Brooks Ecological
Grounded advice

Thurgoland CoE Primary School

Biodiversity Net Gain Assessment

Report Ref. ER-8575-01

23/06/2025

Thurgoland CoE Primary School

Report reference	**ER-8575-01 – Biodiversity Net Gain Assessment**
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Report duration	In accordance with CIEEM (2019), unless otherwise stated the findings of this report remain valid for a period of 18 months. After this period advice should be sought on the scope of any updating work required.

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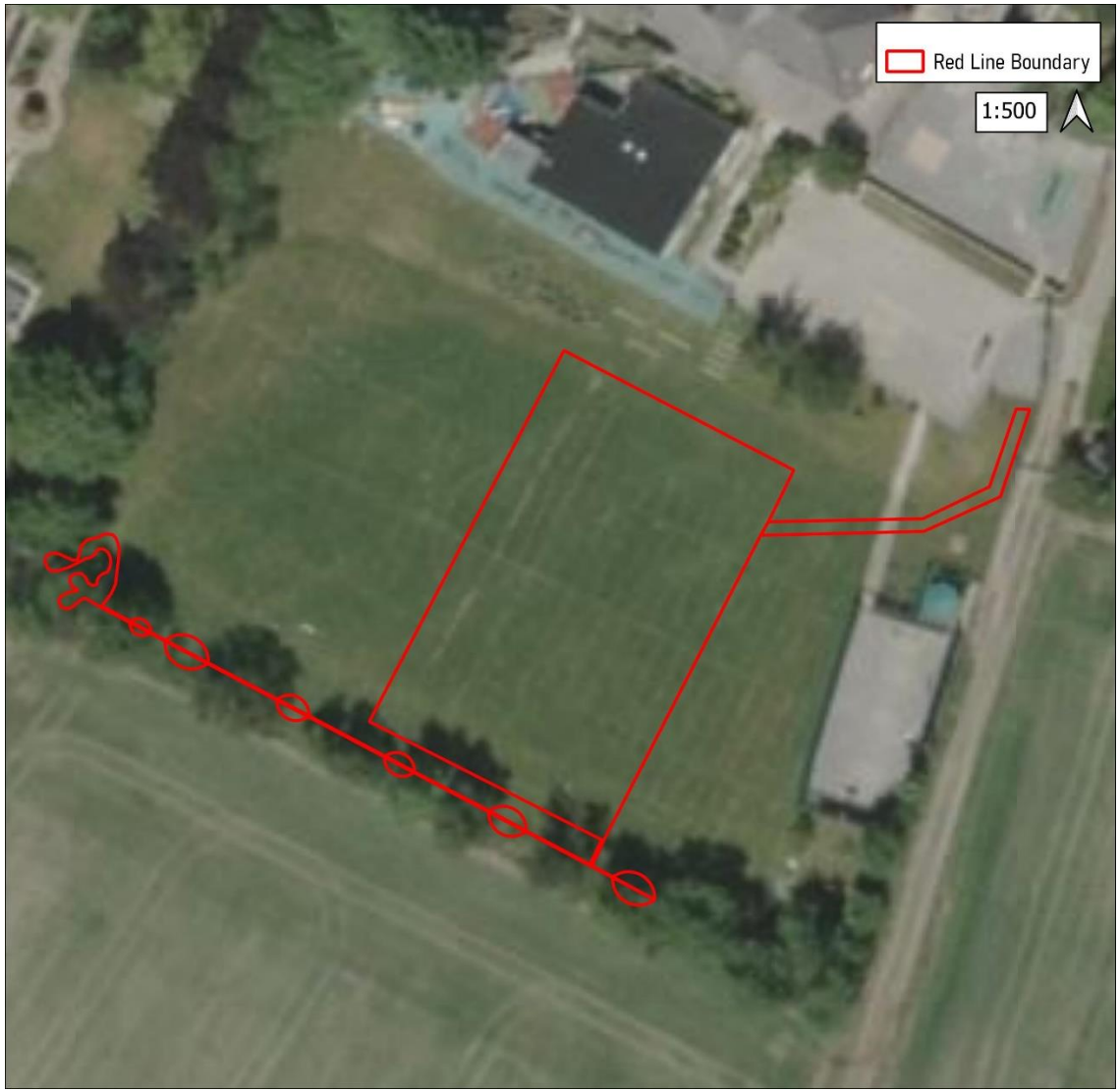
Introduction

