

Huddersfield Bus Station (Phase 2) – Biodiversity Net Gain Assessment (Design Stage)

Kirklees Council

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Contents

Executive Summary	4
1. Introduction	5
1.1 Background	5
1.2 Biodiversity Net Gain Assessment	6
1.3 Relevant Legislation and Policy	6
2. Methodology	7
2.1 Background	7
2.2 Biodiversity Metric Inputs	7
2.3 Biodiversity Metric Calculations	9
2.4 Trading Rules	9
2.5 Assumptions and Limitations	10
3. Findings and Evaluation	12
3.1 On-Site Baseline Habitats	12
3.2 Off-Site Baseline Habitats	13
3.3 On-Site Post-Development Biodiversity	14
3.4 Off-Site Post Development Biodiversity	15
3.5 Combined Net Change in Biodiversity	17
4. Assessment and Recommendations	18
4.1 Summary of Biodiversity Net Gain Delivery	18
4.2 Habitat Management and Monitoring	18
4.3 BNG Principles	18
5. References	19
Figure 1: Baseline Habitat Map – On-Site	21
Figure 2: Baseline Habitat Map – Off-Site	22
Figure 3: Post Development Habitat Map – On-Site	23
Figure 4: Post Development Habitat Map – Off-Site	24
Appendix 1: BNG Good Practice Principles	25
Appendix 2: BNG Policy and Legislation	28
Appendix 3: The Statutory Biodiversity Metric Tool	29
Appendix 4: Condition Assessment Results	30

Appendix 5: Site Photographs..... 31

Executive Summary

Cura Terrae Land & Nature Limited (Ltd) (Cura Terrae), formerly Ecus Ltd, was commissioned by Kirklees Council in December 2025 to undertake a Design Stage Biodiversity Net Gain Assessment (BNGA) for Huddersfield Bus Station, Upperhead Row, Huddersfield, HD1 1JN, central Ordnance Survey National Grid Reference (NGR): SE 14204 16569, hereafter referred to as 'the Site' and as displayed in Figure 1. This Design Stage BNGA has been carried out to determine the anticipated change in biodiversity value of the Site based upon the proposed development and associated post-development habitats, using the Department for Environment, Food and Rural Affairs (DEFRA) 'Statutory Biodiversity Metric User Guide' (SBM) (DEFRA, 2025).

Site proposals relate to Phase 2 of the development only, covering the area denoted as the 'Phase 2 Boundary' within Bryan G Hall 'Combined Phasing Plan' (Drawing Reference: HBS-BGH-Z0-XX-DR-C0024, May 2024). Soft landscaping proposals are taken from Pick Everard 'Landscape Masterplan' (Drawing Reference: 221655-PEV-XX-00-DR-L-0301, Rev P09, October 2025) and SGP Architects 'Proposed Roof Plan' (Drawing Reference: 202335-SGP-ZZ-ZZ-DR-A-131102, Rev P06, dated June 2024), both hereafter referred to as the 'Landscape Proposals' which cover the area denoted as 'Phase 2 boundary' in Figure 1.

Cura Terrae (as Ecus) was also commissioned to undertake a Preliminary Ecological Appraisal (PEA) for the Site ('Huddersfield Bus Station – Preliminary Ecological Appraisal' Ref. 21287 V2.0, dated July 2024) (PEA, Ecus 2024a) along with habitat condition assessments to inform the initial Feasibility Stage BNGA for the Site ('Huddersfield Bus Station (Phase 2) – Biodiversity Net Gain Assessment' Ref. 21287 V2.0, dated July 2024) (BNGA, Ecus 2024b).

Following discussions with the client, four areas of land to the south of the Site are to be used as off-site compensation in order to satisfy trading rules of the SBM due to the proposed loss of baseline urban trees at the Site (DEFRA, 2025), as detailed in the Feasibility Stage BNGA (Ecus, 2024b). Off-site proposals are taken from Kirklees Council 'Off-site BNG Tree Planting Locations' (Drawing Reference: LAD.696.101, dated December 2025), hereafter referred to as the 'off-site' areas (areas 1-4, as displayed in Figure 2).

The proposed development is predicted to result in a combined net unit change of +0.19 Habitat Units (HU), which equates to a net percentage change of +62.45%, which exceeds the statutory requirement for 10% net gain post-development and satisfies the trading rules for the SBM.

Any subsequent changes made to the Landscape Proposals and off-site proposals would need to be fully reflected in a revised Design Stage BNGA and any relevant updates should be made to the compensation proposals. An accompanying Biodiversity Enhancement Management Plan (BEMP) ('Huddersfield Bus Station (Phase 2) – Biodiversity Enhancement Management Plan' Ref. 26164-BEMP-V1.0) (Cura Terrae, 2026) has been produced to ensure the on and off-site habitats deliver the habitat scores listed within this Design Stage BNGA, as agreed with the Local Planning Authority.

