BIODIVERSITY NET GAIN ASSESSMENT

LAND OFF ROWGATE,
UPPER CUMBERWORTH,
HUDDERSFIELD

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Chartered Institute of Ecology and Environmental Management
CIEEM
25 YEARS
Arboricultural ASSOCIATION
Professional Member

Biodiversity Net Gain Assessment

Land off, Rowgate,
Upper Cumberworth,
Huddersfield

A report for

James Thackra

Report by

email: patrick@pennineecological.co.uk

web: www.pennineecological.co.uk

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1.0	Gareth Hey ACIEEM	Patrick Leatham MCIEEM	Final report	15/10/2026

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EXECUTIVE SUMMARY

PENNINE Ecological were commissioned to undertake a Biodiversity Net Gain assessment of Land off, Rowgate, Upper Cumberworth, Huddersfield, HD8 8XH. The assessment is required to support an application for the construction of four dwellings.

The assessment includes the use of Natural England's/Defra's Statutory Biodiversity Metric Calculation Tool (version 1.0.4 published in July 2025) to determine whether the proposals would result in a biodiversity net gain or loss. The assessment was completed using standard methodologies and there was no deviation from the recognised guidance.

The baseline habitats recorded on site are of low and medium distinctiveness and have a baseline habitat value of 1.78. The total number of habitat units lost (before mitigation) is 0.55.

The proposed development will comprise new residential dwellings with associated areas of hardstanding (developed land; sealed surface) and vegetated gardens, alongside the retention of areas of mixed scrub around the site boundaries. Based on the proposed habitat layout, the development will not be capable of delivering the required 10% Biodiversity Net Gain (BNG) entirely on-site. As such, off-site compensation will be required to address the resulting biodiversity unit shortfall, with the client intending to pursue the purchase of off-site biodiversity units to achieve the required net gain.

The current proposals would result in a – 30.73% habitat net loss. The habitat trading rules have not been satisfied.

	Habitat Units	Habitat Units % Change
On-site Baseline	1.78	-
On-site Post-intervention	1.23	-
On-site Net Change	- 0.55	- 30.73%
Trading Rules Satisfied	No	

Two Biodiversity Gain Sites within the same LPA / NCA have been identified which have the required habitat units available.

This report and supporting documentation provide the LPA with sufficient evidence to demonstrate how the proposal can achieve the required 10% Biodiversity Net Gain.

1. INTRODUCTION

1.1 BACKGROUND

PENNINE Ecological were commissioned to undertake a Biodiversity Net Gain assessment of Land off Rowgate, Upper Cumberworth, Huddersfield, HD8 8XH (hereafter referred to as 'the site'). Appendix A, Figure 1 provides the site's red line application boundary and the results of the UKHabs baseline survey.

The assessment has been undertaken to support an application for the construction of four dwellings, and associated landscaping.

1.2 PURPOSE OF THIS REPORT AND BNG BACKGROUND

As of 12th February 2024 BNG became mandatory (unless exempt) under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021). Developers must deliver a BNG of 10% unless otherwise agreed with the relevant Local Authority.

The BNG assessment is required at this site due to the anticipated loss of low and medium distinctiveness habitats. The BNG assessment has been undertaken to determine whether or not the proposal demonstrates an overall net gain or loss of biodiversity, in line with the current National Planning Policy Framework, 2026.

Through site selection and layout, applicants should avoid or reduce any negative impact on biodiversity. They must deliver at least 10% BNG (unless agreed otherwise with the Local Authority), as measured by the statutory biodiversity metric. There are three ways an applicant can achieve BNG.

1. They can create biodiversity on-site (within the red line boundary of a proposal site).

2. If the applicant cannot achieve all of their BNG on-site, they can deliver through a mixture of on-site and off-site. Applicants can either make off-site biodiversity gains on their own land outside the proposal site, or buy off-site biodiversity units on the market.

3. If the applicant cannot achieve on or off-site BNG, they must buy statutory biodiversity credits from the government. This should be a last resort. The government will use the revenue to invest in habitat creation in England.

1.3 SITE LOCATION

The site is located at National Grid Reference is SE 20411 08961. It comprises a parcel of land formerly utilised as a builders yard. It is bound by Rowgate to the east, an arable field to the north, pocket of woodland to the west, and dwelling to the south. The wider landscape comprises a mosaic of arable land, woodland and residential development. The site comprises an area of disused land, which has been colonised by a series of tall forbs and ruderal vegetation. An aerial image of the area subject to survey and the red line application boundary is shown below.

Figure 1.1: Site Location and red line boundary



2. METHODOLOGY

2.1 UK HABITAT CLASSIFICATION BASELINE SURVEY

For a BNG assessment to be completed a UK Habitat Classification (UKHabs) Survey (UKHab Ltd, 2023) has to be undertaken of the site's baseline habitats. The UKHabs surveys, and habitat condition assessments were undertaken by Gareth Hey in August 2026. This BNG assessment has also been undertaken by Gareth Hey.

