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Client: Connect Housing

Project: Newsome Mills

Report: Preliminary Ecological Appraisal

QUALITY ASSURANCE

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1.0 EXECUTIVE SUMMARY

Greengage Environmental Ltd was commissioned to undertake a Preliminary Ecological Appraisal by Connect Housing of a site known as Newsome Mills in Huddersfield.

This document is a report of this survey and has been produced to support a planning submission for the site which seeks the redevelopment of the site comprising:

- 37no. apartments in the Newsome Mill building.
- 8no. apartments in the Weavers building.
- 27no. houses and 6no. cottage flats in the wider site.

This survey aimed to establish the ecological value of this site and the presence/likely-absence of notable and/or legally protected species in order to inform appropriate mitigation, compensation and enhancement actions in light of proposed development works.

The survey area extends to 1.08 hectares and comprises the grounds of a former textile mill, Newsome Mill, first established in 1827. In 2016, the mill building was badly damaged in a fire, which left the clocktower intact, but only the façade on Ruth Street remained. The Site has remained derelict since.

A review of statutory and non-statutory designated sites within the vicinity of the proposed development site identified the nearest designated sites as being >1km away. As such, impacts upon designated sites are considered highly unlikely.

Habitats identified on site include:

- Artificial unvegetated, unsealed surface;
- Other woodland; broadleaved;
- Ruined buildings; and
- Other neutral grassland.

Owing to the timing of the site-specific survey, it is recommended that an updated UK Habitat Classification Survey is undertaken prior to commencement of works to accurately assess and categorise the grassland habitats on site, in addition to confirming the presence/likely absence of protected and/or invasive non-native plant species.

The site is considered to have potential to support the following notable and/or protected species:

- Moderate potential to support foraging badgers;
- Low potential to support foraging and commuting bats;
- High potential to support roosting bats;
- Moderate potential to support nesting birds;
- Moderate potential to support reptiles;
- Low potential to support invertebrates; and

- Moderate potential to support hedgehog.

Mitigation recommendations include implementation of a bat-sensitive lighting strategy, sensitive timing of works and presence of an Ecological Clerk of Works during site clearance. Further surveys are also recommended for:

- Foraging/commuting bats;
- Roosting bats; and
- Reptiles.

Results from these further surveys will inform the detailed approach to mitigation in light of potential impacts upon these species.

Enhancement recommendations are set out, including:

- Provision of high levels of tree planting across the site and retention or creation of valuable grassland habitats within the public realm;
- Orientation of residential gardens to provide a natural buffer to the woodland edge habitat; and
- Inclusion of bird and bat boxes within the built form of new buildings.

Should recommendations set out within this report be adhered to, in addition to subsequent protected species survey reports, proposals can fully comply with all relevant biodiversity protection legislation and planning policy.

2.0 INTRODUCTION

Greengage was commissioned to undertake a Preliminary Ecological Appraisal by Connect Housing (hereafter referred to as 'the Client') of a site known as Newsome Mills (hereafter referred to as 'the Site'), in Huddersfield.

This document is a report of this survey and has been produced to support a planning submission for the site which seeks redevelopment of the site comprising:

- 37no. apartments in the Newsome Mill building.
- 8no. apartments in the Weavers building.
- 27no. houses and 6no. cottage flats in the wider site.

This survey aimed to establish the ecological value of this site and the presence/likely-absence of notable and/or legally protected species in order to inform appropriate mitigation, compensation and enhancement actions in light of proposed development works.

2.1 SITE DESCRIPTION

The survey area extends to approximately 1.08 hectares and is centred on National Grid Reference SE 14334 14908.

The Site is located approximately 2km south of Huddersfield town centre, in the Kirklees District. The Site is bounded to the south by Ruth Street, to the east by Hart Street, and to the west and north by a section of the Kirklees Wildlife Habitat Network, comprised of deciduous woodland.

The Site itself constitutes the grounds of a former textile mill, Newsome Mill, first established in 1827. The mill building, clock tower, and associated 'cottages' were Grade II listed in 1978. In 2016, the mill building was badly damaged in a fire, which left the clocktower intact, but only the façade on Ruth Street remained. The Site has remained derelict since.

