin F Holland, April 2025)

### Site Description

- 2.3. The site is located at Boothroyd Lane, Dewsbury, West Yorkshire, WF13 2LF (Figure 1: Site Location Plan) (central OS grid reference: SE 23802 21773). The site comprises grassland, woodland, and hardstanding on a derelict urban site.

### Development Proposals

- 2.4. The development proposals include the erection of a proposed care home.

### Planning status of project, certainty of design and assumptions made

- 2.5. The present strategy has been prepared to support a planning application, based on the Proposed Site Plan (2025).
- 2.6. As stated in the 'Limitations' section, necessary assumptions have been made at this stage regarding the types and extents of habitats that will and can be retained, enhanced and created.

### Aims, Objectives & Scope

- 2.7. With reference to the Development Proposals and best practice BNG reporting guidelines (CIEEM, 2021), the objectives & scope of the present strategy are to provide:
- An assessment as to whether the project can feasibly deliver BNG or not for the options being considered;
  - Advice for the project to maximise its ability to deliver BNG considering factors such as location, design, construction methods and programme (where known/relevant);
  - If on-site BNG can't be achieved, consideration of the potential for off-site delivery of BNG, either securing land in close proximity to the project site or other

alternatives, including more distant land under direct control or a brokered agreement; and

- Where, following a review of the BNG Principles, the delivery of project-wide BNG as an outcome is not considered possible (e.g., as a result of impacts to irreplaceable habitats or other site constraints), a record of the reasons and next steps towards delivering biodiversity gains elsewhere through the project.

### **Planning Policy and Legislation**

- 2.8. A summary of biodiversity planning policies and wildlife legislation relevant to the site is provided in Appendix 1.
- 2.9. The site is covered by the Kirklees Biodiversity Action Plan (BAP), which includes:
  - Semi Natural Grassland

## 3. Methodology

### Personnel

- 3.1. The UKHab & condition assessment survey was carried out by Ecologist CJM BSc (Hons), MSc, accredited agent on Natural England Bat Licence Reference Number: 2018-33647-CLS-CLS. CM holds a Natural England Level 1 Great Crested Newt Licence (CL08) (reference number: 2024-12521-CL08-GCN), is a Qualifying member of CIEEM, has attended formal training in UKHab survey, Biodiversity Net Gain, and botanical species identification, and is experienced in undertaking ecology surveys, GIS mapping, and report writing. CM assisted with the UKHab & condition assessment survey.
- 3.2. Quality Assurance was carried out by TAE BSc (Hons), MCIEEM. TE has professional experience in ecological consultancy since 2013, including Protected Species Survey, Extended UKHab Habitat Survey and report writing. TE is trained in a wide variety of protected species survey, including holding Natural England class licences for bats (Level 2 Licence CL18), barn owl *Tyto alba*, great crested newt (level 1), and dormice *Muscardinus avellanarius* (level 1). TE is trained in botanical species identification and holds a Level 3 Botanical Society of Britain and Ireland (BSBI) Field Identification Skills Certificate.

### Desk Study

#### *Important Ecological Features*

- 3.3. A desk study was carried within the Preliminary Ecological Appraisal (Elton Ecology, 2025) and should be read in conjunction with the present report.

### Field Survey

#### *UKHab & Condition Assessment Survey*

- 3.4. A UKHab and condition assessment survey was carried out of the site on 6<sup>th</sup> June 2025 with reference to best practice guidelines from UKHab Ltd (2023). The site was walked over, and the habitats present classified based on key indicator species present.
- 3.5. The condition assessment was carried out with reference to guidance within the Statutory Biodiversity Metric Condition Sheets and Technical Supplement (Defra, 2024). The condition of each habitat was assessed by scoring each habitat parcel against the criteria set out in the Statutory Biodiversity Metric Habitat Condition Assessment Sheets. A condition score was assigned to each habitat parcel based on a range of positive and negative indicators of quality against the optimum ecological state for the habitat, such as a grassland having species richness (positive) or the presence of invasive non-native plants (negative). This is used as an indicator for whether the habitat is a good or poor example of its habitat type/distinctiveness, and to inform future management for ecological enhancement where applicable.

### Biodiversity Net Gain Metric Calculation

- 3.6. The prevailing biodiversity metric calculation spreadsheet at the time of writing was used, the Statutory Biodiversity Metric, published 29<sup>th</sup> November 2023, with reference to the Technical Supplement and User Guide (Defra, 2025).
- 3.7. The Statutory Biodiversity Metric calculates the biodiversity units present as follows:

*Baseline Habitats:*

Size of Habitat Parcel x Distinctiveness x Condition x Strategic Significance = Baseline Biodiversity Units

*Post-intervention Habitats* are calculated as above, and then:

x Difficulty x Time to Target Condition x Spatial Risk = Post-intervention Biodiversity Units

*The net gain or loss in Biodiversity Units* is then calculated as:

Post-intervention units – Baseline units = (+/- ) Net Change

- 3.8. As the basis of the calculations, the Statutory Biodiversity Metric requires the user to enter a series of variables for each baseline, enhanced or created habitat parcel. These variables and decisions made are summarised in the sections below and presented in the results section. No river habitats were present at the site, and as such variables relating only to river habitats have not been included.

*Classification and Measurement of Habitats*

- 3.9. The UK Habitat Classification System (UKHab) (UKHab Ltd, 2023) was used during field surveys and converted to the appropriate habitat classification via the Statutory Metric guidance (Defra, 2025), to complete the broad habitat and habitat type variables of the Statutory Metric calculator.
- 3.10. The habitat areas were mapped via the QGIS geographic information system application using a geo-referenced and ground-checked satellite image of the site.
- 3.11. Post-development habitat areas were measured from the illustrative Site Layout Plan, georeferenced into QGIS.
- 3.12. Following the Statutory Biodiversity Metric QGIS Template and Import Tool User Guide (Natural England Joint Publication JP039), each habitat parcel was entered into the QGIS Template where the data was exported into the Import Tool to consolidate the data to be entered into the Statutory Metric calculator.

