

Rob and Dena Frith trading as **RDF** Ecology  
5 Stamford Road  
Woodlathes Village  
Sunnyside  
Rotherham  
South Yorkshire  
S66 3YY  
  
Tel 01709 531 868  
Web [www.rdfecology.co.uk](http://www.rdfecology.co.uk)

January 8, 2020

Mr P Bailey  
Bradbury PM Ltd  
North East Office  
The Forge  
North Charlton  
Chathill  
Northumberland  
NE67 5HP

Dear Paul:

**Hog Close Lane Landfill – Biodiversity Net Gain Calculations**

Following the consultation response from Kirklees Council's Biodiversity Officer to the above development and my subsequent discussions with them, I now attach the completed Biodiversity metric calculations which indicate that the development will result in a biodiversity net gain of 19.88% (1.2 habitat units).

In order to achieve this the development, which results in all habitats within the application site being lost, will include the following habitat compensation measures:

1. Restoration of the site after landfill operations to neutral grassland (g4 *Lolium-Cynosurus* neutral grassland (MG6 NVC community)) with the area extending to approximately 1.79ha;
2. Planting of approximately 0.14 ha of native broad-leaved woodland using locally native species; and,
3. Creation of approximately 0.1ha of reed swamp associated with the water filtration requirements downstream of the site.

With regard to the Kirklees Local Plan Policies, whilst these had not been formally adopted at the time of my final report, I have dealt with the matters raised by the Biodiversity Officer in their consultation response with regard to Policy LP30 below.

Policy LP 30 (as modified) refers to Habitats of Principle Importance (those habitats listed under the provisions of Section 41 of the Natural Environment and Rural Communities Act 2006), which occur within the proposed footprint of works and will be lost as a result of the proposals. These habitats include the woodland within the site (marked as TN1 within the EclA report) and the heathland within the site (marked as TN8 within the report). Policy LP30 requires proposals to protect these habitats '*unless the benefits of the development clearly outweigh the importance of the biodiversity interest, in which case long term compensatory measures will need to be secured*'. In consideration of this policy it is worth noting that the ecological impact assessment determined that the development would leave approximately 90% (0.96ha) of woodland within the vicinity of the landfill and 40% (0.07ha) of

heathland unaffected and as such ecologically viable areas of each habitat would remain within 250m of the development site boundary. Furthermore, the biodiversity metric calculation indicates that there will be a significant biodiversity net gain of 19.88% (1.24 habitat units) arising from the development.

Policy LP 30 (ii) seeks to minimise impact on biodiversity and provide net biodiversity gains through “*good design by incorporating biodiversity enhancements and habitat creation where opportunities exist*”.

In respect of this policy, the biodiversity metric calculation indicates that there will be a significant biodiversity net gain of 19.88% (1.24 habitat units) arising from the development, which is double the 10% gain that is likely to become mandatory in the future and demonstrates the biodiversity benefits of the proposed site restoration and habitat creation. The new areas of grasslands created within the application site boundary will be managed under a conservation management plan to ensure that they continue to meet their ecological targets.

The proposals will result in the loss of habitats within the Kirklees Wildlife Habitat Network (KWHN) amounting to approximately 0.6 ha and policy LP30 (iii) requires proposals to “*safeguard and enhance the function and connectivity of the KWHN at a local and wider landscape-scale unless the loss of the site and its functional role within the network can be fully maintained or compensated for in the long term*”. The section of the KWHN lost as a consequence of the proposed development is at the extreme southern end of a small finger of habitat that includes woodland and riparian habitats leading up to areas of young developing scrub woodland, ruderal vegetation and agricultural grassland within the application site boundary at its most southerly extreme. The loss of this small terminal section would not cause any fragmentation of habitats within the KWHN and would not affect the functioning of the habitats within the KWHN lower down the valley to the north. The biodiversity net gain calculations indicate that there would be an overall biodiversity net gain in the area of the KWHN affected by the proposed development once all restoration works are completed.

In conclusion it is assessed that the development as proposed is in accord with the Local Plan Policy LP30 in so much as it does not affect the functioning and connectivity of the KWHN and provides a significant net gain in biodiversity as a result of the proposed habitat creation and compensation measures.

In the meantime if I can be of any further assistance with this project please do not hesitate to contact me.

Best wishes.

Yours Sincerely,



Rob Frith B.Sc. (Hons) MRSB  
Principal Ecologist  
For and on behalf of **RDF** Ecology

Tel 01709 531 868  
E-mail [rob@rdfecology.co.uk](mailto:rob@rdfecology.co.uk)

Enclosure Digital copy of the Biodiversity Net Gain Metric Calculations.