3.0 METHODOLOGY

The PEA (which included an Extended Ecological Phase 1 Survey) was undertaken in accordance with guidance in the UK Habitat Classification System (UKHab)[1] and the Chartered Institute of Ecological and Environmental Management (CIEEM) (2017) Guidelines for Preliminary Ecological Appraisal[2], in accordance with BS42020:2013: Biodiversity[3]. The overall assessment consisted of:

- Site specific biological information gained from statutory and non-statutory consultation; and
- A site walkover, protected species scoping assessment and Phase 1 Habitat Survey.

The site-specific consultation provided the ecological context for the site survey carried out on the 23rd January 2023.

The survey boundary and existing site is shown at Figure A.1.

Greengage undertook the site walkover during dry, sunny spells weather conditions. There were patches of snow present across the Site, remnant from previous snowfall. Features within the site boundary and accessible features immediately bordering it were evaluated and the extent and distribution of habitats and plant communities were recorded, and supplemented with target notes on areas or species requiring further commentary. Fauna using the area were recorded and areas of habitat suitable for statutorily protected species were identified where present, with an active search carried out for evidence of such use.

3.1 DESK TOP REVIEW

A review of readily available ecological information and other relevant environmental databases (included Defra's Multi-Agency Geographic Information for the Countryside (MAGIC) website[4]) was undertaken for the site and its vicinity. In addition, a local ecological records search from West Yorkshire Ecology Service (WYES) were reviewed to identify the location and citations of local non-statutory designated sites and presence of records for notable and protected species. This provided the overall ecological context for the site, to better inform the Phase 1 Survey.

3.2 ON SITE SURVEYS

Flora

The extent and distribution of different habitats on site were identified and mapped according to the standard Phase 1 Survey methodologies, supplemented with target notes describing the dominant botanical species and any features of interest. Any present protected plant species and invasive/non-natives were also noted. A habitat map has been produced to illustrate the results, as shown at Figure A.1

Fauna

The Phase 1 Survey specifically included assessments to identify the potential value for notable, rare and protected species at site. This involved identifying potential habitats in terms of refugia, breeding sites and foraging areas in the context of species known to be present locally and regionally.

The likelihood of occurrence is ranked as follows:

- Negligible - While presence cannot be absolutely discounted, the site includes very limited or poor-quality habitat for a particular species. The site may also be outside the known national range for a species;
- Low - On-site habitat is poor to moderate quality for a given species, with few or no information about their presence from desk top study. However, presence cannot be discounted due to the national distribution of the species or the nature of on-site and surrounding habitats;
- Moderate - The on-site habitats are of moderate quality, providing most or all of the key requirements for a species. Several factors may limit the likelihood of occurrence, habitat severance, habitat disturbance and small habitat area;
- High - On-site habitat of high quality for given species. Site is within a regional or national stronghold for that particular species with good quality surroundings and good connectivity; and
- Present - Presence confirmed for the survey itself or recent, confirmed records from information gathered through desk top study.

The species surveyed for included:

Badger (*Meles meles*)

The potential for badger to inhabit or forage within the study area was assessed. Evidence of badger activity includes the identification of setts (a system of underground tunnels and nesting chambers), grubbed up grassland (caused by the animals digging for earthworms, slugs, beetles etc.), badger hairs, paths, latrines and paw prints.

Bat Species (*Chiroptera*)

The site visit was undertaken in daylight and the evaluation of bat potential comprised an assessment of natural features on site that aimed to identify characteristics suitable for bat roosts, foraging and commuting. In accordance with Bat Conservation Trust's Good Practice Guidelines[5] and methods given in English Nature's (now Natural England) Bat Mitigation Guidelines[6] consideration was given to:

- The availability of access to roosts for bats;
- The presence and suitability of crevices and other places as roosts; and
- Signs of bat activity or presence.

Definite signs of bat activity were taken to be:

- The bats themselves;

- Droppings;
- Grease marks;
- Scratch marks; and
- Urine spatter.

Signs of possible bat presence were taken to be:

- Stains; and
- Moth and butterfly wings.