*Strategic Significance*

- 3.13. This is a score based on whether the location of the habitat is significant for nature. An assessment of this variable requires consideration as to whether the site is located within the relevant biodiversity local strategy, plan or policy, designated sites for nature conservation, and the sites position within the landscape. Strategic Significance was determined with reference to guidance from the Kirklees Biodiversity Action Plan.
- 3.14. With reference to the Department of Environment, Food & Rural Affairs (DEFRA) Policy paper 'Local Nature Recovery Strategies' (LNRS), there are 48 local nature recovery strategy areas covering England<sup>1</sup>. The relevant strategy area for the site is West Yorkshire and the relevant responsible body is the West Yorkshire Combined Authority<sup>2</sup>.
- 3.15. If no LNRS is available for the local authority area applicable to the site, other relevant documents and criteria are used which can include local published plans, strategies or policies, as listed within the Statutory Biodiversity Metric User Guide Draft on page 25 and

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<sup>1</sup> <https://www.gov.uk/government/publications/local-nature-recovery-strategies/local-nature-recovery-strategies>

<sup>2</sup>

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1166611/Map\\_of\\_local\\_nature\\_recovery\\_strategy\\_areas\\_and\\_responsible\\_authorities.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1166611/Map_of_local_nature_recovery_strategy_areas_and_responsible_authorities.pdf)

any other relevant documents. If the geographic location or type of habitat present is listed within the other relevant documents, a score of high is assigned to the given habitat area. These include:

- Statutory Designated Sites
- Non-Statutory Designated Sites
- National BAP Priority Habitats
- Local Plan
- Neighbourhood Plan
- Area of Outstanding Natural Beauty/National Landscapes Management Plan
- Local Biodiversity Action Plan
- Species and protected sites conservation strategies
- Green Infrastructure / Tree / Woodland Strategies
- River Basin Management Plans
- Catchment Plans and Catchment Planning Systems
- Habitats Supporting Populations of Notable/ Priority and/or Protected Species
- Biodiversity Opportunity Map (BOM)

3.16. Where there are no relevant documents, professional judgement was used to assign a strategic significance score of either 'medium' or 'low'. If a habitat location or type is not listed within a relevant document and there is a lack of evidence to support a professional judgement of 'medium' strategic significance, a score of 'low' is assigned.

3.17. The relevant planning policy documents are:

- Kirklees Local Plan

3.18. The site is not included within the planning policies as a nature conservation priority.

3.19. The relevant Local Biodiversity Action Plan for the site is the Kirklees Biodiversity Action Plan.

*Bespoke Compensation Agreed for Unacceptable Losses*

3.20. This is a yes/no decision cell to indicate whether bespoke compensation has been agreed with decision makers for any losses in very high distinctiveness habitats.

*Temporal Multiplier*

3.21. Within the temporal multiplier for each created/ enhanced habitat parcel the metric requires the user to enter the following variables:

- Habitat created in advance/ years: The Statutory Metric rewards habitat creation in advance of losses by reducing the temporal risk multipliers added.

- Delay in starting habitat creation/ years. If there will be a significant delay in the creation of a habitat type relative to any losses (e.g. phased development), the number of full years that the creation will be delayed is entered. The Statutory Metric then adds the number of years to the pre-populated time to target condition, which increases the effect of the risk multiplier.

### Limitations

- 3.22. The accuracy of habitat area measurement is limited by the methods by which the baseline data was collected and resolution of development proposal plans. In this instance, baseline habitat areas have been calculated by cross referencing illustrative habitat plans mapped in the field with georeferenced aerial imagery. Post-development habitat areas were measured from the concept landscape plans, georeferenced into QGIS.
- 3.23. Reasonable assumptions have been made with regards to the type/condition of habitats that could be created, which would need to be informed by a detailed Habitat Management and Management Plan.
- 3.24. The Biodiversity Metric uses habitats as a proxy for biodiversity, which is a simplification of the real world. Although informed by evidence and reasoning, the outputs of the Metric are not scientifically precise or absolute values. The generated biodiversity unit scores are a proxy for the relative biodiversity worth of a habitat or site. The metric and its outputs must be interpreted with ecological expertise and a common-sense approach. The metric is an aid to biodiversity decisions.
- 3.25. Treeline TL1 was present off-site overhanging the site and was included within the Preliminary Ecological Appraisal Report (Elton Ecology, 2025) relating to the site due to the potential impacts to these habitats that may be caused by the proposed development. With reference to the Statutory Metric User Guide (Defra, 2025), treeline TL1 is not included within the red line boundary of the development and is therefore not included within the biodiversity net gain calculation for the site.
- 3.26. All dimensions and distances provided are approximate.
- 3.27. The present study has been informed by the Site Layout (2025), and as such assumptions have been made regarding the final planned design including the precise extent of proposed landscaping, hardstanding and development footprint.

## 4. Results

### Baseline Habitats

- 4.1. The baseline habitats and condition assessments at the site including the data entered into the biodiversity metric are given in the following tables and mapped on Figure 2: Baseline Habitat Plan. The baseline habitat condition scores and post-development retentions are shown in Figures 3 and 4. The 'consolidated' data is provided in the present report. Non-consolidated data is provided within the completed Biodiversity Metrics. Photographs of the habitats referred to are presented in Appendix 2: Photographs.
- 4.2. Hedgerow habitats were not present on site.
- 4.3. Watercourse habitats, including watercourse riparian zones, were not present on site.
- 4.4. No irreplaceable habitats were present on site.
- 4.5. The baseline habitat date was taken to be 6<sup>th</sup> June 2025, the date of the habitat survey. Historic satellite evidence demonstrated a reduction in hardstanding habitats post-demolition of the building on site and therefore a retrospective biodiversity net gain assessment was not carried out.