1. Brooks Ecological Ltd was commissioned by Thurgoland CoE Primary School to carry out a Biodiversity Net Gain (BNG) Assessment of the proposed development Site at Thurgoland CoE Primary School.
2. The survey applies to the parcel of land shown in Figure 1 opposite.
3. The baseline value of the Site in relation to BNG was assessed and is presented here alongside advice on achieving the best BNG position.
4. Biodiversity Accounting metrics are used to quantify the value of a site in Biodiversity Units. This helps in assessing the ecological impacts of the proposed development and can help to inform avoidance, or on-Site mitigation levels required; or as a last resort can translate to a direct monetary value where compensation (off-Site) is required.
5. For the purposes of metric calculations, the Site area has been measured using GIS against the provided red line boundary as 0.11ha.
6. Our assessment has made use of the Statutory Biodiversity Metric Calculation Tool, and extracts from this have been used throughout the report. The full spreadsheet has been provided digitally as file BM-8575-01, and should be submitted as part of the application.

Figure 1 Extent of BNG assessment (red line boundary).



Pre-development baseline

Habitats identified

7. Habitats present on-Site are outlined in Table 1, opposite. These are shown in relation to location and extent in Figure 2 overleaf.

Condition Assessment

8. Habitat condition has been assessed as part of the Preliminary Ecological Appraisal of the Site.
9. Information on condition assessments is provided in the Excel spreadsheet CA-8575-01 provided alongside this report.

Strategic Significance

10. None of the habitats on-Site fall within or close to the WHN, and so all are mapped as 'area/compensation not in local strategy/ no local strategy'.

Irreplaceable habitat

11. Irreplaceable habitats have not been found on Site

Habitat Degradation[1]

12. There is no evidence on Site or in aerial mapping of the Site which suggests that it has been deliberately degraded.

Biodiversity Metric

13. Habitat types, conditions, and areas have been entered into the Statutory Biodiversity Metric Calculation Tool, alongside information on their strategic significance.
14. The Statutory Biodiversity Metric Calculation Tool (published 23/07/2024), is provided alongside this assessment, in Excel spreadsheet BM-8575-01, and may be useful in investigating design options for the Site.

Table 1 Habitat Types.

Habitat	Irreplaceable?	Distinctiveness	Condition	See Condition Assessment sheet
Modified grassland	No	Low	Poor	5A

[1] See Appendices for further information on degradation.

Figure 2 The Site's habitats assigned to types used in the Biodiversity Metric. Labelled codes cross-reference to our condition assessment sheet which should be read in conjunction with this report.

Survey

15. The survey was carried out during June 2025[2] and followed the principles of Extended Phase 1 Habitat Survey methodology (JNCC, 2010).

16. The timing of the survey meant that it was possible to confidently classify the type and condition of habitats present on this Site.

17. Enough time was afforded the surveyor to carry out the survey. The survey was not constrained by poor weather and the entirety of the Site was accessible.

Habitat Appraisal

18. The Site's habitats are described in order on the following pages. In line with the requirement to provide information on Biodiversity Net Gain (BNG), habitats are named in accordance with the UK Habitats classification system. We have used the UK Habitats v2.01 guidance in identifying habitats. Habitat descriptions are divided into the 'distinctiveness' categories used in the calculations presented in the Biodiversity Gain Assessment, with more weight being afforded the more distinctive/important habitats.

19. Generally, the following apply to each tier of distinctiveness, although some authorities might highlight some lower distinctiveness habitats as having a higher importance locally. Where relevant we have highlighted these.