Features with potential as roost sites include mature trees with holes, crevices or splits (the most utilised trees being oak, ash, beech, willow and Scots pine), caves, bridges, tunnels and buildings with cracks or gaps serving as possible access points to voids or crevices.

Additionally, linear natural features such as tree lines, hedgerows and river corridors are often considered valuable for commuting and semi-natural habitats such as woodland, meadows and waterbodies can provide important foraging resources. Consideration was given to the presence of these features both immediately within and adjacent to the assessment area.

Reptiles

The potential for reptile species on site was assessed during the walkover survey. Possible species include grass snake (*Natrix natrix*), common (*Lacerta vivipara*) and slow worm (*Anguis fragilis*). These native reptile species generally require open areas with low, mixed-height vegetation, such as heathland, rough grassland, and open scrub or, in the case of grass snake, waterbody margins. Suitable well drained and frost-free areas are needed so they can survive the winter.

Birds

During the walkover survey, the potential for breeding, wintering and migratory birds was assessed. In particular, this includes areas of trees, scrub, heathland and wetlands that could support nests for common or notable species.

Invertebrates

As part of the walkover survey the quality of invertebrate habitat and the potential for notable terrestrial and aquatic invertebrate species was considered. There is a wide variety of habitats suitable for invertebrates including wetland areas, heathland, areas of bare sandy soil, ephemeral brownfield vegetation and meadows.

Biodiversity Action Plan priority species/ Species of Principal Importance

Where consultation and desk-study indicates the presence of BAP priority species (Species of Principal Importance) not protected by statute, effort was made to establish the potential for the site to support these species.

3.3 SURVEYORS

Chris Moss, who surveyed the Site, has an MSc in Planning and Environmental Management and is also completing a PhD in Green Infrastructure planning. Chris also sits on IEMA's Policy and Practice Steering Group for Biodiversity and Natural Capital.

Daniel Perlaki, who prepared this report, has an MSc in Conservation Science and Policy and is a graduate member of CIEEM. He has six years' experience in ecological consultancy.

Paul White, who reviewed this report, has a Bachelor's degree in Marine Biology (BSc Hons), a Natural England Great Crested Newt Licence (2018-38559-CLS-CLS) and Dormouse Licence (2020-44691-CLS-CLS), and is an Associate member of CIEEM. Paul has over 15 years' experience in ecological surveying and has undertaken and managed numerous ecological surveys and assessments.

This report was written by Daniel Perlaki and reviewed and verified by Paul White who confirms in writing (see the QA sheet at the front of this report) that the report is in line with the following:

- Represents sound industry practice;
- Reports and recommends correctly, truthfully and objectively;
- Is appropriate given the local site conditions and scope of works proposed; and
- Avoids invalid, biased and exaggerated statements.

3.4 CONSTRAINTS

The PEA was undertaken during a sub-optimal time of year during comprised conditions. It was not possible to access all areas of the site, such as the remnant outbuildings and clocktower buildings located in the south of the Site.

Several significant constraints stand to impact conclusions drawn in this report. Principally, the survey was undertaken out of optimal survey season for floral community identification. Remnant snow cover on the ground further hindered this initial identification process. Whilst external inspections of the outbuildings were suitably comprehensive, the clocktower was only surveyed from a distance.

4.0 RESULTS

4.1 DESK TOP REVIEW

Designations

Consultations with the local biological record centres (WYES) and the MAGIC dataset have confirmed that there are no statutory designations of national or international importance within the boundary of the site.

Records from WYES identified 3no. statutory sites within 2km of the site boundary. All 3 are recognised by the LPA as Local Nature Reserves (LNRs), a statutory designation of local importance.

There are also 9no. Local Wildlife Sites (LWSs), within a 2km radius. LWSs are non-statutory designations of local importance.

Table 4.1 below gives the locations and descriptions of a selection of the nearest/most relevant local designations.