1. Introduction

1.1 Background

- 1.1.1 Cura Terrae Land & Nature Limited (Ltd) (Cura Terrae), formerly Ecus Ltd, was commissioned in December 2025 by Kirklees Council to undertake a Design Stage Biodiversity Net Gain Assessment (BNGA) for Huddersfield Bus Station, Upperhead Row, Huddersfield, HD1 1JN, central Ordnance Survey National Grid Reference (NGR): SE 14204 16569, hereafter referred to as the 'Site' and as displayed in Figure 1.
- 1.1.2 This Design Stage BNGA has been carried out to determine the anticipated change in biodiversity value of the Site based upon the proposed development and associated post-development habitats, using the Department for Environment, Food and Rural Affairs (DEFRA) '*Statutory Biodiversity Metric User Guide*' (SBM) (DEFRA, 2025).
- 1.1.3 The proposals comprise the transformation of the bus station and construction of a new canopy area adjacent to its southeast elevation. This Design Stage BNGA relates to Phase 2 of the development only, covering the area denoted as the '*Phase 2 Boundary*' within Bryan G Hall '*Combined Phasing Plan*' (Drawing Reference: HBS-BGH-Z0-XX-DR-C0024, May 2024). Soft landscaping proposals are taken from Pick Everard '*Landscape Masterplan*' (Drawing Reference: 221655-PEV-XX-00-DR-L-0301, Rev P09, October 2025) and SGP Architects '*Proposed Roof Plan*' (Drawing Reference: 202335-SGP-ZZ-ZZ-DR-A-131102, Rev P06, dated June 2024), both hereafter referred to as the 'Landscape Proposals' which covers the area denoted as 'Phase 2 boundary' in Figure 1.
- 1.1.4 Cura Terrae (as Ecus) was also commissioned to undertake a Preliminary Ecological Appraisal (PEA) for the Site ('*Huddersfield Bus Station – Preliminary Ecological Appraisal*' Ref. 21287 V2.0, dated July 2024) (PEA, Ecus 2024a) along with habitat condition assessments to inform the initial Feasibility Stage BNGA for the Site ('*Huddersfield Bus Station (Phase 2) – Biodiversity Net Gain Assessment*' Ref. 21287 V2.0, dated July 2024) (BNGA, Ecus 2024b).
- 1.1.5 Following discussions with the client, four areas of land to the south of the Site are to be used as off-site compensation in order to satisfy trading rules of the SBM due to the proposed loss of baseline urban trees at the Site (DEFRA, 2025), as detailed in the Feasibility Stage BNGA (Ecus, 2024b). Off-site proposals are taken from Kirklees Council '*Off-site BNG Tree Planting Locations*' (Drawing Reference: LAD.696.101, dated December 2025), hereafter referred to as the 'off-site' areas (areas 1-4, as displayed in Figure 2).
- 1.1.6 This report details the results of the Design Stage BNGA using biodiversity metric calculations which have been completed based on the ecological walkover surveys undertaken in February 2024 and January 2026 and area calculations of the post-development habitats taken from the Landscape Proposals and Off-site BNG Tree Planting Locations. The methodologies employed

and all survey findings are described along with an evaluation and assessment of the ecological value of the Site. Any recommendations with regard to ensuring BNG are also detailed as required.

1.2 Biodiversity Net Gain Assessment

1.2.1 Under the Environmental Act 2021, developments are required to achieve 10% Biodiversity Net Gain (BNG) to ensure that biodiversity of the Site post-development is greater than that present at baseline (pre-development) value. BNG calculations are conducted through assessing the type and condition of habitats on a site and then comparing the anticipated changes in habitat types and condition based on the development proposals. A Design Stage BNGA follows the mitigation hierarchy, which sets out that everything possible must be done to firstly avoid, secondly minimise and thirdly restore/rehabilitate losses of biodiversity on Site. Only as a last resort are residual losses compensated for through biodiversity offsetting, whereby the loss of biodiversity is compensated for via new habitat creation off-site or by paying a financial sum to an offset provider. Design Stage BNGA reports should adhere to the BNG good practice principles (Appendix 1).

1.3 Relevant Legislation and Policy

1.3.1 This Design Stage BNGA has been compiled with reference to the following relevant nature conservation legislation, planning policy and the UK Biodiversity Framework from which the protection of sites, habitats and species is derived in England including:

- UK Government's 25 Year Environment Plan (Defra, 2018);
- Biodiversity 2020: A Strategy for England's Wildlife and Ecosystem Services (Defra, 2011);
- National Planning Policy Framework (NPPF) (DLUHC, 2024);
- The Natural Environment and Rural Communities (NERC) Act (HMSO, 2006);
- The Environment Act (Defra, 2021);
- Kirklees Biodiversity Action Plan (Kirklees Council, 2007); and,
- Kirklees Local Plan 2013-2031 '*Policy LP30: Biodiversity and geodiversity*' (Adopted 2019) (Kirklees Council, 2024).

2. Methodology

2.1 Background

- 2.1.1 This Design Stage BNGA uses the industry recognised best practice methodology within the 'Statutory Biodiversity Metric User Guide' (SBM) (DEFRA, 2025).
- 2.1.2 The SBM uses habitat features as a measure for the value and importance to nature. The following information on each habitat are required for the metric inputs:
- Type;
 - Area/length;
 - Distinctiveness (automatically calculated);
 - Irreplaceable habitats;
 - Condition; and,
 - Strategic significance.

2.2 Biodiversity Metric Inputs

Habitat Type and Area/Length

Baseline

- 2.2.1 The Site was surveyed on 16th February 2024 by Senior Ecologists Katie Smith BSc (Hons) ACIEEM and James Storey MSc MCIEEM. The off-site areas were surveyed on 6th January 2026 by Assistant Ecologist Adam Watts BSc (Hons).
- 2.2.2 The visits included an ecological walkover survey using the UK Habitat Classification System (UK Hab 2.0) (UKHab Ltd., 2023). The habitats present were identified and classified according to the UK Habitat Classification system which closely aligns with the SBM. The on-site baseline habitats are denoted within the 'Phase 2 boundary' as displayed in Figure 1. The off-site baseline habitats are displayed in Figure 2.
- 2.2.3 The SBM uses a classification system based mainly on the UKHab, with input from other systems including the Water Framework Directive (WFD) Lakes Typology (UKTAG, 2003), the European Nature Information System (EUNIS) habitat type hierarchical view (EEA, 2019), Natura 2000 Annex I habitats (JNCC, 2019) and habitats specific to the SBM.
- 2.2.4 The area/length covered by each habitat type was mapped using the QGIS 3.34.10 Geographical Information System (GIS).