Very Low Distinctiveness Habitats

20. Habitats of little or no habitat value, i.e., lacking any significant native vegetation, but could still provide supporting habitat for protected or notable fauna such as birds or bats. In the context of BNG, their areas are included in calculations, but mitigation or compensation is not required.

Low Distinctiveness Habitats

21. Habitats which are ubiquitous, often which have been created or modified intentionally. They tend to lack diversity of species and structure. They are unlikely to support notable flora but could still provide supporting habitat for protected or notable fauna. In the context of BNG, they are included in calculations, but compensation/mitigation needs only to provide habitat of similar or higher distinctiveness.

Medium Distinctiveness Habitats

22. Habitats which are common but provide a higher level of structural and species diversity. Though unlikely to support more notable assemblages, species of interest could be present here and they are more likely to be important supporting habitat to fauna. In the context of BNG, mitigation needs to provide habitat of the same broad habitat type, or that of higher distinctiveness.

High Distinctiveness Habitats

23. Habitats which are more natural and contain more important assemblages of plants and potentially species which are rare in their own right. They will provide good habitat for fauna. These habitats are likely to be targeted as conservation priorities and will be the subject of additional policy guidance or legislation. In the context of BNG, whilst mitigation or compensation for loss or damage is possible, provision of more of the same type of habitat would be required, which (with a few exceptions) is likely to be difficult.

Very High Distinctiveness Habitats

24. These are the UK's rarest/best habitats. They will be present in very particular locations and a range of rare or important plant and animal species will depend on the particular conditions they provide. These habitats will be the subject of restrictive policy guidance or legislation. Whilst the BNG metric does not preclude mitigation or compensation in respect of these habitats, creation of the same habitat type would be required, and this would range between very difficult/expensive and impossible.

Irreplaceable Habitats

25. These are habitats of high biodiversity value, which are so difficult to recreate that it would be impossible to achieve the requirement to increase biodiversity on top of no net loss. These habitats have significant protection in the NPPF; any impacts from development require a strong justification and will flag as unacceptable in the Biodiversity Metric. Bespoke compensation for any loss of these habitats must be agreed with the LPA.

26. Each habitat is mapped and an area for each type is provided in the format of the Statutory Biodiversity Metric Calculation Tool. The areas can be used to quantify the impacts of development in an Ecological Impact Assessment if this is required by the Local Planning Authority.

Condition Assessment

27. Our condition assessment for each habitat described references where available the criteria set out in DEFRA (2024) Statutory Biodiversity Metric Condition Assessments. A completed version of this spreadsheet is provided digitally with the Biodiversity Gain Report which accompanies this report.

[2] This Report has been prepared during June 2025 following a visit to the Site in June 2025, and our findings are based on the conditions of the Site that were reasonably visible and accessible at that date. We accept no liability for any areas that were not reasonably visible or accessible, nor for any subsequent alteration, variation, or deviation from the Site conditions which affect the conclusions set out in this report.

Habitats of Low/Very Low Distinctiveness

Figure 3 Approximate location and extent of these habitats.

Table 2 Summary – Habitats of Low/Very Low Distinctiveness.

UK Habitats	Summary Description
Modified Grassland	A heavily managed, typical, species-poor amenity grassland (lawn) for the school's recreational grounds. Grasses predominantly consisted of perennial rye, annual meadow grass and rough meadow grass. Forbs were frequently to occasionally encountered and consisted of white clover, broadleaved plantain, creeping buttercup, dandelion, common daisy and broadleaved dock.

Figure 4 Typical views of the modified grassland area.

Trading Rules

28. As part of delivering a Net Gain for biodiversity, the BNG process requires that trading rules are complied with, such that loss of habitats is compensated for in a like-for-like or like-for-better fashion. This is based on habitat distinctiveness.

