

BIODIVERSITY ACCOUNTING ASSESSMENT REPORT

at
**Newsome Mills
4 Ruth Street
Huddersfield
West Yorkshire
HD4 6JF**

**Client:
TrueNorth Partnerships**

**Client Address:
Suite S2
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**JCA Ref:
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19/02/2026**

V2: 30/06/2026



Quality Assurance

Version	Desktop Survey Completed:		Site Surveyed:		Report Completed:		Reviewed:	
	Date	Name	Date	Name	Date	Name	Date	Name
001	30/01/26	Grace Bramley	20/01/26	Grace Bramley	05/02/26	Grace Bramley	11/02/26	Kristen Kelly
				Alex Donovan			18/02/26	Elizibeth Davies
002	n/a	n/a	n/a	n/a	24/06/26	Grace Bramley	30/06/26	Adam West

This report has been prepared and provided in accordance with the *British Standard 42020: Biodiversity – Code of practice for planning and development 2018* and the *CIEEM's Code of Professional Conduct*.

This Assessment is only valid for the named client and the project described. JCA Limited. accepts no responsibility or liability for the consequences of this document being used for a purpose other than the purpose for which it was commissioned. If the scope of works or timing of the project are altered the advice given in this report may not be valid. Information and data provided within this report is considered accurate at the time of writing.

Provided no significant changes are made to the proposals or on the site (e.g. significant changes to management practices or habitats present) subsequent to the report's issue; this report can be considered valid for 18 months from the date of issue.

As part of membership to our professional body (CIEEM) and EPS licence reporting we are required to provide our biological results to applicable biological record centres. As such, it is our intention to supply biological data collected as part of this assessment, where recorded, to the relevant BRC. If the project is sensitive in nature, we may be able to delay submitting the records until the project enters the public domain, however, this must be discussed with JCA Limited and agreed in writing.



Executive Summary

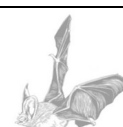
JCA Limited was instructed by **TrueNorth Partnership** to carry out a Biodiversity Accounting Assessment (BAA) of **Newsome Mills, 4 Ruth Street** (hereafter referred to as the 'Site') to inform a planning application for the construction of a housing development and associated landscaping and access ('the Proposed Development').

The purpose of the assessment is to determine the baseline biodiversity value of the Site and to assess if there are sufficient biodiversity enhancement opportunities available within the Site boundary to compensate for any residual biodiversity losses as a result of the Proposed Development.

To fulfil the brief, the Biodiversity Metric 4.0 (June 2024 update) was used to calculate the baseline biodiversity value of all existing habitats on-Site. The metric was then used to provide a comparative measure of any habitat creation and enhancements associated with the Client's Proposed Development. The resulting balance determines the extent of Biodiversity Units (BU) generated through the proposed habitats post development.

The baseline habitat units present on site are **8.01** BU. On balance of impacts and habitat retention/enhancement/creation, the report concludes that the Proposed Development will result in a net loss of **-3.29** habitat BU, equivalent to a net loss of **-41.08%**. In addition, the Proposed Development has **not satisfied** the trading rules.

This executive summary is intended as a summary of the assessment of the Site based on information received by the client at the time of production. This executive summary should be read in conjunction with the full Report.



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1. Introduction

1.1 Purpose of the Report

1.1.1 JCA Limited have been instructed by **TrueNorth Partnership** to undertake a Biodiversity Accounting Assessment (BAA) of a site located at **Newsome Mills, 4 Ruth Street** (hereafter referred to as the 'Site').

1.1.2 The purpose of this report is to:

- Assess the baseline biodiversity value of the Site through the total sum of the habitats within the Site, and their calculated biodiversity value.
- Assess if there are sufficient biodiversity enhancement and/or creation opportunities available within the Site boundary to compensate for any residual biodiversity losses as a result of the Proposed Development.
- To determine the level of overall residual biodiversity gains or losses associated with the Proposed Development.

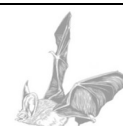
1.1.3 The Site location and red line / survey area are shown in Appendix 1.

1.2 Site Description

1.2.1 The site is located at Ordnance Survey (OS) National Grid Reference **SE 14339 14910**, with nearby postcode **HD4 6JF**. The site is bordered to the north, east and south by suburban development, and to the west by an area of priority deciduous woodland which forms part of the Kirklees habitat network.

1.3 Details of Proposed Development

1.3.1 The development proposed at the site is the construction of a housing complex with associated access and landscaping.



2. Biodiversity Accounting in Context

2.1 Biodiversity Net Gain Principles

2.1.1 Biodiversity Net Gain: Good Practice Principles for Development published by CIEEM et. al (2016) states that delivering biodiversity net gain goes beyond balancing relative gains and losses. It also involves doing everything to avoid biodiversity losses in the first instance. The application of the DEFRA metric detailed in this report supports developments to adopt this approach by:

- a) Providing a habitat balance sheet which can be used to identify those habitats with the greatest value and subsequently those with the greatest impacts if lost;
- b) Supporting and incentivising the mitigation hierarchy by quantifying the benefits of avoiding and mitigating impacts on high value features;
- c) Promoting the value of biodiversity enhancements and demonstrating the potential for additionality on retained habitats;
- d) Providing a balance of losses, enhancements or on-Site compensation to determine if a measure net gain contribution can be achieved;
- e) Providing transparent, robust and credible evidence to help inform the best possible Site options for biodiversity; and,
- f) Ensuring that any residual off-Site compensation required (e.g. through biodiversity offsetting) is proportionate to the impacts and can secure a measurable net gain contribution for biodiversity overall.