Post-Development

- 2.2.5 Proposals for the Site have been analysed and habitats present post-development have been determined using the Landscape Proposals, Off-site BNG Tree Planting Locations, and using best knowledge of the likely habitats to be retained, created and enhanced as agreed following discussions with the client and in accordance with the habitat classification system used by the SBM.

Habitat Distinctiveness

- 2.2.6 For all baseline and post-development habitats the distinctiveness of each habitat type is automatically calculated within the SBM.

Habitat Condition

- 2.2.7 The condition of a habitat is a measure of the biological 'working-order' of a habitat type judged against the perceived ecological optimum state for that particular habitat. The condition assessments were undertaken using the '*The Statutory Biodiversity Metric – Technical Annex 1: Condition Assessment Sheets and Methodology*' spreadsheet (DEFRA, 2024) see Appendix 4.

Baseline

- 2.2.8 Following the UKHab ecological walkover surveys at the Site (including off-site area) the condition of each habitat type was assessed and categorised as either Good, Moderate or Poor.
- 2.2.9 If a habitat varied in condition across the Site this was recorded and mapped.

Post-Development

- 2.2.10 The condition of habitats post-development across the Site has been assigned based on assumptions of likely habitat condition in line with the condition assessment criteria (DEFRA, 2024).

Habitat Strategic Significance

- 2.2.11 The SBM accounts for whether the habitat is situated in an area locally identified as significant for nature.
- 2.2.12 Data on areas and habitats locally identified as significant for nature were obtained from the following sources:
- Multi-Agency Geographical Information for the Countryside (MAGIC) website for mapped statutory designated sites (<https://magic.defra.gov.uk/magicmap.aspx>);

- West Yorkshire Joint Services (WYJS) for data relating to non-statutory designated sites for nature conservation within and adjacent the Site;
- Habitats listed within the Kirklees Biodiversity Action Plan (LBAP); and,
- Strategic plans identified within the Kirklees Local Plan 2013-2031 (Adopted 2019) (Kirklees Council, 2024).

2.3 Biodiversity Metric Calculations

- 2.3.1 Biodiversity metric calculations provide a numerical score for the value of existing habitats and their likely value post-development in Habitat Units (HU), Hedgerow Units (HeU) and Watercourse Units (WU), in order for the impact of the proposed development to be quantitatively assessed.
- 2.3.2 Using the SBM, habitat values are calculated based on whether they occur commonly or whether they are rare, their area (ha) or length (km) for linear features such as hedgerows and ditches, condition and importance within the local area, usually identified from local relevant planning policies or documents. This gives individual baseline HU, HeU and WU.
- 2.3.3 Individual trees are classified as either Urban Tree or Rural Tree, depending on the extent of urbanisations around them. The size of a tree is either Small, Medium, Large or Very Large, dependent on the diameter at breast height (centimetres). A biodiversity metric area equivalent (hectares) is automatically calculated within the SBM dependent on the tree size, however this area measurement is not included within the total habitat area (in ha) of the Site.
- 2.3.4 The post-development value can also be calculated for habitats where factors including time to target condition and difficulty of creation/enhancement are also taken into consideration. The values for area habitats and linear habitats are calculated separately. This provides an overall assessment of the biodiversity net gain or loss as a result of a development. To achieve biodiversity net gain, all three of HU, HeU and WU are treated separately, the individual gains cannot be combined to form an overall gain for the Site.

2.4 Trading Rules

- 2.4.1 The trading rules establish minimum requirements for creating and enhancing habitats to offset specific habitat losses, ensuring no net loss. The SBM considers distinctiveness, as described in section 2.2.6, and using this data the SBM applies trading rules that require any habitat loss to be replaced on a 'like for like' or 'like for better' basis. The trading rules are detailed below in Table 1.

Table 1: Trading Rules within SBM

Distinctiveness Group	Trading Rules
Very High	Bespoke compensation likely to be required
High	Same habitat required
Medium	Same broad habitat or a higher distinctiveness habitat required
Low	Same distinctiveness or better habitat required
Very Low	Compensation not required

2.5 Assumptions and Limitations

- 2.5.1 For strategic significance, all habitats at the Site have been considered ‘*Low Strategic Significance*’ as they do not qualify as priority habitats, are not identified on any strategic plans and are not considered to be ecologically desirable based on the location of the Site and surrounding landscape.
- 2.5.2 On-site SBM calculations are based upon the partial loss of modified grassland, developed land; sealed surface and urban trees (Tree Group (TG) 2) to be replaced by introduced shrub, other green roof, the planting of two urban trees (TG3) and developed land; sealed surface habitats, in addition to the enhancement of retained modified grassland, as detailed further in Table 2. Off-site compensation includes the planting of 6 small-sized urban trees (TG4).
- 2.5.3 The condition and size of the baseline urban trees have been classified based on information contained within the PEA (Ecus, 2024a) and an Arboricultural report of the Site (‘*Huddersfield Bus Station - BS 5837:2012 Arboricultural Report, Impact Assessment and Method Statement*’ Ref. 21287 V1.0, dated May 2024) (Arb report, Ecus 2024c).
- 2.5.4 Both on and off-site surveys and condition assessments were undertaken during January and February, outside of the peak botanical survey season, therefore it is possible that some flowering plants may have been under-recorded. However, this was not a significant limitation given that there was sufficient plant growth to characterise the baseline habitats present within on and off-site areas in order to complete the relevant condition assessments to a reasonable standard.