Table 2: On Site Habitat Baseline Areas

UKHab Habitat Code	UKHab Habitat Classification	Data Entered into Metric					Description	Photograph Ref No. (Appendix 2: Photographs)
		Unique Polygon Reference No.	Area (hectares)	Condition	Strategic Significance	Habitat retained/enhanced/lost		
g3c	Other neutral grassland	1	0.1738	Poor	Area/compensation not in local strategy/ no local strategy	Lost	<p>Two areas of <i>Arrhenatherum</i> neutral grassland were present on site.</p> <p>An area with tussocky sward was present in the west of the site surrounding the disused sports arena. The habitat had an average of 5 species per m<sup>2</sup> and scattered scrub comprising approximately 20% of ground cover. Species present included dominant false oat-grass <i>Arrhenatherum elatius</i>, abundant creeping buttercup <i>Ranunculus repens</i> and red fescue <i>Festuca rubra</i>, frequent bush vetch <i>Vicia sepium</i>, spear thistle <i>Cirsium vulgare</i>, cock's-foot <i>Dactylis glomerata</i>, creeping cinquefoil <i>Potentilla reptans</i>, occasional ribwort plantain <i>Plantago lanceolata</i>, wood avens <i>Geum urbanum</i>, cleavers <i>Galium aparine</i>, Yorkshire-fog <i>Holcus lanatus</i>, dandelion <i>Taraxacum officinale</i> agg., ivy <i>Hedera helix</i>, hedge bindweed <i>Calystegia sepium</i>, rarely present selfheal <i>Prunella vulgaris</i>, herb-Robert <i>Geranium robertianum</i>, meadow buttercup <i>Ranunculus acris</i>, barren brome <i>Bromus sterilis</i>, black medick <i>Medicago lupulina</i>, sycamore <i>Acer pseudoplatanus</i>, goat willow <i>Salix caprea</i>, and ash <i>Fraxinus excelsior</i> saplings, and locally dominant wild cherry <i>Prunus avium</i> scrub south of the woodland, elm <i>Ulmus</i> sp. scrub in the east of the site, and bramble <i>Rubus fruticosus</i> agg. scrub southwest of the woodland and in the east of the habitat.</p> <p>An area with tussocky sward was present in the east of the site in the location of the demolished building with an average of 4 species per m<sup>2</sup> and a varied sward height. Species present included dominant false oat-grass and red fescue, abundant creeping buttercup, bush vetch, spear thistle, and hedge bindweed, frequent Yorkshire-fog, common nettle <i>Urtica dioica</i>, occasional bramble and cock's-foot, and rarely present red clover <i>Trifolium pratense</i>, white clover <i>Trifolium repens</i>, broadleaved dock <i>Rumex obtusifolius</i>, meadow buttercup, ribwort plantain, comfrey <i>Symphytum officinale</i>, tall fescue <i>Schedonorus arundinaceus</i>, mustard, and broom <i>Cytisus scoparius</i>.</p>	1-3
u1b	Developed land, sealed surface	2	0.1351	N/A - Other	Area/compensation not in local strategy/ no local strategy	0.1150 ha retained 0.0201 ha lost	A hardstanding path and former sports arena was present on site. Vegetation encroachment at the habitat margins included rarely present Yorkshire-fog, cock's-foot, red fescue, herb-Robert, bramble, cat's-ear <i>Hypochaeris radiata</i> , moss, and mustard.	4
w1g	Other woodland; broadleaved	3	0.0349	Moderate	Area/compensation not in local strategy/ no local strategy	0.0315 ha retained 0.0034 ha lost	A deciduous woodland was present in the northwest of the site. Species present included frequent wild cherry, occasional ash, hawthorn <i>Crataegus monogyna</i> , elm, and rarely present sycamore, poplar <i>Populus</i> sp., and cypress. Dense ivy cover was present on the trees in the west of the habitat. The shrub layer included occasional wild cherry and rarely present ash and holly <i>Ilex aquifolium</i> , and the ground flora included dominant bramble, abundant ivy, occasional wild cherry saplings, and rarely present ash and sycamore saplings.	5
200	Individual trees	N/A	0.0529	Moderate	Area/compensation not in local strategy/ no local strategy	0.0122 ha retained 0.0407 ha lost	Four small moderate condition trees were present within the other neutral grassland on site. The trees comprised one sycamore and three ash trees. One large moderate Leyland cypress tree was present in the south of the site.	6-8
200	Individual trees	N/A	0.0407	Good	Area/compensation not in local strategy/ no local strategy	Lost	One small good condition elm tree was present in the southwest of the site. One large good condition Leyland cypress tree was present in the south of the site.	7

Table 3: Condition Assessment – Medium Distinctiveness Grassland (Adapted from Defra, 2025)

Condition Sheet:					
Condition Assessment Criteria		West section of other neutral grassland		East section of other neutral grassland	
		Condition Achieved (Y/N)	Notes/Justification	Condition Achieved (Y/N)	Notes/Justification
1	"The parcel represents a good example of its habitat type, with a consistently high proportion of characteristic indicator species present relevant to the specific habitat type  NB - this criterion is essential for achieving moderate or good condition."	N	High presence of sub-optimal creeping buttercup relative to indicator species.  Scattered scrub present.	N	High presence of sub-optimal creeping buttercup relative to indicator species.
2	Sward height is varied (at least 20% of the sward is less than 7 cm and at least 20% is more than 7 cm) creating microclimates which provide opportunities for insects, birds and small mammals to live and breed.	Y	Sward height varied between 5cm and 60cm with tussocks throughout.	Y	Sward height varied with approximately 20% of the sward was under 7cm.
3	Cover of bare ground is between 1% and 5%, including localised areas, for example, rabbit warrens.	Y	Approximately 2% bare ground cover.	Y	Approximately 1% bare ground cover.
4	Cover of bracken is less than 20% and cover of scrub is less than 5%.	N	No bracken observed. Scattered scrub covered approximately 20% of the grassland.	Y	No bracken observed. Scattered scrub covered under 5% of the grassland.
5	Combined cover of species indicative of suboptimal condition and physical damage accounts for less than 5% of total area. No invasive non-native plant species present.	N	Under 5% damage cover due to the presence of refuse.  Sub-optimal creeping buttercup abundant.  No invasive non-native plant species observed.	N	No damage observed.  Sub-optimal creeping buttercup abundant, common nettle frequent, and broadleaved dock rarely present.  No invasive non-native plant species observed.
6	There are 10 or more vascular plant species per m <sup>2</sup> present, including forbs that are characteristic of the habitat type – Essential for good condition	N	Five species per m <sup>2</sup> .	N	Four species per m <sup>2</sup> .
<b>Essential criterion 1 achieved (Y/N)</b>		N		N	
<b>Number of criteria passed</b>		2		3	
<b>Condition Assessment Result</b>	<b>Condition Assessment Score</b>	<b>Score Achieved ×/✓</b>		<b>Score Achieved ×/✓</b>	
Passes 5 or 6 criteria, including essential criterion 1 and additional criterion 6.	<b>Good (3)</b>				
Passes 3 - 5 criteria, including essential criterion 1.	<b>Moderate (2)</b>				
"Passes 2 or fewer criteria;	<b>Poor (1)</b>	✓		✓	