2.2 Relevant Planning Policy and Legislation

2.2.1 In England, Biodiversity Net Gain (BNG) is mandatory under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021). All planning permissions granted in England will have to deliver at least 10% Biodiversity Net Gain (BNG) to be maintained for a period of at least 30 years. The concept seeks measurable improvements for biodiversity by creating or enhancing habitats in association with development.



2.3 Local Policy and Guidance

2.3.1 West Yorkshire Local Nature Recovery Strategy (LNRS)

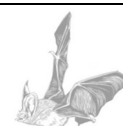
There is a LNRS for West Yorkshire which has been considered in this report.

2.3.2 Kirklees Local Plan 2013 – 2031 (Kirklees Council, Adopted February 2019)

2.3.3 Policy LP24: Design, Policy LP30: Biodiversity and Geodiversity and Policy LP31: Strategic Green Infrastructure Network, of the Kirklees Local Plan apply to the Proposed Development.

2.3.4 Kirklees Biodiversity Action Plan (KBAP)

2.3.5 The BAP for Kirklees (Kirklees Metropolitan Council, No Date) concentrates on species and habitats that had national action plans produced or are of local conservation concern. These include semi natural grassland, riverine habitats, ancient woodland, water vole *Arvicola amphibius* and great crested newt *Triturus cristatus*.



3. Methodology

3.1 Background

- 3.1.1 Biodiversity accounting of existing and post-development habitats and linear features on-Site was carried out using the Biodiversity Metric 4.0 Calculator Tool, following guidance set out in the metric user guide (DEFRA, 2024). The process for data collation and analysis associated with the assessment is detailed in Sections 4.2 – 4.3 below.

3.2 Assessing strategic significance

- 3.2.1 A desk study was conducted to collate baseline data about ecological sites within the zone of influence of the proposed development site, following guidelines set out by the Chartered Institute of Environmental and Ecological Management (CIEEM, 2017). This data-gathering exercise was undertaken to obtain any available information relating to statutory nature conservation sites, ecological networks, local plans and priority habitats to help establish the strategic significance of the site. Sources of information used are shown in Table 1.

Table 1: Summary of information sources used for the desk study

Organisation/source	Information sought
MAGIC	Locations of and citations for all national statutory wildlife sites, including SSSI, and all international sites including SAC, SPA or Ramsar sites within 5 kilometres of the site. Priority Habitats within 300m.
Kirklees Council	Adopted Local Plan, evidence base, and polices map

- 3.2.2 This evidence was reviewed and used to assess the strategic significance of the site, and/or individual habitats and whether it lies within an ecological network for the area.

3.3 Baseline Data

- 3.3.1 A baseline analysis of the existing habitats on-Site was carried out from the information gathered during the Site's ecological assessment visit carried out by Grace Bramley (Assistant Ecologist, JCA Limited) and Alex Donovan (Assistant Ecologist, JCA Limited) on 20/01/2026.



3.4 Biodiversity Net Gain

3.4.1 Biodiversity Net Gain complements and works with the biodiversity mitigation hierarchy set out in the National Planning Policy Framework paragraph 180a. To achieve a net gain in a way that is consistent with the mitigation hierarchy and reflects the 'spatial-hierarchy' preference for local enhancements, the following steps should be followed:

- (1) Aim to avoid or reduce biodiversity impacts through site selection and layout;
- (2) Enhance and restore biodiversity on-site;
- (3) Create or enhance off-site habitats, either on their own land or by purchasing biodiversity units on the market; and
- (4) As a last resort, to prevent undue delays, purchase statutory biodiversity credits from the UK Government where they can demonstrate that they are unable to achieve biodiversity net gain through the available on-site and off-site options.

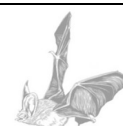
3.4.2 On completion of the fieldwork the habitat information was mapped and areas were imported into the DEFRA Biodiversity Statutory Metric Calculation Tool. The metric calculates the baseline biodiversity units for the site based on the following factors:

- Area
- Habitat distinctiveness
- Habitat condition
- Strategic significance

3.4.3 Once inputted the metric provides biodiversity units for the proposed habitats based on the following factors:

- Area
- Habitat distinctiveness
- Habitat target condition
- Strategic significance
- Time habitat is created
- Time to the target condition
- Difficulty of creation

3.4.4 The difference between the baseline units and proposed units is then used as a measure of change and is used to assess the number of biodiversity units achieved. Habitats, hedgerows and rivers are inputted as separate factors, with each requiring net gains.



Mitigation hierarchy

- 3.4.5 Development proposals should first seek to avoid impacts by retaining habitats. Second, development proposals should look to minimise the impact by producing plans that are designed to limit habitat disturbance, damage, and loss, thereby mitigating against any unavoidable impacts. Third, proposals should look to restore any damaged or degraded habitats. Then, only as a last resort should proposals compensate for unavoidable residual impacts to damaged or lost habitats that remain after avoidance and mitigation measures.

3.5 Impact Assessment

- 3.5.1 The existing baseline habitat plan for the Site was overlain with the Proposed Landscape Plan (Dwg number: 7070.01 C) of the Proposed Development using GIS software to provide an area (Ha) of temporary and permanent habitat loss.
- 3.5.2 The area of any retained/enhanced or created habitats proposed as part of the development was also mapped to provide an area (Ha) (or length (Km) for linear features) of the on-Site compensation proposals being provided. An estimate of future condition, time until establishment and the likelihood of success was then calculated using landscaping data provided by the client and professional judgement.