Table 4.1 Statutory and Non-Statutory Designated Sites within Search Radius

Site Name	Approximate Location	Description
Statutory Designations		
Castle Hill LNR	~1.2km southwest	Well known geological landmark with an impressive Victorian tower, the surrounding habitat is typical Pennine fringe with drystone walls, scrub and acidic grassland.
Gledholt Woods LNR	~1.8km northwest	10ha area of mature woodland and areas of meadowland set within urban Kirklees. The woodlands support woodland birds such as Song Thrush (*Turdus philomelos*), Robin (*Erithacus rubecula*) and Coal Tit (*Periparus ater*) and are also noted for their Bluebell (*Hyacinthoides non-scripta*) displays in spring and fungi species in the autumn. The occasional Roe Deer (*Capreolus capreolus*) often wander through.
Upper Park Wood LNR	~1.9km south	Oak (Quercus sp.) woodland with rich ground flora including include Heath Bedstraw (Galium saxatile), Sheep's Sorrel (Rumex acetosella) and Bilberry (Vaccinium myrtillus).
Non-Statutory		
Arthur, Molly Carr and Roaf Woods LWS	~1.5km southwest	No citation available

Site Name	Approximate Location	Description
Castle Hill LWS	~1.2km southwest	Well known geological landmark with an impressive Victorian tower, the surrounding habitat is typical Pennine fringe with drystone walls, scrub and acidic grassland
Gledholt Woods	~1.8km northwest	10ha area of mature woodland and areas of meadowland set within urban Kirklees. The woodlands support woodland birds such as Song Thrush, Robin and Coal Tit and are also noted for their Bluebell displays in spring and fungi species in the autumn. The occasional Roe Deer often wander through.
Huddersfield Narrow Canal	~1.6km northwest	No citation available
Longley Hill Plantation	~1km east	No citation available
Park Wood	~1.8km south-sotuheast	Oak woodland with rich ground flora including include Heath Bedstraw, Sheep's Sorrel and Bilberry.
Sir John Ramsden Canal	~1.8km north-northeast	No citation available
Upper Park Wood	~1.9km south	Oak woodland with rich ground flora including include Heath Bedstraw, Sheep's Sorrel and Bilberry.

Biodiversity Action Plans

UK Biodiversity Action Plans (BAPs) have been developed which set priorities for nationally important habitats and species. To support the BAPs, Species/Habitat Statements (otherwise known as Species/Habitat Action Plans) were produced that provide an overview of the status of the species and set out the broad policies that can be developed to conserve them. A list of priority species of conservation importance was also developed.

The UK BAP was succeeded in 2012 by the UK-Post 2012 Biodiversity Framework which informed the creation of the Biodiversity 2020 strategy; England's contribution towards the UK's commitments under the United Nations Convention of Biological Diversity.

Despite this, the UK BAP priority species lists and conservation objectives still remain valid through integration with local BAPs (which remain valid), and in the form of the Habitats and Species of Principle Importance list (as required under section 41 of the Natural Environment and Rural Communities (NERC) Act).

The following UK BAP priority habitats were present at site or in the immediate vicinity:

- Deciduous Woodland (part of the Kirklees Wildlife Habitat Network borders the Site's western boundary).

The following UK BAP priority habitats were present within the 2km search radius:

- Ancient Semi-natural Woodland (ASNW); and
- Planted Ancient Woodland Site (PAWS).

Local Biodiversity Action Plans (LBAPs) ensure that national action plans (the UK BAP/Biodiversity 2020) are translated into effective action at the local level and establish targets and actions for locally characteristic species and habitats.

Kirklees Biodiversity Action Plan and Biodiversity Strategy

The Kirklees Biodiversity Strategy sets out the approach to meeting the targets for Habitats and Species of Principal Importance as set out in the Kirklees Biodiversity Action Plan. These include the following habitats and species:

Local Habitats of Principal Importance:

- Scrub - Primarily Valley Slopes and Pennine Foothills but can occur elsewhere. Includes Open Mosaic Habitats on Previously Developed Land (mostly in Urban Areas);
- Other semi-natural grassland (wet/rush pasture and rough grassland) - Mid-altitudinal Grasslands and Pennine Foothills;
- Riverine - Floodplain: Corridors includes Reedbeds and Rivers.