- 2.5.5 An assumption has been made that all retained modified grassland on-site will be subject to enhancement measures sufficient to improve their condition from Poor to Moderate. Such measures to secure a condition of at least Moderate are detailed within the accompanying BEMP (*'Huddersfield Bus Station (Phase 2) – Biodiversity Enhancement Management Plan'* Ref. 26164-BEMP-V1.0) (Cura Terrae, 2026).
- 2.5.6 Based on the Landscape Proposals and Off-site BNG Tree Planting Locations, proposed habitats have been converted to suitable habitat classifications for use in the SBM, as detailed in Table 2 below.

Table 2: Habitat Conversions for SBM Classifications

Landscape Proposals and Off-Site Areas Habitat	SBM classification
Standard Tree	Urban tree
Proposed Heavy Standard tree	Urban tree
Ornamental Planting	Introduced shrub
Bulb Planting	Modified grassland

- 2.5.7 The condition of post-development habitats has been estimated based on the criteria within *'The Statutory Biodiversity Metric - Technical Annex 1: Condition Assessment Sheets and Methodology'* (DEFRA, 2024) and based on reasonable assumptions for the habitat types taking into account feasibility, the locality, and their extent within the on-site and off-site areas.
- 2.5.8 The quantification of biodiversity is one of a number of factors to be considered when assessing the impact of the proposed development on biodiversity. This Design Stage BNGA does not cover potential impacts of the proposed development on protected species and designated sites. These are outlined within the PEA report in relation to on-site only (Ecus, 2024a).

3. Findings and Evaluation

3.1 On-Site Baseline Habitats

- 3.1.1 On-site baseline area-based habitats recorded comprise Urban – Developed land; sealed surface, Urban – Introduced shrub, Grassland – Modified grassland and Individual trees – Urban tree as displayed in Figure 1 and shown in Appendix 5.
- 3.1.2 No Hedgerow Units (HeU) or Watercourse Units (WU) were recorded within or adjacent to the on-site areas.

Biodiversity Metric Calculations

- 3.1.3 The total area covering Phase 2 of the works on-site has been calculated at 0.2 ha. The habitat type, distinctiveness, condition, area and HU of the area habitats are provided within Table 3. Baseline area-based habitats have a biodiversity value of 0.30 HU, as shown in Appendix 3.

Table 3: Baseline Area-based Habitats, Distinctiveness, Condition and Habitat Units

Habitat Type	Distinctiveness	Condition	Area (ha)	Habitat Units
Urban – Developed land; sealed surface	Very low	N/A	0.170	0.00
Urban – Introduced shrub	Low	N/A	0.005	0.01
Grassland – Modified grassland	Low	Poor	0.024	0.05
Individual trees – Urban tree (TG1)	Medium	Moderate	0.0244	0.20
Individual trees – Urban tree (TG2)	Medium	Poor	0.0122	0.05

Habitat Type	Distinctiveness	Condition	Area (ha)	Habitat Units
Total Habitat Units (HU)				0.30¹

3.2 Off-Site Baseline Habitats

- 3.2.1 Baseline area-based habitats recorded for the off-site areas comprised Grassland – Modified grassland, as illustrated in Figure 2 and Appendix 5.
- 3.2.2 No Hedgerow Units (HeU) or Watercourse Units (WU) were recorded within or adjacent to the off-site areas.

Biodiversity Metric Calculations

- 3.2.3 The total area off-site has been calculated at 0.02 ha. The habitat type, distinctiveness, condition, area and HU of the area-based off-site habitats are provided within Table 4. Off-site baseline area habitats have a biodiversity value of 0.05 HU.

Table 4: Off-Site Baseline Area-based Habitats, Distinctiveness, Condition and Habitat Units

Habitat Type	Distinctiveness	Condition	Area (ha)	Habitat Units
Grassland – Modified grassland (Off-site area 1)	Low	Poor	0.006	0.01
Grassland – Modified grassland (Off-site area 2)	Low	Poor	0.002	0.00
Grassland – Modified grassland (Off-site area 3)	Low	Poor	0.002	0.00
Grassland – Modified grassland (Off-site area 4)	Low	Poor	0.014	0.03

¹ Please note that the sum of the HU in Table 3 varies by 0.01 to that shown in the metric tool (Appendix 3). This is due to differences in rounding up and is not statistically significant

Habitat Type	Distinctiveness	Condition	Area (ha)	Habitat Units
Total Habitat Units (HU)				0.05²

3.3 On-Site Post-Development Biodiversity

- 3.3.1 The following calculations present a version of the completed biodiversity metric calculations based on the post-development proposals shown in the Landscape Proposals and using best knowledge of the likely habitats to be retained, created and enhanced. Predicted on-site post-development habitats are mapped in Figure 3.
- 3.3.2 Post-development habitats on-site are predicted to comprise Urban – Developed land; sealed surface, Urban - Other green roof, Urban – Introduced shrub, Grassland – Modified grassland and Individual trees – Urban tree.
- 3.3.3 The habitat type, distinctiveness, condition, area and HU of the post-development habitats on-site are provided within Table 5. Post-development, the area-based habitats (including retained, enhanced and created habitats) on-site produced a biodiversity value of 0.42 HU.

Table 5: On-Site Post-Development Area-based Habitats, Distinctiveness, Condition and Habitat Units

Habitat Type	Distinctiveness	Condition	Area (ha)	Habitat Units
<i>Retained</i>				
Urban – developed land; sealed surface	Very Low	N/A	0.107	0.00
Urban – Introduced shrub	Low	N/A	0.003	0.01

² Please note that the sum of the HU in Table 4 varies by 0.01 to that shown in the metric tool (Appendix 3). This is due to differences in rounding up and is not statistically significant

Habitat Type	Distinctiveness	Condition	Area (ha)	Habitat Units
Individual trees – Urban tree (TG1)	Medium	Moderate	0.024	0.20
Created				
Urban – Introduced shrub	Low	N/A	0.01	0.02
Urban – Other green roof	Low	N/A	0.06	0.12
Individual trees – Urban tree (TG3)	Medium	Poor	0.008	0.02
Enhanced				
Grassland – Modified grassland	Low	Moderate	0.017	0.06
Total Habitat Units (HU)				0.42³

3.4 Off-Site Post-Development Biodiversity

- 3.4.1 The following calculations present a version of the completed biodiversity metric calculations for the off-site areas shown in the Off-site BNG Tree Planting Locations and using best knowledge of the likely habitats to be retained and created. Predicted off-site post-development habitats are mapped in Figure 4.
- 3.4.2 Post-development area-based off-site habitats are predicted to comprise Grassland – Modified grassland and Individual trees – Urban tree.