3.6 Habitat Creation and Enhancement

- 3.6.1 The area of any retained/enhanced or created habitats proposed on-Site as part of the Proposed Development was mapped using the Proposed Landscape Plan (Dwg number:7070.01 C) of the final development, to provide an area (Ha) (or length (Km) for linear features) estimate of on-Site compensation provided. This includes areas of developed land, which are assigned a very low (or null) value, notably, areas of buildings and/or roads.
- 3.6.2 Condition and strategic significance for each habitat or linear feature were projected using available ecological data or professional opinion about the likely value.

3.7 Residual Effects

- 3.7.1 The residual effects of the Proposed Development scheme were calculated using the Biodiversity Metric 4.0 Calculator Tool. This subtracts the pre-development baseline values from that of the post-development values to determine the change in overall habitat value for the Site, taking into account any habitat trading.
- 3.7.2 Habitat trading is where the loss of a habitat must be compensated for through the creation or restoration of areas of equivalent or greater distinctiveness value. Guidance by Defra is that the loss of high distinctiveness areas, such as Habitats of Principal Importance (HPI, NERC Act, S.41), require compensation in a like-for like

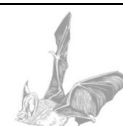


manner (creation or restoration of habitat of the same habitat classification as that impacted). Within the Biodiversity Metric 'trading up' (where compensation through creation of a higher distinctiveness habitat) can occur, however, 'trading down' (compensation through creation of lower distinctiveness habitats) is not permitted. Therefore, if present, despite gains in lower distinctiveness habitats, these will not reduce the net gain requirement for the development. This also applies to the different habitat features i.e. habitats, hedgerows and rivers and streams. Hedgerow creation gains will not reduce net gain requirements for either rivers and streams or habitats.

- 3.7.3 Where the resulting biodiversity balance is negative, a residual net loss of biodiversity is recorded. Where the balance is positive a residual net gain of biodiversity is recorded.

3.8 Limitations

- 3.8.1 Access to some areas of the site were restricted due to the buildings on site being deemed as structurally unsafe.
- 3.8.2 The woodland in the southwest of the site was not accessed as there was no safe way into the area.
- 3.8.3 The survey was undertaken outside of the optimal period for habitat assessment when plants had died back for the winter.
- 3.8.4 These were significant constraints and the habitats found on site will need to be reassessed during the optimal survey season. Assumptions have had to be made about the condition of the habitats. These were species composition and number of species, the condition of the woodlands on site could not be assessed as they were not accessible.
- 3.8.5 The Preliminary Ecological Appraisal by Greengage Environmental (2023) was used as a baseline for the habitats onsite. Recommendations have been made in section 5.6, to address these limitations.



4. Biodiversity Metric 4.0

4.1 Introduction

- 4.1.1 The assessment was carried out by JCA Limited using the ecological data gathered during the Site's ecological assessment survey carried out on 20/01/2026.
- 4.1.2 The site was surveyed outside the optimal survey period. Given the habitats noted it is considered sufficient indicator plant species were visible that the surveyor would have noted habitat of higher conservation value, and this was not considered a significant constraint.
- 4.1.3 The south of the site was fenced off due to unstable structures and so habitats within these areas had to be surveyed from outside the fenced of area.

4.2 Strategic Significance

- 4.2.1 There are deciduous woodland priority habitat and Kirklees habitat network adjacent to the site. The site is linked to the wider landscape through the habitat network and priority habitats. The site is therefore considered to be ecologically desirable.
- 4.2.2 The site is not part of any designated site, or listed on any local plan, neighborhood plan or other policy document for ecology. In line with the LNRS for West Yorkshire the site is considered to have low strategic significance (Area/compensation not in local strategy/ no local strategy).

4.3 Existing Site Value

- 4.3.1 The existing biodiversity value for each habitat, together with the cumulative value of all habitats is provided in Table 2.

Table 2: Baseline habitats on site and their ecological value as categorised by the Biodiversity Metric 4.0 calculator.

Biodiversity Metric Reference Number	Biodiversity Metric 4.0 Habitat Type	Total Area on Site (Ha)	Distinctiveness	Condition	Strategic Significance	Ecological Baseline Habitat Unit
1	Modified grassland	0.0008	Low	Poor	Area/compensation not in local strategy/ no local strategy	<0.005
2	Other neutral grassland	0.4308	Medium	Poor	Area/compensation not in local strategy/ no local strategy	1.72
3	Other neutral grassland	0.0604	Medium	Poor	Area/compensation not in local strategy/ no local strategy	0.24
4	Bramble scrub	0.007	Medium	Condition Assessment N/A	Area/compensation not in local strategy/ no local strategy	0.03
5	Mixed scrub	0.2704	Medium	Moderate	Area/compensation	2.16