Local Species of Principal Importance:

- Birds including Skylark (*Alauda arvensis*), House Sparrow (*Passer domesticus*), Linnet (*Carduelis cannabina*).
- Invertebrates including Small Heath (*Coenonympha pamphilus*), Northern Wood Ant (*Formica lugubris*), White-letter Hairstreak (*Satyrium w-album*).
- Reptiles and amphibians including Common Lizard (*Lacerta vivipara*), Great Crested Newt (*Triturus cristatus*), Grass snake (Natrix natrix).
- Terrestrial mammals including Brown Hare (*Lepus europaeus*), Noctule (*Nyctalus noctulla*), Common Pipistrelle (*Pipistrellus pipistrellus*).

Species Record

The information provided in the biological data search from 405 identified records of a number of protected and BAP priority species within 2km search radius of the site. Among others, these include the following species of relevance to the site:

- Birds including Skylark (*Alauda arvensis*; Bird of Conservation Concern (BoCC): Red; UKBAP; Kirklees BAP) and Linnet (*Carduelis cannabina*; BoCC: Red; UKBAP; Kirklees BAP);
- Reptiles including Common lizard (*Lacerta vivipara*; Wildlife and Countryside Act (WaCA) 1981 Schedule 5 Part 9.1 and 9.5; UKBAP; Kirklees BAP) and slow worm (*Anguis fragilis*).

- Terrestrial mammals including Badger (*Meles meles*) and Brown Hare (*Lepus europaeus*; UKBAP; Kirklees BAP).
- Bats including Noctule Bat (*Nyctalus noctula*; WaCA 1981 Schedule 5; UKBAP; Kirklees BAP) and Pipistrelle (*Pipistrellus pipistrellus*; WaCA 1981 Schedule 5; Kirklees BAP).

The species listed above are primarily those known to be in the area that may be impacted by any proposals at the site, or that stand to benefit as a consequence of potential ecological enhancements at the site and inform site-specific mitigation and enhancement recommendations described in the following chapter.

Detailed Description of Site: Habitats

The habitats presented across the assessment site consist of the following UKHab categories, as mapped at Figure A.1:

- Artificial unvegetated, unsealed surface with non-native ruderal/ephemeral, vacant/derelict - u1c, 17 48 351
- Other woodland; broadleaved - w1g
- Ruined building - u1b5, 112
- Other neutral grassland - g3c

Artificial unvegetated, unsealed surface with non-native ruderal/ephemeral

Former areas of hardstanding situated around the buildings at the southern end of the site are sufficiently damaged and porous to constitute an unsealed surface. Patch native and non-native vegetation has emerged in this area, including bramble (*Rubus fructicosus* agg.), butterfly bush (*Buddleja davidii*), ivy (*Hedera helix*), sycamore (*Acer pseudoplatanus*) and greater plantain (*Plantago major*). Vegetation is densest at the foot of buildings where microclimatic conditions are more favourable. Areas of bare ground and hardstanding are still present across this area.

Figure 4.1 Hardstanding with porous areas and ruderal/ephemeral vegetation

Other woodland; broadleaved

A minor area of secondary woodland is present within the site boundary, at the southern point. This is part of a larger woodland which forms the western boundary of the site, although the majority of the woodland is outside of the site boundary.

Canopy species of the woodland on site and adjacent consist of sycamore (*Acer pseudoplatanus*), ash (*Fraxinus excelsior*) and alder (*Alnus glutinosa*). No ground-flora was visible owing to the time of year of the survey; however, all trees were heavily covered in ivy.

There is a remnant area of hardstanding within the woodland parcel.

Ruined Building

There are three structures on site, although all are severely damaged:

- Newsome Mill is the largest structure on site. It was a four-storey stone building although all that currently remains is the perimeter wall, with the exception of the north-western elevation which is approximately 50% missing. A clock tower at the western corner of the building is still intact and is approximately 6-storeys tall, although is in disrepair. The interior of the building has been colonised by typical ruderal species such as bramble, butterfly bush, ivy and willowherb (*Epilobium* sp.) growing around building waste.

Figure 4.2 Newsome Mill Building

- A single-storey annex to the Newsome Mill building is situated to its northeast. As with the Mill, all that remains is the perimeter wall and some roofing beams. The interior area has also been colonised, although predominantly by shrubs such as butterfly bush, self-set willow (*Salix caprea*), sycamores and elder (*Sambucus nigra*).