³ Please note that the sum of the HU in Table 5 varies by 0.01 to that shown in the metric tool (Appendix 3). This is due to differences in rounding up and is not statistically significant

3.4.3 The habitat type, distinctiveness, condition, area and HU of the post-development habitats are provided within Table 6. Post-development, the area-based habitats (including retained and created habitats) off-site produced a biodiversity value of 0.12 HU.

Table 6: Off-Site Post-Development Area-based Habitats, Distinctiveness, Condition and Habitat Units

Habitat Type	Distinctiveness	Condition	Area (ha)	Habitat Units
<i>Retained</i>				
Grassland – Modified grassland (Off-site area 1)	Low	Poor	0.006	0.01
Grassland – Modified grassland (Off-site area 2)	Low	Poor	0.002	0.00
Grassland – Modified grassland (Off-site area 3)	Low	Poor	0.002	0.00
Grassland – Modified grassland (Off-site area 4)	Low	Poor	0.014	0.03
<i>Created</i>				
Individual trees – Urban tree (TG4)	Medium	Moderate	0.024	0.07

Habitat Type	Distinctiveness	Condition	Area (ha)	Habitat Units
Total Habitat Units (HU)				0.12⁴

3.5 Combined Net Change in Biodiversity

3.5.1 The proposed development is predicted to result in a combined net unit change of +0.19 HU, which equates to a net percentage change of +62.45%, as detailed in Table 7.

Table 7: Summary of Biodiversity Net Gain Calculations

Habitat Type	Baseline Units	Post-Development Units	Change in Units	% Change in Units
On-Site				
Habitat Units (HU)	0.30	0.42	+ 0.11	+37.75%
Off-Site				
Habitat Units (HU)	0.05	0.12	+ 0.07	+155.41%
Combined Net Unit Change				
Habitat Units (HU)			+ 0.19 ⁵	+62.45%

⁴ Please note that the sum of the HU in Table 6 varies by 0.01 to that shown in the metric tool (Appendix 3). This is due to differences in rounding up and is not statistically significant

⁵ Please note that the sum of the combined HU in Table 7 varies by 0.01 to that shown in the metric tool (Appendix 3). This is due to differences in rounding up and is not statistically significant

4. Assessment and Recommendations

4.1 Summary of Biodiversity Net Gain Delivery

- 4.1.1 The proposed development is predicted to result in a combined net unit change of +0.19 HU, which equates to a net percentage change of +62.45%, which exceeds the statutory requirement for 10% net gain post-development. The current proposals are sufficient in biodiversity value to satisfy the trading rules of the SBM and compensate for the losses of baseline habitats on-site to facilitate the development.

4.2 Habitat Management and Monitoring

- 4.2.1 Any subsequent changes made to the Landscape Proposals and Off-site BNG Tree Planting Locations would need to be fully reflected in a revised Design Stage BNGA and any relevant updates should be made to the compensation proposals.
- 4.2.2 An accompanying Biodiversity Enhancement Management Plan (BEMP) (Cura Terrae, 2026) has been produced to ensure the on and off-site habitats deliver the habitat scores listed within this Design Stage BNGA, as agreed with the Local Planning Authority.