Biodiversity Metric Reference Number	Biodiversity Metric 4.0 Habitat Type	Total Area on Site (Ha)	Distinctiveness	Condition	Strategic Significance	Ecological Baseline Habitat Unit
					not in local strategy/ no local strategy	
6	Mixed scrub	0.1886	Medium	Poor	Area/compensation not in local strategy/ no local strategy	0.75
7	Built linear features	0.0086	V.Low	N/A - Other	Area/compensation not in local strategy/ no local strategy	0.00
8	Developed land; sealed surface	0.1187	V.Low	N/A - Other	Area/compensation not in local strategy/ no local strategy	0.00
9	Other woodland; broadleaved	0.0049	Medium	Poor	Area/compensation not in local strategy/ no local strategy	0.02
10	Other woodland; broadleaved	0.1426	Medium	Poor	Area/compensation not in local strategy/ no local strategy	0.57
11	Urban tree	0.2158	Medium	Moderate	Area/compensation not in local strategy/ no local strategy	1.73
12	Urban tree	0.0651	Medium	Good	Area/compensation not in local strategy/ no local strategy	0.78
	Total (area excl. trees)	1.23	–	–	–	8.01

4.3.2 The following habitat types were recorded on site: modified grassland, other neutral grassland, bramble scrub, mixed scrub, built linear feature, developed land; sealed surface, other woodland; broadleaved, and individual trees.

Detailed assessments of the condition of each habitat can be found within the accompanying habitat condition spreadsheet.

4.3.3 Modified grassland

UKHab code: g4 – modified grassland

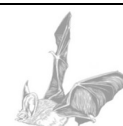
Approximately **0.0008** ha was classified as modified grassland. This represents a 'low' distinctiveness habitat and was assessed as poor condition. It was assessed as poor as it failed essential criterion A, number of plant species. This habitat has a biodiversity value of **<0.005** BU.

Species identified in this habitat include alder *Alnus glutinosa*, broad leaved dock *Rumex obtusifolius*, cow parsley *Anthriscus sylvestris*, perennial rye grass *Lolium perenne*, and plantain sp. *Plantago* sp.

4.3.4 Other neutral grassland

UKHab code: g3c – other neutral grassland, secondary code: 10 – scattered scrub

Approximately **0.4912** ha was classified as other neutral grassland. This represents a 'medium' distinctiveness habitat and was assessed as poor condition. It was classified as poor condition as it failed essential criterion A and condition F. An average of 5.8



species per meter squared were identified, results of the quadrates can be found in Appendix 4. This habitat has a biodiversity value of **1.96** BU.

Species identified in this habitat include broadleaved dock *Rumex obtusifolius*, buttercup sp. *Ranunculus sp.*, clover sp. *Trifolium sp.*, cocks foot *Dactylus glomerata*, common vetch *Vicia sativa*, dandelion *Taraxacum officinale*, moss sp., perennial rye grass *Lolium perenne*, ribwort plantain *Plantago lanceolata*, soft rush *Juncus effusus*, thistle sp. *Cirsium sp.*

4.3.5 Bramble scrub

UKHab code: h3d – bramble scrub

Approximately **0.007** ha was classified as bramble scrub. This represents a 'medium' distinctiveness habitat, there is no condition assessment for this habitat type and it is automatically assigned a biodiversity value. This habitat has a biodiversity value of **0.03** BU.

Species identified in this habitat includes bramble *Rubus fruticosus*.

4.3.6 Mixed scrub

UKHab code: h3h – mixed scrub

Approximately **0.4590** ha was classified as mixed scrub, in five parcels (S1-5). This represents a 'medium' distinctiveness habitat, four of the areas of scrub were assessed as poor condition and one area was assessed as moderate condition. The areas were assessed as poor and moderate as all areas of scrub failed criterion A, S1,2,3 and 5 failed criterion B, S1 and 5 failed criterion D and S1,2,3 failed criterion E. These habitats have a biodiversity value of **2.91** BU.

The species identified in these areas include:

S1 – ash *Fraxinus excelsior*, bramble *Rubus fruticosus*, cherry sp. *Prunus sp.*, cow parsley *Anthriscus sylvestris*, grass sp., hawthorn *Crataegus monogyna*, holly *Ilex aquifolium*, ivy *Hedera helix*.

S2 – ash *Fraxinus excelsior*, bramble *Rubus fruticosus*, broadleaved dock *Rumex obtusifolius*, buddleia *Buddleja davidii*, cherry sp. *Prunus sp.*, cocks foot *Dactylus glomerata*, dandelion *Taraxacum officinale*, grass sp., oak *Quercus robur*, plantain sp. *Plantago sp.*, ragwort *Senecio jacobaea*, silver birch *Betula pendula*, thistle sp. *Cirsium sp.*, willow sp. *Salix sp.*, willowherb sp. *Epilobium sp.*

S3 – alder *Alnus glutinosa*, bramble *Rubus fruticosus*, buddleia *Buddleja davidii*, willow sp. *Salix sp.*

S4 – alder *Alnus glutinosa*, bramble *Rubus fruticosus*, broom *Cytisus scoparius*, buddleia *Buddleja davidii*, buttercup sp. *Galium aparine*, cleavers *Galium aparine*, cocks foot *Dactylus glomerata*, gorse *Ulex europaeus*, perennial rye grass *Lolium perenne*, plantain sp. *Plantago sp.*, ribbon grass *Phalaris arundinacea var. picta*, silver birch *Betula pendula*, thistle sp. *Cirsium sp.*, willow sp. *Salix sp.*



S5 – alder *Alnus glutinosa*, ash *Fraxinus excelsior*, bramble *Rubus fruticosus*, buddleia *Buddleja davidii*, grass sp., willow sp. *Salix* sp.