Table 4: Condition Assessment – Woodland Habitat Type (Adapted from Defra, 2025)

Condition Sheet: WOODLAND Habitat Type						
Indicator		Good (3 Points)	Moderate (2 points)	Poor (1 point)	Score per indicator	Notes/Justification
1	Age distribution of trees	Three age classes present	Two age classes present	One age class present	2	Young and intermediate trees observed.
2	Wild, domestic, and feral herbivore damage	No significant browsing damage evident in woodland	Evidence of significant browsing pressure is present in 40% or less of whole woodland	Evidence of significant browsing pressure is present in 40% or more of whole woodland	3	No significant browsing damage evident in woodland.
3	Invasive plant species	No invasive species present in woodland	Rhododendron <i>Rhododendron ponticum</i> or cherry laurel <i>Prunus laurocerasus</i> not present, other invasive species <10% cover.	Rhododendron or laurel present, or other invasive species > 10% cover	3	No invasive species observed.
4	Number of native tree species	Five or more native tree or shrub species found across woodland parcel	Three to four native tree or shrub species found across woodland parcel	None to two native tree or shrub species across woodland parcel	3	More than five native tree and shrubs species.
5	Cover of native tree and shrub species	> 80% of canopy trees and >80% of understory shrubs are native	50-80% of canopy trees and 50-80% of understory shrubs are native	< 50% of canopy trees and <50% of understory shrubs are native	3	> 80% of canopy trees and >80% of understory shrubs are native.
6	Open space within woodland	10 - 20% of woodland has areas of temporary open space, unless woodland is <10ha in which case lower threshold of 10% does not apply	21- 40% of woodland has areas of temporary open space	More than 40% of woodland has areas of temporary open space	3	Woodland is <10ha.
7	Woodland regeneration	All three classes present in woodland; trees 4-7cm DBH, saplings and seedlings or advanced coppice regrowth	One or two classes only present in woodland	No classes or coppice regrowth present in woodland	2	Trees 4-7cm DBH and saplings observed.
8	Tree health	Tree mortality less than 10%, no pests or diseases and no crown dieback	11% to 25% mortality and/or crown dieback or low risk pest or disease present	Greater than 25% tree mortality and or any high-risk pest or disease present	3	No evidence of tree mortality, pests or diseases, or crown dieback observed.
9	Vegetation and ground flora	Ancient woodland flora indicators present	Recognisable NVC plant community present	No recognisable NVC community	1	No recognisable NVC community.
10	Woodland vertical structure	Three or more storeys across all survey plots or a complex woodland	Two storeys across all survey plots	One or less storey across all survey plots	2	Canopy and shrub layer present.
11	Veteran trees	Two or more veteran trees per hectare	One veteran tree per hectare	No veteran trees present in woodland	1	No veteran trees observed.
12	Amount of deadwood	50% of all survey plots within the woodland parcel have standing deadwood, large dead branches/ stems and stumps	Between 25% and 50% of all survey plots within the woodland parcel have standing deadwood, large dead branches/ stems and stumps	Less than 25% of all survey plots within the woodland parcel have standing deadwood, large dead branches/ stems and stumps	1	No deadwood observed.
13	Woodland disturbance	No nutrient enrichment or damaged ground evident	Less than 1 hectare in total of nutrient enrichment across woodland area and/or less than 20% of woodland area has damaged ground	More than 1 hectare of nutrient enrichment and/or more than 20% of woodland area has damaged ground	2	Some refuse observed within the woodland.
<b>Total Score</b>					29	
<b>Condition Assessment Result</b>				<b>Condition Assessment Score</b>	Result Achieved	
Total score >32 (33 to 39)				Good (3)	Moderate	
Total score 26 to 32				Moderate (2)		
Total score <26 (13 to 25)				Poor (1)		

Table 5: Condition Assessment – Individual Trees (Adapted from Defra, 2024)

Condition Sheet:		Ash		Sycamore		Elm		Good condition cypress		Moderate condition cypress	
Condition Assessment Criteria		Condition Achieved (Y/N)	Notes/Justification	Condition Achieved (Y/N)	Notes/Justification						
A	The tree is a native species (or at least 70% within the block are native species).	Y	Ash	N	Sycamore	Y	Elm, considered likely native wych elm.	N	Leyland cypress	N	Leyland cypress
B	The tree canopy is predominantly continuous, with gaps in canopy cover making up <10% of total area and no individual gap being >5 m wide (individual trees automatically pass this criterion).	Y	N/A	Y	N/A	Y	N/A	Y	N/A	Y	N/A
C	The tree is mature (or more than 50% within the block are mature).	N	Early mature.	N	Young.	N	Young.	Y	Mature.	Y	Mature.
D	There is little or no evidence of an adverse impact on tree health by human activities (such as vandalism, herbicide or detrimental agricultural activity). And there is no current regular pruning regime, so the trees retain >75% of expected canopy for their age range and height.	Y	No evidence observed.	Y	No evidence observed.	Y	No evidence observed.	Y	No evidence observed.	Y	No evidence observed.
E	Natural ecological niches for vertebrates and invertebrates are present, such as presence of deadwood, cavities, ivy or loose bark.	N	No niches observed.	N	No niches observed.	Y	Niches suitable for invertebrates observed in loose bark.	Y	Niches suitable for invertebrates observed in loose bark.	N	No niches observed.
F	More than 20% of the tree canopy area is oversailing vegetation beneath.	Y	Oversailing over 50% grassland.	Y	Oversailing tall forbs.	Y	Oversailing grassland.	Y	Oversailing approximately 50% grassland.	Y	Oversailing approximately 50% grassland.
<b>Number of criteria passed</b>		4		3		5		5		4	
<b>Condition Assessment Result</b>	<b>Condition Assessment Score</b>	<b>Score Achieved ×/✓</b>		<b>Score Achieved ×/✓</b>		<b>Score Achieved ×/✓</b>		<b>Score Achieved ×/✓</b>		<b>Score Achieved ×/✓</b>	
<b>Passes 5 or 6 criteria</b>	<b>Good (3)</b>					✓		✓			
<b>Passes 3 or 4 criteria</b>	<b>Moderate (2)</b>	✓		✓						✓	
<b>Passes 2 or fewer criteria</b>	<b>Poor (1)</b>										

### **Proposed Design**

- 4.6. The proposed design includes the erection of a new care home.
- 4.7. The proposed values for post-development created habitats at the site entered into the Biodiversity Metric are given in the tables overleaf and mapped on Figure 5: Proposed Habitats Plan. The target conditions for the habitats are shown in Figure 6: Proposed Habitat Target Condition Plan.