4.3 BNG Principles

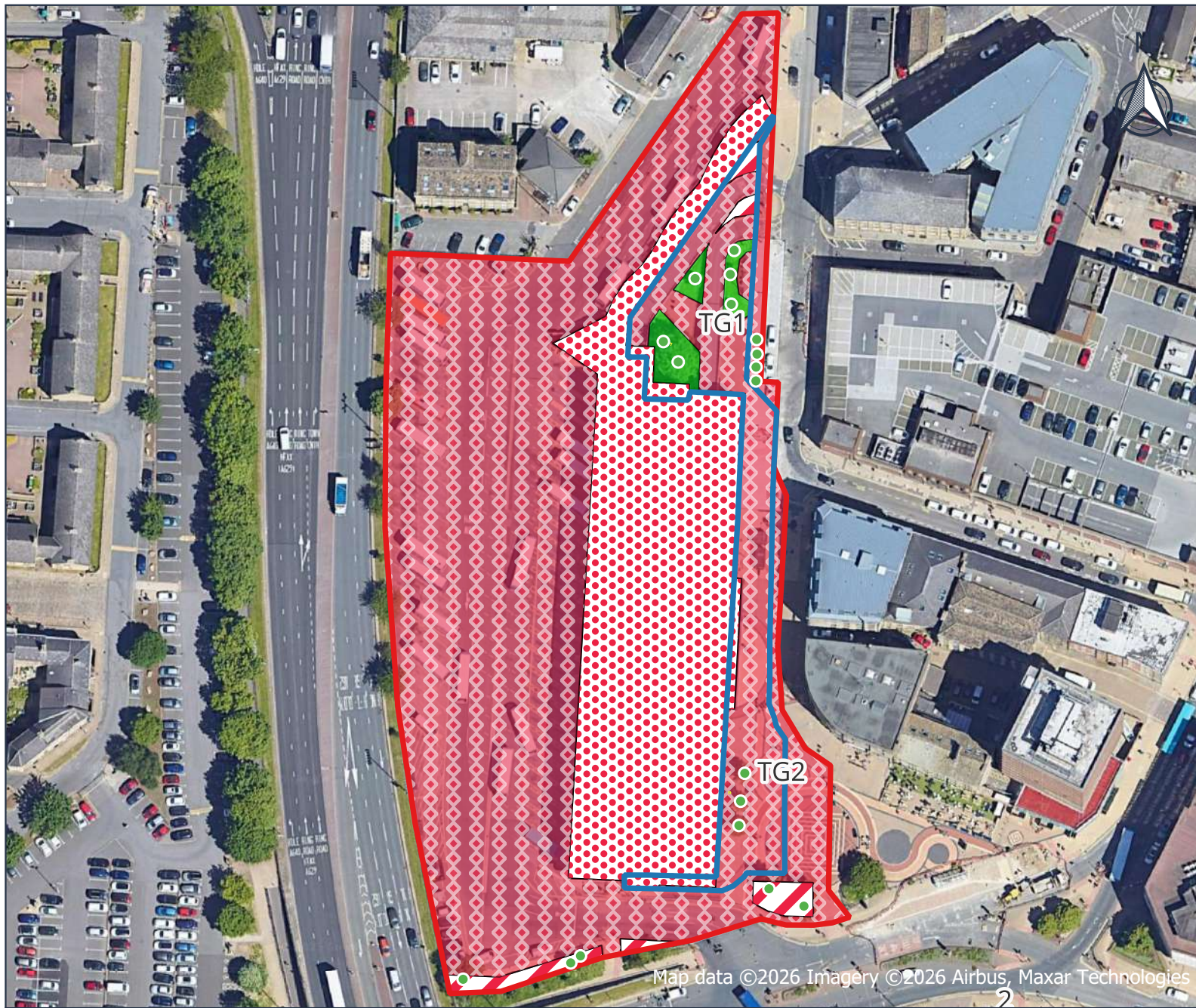
- 4.3.1 Appendix 1 details the BNG good practice principles (CIEEM, CIRIA, IEMA, 2016) which should be adhered to when undertaking BNG assessments in association with proposed developments. The actions within Appendix 1 have been taken into account throughout the design stage of the development at the Site (including off-site areas).

5. References








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Figure 1: Baseline Habitat Map – On-Site



Legend

-  Site boundary
-  Phase 2 boundary
-  Individual trees - Urban tree
-  Grassland - Modified grassland
-  Urban - Introduced shrub
-  Urban - Developed land; sealed surface (Buildings)
-  Urban - Developed land; sealed surface