4.3.7 Built linear feature

UKHab code: u1e – built linear features

Approximately **0.0086** ha was assessed as a built linear feature, the remaining walls from one of the mill buildings. This is a ‘very low’ distinctiveness habitat and has no condition assessment or biodiversity value. This habitat has a biodiversity value of **0.00** BU.

4.3.8 Developed land; sealed surface

UKHab code: u1b – developed land; sealed surface

Approximately **0.1187** ha was classified as developed land. This is a ‘very low’ distinctiveness habitat and has no condition assessment or biodiversity value. This habitat has a biodiversity value of **0.00** BU.

4.3.9 Other broadleaved woodland

UKHab code: w1g – other broadleaved woodland

Approximately **0.1475** ha was classified as other broadleaved woodland. This is a ‘medium’ distinctiveness habitat, there are two areas classified as woodland both of which were assessed as poor condition. Both areas were assessed as poor condition as they scored 1 or 2 point for most of the criterion. This habitat has a biodiversity value of **0.59** BU.

The species identified in these habitats include:

W1 – ash *Fraxinus excelsior*, bramble *Rubus fruticosus*, cherry laurel *Prunus laurocerasus*, cherry sp. *Prunus* sp., holly *Ilex aquifolium*, ivy *Hedera helix*, willow sp. *Salix* sp.

W2 – ash *Fraxinus excelsior*, bramble *Rubus fruticosus*, budlija *Buddleja davidii*, cherry sp. *Prunus* sp., silver birch *Betula pendula*, sycamore *Acer pseudoplatanus*, willowherb sp. *Epilobium* sp.

4.3.10 Individual trees

43 individual trees were identified on site. These are a ‘medium’ distinctiveness habitat. These habitats have a biodiversity value of **2.51** BU.

Table 3: Description of the individual trees found on-site.

Tree Ref	Common Name	Scientific Name	Size Class	Condition
T01	Ash	<i>Fraxinus excelsior</i>	Small	Moderate
T02	Ash	<i>Fraxinus excelsior</i>	Small	Moderate
T03	Ash	<i>Fraxinus excelsior</i>	Medium	Moderate
T04	Ash	<i>Fraxinus excelsior</i>	Medium	Moderate



T05	Ash	<i>Fraxinus excelsior</i>	Medium	Moderate
T06	Ash	<i>Fraxinus excelsior</i>	Medium	Moderate
T07	Ash	<i>Fraxinus excelsior</i>	Small	Moderate
T08	Ash	<i>Fraxinus excelsior</i>	Small	Moderate
T09	Ash	<i>Fraxinus excelsior</i>	Small	Good
T10	Ash	<i>Fraxinus excelsior</i>	Small	Good
T11	Ash	<i>Fraxinus excelsior</i>	Small	Moderate
T12	Ash	<i>Fraxinus excelsior</i>	Medium	Moderate
T13	Hawthorn	<i>Crataegus monogyna</i>	Medium	Moderate
T14	Ash	<i>Fraxinus excelsior</i>	Large	Good
T15	Ash	<i>Fraxinus excelsior</i>	Small	Good
T16	Ash	<i>Fraxinus excelsior</i>	Small	Moderate
T17	Ash	<i>Fraxinus excelsior</i>	Small	Moderate
T18	Ash	<i>Fraxinus excelsior</i>	Small	Moderate
T19	Ash	<i>Fraxinus excelsior</i>	Small	Moderate
T20	Ash	<i>Fraxinus excelsior</i>	Small	Moderate
T21	Ash	<i>Fraxinus excelsior</i>	Small	Moderate
T22	Ash	<i>Fraxinus excelsior</i>	Small	Moderate
T23	Ash	<i>Fraxinus excelsior</i>	Small	Moderate
T24	Ash	<i>Fraxinus excelsior</i>	Small	Moderate
T25	Ash	<i>Fraxinus excelsior</i>	Small	Moderate
T26	Ash	<i>Fraxinus excelsior</i>	Small	Moderate
T27	Ash	<i>Fraxinus excelsior</i>	Small	Moderate
T28	Ash	<i>Fraxinus excelsior</i>	Small	Moderate
T29	Ash	<i>Fraxinus excelsior</i>	Small	Moderate
T30	Ash	<i>Fraxinus excelsior</i>	Small	Moderate
T31	Ash	<i>Fraxinus excelsior</i>	Small	Moderate
T32	Ash	<i>Fraxinus excelsior</i>	Small	Moderate
T33	Ash	<i>Fraxinus excelsior</i>	Small	Moderate
T34	Ash	<i>Fraxinus excelsior</i>	Small	Moderate
T35	Ash	<i>Fraxinus excelsior</i>	Small	Moderate
T36	Ash	<i>Fraxinus excelsior</i>	Small	Moderate
T37	Ash	<i>Fraxinus excelsior</i>	Small	Moderate
T38	Ash	<i>Fraxinus excelsior</i>	Small	Moderate
T39	Ash	<i>Fraxinus excelsior</i>	Small	Moderate
T40	Ash	<i>Fraxinus excelsior</i>	Small	Moderate
T41	Ash	<i>Fraxinus excelsior</i>	Small	Moderate
T42	Ash	<i>Fraxinus excelsior</i>	Small	Moderate
T43	Ash	<i>Fraxinus excelsior</i>	Small	Moderate



5. Proposed Development Impact Assessment

5.1 Description of the Proposed Development

- 5.1.1 The Proposed Development involves the construction of a housing complex with associated access and landscaping.
- 5.1.2 The Proposed Development will see the partial removal of all on-Site habitats to facilitate the development.