Table 6: On Site Habitat Creation

Data Entered into Metric						
Broad Habitat	Proposed Habitat	Area (hectares)	Condition	Strategic Significance	Habitat created in advance/years	Delay in starting habitat creation/years
Grassland	Modified grassland	0.0125	Poor	Area/compensation not in local strategy/ no local strategy	0	0
Grassland	Other neutral grassland	0.0119	Moderate	Area/compensation not in local strategy/ no local strategy	0	0
Heathland and scrub	Mixed scrub	0.042	Poor	Area/compensation not in local strategy/ no local strategy	0	0
Urban	Developed land; sealed surface	0.1187	N/A - Other	Area/compensation not in local strategy/ no local strategy	0	0
Urban	Introduced shrub	0.0122	Condition Assessment N/A	Area/compensation not in local strategy/ no local strategy	0	0
Individual trees	Urban tree	0.0041*	Poor	Area/compensation not in local strategy/ no local strategy	0	0

\*\*Calculated as per 1 tree in poor condition in accordance with the Tree Helper Tool.

### Biodiversity Metric Results

- 4.8. The completed biodiversity metric excel spreadsheet has been issued with the present report and should be read in conjunction with it. The 'headline results' output of the Statutory Biodiversity Metric calculation are presented in Table 7 below.

*Table 7: Summary of Biodiversity Metric Output*

	Unit
On-site Baseline Units	1.89
On-Site Post-Intervention Units	0.65
Total Net Unit Change	<b>-1.24</b>
On-site net % change	<b>-65.51%</b>
Trading rules satisfied?	<b>No</b>

## 5. Conclusion

- 5.1. Following best practice guidelines for use of the Statutory Biodiversity Metric, assessment has shown a total net loss post-development of -1.24 habitat units (-65.51%), this equates to a deficit of 1.42 habitat units below the biodiversity net gain target of 10%. Trading rules were not satisfied.
- 5.2. It is considered that the on-site delivery of the 1.42 habitat units to deliver a 10% net gain would not be feasible. It is therefore recommended that off-site habitat compensation options are explored, such as exploring habitat creation/enhancement on land also under the ownership of the applicant, or via purchasing the biodiversity units from a third-party habitat bank.

## 6. References

Baker, J. Hoskin, R. Butterworth, T (2019) *Biodiversity Net Gain. Good Practice Principles for Development. A Practical Guide*. CIRIA. ISBN: 978-0-86017-791-3

British Standards Institute (BSI) (2013). *BS 42020:2013 Biodiversity. Code of practice for planning and development*. British Standards Institute, London.

British Standards Institute (BSI) (2021). *BS 8683:2021 Biodiversity. Process for designing and implementing Biodiversity Net Gain — Specification*. British Standards Institute, London.

CIEEM (2017) *Guidelines on Ecological Report Writing*. Chartered Institute of Ecology and Environmental Management, Winchester.

CIEEM (2018) *Guidelines for Ecological Impact Assessment in The UK and Ireland*. Chartered Institute of Ecology and Environmental Management, Winchester.

CIEEM (2021). *Biodiversity Net Gain Report and Audit Templates*. Chartered Institute of Ecology and Environmental Management, Winchester, UK.

Defra (2024) *The Statutory Biodiversity Metric - User Guide*. Department for Environment, Food & Rural Affairs, February 2024.

UKHab Ltd (2023). *UK Habitat Classification Version 2.0* (at <https://www.ukhab.org>)

## 7. Figures

*Figure 1: Site Location Plan (Overleaf)*

*Figure 2: Baseline Habitat Plan (Overleaf)*

*Figure 3: Baseline Habitat Condition Plan (Overleaf)*

*Figure 4: Baseline Habitat Retention Plan (Overleaf)*

*Figure 5: Proposed Habitat Plan (Overleaf)*

*Figure 6: Proposed Habitat Condition Plan (Overleaf)*



## Legend

 Site Boundary

Project:  
**Former Dewsbury Arena, Land At  
 Boothroyd Lane, Dewsbury, West  
 Yorkshire, WF13 2LF**