TG1: Tree Group 1
 TG2: Tree Group 2

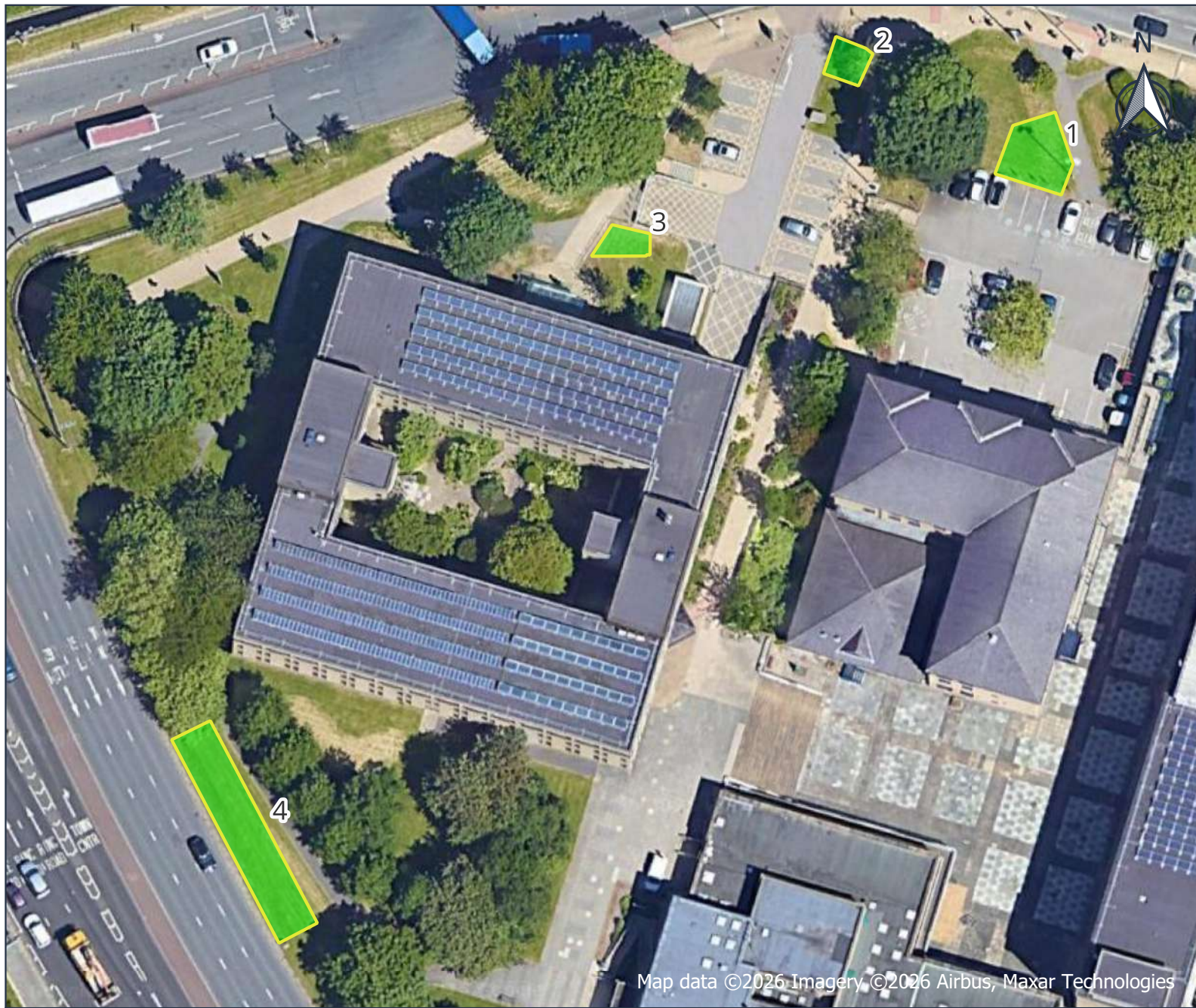


Revision	Date	Drawn by	Checked by
A	07.01.2025	AW	EH
B	11.02.2026	AW	JS

Drg. Ref.: 26164-ECO-1-A Scale (A4): 1:1,250

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Figure 2: Baseline Habitat Map – Off-Site



Legend

- Off-site boundary
- Grassland - Modified grassland



Revision	Date	Drawn by	Checked by
A	07.01.2025	AW	EH

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Figure 3: Post-Development Habitat Map – On-Site



Legend

-  Site boundary
-  Phase 2 boundary
-  Urban - Introduced shrub
-  Grassland - Modified grassland
-  Urban - Introduced shrub (Proposed)
-  Urban - Developed land; sealed surface (Buildings)
-  Urban - Developed land; sealed surface
-  Urban - Other green roof
-  Retained Individual trees
-  Proposed Individual trees

TG1: Tree Group 1
 TG3: Tree Group 3

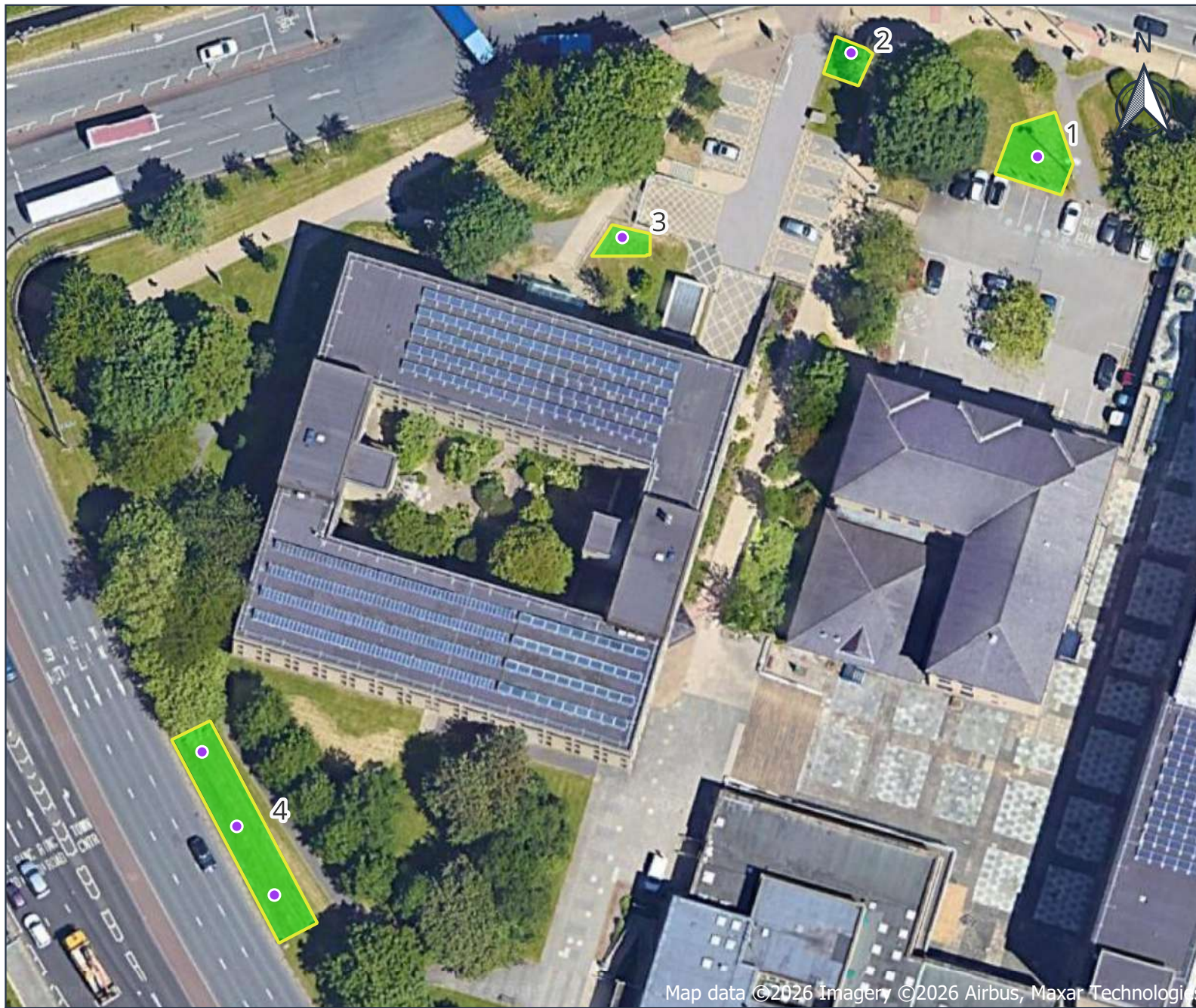


Revision	Date	Drawn by	Checked by
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Figure 4: Post-Development Habitat Map – Off-Site



Legend

- Off-site boundary
- Grassland - Modified grassland
- Individual trees - Urban tree (Tree Group 4)



Revision	Date	Drawn by	Checked by
A	07.01.2025	AW	EH
B	11.02.2026	AW	JS

Drg. Ref.: 26164-ECO-4-A Scale (A4): 1:700

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Appendix 1: BNG Good Practice Principles

The BNG good practice principles are based upon issued joint guidance from the Chartered Institute for Ecology and Environmental Management (CIEEM), the Construction Industry Research and Information Association (CIRIA) and Institute for Environmental Management and Assessment (IEMA) (CIEEM, CIRIA & IEMA (2016 and CIEEM, CIRIA & IEMA 2019).