5.2 Habitats to be Retained

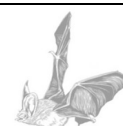
- 5.2.1 The Proposed Development will see the retention of:
- 0.0003 ha of modified grassland, in poor condition, worth <0.005 BU,
 - **0.0053** ha of bramble scrub, worth **0.02** BU,
 - **0.0152** ha of mixed scrub, in moderate condition, worth **0.55** BU,
 - **0.0249** ha of mixed scrub, in poor condition, worth **0.10** BU,
 - **0.1038** ha of developed land, worth **0.00** BU,
 - **0.0391** ha of broadleaved woodland, in poor condition, worth **0.16** BU,
 - **38** individual trees, 5 in good condition and 33 in moderate condition, worth **2.34** BU.

5.3 Habitats to be Enhanced

- 5.3.1 The Proposed Development will see the enhancement of **0.0604** ha of other neutral grassland, from poor to moderate condition, delivering **0.47** BU. To achieved moderate condition the grassland will need to pass 3-5 criteria including essential criterion A. The grassland currently passes 4 criteria but not Criterion A. This will become 'Formally identified in local strategy' as it meets Measure B3_M02 from the West Yorkshire LNRS.

5.4 Habitats to be Lost

- 5.4.1 The Proposed Development will see the loss of:
- **0.005** ha of modified grassland, worth **<0.005** BU, this is not considered a major loss,



- **0.43** ha of other neutral grassland, worth **1.72** BU, this is considered a major loss,
- **0.0017** ha of bramble scrub, worth **0.01** BU, this is not considered a major loss,
- **0.42** ha of mixed scrub, worth **2.69** BU, this is considered a major loss,
- **0.0086** ha of built linear features, worth **0.00** BU, this is considered a minor loss,
- **0.01** ha of developed land, worth **0.00** BU, this is considered a minor loss,
- **0.11** ha of broadleaved woodland, worth **0.43** BU, this is considered a major loss,
- **5** individual trees, worth **0.16** BU, this is considered a major loss.

5.5 Habitats to be Created

5.5.1 The Proposed Development will see the creation of:

- **0.0767** ha of poor condition modified grassland, worth **0.15** BU. There are no specific criteria required to achieve the target condition.
- **0.0012** ha of moderate condition other neutral grassland, worth **0.01** BU. To achieve moderate condition the grassland will need to meet 3-5 of the criteria including essential criterion A. It is recommended to meet criteria A, B, D, and E. By aiming to meet these four criteria if one is failed then the grassland will still achieve moderate condition.
- **0.0944** ha of poor condition other neutral grassland, worth **0.35** BU. There are no specific criteria required to achieve the target condition.
- **0.027** ha of poor condition mixed scrub, worth **0.10** BU. There are no specific criteria required to achieve the target condition.
- **0.0012** ha of built linear features, worth **0.00** BU.
- **0.599** ha of developed land, worth **0.00** BU.
- **0.0156** ha of introduced shrub, worth **0.03** BU. This habitat type has no condition assessment.
- **0.1687** ha of vegetated garden, worth **0.33** BU. This habitat type has no condition assessment.
- **43** moderate condition individual trees, worth **0.54** BU. To achieve moderate condition the individual trees will need to meet 3-4 of the criteria. It is



recommended to meet criteria A, B, D, and F. By aiming to meet these four criteria if one is failed then the trees will still achieve moderate condition.

5.5.2 The Proposed Development will see the creation of **0.059** km of ornamental hedgerows, worth **<0.005** BU. This habitat type has no condition assessment.

5.6 Overall Impacts

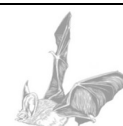
5.6.1 The retention, enhancement and loss of habitats as a result of the Proposed Development are quantified in Table 4.

Table 4: Summary of baseline habitat biodiversity value through retention and enhancement.

Biodiversity Metric Reference Number	Statutory Biodiversity Metric Habitat Type	Retained		Enhanced		Lost	
		Area (ha)	Unit	Area (ha)	Unit	Area (ha)	Unit
1	Modified grassland	0.0003	0.00	0.00	0.00	0.00	0.00
2	Other neutral grassland	0.00	0.00	0.00	0.00	0.43	1.72
3	Other neutral grassland	0.00	0.00	0.0604	0.24	0.00	0.00
4	Bramble scrub	0.0053	0.02	0.00	0.00	0.00	0.01
5	Mixed scrub	0.0152	0.12	0.00	0.00	0.26	2.04
6	Mixed scrub	0.0249	0.10	0.00	0.00	0.16	0.65
7	Built linear features	0.00	0.00	0.00	0.00	0.01	0.00
8	Developed land; sealed surface	0.1038	0.00	0.00	0.00	0.01	0.00
9	Other woodland; broadleaved	0.0049	0.02	0.00	0.00	0.00	0.00
10	Other woodland; broadleaved	0.0342	0.14	0.00	0.00	0.11	0.43
11	Urban tree	0.1954	1.56	0.00	0.00	0.02	0.16
12	Urban tree	0.0651	0.78	0.00	0.00	0.00	0.00
	Total (area excl. trees)	0.1895	2.74	0.06	0.24	0.98	5.02

5.6.2 The existing baseline across the site was compared to the current hard and soft landscaping plans. The Metric calculated a net change of **-41.08%** for habitat units. The full Metric spreadsheet has been provided alongside this report for the LPAs review. Table 5 summarizes the biodiversity metric results.