2.2 BIODIVERSITY METRIC CALCULATOR TOOL

All habitats recorded within the footprint of the site during the field survey were included in the Biodiversity Metric Calculation Tool (version 1.0.4 published in July 2025). The statutory biodiversity metric is a way of measuring biodiversity value for the purposes of BNG.

This metric calculation has been undertaken following the standard methodology (DEFRA, 2025) and in accordance with CIEEM good practice guidelines (CIEEM, 2019).

2.2.1 Strategic Significance

The Local Nature Recovery Strategy (LNRS) for West Yorkshire has been published[1]. As the LNRS has been published, all baseline habitats have a strategic significance of low, as the site is not located within an area with a local strategy. The strategic significance for each proposed habitat parcel on site was determined using the guidance table below (DEFRA, 2025).

[1]https://www.westyorks-ca.gov.uk/resources/local-nature-recovery-strategy/

Table 7 Strategic significance categories applied to post-development interventions where a LNRS has been published.

Category	Score	Description
High (Formally identified in local strategy)	1.15	This category can only be applied to post development interventions when: • the location of the habitat parcel has been mapped in the Local Habitat Map[4] as an area where a potential measure has been proposed to help deliver the priorities of that LNRS; and • the proposed intervention is consistent[5] with the mapped potential measure in the LNRS for the habitat parcel You should record that you have applied the published LNRS in your gain plan.
Medium (Location ecologically desirable but not in local strategy)	1.10	This category cannot be applied.
Low (Area / compensation not in local strategy)	1	Where the definitions for high strategic significance are not met. Even if your project is in an area mapped with a potential measure, if the proposed intervention is not consistent with a potential measure proposed by the LNRS for that location, you should record strategic significance as low.

2.3 SURVEYOR EXPERIENCE

This survey and BNG assessment has been undertaken Gareth Hey. Gareth is an associate member of the Chartered Institute of Ecology and Environmental Management (ACIEEM) and has over 10 years' experience in ecological survey and evaluation.

The report has been reviewed by Patrick Leatham who is a Full member of CIEEM (MCIEEM). Key skills include the following.

Key skills include the following;

- Over 14 years completing Extended Phase 1 Habitat Survey / UKHabs Survey and River Corridor Surveys on both small planning applications and Nationally Significant Infrastructure Projects (NSIPs).

- Proficient field botanist, including some difficult plant groups.
- MoRPh rivers certified ecologist able to undertake river condition assessments for BNG.

2.4 LIMITATIONS

The surveys were undertaken on 12/08/2026 in suitable weather conditions (dry weather). Full access to the site was possible during the survey.

There are considered to be no survey constraints and an appropriate evaluation of the site has been completed.

3. BIODIVERSITY NET GAIN ASSESSMENT RESULTS

The following section details the baseline habitats, along with habitats to be created, enhanced and retained within the proposal site (where applicable).

3.1 HABITATS BASELINE

The habitats recorded on-site were of the following distinctiveness';

- Low – Ruderal/ephemeral
- Medium – Mixed scrub

3.1.1 Strategic Significance

The strategic significance applied to all habitats at baseline is low (area not in local strategy).

There is a Local Nature Recovery Strategy (LNRS) established for West Yorkshire (West Yorkshire Local Nature Recovery Strategy), however, the site does not lie within any current priority measure areas. The habitat creation and enhancement strategic significance is therefore low.

3.1.2 Habitat Baseline Results Summary

In total, the baseline habitats surveyed have a total habitat value of 1.78 habitat units.

A summary of the baseline habitat information is shown in Table 3.1 below.

Table 3.1: Summary of the Baseline Habitats and Habitat Value

Broad Habitat	Habitat Type	Habitat Area (ha)	Distinctiveness	Condition	Total Habitat Units (Ecological Baseline)	Retained - units	Enhanced – units	Units Lost (before mitigation)
Sparsely vegetated land	Ruderal/Ephemeral	0.25	Low	Poor	0.5	0.00	0.00	0.5
Heathland and shrub	Mixed scrub	0.16	Medium	Moderate	1.28	1.04	0.00	0.24
TOTAL		**0.41ha**			**1.78**	**1.04**	**0.00**	**0.74**

3.2 HABITATS CREATED AND ENHANCED

The habitats to be created on site (Table 3.2) are of the following distinctiveness':

- Low; Vegetated garden.
- Very low; Developed land; sealed surface.

The total number of habitat units to be created is 0.19, plus the retained area of scrub totalling 1.04 units (1.23 units post-development).

The habitats and their respective areas, distinctiveness, condition etc. are included in Table 3.2 below.