Figure 4.3 Single-storey annex to Newsome Mill

- A two-storey stone building is present immediately northwest of the clock tower of the Newsome Mill building. This too is in a state of disrepair with large sections of the roof missing and has been heavily colonised by bramble amongst the waste material.

Figure 4.4 Two-storey building to northwest of the Mill

Other neutral grassland

The main body of the site has been characterized as other neutral grassland, although the survey was undertaken at an inappropriate time of year for definitive classification of grassland habitats.

The grassland is tussocky due to the lack of management, and has a dense, rank sward. Whilst no herbaceous species were visible, remnants from the previous year were visible, in addition to minor areas of scrub encroachment. There is little sign of enrichment. Historical satellite images show the site was in use as an industrial site in 2003 and was demolished before 2009. It is likely that the grassland has developed with little deliberate management intervention and the substrate will likely comprise demolition waste and hardcore, some of which is still visible.

Grasses have not been identified owing to the time of year of the survey. Scrub encroachment from bramble, broom (*Cytisus scoparius*) and dogwood (*Cornus sanguinea*) is present in some minor areas. Flower stalks from dock (*Rumex obtusifolius*) were visible, in addition to high densities of clovers (*Trifolium* sp.) in the sward.

Detailed description of Site: Species

Badger

There are records for badgers within 2km of the site, however the locations of badger setts are kept confidential.

The site and its immediate surroundings feature numerous habitats of value for foraging badgers, including woodland, grassland and urban habitats. However, no field signs that could be directly attributed to badgers, such as latrines, fur, pawprints etc. were recorded. One mammal excavation was recorded within the woodland to the west of the site in addition to one cavity in a tree stump suitable for mammals, although outside the site boundary. However, the size and shape of the holes, in addition to feeding remains found outside the hole indicate it is used by foxes. The holes were also obstructed by fallen branches and leaves, indicating that they are infrequently used.

The site is considered to have **moderate potential** to support foraging badgers, although badger setts are considered **likely absent**.

Bats

Foraging and commuting

There are records for numerous bat species within 2km of the site, although records are limited to more common urban species.

Habitats on and adjacent the site provide potentially valuable foraging habitats in the form of woodland and the woodland edge; however, the woodland on and adjacent to the site is limited in extent and does not connect to large areas of woodland in the wider landscape which diminishes its value for foraging and commuting.

The large area of grassland is of lesser value owing to the lack of vertical habitat structure or landscape features.

The site is not likely to be subject to particularly high levels of external lighting due to its suburban context, and the woodland edge habitat is in the centre of an undeveloped site where there is no artificial lighting. This will increase the value of the site for light-intolerant species; however, external lighting is not a major deterrent to the species for which records exist within 2km of the site.

Overall, the site is considered to have **low potential** to support foraging and commuting bats.

Roosting

None of the trees present on site or in the woodland immediately adjacent the site featured any potential roosting features owing to their limited age class and structure.

However, the buildings possess numerous potential roosting features:

- The clock tower at the western end of the Newsome Mill building has a smashed clock face, wooden slats and missing doors and beams from the formerly interior section of the buildings. All of these features provide ingress points into the tower which could not be internally inspected due to

concerns regarding the structural integrity of the tower. These features, and this building, are considered to have **high potential** to support roosting bats.

Figure 4.5 Ingress points into the clock tower building

- The two-storey building northwest of the clock tower has numerous gaps and ingress points into the cavity wall, which provides a relatively well insulated internal void which could be used by roosting bats. The status of the inside of the cavity wall is not known, however, this feature and building are considered to have **moderate potential** to support roosting bats.

Figure 4.6 Gaps into the cavity wall providing an internal void

- The single-storey annex to Newsome Mill is considered to have **negligible potential** to support roosting bats. The remaining walls are intact and made of cinder blocks, and the damage to the roof means the entire internal area is no open, with no protection from light or weather.