Table 5: Summary value of baseline habitat biodiversity value through retention, creation and enhancement



On-site baseline	Habitat units	8.01 BU
	Hedgerow units	0.00 BU
On-site post intervention	Habitat units	4.72 BU
	Hedgerow units	<0.005 BU
Total net change %	Habitat units	-41.08% (-3.29 BU)
	Hedgerow units	0.00% (0.00 BU)
Trading rules satisfied	Yes/No	No

5.6.3 A unit deficit of **4.09** BU has been generated, required to achieve a 10% net gain. The trading rules have been failed due to the loss of **-1.13** BU for other neutral grassland, **-2.60** BU for scrub habitats, and **-0.43** BU for broadleaved woodland habitats.

5.6.4 As discussed in section 3.8, the above assessment is based upon a number of assumptions which must be validated by a resurvey at the appropriate time of year (April – September). No works can commence on site until the resurvey has been completed. Consequently, the conclusions reached are subject to change.



6. References

CIEEM, CIRIA, IEMA (2016) Biodiversity Net Gain. Good practice principles for development.

CIEEM, CIRIA, IEMA (2019) Biodiversity Net Gain. Good practice principles for development.
A practical guide. CIRIA C776a. London, 2019.

CIEEM (2017) Guidelines for Preliminary Ecological Appraisal, 2nd edition. Chartered
Institute of Ecology and Environmental Management, Winchester.

CIEEM (2018) Guidelines for Ecological Impact Assessment in the UK and Ireland:
Terrestrial, Freshwater, Coastal and Marine. Version 1.1. Chartered Institute of Ecology and
Environmental Management, Winchester.

Department for Communities and Local Government (2005), Circular 06/2005: Biodiversity
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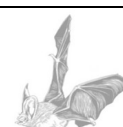
DEFRA (2023) Biodiversity Metric Calculation tool (spreadsheet) (Biodiversity Metric 4.0)

DEFRA (2023) Biodiversity Metric 4.0 User guide

DEFRA (2023) Biodiversity Metric 4.0 and SSM: Technical Annex1 (habitat condition
assessments)

Ministry of Housing, Communities and Local Government (2021), National Planning Policy
Framework.

Multi-Agency Geographical Information for the Countryside (MAGIC) Website



Appendices

Appendix 1: UKHab Habitat Map



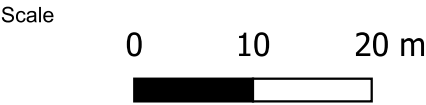


Site name & address

Newsome Mills
4 Ruth Street
Huddersfield
HD4 6JF

Key

- Red Line Boundary
- INDIVIDUAL TREES
- Individual tree Baseline
- Existing Large Urban Tree
- Existing Medium Urban Tree
- Existing Small Urban Tree
- HABITATS
- Habitats Baseline
- h3d - Bramble scrub
- u1e - Built linear features
- u1b - Developed land; sealed surface
- h3h - Mixed scrub
- g4 - Modified grassland
- g3c - Other neutral grassland
- 10 - Scattered scrub
- w1g - Other woodland; broadleaved
- Google Satellite Hybrid



Site Newsome Mill	Client Connect Housing
Project 22240c/GB BAA	Author Grace Bramley
Plan ref NSM-TRI-ZZ-ZZ-DR-A-2017 P10	Revision 01

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Appendix 2: Proposed Habitat Map



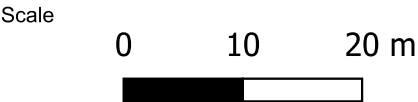


Site name & address

Newsome Mills
4 Ruth Street
Huddersfield
HD4 6JF

Key

- Red Line Boundary
- INDIVIDUAL TREES
- Individual tree Proposed
 - Proposed Small Urban Tree
 - Retained Large Urban Tree
 - Retained Medium Urban Tree
 - Retained Small Urban Tree
 - Lost Tree
- HEDGEROWS
- Hedgerows Proposed
 - Non-native and ornamental hedgerow
- HABITATS
- Habitats Proposed
 - Bramble scrub
 - Built linear features
 - Developed land; sealed surface
 - Introduced shrub
 - Mixed scrub
 - Modified grassland
 - Other neutral grassland
 - Other woodland; broadleaved
 - Vegetated garden



Site Newsome Mills	Client True North Partnership
Project 22240c/GB BAA	Author Grace Bramley
Plan ref 7070.01 C	Revision 02

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Appendix 3: Proposed Development Plan

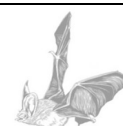


Available from Germinal GB Ltd. Tel: 01522 868714 (or similar approved)

Date	Scale(s)	Dwg no	Rev
Feb 26	1:250 @ A0	7070.01	B
Dwn	Chkd		
NC	JW		

Appendix 4: Quadrature Results

Quadrature Number	Species Identified	Number of Species
Q1	Ribwort plantain Clover sp. Vetch Cocks foot Perennial rye grass	5
Q2	Dandelion Clover sp. Buttercup sp. Broadleaved dock Ribwort plantain Cocks foot Perennial rye grass	7
Q3	Plantain Cocks foot Buttercup sp. Clover sp. Perennial rye grass	5
Q4	Thistle sp. Perennial rye grass Cocks foot Vetch Clover sp. Buttercup sp. Ribwort plantain	7
Q5	Buttercup sp. Ribwort plantain Clover sp. Perennial rye grass Cocks foot	5
Average number:		5.8



Appendix 5: Site Photographs



Photo 1: Individual trees, developed land and mixed scrub on the east side of the site, looking north.