Table 3.2: Summary of the On-Site Habitat Creation and Habitat Value

Broad Habitat	Habitat	Habitat Area (ha)	Distinctiveness	Condition	Habitat Units Delivered
Urban	Developed land; sealed surface	0.18	V.Low	N/A - Other	0.00
Urban	Vegetated garden	0.1	Low	Condition assessment N/A	0.19
TOTAL		**0.28ha**			**0.19**

4. CONCLUSION

4.1 CONCLUSION AND BNG ASSESSMENT RESULTS

The following section summarises the BNG assessment results.

Baseline habitats of low and medium distinctiveness were identified within the site during the habitat survey undertaken in August 2026.

The proposed development has been designed with consideration of the biodiversity mitigation hierarchy. Opportunities to avoid and minimise habitat losses, and to provide habitat creation and enhancement within the site, have been considered throughout the design process. However, given the extent of habitat loss required to facilitate the development, it is not considered feasible to achieve the mandatory 10% BNG entirely through on-site measures.

- Avoiding impacts on notable habitats: No habitats of notable ecological importance are present within the site. Where feasible, existing areas of mixed scrub around the site boundaries will be retained.

- Minimising impacts on site: The proposed development will affect habitats of low and medium distinctiveness. Habitat retention has been incorporated where practicable, with the remaining losses limited to those necessary to accommodate the proposed development.

- Restoring and creating habitats on site: The proposed development will include areas of vegetated garden alongside retained boundary vegetation. Opportunities for further habitat creation and enhancement have been considered; however, achieving the required 10% net gain entirely on-site would require a substantial area of additional habitat, including scrub, which cannot realistically be accommodated alongside the proposed development.

Following the application of the mitigation hierarchy, the proposals result in an overall biodiversity net loss, with a shortfall of 0.73 habitat units against the mandatory 10% BNG requirement. It is therefore proposed that the outstanding 0.73 habitat units are secured through the purchase of suitable off-site biodiversity units from a registered habitat bank.

Where possible, the required off-site units should be sourced within the same Local Planning Authority (LPA) area or National Character Area (NCA) as the development site to minimise the application of the spatial risk multiplier within the Statutory

Biodiversity Metric. The off-site provision will be secured through the appropriate legal mechanism, with the habitat provider responsible for the long-term creation, management and monitoring of the compensatory habitat.

5. BNG PROPOSALS

This report and supporting documentation provide the LPA with sufficient evidence to demonstrate how the proposed development can achieve the mandatory 10% Biodiversity Net Gain (BNG), through a combination of on-site habitat retention and creation and the purchase of off-site biodiversity units to address the identified shortfall.

The proposals result in a shortfall of 0.73 habitat units against the required 10% net gain. It is therefore proposed that the outstanding units are secured through the purchase of suitable biodiversity units from a registered off-site habitat bank.

Where possible, the required biodiversity units should be sourced within the same LPA area or NCA as the development site.

Following a review of the 'Bristol Trees Biodiversity Gain Sites[2]' register, two Biodiversity Gain Sites have been identified within the same LPA or NCA with available habitat units.

Figure 5.1: Biodiversity Gain Site within the same LPA

BGS Reference	Responsible Body	Size (ha) ▼	# Allocations	HU Gain	LPA	NCA	LNRS	IMD Decile
BGS-070426001	On Nature Ltd, Restoration Soil Limited	25.60	5	69.65	Kirklees	Nottinghamshire, Derbyshire and Yorkshire Coalfield	West Yorkshire	8

Figure 5.2: Biodiversity Gain Site within the same NCA

BGS Reference	Responsible Body	Size (ha) ▼	# Allocations	HU Gain	LPA	NCA	LNRS	IMD Decile
BGS-050924002 Bolsterstone Habitat Bank	RSK Biocensus Limited	19.91	41	113.40	Sheffield	Yorkshire Southern Pennine Fringe	South Yorkshire	8

The long-term creation, management and monitoring of the off-site habitats will be the responsibility of the habitat bank provider and will be secured for the required management period. Details of the final on-site and off-site biodiversity provision will

[2] https://bgs.bristoltrees.space/sites

be incorporated into the Biodiversity Gain Plan submitted to the LPA prior to commencement of the development.

REFERENCES

CIEEM (2019). *Biodiversity net gain. Good practice principles for development; a practical guide*. CIRIA publications

Department for Environment, Food and Rural Affairs (DEFRA) (2025). The Statutory Biodiversity Metric - User Guide. Last updated: July 2025

UKHabs Ltd (2023). *UK Habitat Classification Version 2.01* (at https://www.ukhab.org)

Online Resources

Bristol Tree Forum - https://bgs.bristoltrees.space/sites

Appendix A - Figures

Figure 1: Baseline Habitats Map



Figure 2: Proposed Habitats Plan