29. Once trading rules are complied with, the 'gain' component can come from any distinctiveness category.

Habitat Unit Score

30. The Site has been assessed as having a baseline score of 0.22 Habitat Units. These break down as shown in Table 3, below.

Table 3 Habitat Units broken down by distinctiveness at this Site.

Distinctiveness	Units	Approach to compensation if lost
Very Low	0	No compensation required.
Low	0.22	Can be replaced with any habitat of the same distinctiveness (low) or any habitat from a higher distinctiveness (Medium, High or Very High)
Medium	0	Can not be replaced with habitats from a lower distinctiveness. Compensation needs to be like for like, or like for better. This means it can only be replaced by habitat from the same broad categories in Medium distinctiveness or any habitat from a higher distinctiveness category (High or Very High).
High	0	Can only be replaced with the same habitat.
Very High	0	Can only be replaced with the same habitat; bespoke compensation required.
Irreplaceable	0	Bespoke compensation required, outside of BNG.

Post-development value[3]

31. This section calculates the Biodiversity Unit value of the post-development Site and quantifies any gain or shortfall in Units.

Proposed habitats

32. Habitats present on-Site post-development have been based on the Block Plan 2158_P2 pdf (AXO Leisure, June 2025) (Figure 5, opposite).

33. Habitats assigned are shown in Figure 6 overleaf.

Condition assessment

34. The condition assessment for each proposed habitat is based on what is realistic and achievable for the Site, based on the Block Plan 2158_P2.

35. Achieving these conditions scores will be reliant on specific, ecologically-driven management recommendations of the planted trees. These can be outlined in a Biodiversity Enhancement and Management Plan (BEMP) and/or will be set out in a Habitat Management and Monitoring Plan (HMMP), which will be required as a standard condition of planning.

Figure 5 Block Plan 2158_P2 pdf (AXO Leisure, June 2025)

[3] Please see assumptions section at end of report

Post-development habitats

Habitat Score

36. The Site has been assessed as having a post-development score of 0.24 Habitat Units.
37. This score is based on our interpretation of the Block Plan, as shown in Figure 6 opposite.
38. Calculations for the change in Habitat Units have been based on the pitch area of the Site being cleared of existing habitats and this section of land reprofiled, which results in the loss of 0.20 Habitat Units present pre-development.
39. The pitch and access track which are to be built have been mapped as *developed land; sealed surface*, which contribute no Habitat Units to the post-development score.
40. Post-development calculations include Habitat Units gained through the planting of 18 small, native trees, with a target condition of 'moderate'. Species composition include guelder rose, spindle and goat willow. These are to be planted in between existing tree line and clusters of trees.
41. With the trees being native and with a continuous canopy (individual trees) oversailing at least 20% vegetated area, they are expected to reach a target condition of 'moderate', which also aligns with the condition of existing trees on Site.

Figure 6 Post-development habitats.

Habitat Retention

42. It is assumed that the areas of modified grassland other than the pitch and access track will be retained without impact. This information allows us to see which areas can be marked as retained in the metric calculations.

43. This is based on information provided by the developer who will have considered / consulted their team on requirements to provide (amongst other things) Site compounds, to store and move materials, to install drainage, flood storage, access and services - all with suitable easements.

44. Metric calculations assume that should additional areas other than the pitch itself and access track be impacted by Site clearance and construction, these areas will confined to lawn and be returned to their current condition e.g. modified grassland in poor condition within the year.

The BNG Hierarchy

45. The project's engagement with the Mitigation Hierarchy is set out in Appendix 1.

Change in Unit Value

46. The Statutory Metric has been used to calculate the net unit change for the Site; this has been predicted an overall net gain of 0.02 Habitat Units (10.95%)[4].

47. A copy of the Statutory Biodiversity Metric Calculation Tool Excel spreadsheet (ref. BM-8575-01) and Condition Assessment sheets (CA-8575-01) have been provided with this report and should be submitted digitally as part of the application.