Photo 2: Other neutral grassland and mixed scrub on centre and west of site, looking west.



Photo 3: mixed scrub and other neutral grassland, looking southwest.



Photo 4: other neutral grassland and individual trees at north of site, looking northwest.



Photo 5: Mixed scrub on west of site, looking southwest.



Photo 6: mixed scrub with priority woodland beyond, looking west.





Photo 7: mixed scrub with buildings beyond, looking south.



Photo 8: woodland 1 and priority woodland to the southwest of the site.



Photo 9: woodland 1 at southwest of site.



Photo 10: built linear features and mixed scrub at the south of the site.



Photo 11: individual trees and mixed scrub with other neutral grassland at the north of the site.



Photo 12: individual trees and mixed scrub with other neutral grassland at the north of the site.

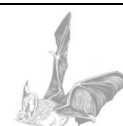




Photo 13: woodland two within derelict building at southeast of site.



Photo 14: mixed scrub at south of site.



Photo 15: woodland 1 at southwest of site.



Appendix 6: Author Qualifications

Adam West, Principal Ecologist

BSc (Hons) Animal and Wildlife Management, ACIEEM.

Adam joined JCA to lead the expanding ecology department. Having returned to education as a mature student, Adam studied Countryside Management for two years before undertaking a Bachelor's degree in Animal and Wildlife Management, for which he was awarded First Class Honours. Adam has many years' experience in ecological consultancy, working on projects ranging from individual planning applications to national infrastructure projects. Adam holds a Natural England Level 1 great crested newt survey class licence and a Natural England Level 2 bat survey class licence.

Grace Bramley, Assistant Ecologist

BSc (Hons) Design and Innovation with Environmental Science

Grace joined JCA in 2024 after completing her degree from The Open University with a first-class honour's degree in design and environmental science. Prior to this she spent six years working in the automotive industry followed by three years in the chemical industry. She is conducting Preliminary Ecological Appraisal and Biodiversity Net Gain Assessments and working towards her protected species licenses.

Kristen Kelly, Graduate Ecologist

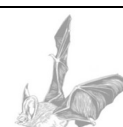
BSc (Hons) Ecology & Conservation, MSc Biodiversity & Conservation

Kristen joined JCA in 2025 after completing her master's degree at the University of Leeds with a distinction in biodiversity and conservation. Prior to this she completed her Bachelors at Edge Hill University with a first in ecology and conservation. She has gained a level 2 FISC qualification in plant identification and is currently gaining experience in Preliminary Ecological Appraisal and UK Habs.

Alex Donovan, Assistant Ecologist

MBiol BSc (Hons) Biology (Industrial), MRSB.

Alex joined JCA in 2023 after graduating from the University of Leeds with a First Class Honours Integrated Master's degree in Biology, including an industrial placement year working in the Uplands Research Department of the Game and Wildlife Conservation Trust. Alex is a Qualifying Member of CIEEM, a Member of the Royal Society of Biology, and a member of the BTO's Bird Ringing Scheme and Nest Record Scheme. Alex holds Natural England licences for barn owls (CL29) and great crested newts (level 1, CL08) and is working towards additional survey licences for bats and white-clawed crayfish.



The Information and advice which we have prepared and provided is true and has been prepared and provided in accordance with the CIEEM's Code of Professional Conduct. We confirm that the opinions expressed are our true and bona fide opinions.

Signed

Redacted

.....
Grace Bramley *BSc (Hons)*

24/06/2026

Final review by

Redacted

.....
Adam West *BSc (Hons), ACIEEM*

30/06/2026



For and on behalf of **JCA Ltd**

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ECOLOGICAL SERVICES

Ecological Pre-Planning Services

- Phase 1 Habitat Surveys
- Great Crested Newt eDNA Sampling
- Protected species: Bat, Wintering and Nesting Bird, Badger, Amphibian, Otter, Water Vole, White-Clawed Crayfish, Dormice and Reptile Surveys.
- Preparation for Environmental Impact Assessment (EIA)
- Invasive Species Surveys
- Code for Sustainable Homes
- Butterfly & Insect Surveys

Ecological Post-Planning Services

- Biodiversity Enhancement Plans
- Protected Species Mitigation
- Ecological Management (Bat and Bird box installation and inspection)
- Planting Schemes
- Monitoring of bird or bat boxes.

ARBORICULTURAL SERVICES

Guidance for Architects & Developers

- British Standard 5837 Surveys
- Arboricultural Implications Assessments (AIA)
- Arboricultural Method Statements (AMS)

Advice for Engineers, Loss Adjusters and Insurers

- Tree Surveys for Subsidence
- Heave Assessment
- Tree Root Identification

Advice for Local Authorities and Social Housing

- Tree Safety Surveys
- Specialist Decay Detection
- Landscape and Orchard Design

Tree Advice for the Legal Profession

- Subsidence Litigation
- Personal Injury and Accident Investigation
- Expert Witness, Planning Inquiries and Appeals

Veteran Tree Management

- Ancient Woodland Management
- Veteran Tree Management

Tree Health and Pest and Disease Management

- Pest and Disease Surveys
- Tree Health Checks
- Disease Mitigation and Control



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