Drawing:  
**Figure 1: Site Location Plan**

Date: 16-07-2025      Version: FINAL

Author: CJM      Job No: P2833









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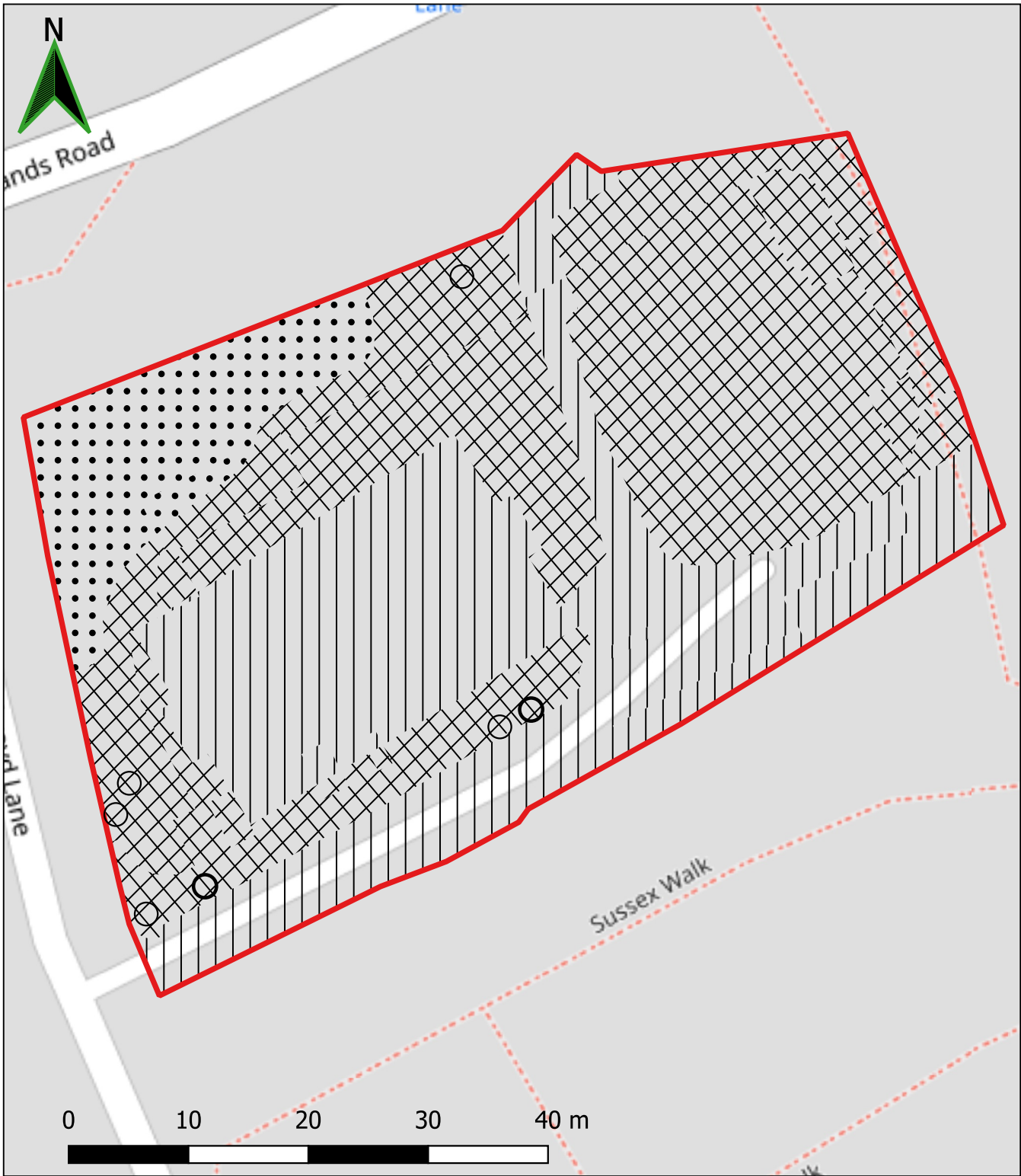
**Legend**

-  Site Boundary
-  Developed Land; Sealed Surface
-  Other Neutral Grassland
-  Other Woodland; Broadleaved
-  Existing Large Urban Tree
-  Existing Small Urban Tree

Project:  
**Former Dewsbury Arena, Land At Boothroyd Lane, Dewsbury, West Yorkshire, WF13 2LF**  
 Drawing:  
**Figure 2: Baseline Habitat Plan**  
 Date: 29-07-2025      Version: FINAL  
 Author: CJM              Job No: P2833



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### Legend

Site Boundary

Baseline Habitat Condition

Moderate

Poor

N/A - Other

Baseline Individual Tree Condition

Moderate

Good

Project:

**Former Dewsbury Arena, Land At Boothroyd Lane, Dewsbury, West Yorkshire, WF13 2LF**

Drawing:

**Figure 3: Baseline Habitat Condition Plan**

Date: 16-07-2025

Version: FINAL

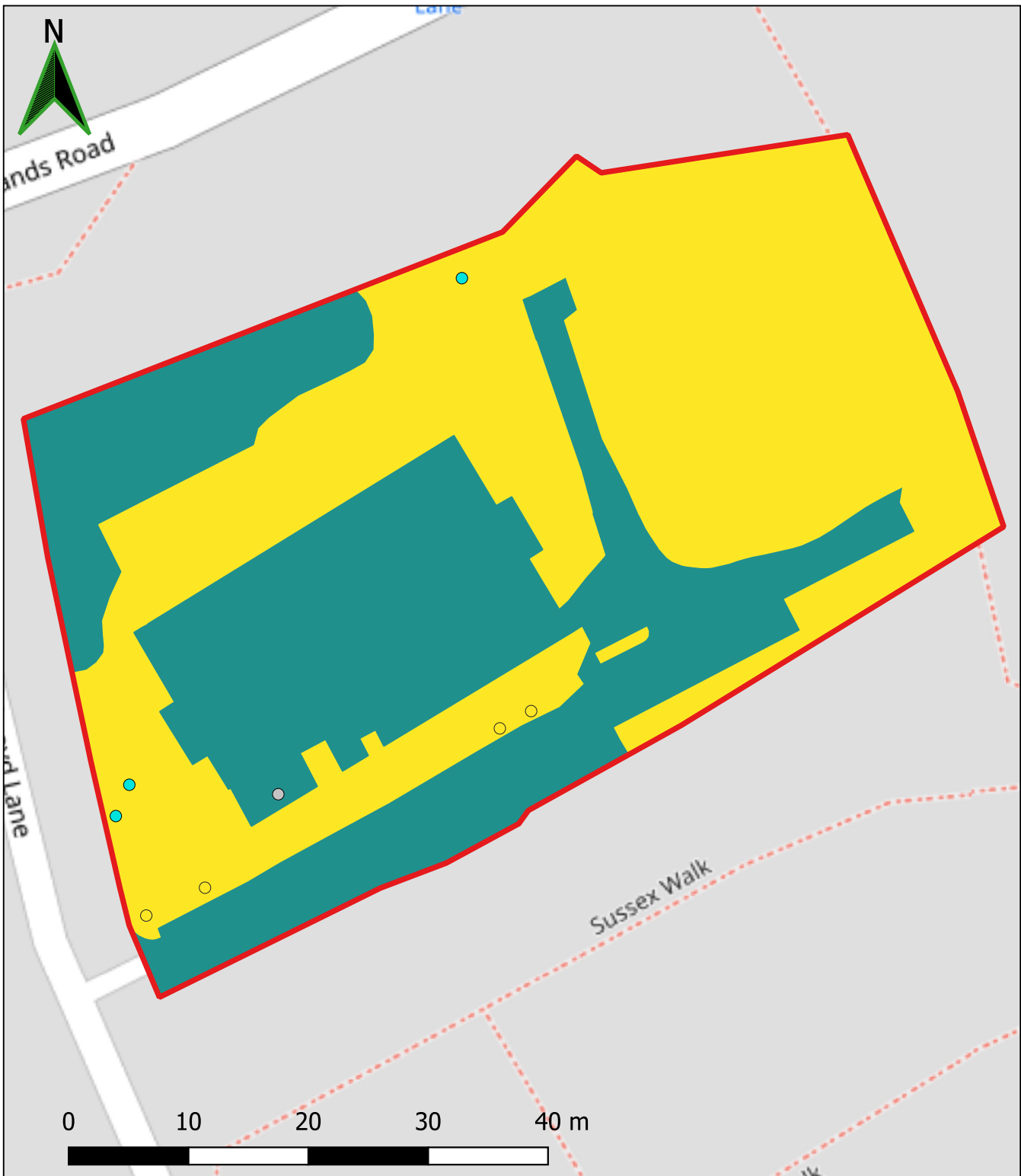
Author: CJM

Job No: P2833



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### Legend

Site Boundary

Habitats Retention

Retained

Lost

Individual Tree Retention

Created

Retained

Proposed Lost

Project:

**Former Dewsbury Arena, Land At Boothroyd Lane, Dewsbury, West Yorkshire, WF13 2LF**

Drawing:

**Figure 4: Baseline Habitat Retention Plan**

Date: 21-07-2025

Version: FINAL

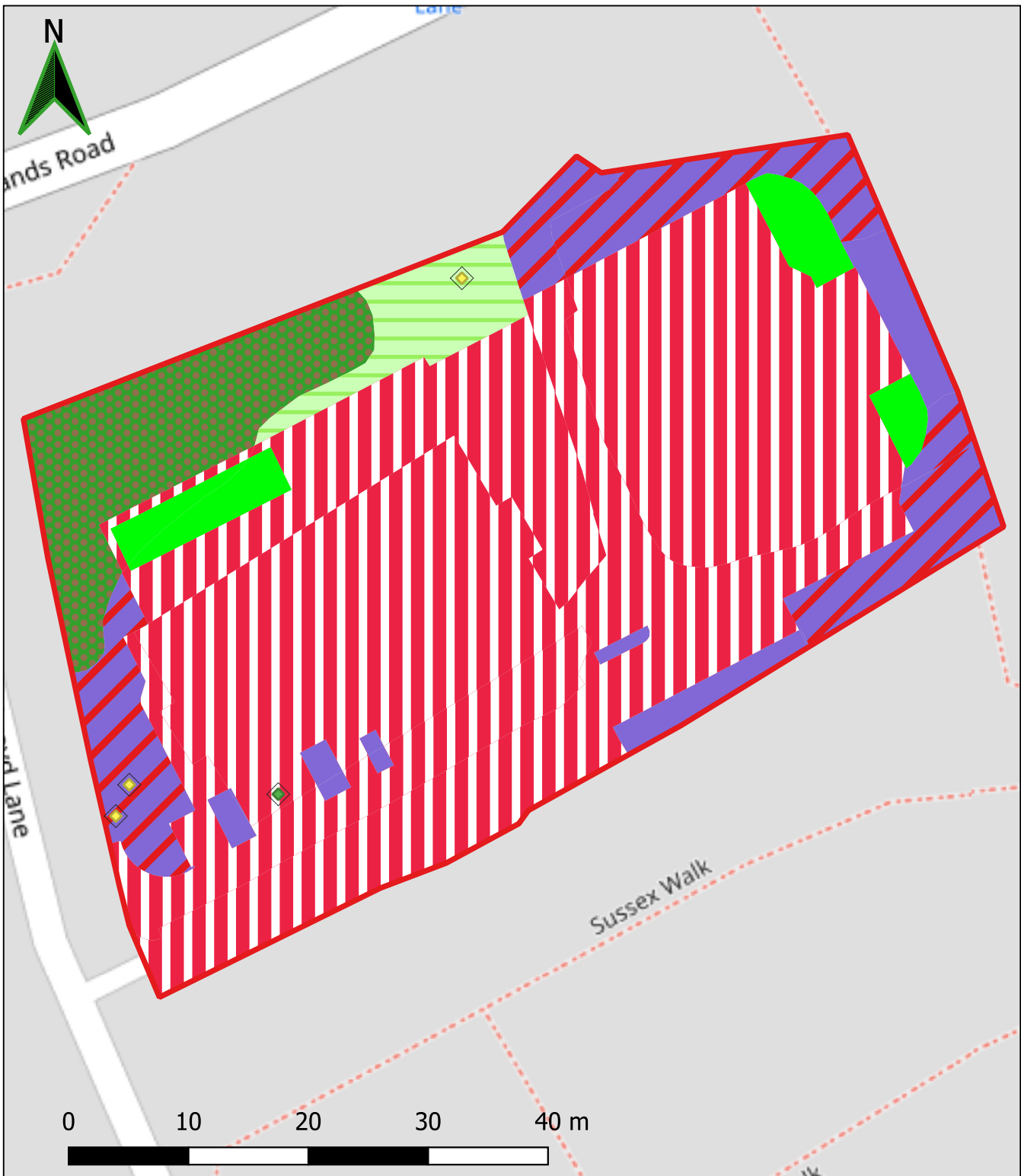
Author: CJM

Job No: P2833




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**Legend**

-  Site Boundary
-  Developed Land; Sealed Surface
-  Introduced Shrub
-  Mixed Scrub
-  Modified Grassland
-  Other Neutral Grassland
-  Other Woodland; Broadleaved
-  Proposed Small Urban Tree
-  Retained Small Urban Tree

Project:  
**Former Dewsbury Arena, Land At  
 Boothroyd Lane, Dewsbury, West  
 Yorkshire, WF13 2LF**