Trading Rules

48. Habitat types are separated out into distinctiveness categories (Very Low to Very High) which dictate what mitigation/compensation is required for their loss. This is assessment is separate to the 'net unit change' score quoted above.

49. Trading rules have been satisfied.

Requirements for Planning

50. There is mandatory requirement for all developments to demonstrate at least a 10% net gain in each unit measurement, as well as to satisfy Trading rules. A standard planning condition will be imposed on all decision notices to ensure this is met.

51. The proposed development is able to demonstrate a 10% net gain within its redline boundary and satisfies Trading Rules.

52. A 30-year Habitat Monitoring and Management Plan (HMMP) may be required to discharge relevant pre-start planning conditions. Although, as the BNG score here relies on the retention of low distinctiveness habitats and the planting of a small number of landscape trees, the LPA may see imposing an HMMP requirement as disproportionate in this instance.

Figure 7 Biodiversity Metric Summary.

FINAL RESULTS		
Total net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	*Habitat units*	0.02
	Hedgerow units	0.00
	Watercourse units	0.00
Total net % change (Including all on-site & off-site habitat retention, creation & enhancement)	*Habitat units*	10.95%
	Hedgerow units	0.00%
	Watercourse units	0.00%
Trading rules satisfied?	Yes ✓	

[4]Our report provides an estimate of the Site's value in Biodiversity Units. This is based on thorough assessment at the time of survey and using the information available at this time. In this assessment we have used the latest version of DEFRA's Biodiversity Metric Tool, the UK Habitats Classification, and relevant guidance. This assessment requires subjective judgments to be made in terms of habitat type and condition and could be open to other interpretations. Reliance on the Unit Score, or conversion of this into a monetary value, would be at the developer's own risk. Where conversion to monetary value is required, it is always advisable to get calculations checked independently.

Assumptions

53. Establishment of the post development value of the Site at this stage is necessarily based on several assumptions which we have set out below, please provide the additional information required against each if this is available:

	Factor	Information Required
1	Timing The BNG metric includes options to identify habitat creation which is deferred (by x years after it is lost) or habitat which is created in advance (elsewhere prior to its loss from Site). These are subject to multipliers and will affect your ultimate BNG score. Delays between habitat loss and habitat creation of more than a year must be reflected within the metric's calculations. We have assumed that tree planting is able to take place simultaneously to the development. Should tree planting be delayed by a period of over a year post-development, calculations will need to be re-run.	Please provide a realistic timescale for the period between loss of habitat (Site clearance) and the completion of new on-Site habitat areas.
2	Phasing Unless you have told us otherwise, we have assumed that development will not be phased (in planning terms) and that habitat will be lost and created in a single phase.	Please confirm whether development will be phased.
3	Habitat Retention We have assumed that all habitat where the pitch and access track are to be built will be lost. Should any remaining areas of modified grassland (lawn) within or in close proximity to the redline boundary be impacted by the development, these should be reinstated to their original condition within two years.	Identify any areas of temporary impacts, for example from clearance, excavation, storage, compounds etc. – these may be impacted by the above but can be returned to the same habitat within 2 years.
4	Other limiting factors Ecological conditions are likely to be the primary factors determining the potential of the site to deliver Biodiversity Units, these would normally be established through a Preliminary Ecological Appraisal (PEA). Where a PEA has not been carried out, we have assumed that ecological factors are not limiting. Where a PEA has been carried out by a third party, we have assumed that the information provided is suitable and accurate. There are other limiting factors falling outside of the remit of ecological assessment which could also affect delivery, these may not be apparent to us at this stage. As part of any future management plans produced to deliver Biodiversity Units it will be necessary to assess information on (though not limited to) the following factors - any of which could have a bearing on the site's potential: • Designated Sites (these may have been considered if desk-study has been part of the scope)	Provide information and reports or references any of the factors which you know will be, or could be, limiting in terms of habitat creation, if applicable.