Principle	Description
1. Apply the mitigation hierarchy	Do everything possible to first avoid and then minimise impacts on biodiversity. Only as a last resort, and in agreement with external decision-makers where possible, compensate for losses that cannot be avoided. If compensating for losses within the development footprint is not possible or does not generate the most benefits for nature conservation, then offset biodiversity losses by gains elsewhere.
2. Avoid losing biodiversity that cannot be offset by gains elsewhere	Avoid negative impacts on irreplaceable biodiversity – these impacts cannot be offset to achieve No Net Loss or Net Gain.
3. Be inclusive and equitable	Engage stakeholders early, and involve them in designing, implementing, monitoring and evaluating the approach to Net Gain. Achieve Net Gain in partnership with stakeholders where possible, and share the benefits fairly among stakeholders.
4. Address risks	Mitigate difficulty, uncertainty and other risks to achieving Net Gain. Apply well-accepted ways to add contingency when calculating biodiversity losses and gains in order to account for any remaining risks, as well as to compensate for the time between the losses occurring and the gains being fully realised.
5. Make a measurable Net Gain contribution	Achieve a measurable, overall gain for biodiversity and the services ecosystems provide while directly contributing towards nature conservation priorities.

<p>6. Achieve the best outcomes for biodiversity</p>	<p>Achieve the best outcomes for biodiversity by using robust, credible evidence and local knowledge to make clearly-justified choices when:</p> <ul style="list-style-type: none"> • Delivering compensation that is ecologically equivalent in type, amount and condition, and that accounts for the location and timing of biodiversity losses; • Compensating for losses of one type of biodiversity by providing a different type that delivers greater benefits for nature conservation; • Achieving Net Gain locally to the development while also contributing towards nature conservation priorities at local, regional and national levels; • Enhancing existing or creating new habitat; • Enhancing ecological connectivity by creating more, bigger, better and joined areas for biodiversity.
<p>7. Be additional</p>	<p>Achieve nature conservation outcomes that demonstrably exceed existing obligations (i.e. do not deliver something that would occur anyway).</p>
<p>8. Create a Net Gain legacy</p>	<p>Ensure Net Gain generates long-term benefits by:</p> <ul style="list-style-type: none"> • Engaging stakeholders and jointly agreeing practical solutions that secure Net Gain in perpetuity; • Planning for adaptive management and securing dedicated funding for long-term management; • Designing Net Gain for biodiversity to be resilient to external factors, especially climate change; • Mitigating risks from other land uses;

	<ul style="list-style-type: none">• Avoiding displacing harmful activities from one location to another;• Supporting local-level management of Net Gain activities.
9. Optimise sustainability	Prioritise Biodiversity Net Gain and, where possible, optimise the wider environmental benefits for a sustainable society and economy.
10. Be transparent	Communicate all Net Gain activities in a transparent and timely manner, sharing the learning with all stakeholders.

Appendix 2: BNG Policy and Legislation

Level	Policy / Legislation	Summary / Key Points	Relevance to BNG
Legal Duty for Public Bodies	Natural Environment and Rural Communities (NERC) Act (HMSO, 2006)	Section 40: public authorities must have regard to conserving biodiversity. Section 41: lists habitats/species of principal importance.	Supports conservation and enhancement of biodiversity; underpins BNG objectives.
Legal Implementation	Environment Act (HMSO, 2021) – Schedule 7a	Makes BNG mandatory in England; sets 10% gain target; defines calculation of onsite, offsite, and credits.	Operationalises BNG as a legal requirement; ensures measurable biodiversity gain.
Planning Guidance	National Planning Policy Framework (NPPF, DLUHC, 2024)	Encourages net environmental and biodiversity gains; protects habitats and species; outlines planning principles for avoiding, mitigating, or compensating harm.	Guides Local Authorities in integrating BNG into planning decisions; aligns with Environment Act.
Strategic National Policy	UK Government’s 25 Year Environment Plan (DEFRA, 2018)	Sets the principle of “net environmental gain” for development. Plans consultation to make BNG mandatory.	Provides overarching strategic direction; foundation for mandatory BNG.
National Biodiversity Goals	Biodiversity 2020: A strategy for England’s wildlife and ecosystem services (DEFRA, 2011)	Ambition to halt biodiversity loss; increase priority habitats by 200,000 ha; “Bigger, Better, More, Joined”.	Provides ecological rationale for BNG; supports habitat creation and connectivity.

Appendix 3: The Statutory Biodiversity Metric Tool

Provided as a separate Microsoft Excel Spreadsheet

Appendix 4: Condition Assessment Results

Provided as a separate Microsoft Excel Spreadsheet

Appendix 5: Site Photographs



1. Grassland – Modified grassland (on-site)



2. Urban – Developed land; sealed surface (on-site)



3. Urban – Introduced shrub (on-site)



4. Grassland – Modified grassland (off-site area 1)



5. Grassland – Modified grassland (off-site area 2)



6. Grassland – Modified grassland (off-site area 3)



7. Grassland – Modified grassland (off-site area 4)