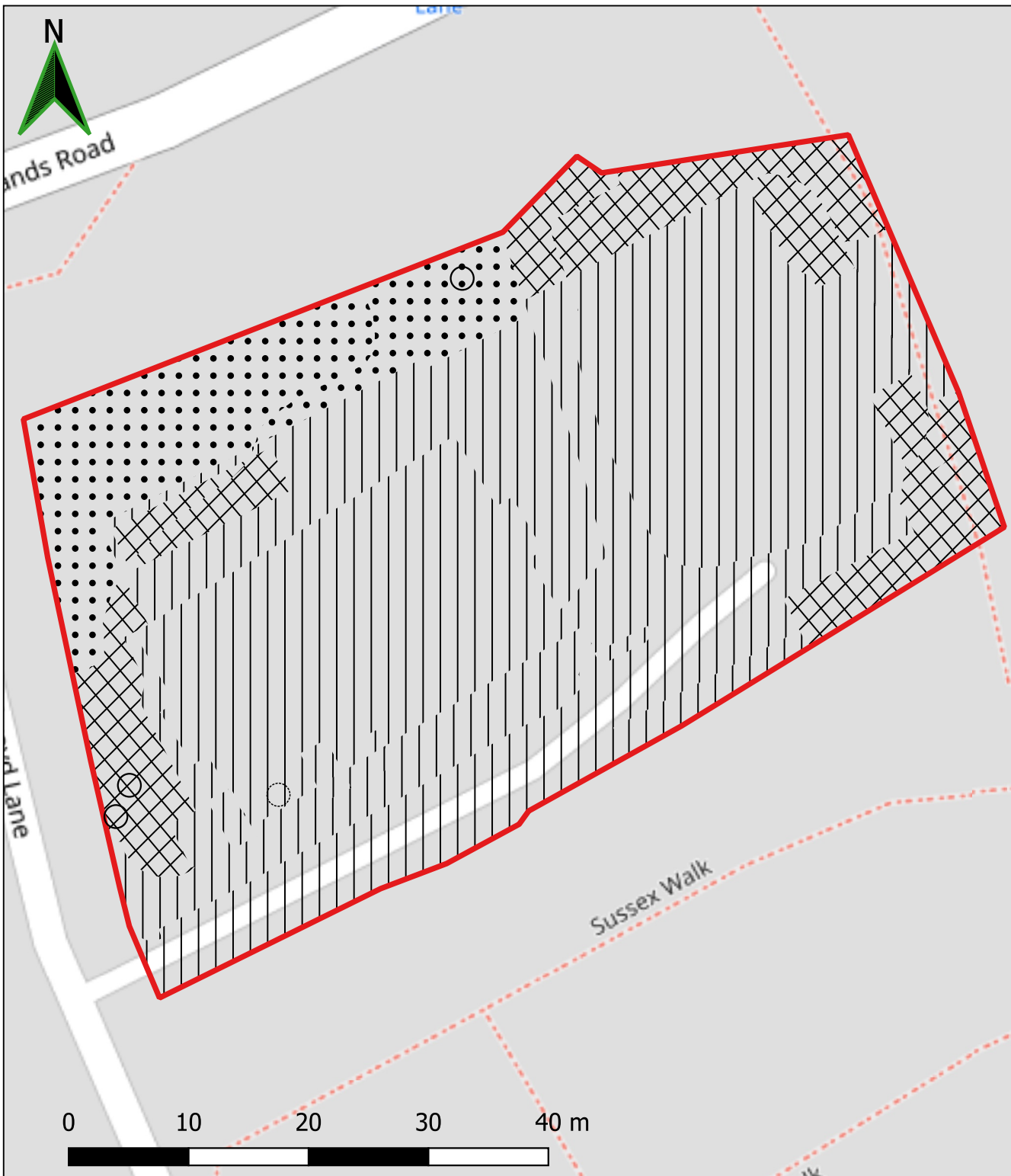
Drawing:  
**Figure 5: Proposed Habitat Plan**

Date: 29-07-2025      Version: FINAL  
 Author: CJM              Job No: P2833



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## Legend


 Site Boundary

Proposed Habitats Condition

 Moderate

 Poor

 N/A - Other

 Condition Assessment N/A

Proposed Individual Tree Condition

 Poor

 Moderate

Project:

**Former Dewsbury Arena, Land At  
Boothroyd Lane, Dewsbury, West  
Yorkshire, WF13 2LF**

Drawing:

**Figure 6: Proposed Habitat Condition Plan**

Date: 21-07-2025

Version: FINAL

Author: CJM

Job No: P2833



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## Appendix 1: Planning Policy & Legislation Summary

This appendix serves as a summary of relevant policy and legislation. It is not intended to supersede the policy or legislation documents to which it refers, and the relevant full documents should always be consulted prior to decision making.

### *National Planning Policy Framework 2024*

Biodiversity is a material consideration under the National Planning Policy Framework (2024). Relevant text to biodiversity from the NPPF is described below.

In Section 2 of the NPPF 'Achieving sustainable development', paragraph 8(c), the NPPF sets an environmental objective:

*"to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy."*

In Section 15 'Conserving and enhancing the natural environment', the NPPF states that:

"187. Planning policies and decisions should contribute to and enhance the natural and local environment by:

- *protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);*
- *recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland; [...]*
- *minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures. [...]"*

The NPPF, in paragraph 192 sets out that to protect and enhance biodiversity, plans should:

- *"Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity<sup>65</sup>; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and*
- *promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity."*

In determining planning applications, the NPPF paragraph 193 sets guidance that local planning authorities should apply the following principles:

- *"if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;*

- *development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest [...];*
- *development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists; and*
- *development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.”*

Paragraph 194 states that the following sites should be given the same protection as habitats sites:

- *“potential Special Protection Areas and possible Special Areas of Conservation;*
- *listed or proposed Ramsar sites; and*
- *sites identified, or required, as compensatory measures for adverse effects on habitats sites, potential Special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites.”*

Paragraph 195 states that “The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or projects will not adversely affect the integrity of the habitats site.”

Paragraph 198 states that planning policies and decisions should ensure new development is appropriate to its location and take into account likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should:

- *“Mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development [...]; [...] and*
- *limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.”*

#### *The Environment Act 2021*

Schedule 14 makes provision for biodiversity gain to be a condition of planning permission in England. The biodiversity net gain relevant percentage is currently set to 10% by the Act.

## Appendix 2: Photographs



Photo 1: West section of other neutral grassland and hardstanding



Photo 2: West section of other neutral grassland with scattered scrub encroaching from the woodland.



Photo 3: East section of other neutral grassland.



Photo 4: Area of hardstanding in the west of the site.



Photo 5: Other broadleaved woodland in the northwest of the site.



Photo 6: Individual ash tree in the north of the site.



Photo 7: Large cypress trees in the south of the site.



Photo 8: Individual sycamore and ash trees in the west of the site.