	Factor	Information Required
	• Protected and Notable Species (these may have been considered if desk-study has been part of the scope) • Invasive and Non-native Species • Land tenure and public access • Climate • Geology / topography • Agricultural land status • Soils and substrates • Contaminated Land • Hydrology and Drainage • Flood Risk • Landscape Character and Designations • Historic Environment and Earth Heritage • Services and Infrastructure • Land ownership These factors may be outside of the remit of this report (especially where a PEA has not been produced) and the expertise of an ecologist. We cannot be responsible for the impact of any of these factors on the potential of the site to deliver Biodiversity Units. Where other information is not made available, we have assumed they are not limiting	

References

Chartered Institute of Ecology and Environmental Management (CIEEM). 2019. *Advice note: on the lifespan of ecological reports and surveys.* Winchester: Chartered Institute of Ecology and Environmental Management. [Online]. Available from: https://cieem.net/resource/advice-note-on-the-lifespan-of-ecological-reports-and-surveys/

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The Statutory Biodiversity Metric Condition Assessments. 2024. London: Department for Environment, Food and Rural Affairs (Defra). [Online]. Available from: https://www.gov.uk/government/publications/statutory-biodiversity-metric-tools-and-guides

Appendices

The following reports/digital documents have been provided alongside this report and should be read in conjunction with it:

- BM-8575-01 – Statutory Biodiversity Metric Calculation Tool
- CA-8575-01 – Statutory Biodiversity Metric Condition Assessments

Habitat degradation

Within Schedule 14 of the Environment Act, which sets out the biodiversity gain condition for development, measures are included that allow planning authorities to recognise any habitat degradation since **30th January 2020** and to take the earlier habitat state as the baseline for the purposes of biodiversity net gain. In order to ascertain the habitats present and their condition on 30th January 2020, aerial imagery or data sets from that time could be used. 30th January 2020 is the relevant date as it was the day the Bill entered Parliament.

In 2023, the Levelling Up and Regeneration Act 2023 (LURA), introduced additional wording further tightening the law regarding degradation by extending the circumstances in which degradation can be addressed. This wording covered both authorised and unauthorised activity on onsite and offsite habitats, on or after **25th August 2023**.

Further information

Further useful information is available on legal agreements to secure Biodiversity Gains at:

- https://www.gov.uk/guidance/legal-agreements-to-secure-your-biodiversity-net-gain
- https://naturalengland.blog.gov.uk/2024/03/04/securing-off-site-biodiversity-net-gain-expert-legal-perspectives/

Appendix 1 - BNG Hierarchy

Level of Hierarchy	Advice provided at PEA/BNG Baseline Stage	Response in designs	Linked documents / plans
First **Avoid**	Clearance of the Medium-distinctiveness habitats – namely other bramble scrub, mixed scrub and individual trees – should be avoided wherever possible, and minimised where it is not avoidable.	No habitats of medium distinctiveness (e.g. nearby trees) are to be impacted by the proposed development.	Block Plan 2158_P2 pdf (AXO Leisure, June 2025), Figure 6 above.
then **Enhance**	Retained habitats on-Site should be enhanced where possible as an important source of Habitat Units post-development.	Development boundary limited to minimum areas of modified grassland, limiting possibilities of enhancement.	Block Plan 2158_P2 pdf (AXO Leisure, June 2025)
then **Create**	Where possible residual loss of Units should be made up for with Habitat Units generated through the creation of new habitats on-Site. Units may be generated through specific ecologically targeted habitat creation, such as wildflower grassland, and standard amenity habitats, such as amenity grassland and ornamental shrub.	The 10% gain could be generated solely from habitats created on Site, e.g. individual native trees.	Block Plan 2158_P2 pdf (AXO Leisure, June 2025); Figure 6 above.
then **Offset**	If a 10% Net Gain cannot be achieved on-Site, any remaining deficit will need to be compensated for off-Site.	N/A, all units could be generated on-site.	Block Plan 2158_P2 pdf (AXO Leisure, June 2025) ; Figure 6 above.