Great Crested Newt

There are no waterbodies on, or within 500m of the site, which are suitable for breeding great crested newt. Furthermore, there are no records for great crested newt within a 2km radius of the site. Therefore, the site is considered to have **negligible potential** to support great crested newt.

Reptiles

There are records for both slow worm and common lizard within 2km of the site.

The grassland on site, whilst rank and dense, provides potential foraging habitat in addition to basking spots in sparser areas. The presence of buried demolition waste from the former industrial units on site may also provide hibernacula, although no evidence of this was recorded. However, the site is relatively isolated from other reptile habitat, bound on all sides by woodland and developed areas which would limit dispersal.

Overall the site is considered to have **moderate potential** to support reptiles.

Dormouse

The woodland on/adjacent the site does not possess a sufficiently dense understorey or suitable foraging opportunities for dormouse. Additionally, it is limited in extent and not well connected to other woodland in the wider vicinity. Furthermore, there are no records of dormouse within 2km of the site. As such, the site is considered to have **negligible potential** to support dormouse.

Water Vole and Otter

There are no watercourses on or adjacent to the site which have potential to support riparian mammals. As such, the site has **negligible potential** to support water vole and otter.

Birds

The grassland habitat on site is largely unsuitable for ground nesting birds owing to its limited extent, suburban situation and dense sward. However, the presence of seed-producing herbs such as dock may provide a foraging resource for passerine species.

The woodland on and adjacent to the site provides nesting and foraging opportunities for woodland birds, although it is limited in extent and Greengage do not possess information about ground flora present. No nests were recorded during the site visit.

The buildings present provide nesting opportunities, particularly within the cavity wall and potential internal voids within the clock tower. Urban species such as starling and house sparrow may make use of such features.

Overall, the site is considered to have **moderate potential** to support breeding birds, although this is largely limited to common resident species.

Invertebrates

The woodland possesses minor amounts of deadwood which may be of value to notable saproxylic coleoptera, although the connectivity to woodland beyond the site boundary is limited and the woodland parcel on and adjacent to the site is limited in extent.

The grassland may provide value for pollinators of note, however botanical identification was not possible at the time of the survey.

The site has **low potential** to support invertebrates.

Protected Plant Species

No protected plant species were recorded during the site survey, however owing to the timing of the survey they can not be considered likely absent.

Invasive/Non-native species

Butterfly bush was present across the site. This is considered potentially invasive, however is not listed in Schedule 9 of the Wildlife and Countryside Act (1981) as amended. No other invasive non-native

species (INNS) were recorded, however owing to the timing of the survey they can not be considered likely absent.

Other BAP Species

The presence of woodland and grassland habitats provides suitable foraging habitat for hedgehog (*Erinaceus europaeus*). No field signs were recorded, however the site is considered to have **moderate potential** to support hedgehogs.

The grassland habitat is too small in extent, and not connected to other grassland habitats to provide habitat for brown hare.

5.0 EVALUATION AND DISCUSSION

5.1 BASELINE SUMMARY

The assessment site and its surroundings have potential to support the following ecological receptors of note, which could therefore be impacted upon by any future prospective development proposals, as indicated in Table 5.1 below. Comment on further recommendations for each receptor is provided; further detail and discussion can be found at paragraph 5.2 onward:

Table 5.1 Baseline Summary

Receptor	Presence/Potential Presence	Comments
Designated Sites: Statutory	1.2km from the site	Owing to the distance from the proposed development site, presence of physical/geographical barriers and scale of the proposed development, construction phase impacts are considered highly unlikely. Additionally, the nearest statutory designated sites are designated for their terrestrial habitats which are not likely to be impacted by construction activities at this distance. Operational phase impacts would be limited to increased recreational pressure, however the proposed development represents a minor increase in the local population, and there are numerous outdoor recreation areas in the vicinity of the site. Therefore, footfall is likely to be dispersed, and associated impacts such as trampling, litter and impacts associated with pet ownership are likely to be limited on any one site.
Designated Sites: Non-Statutory	1km from the site	As above
Notable/Rare Habitats	Present within the site boundary and immediately adjacent	Woodland on and adjacent to the proposed development site is to be retained, protected and where possible enhanced. A CEMP is recommended to detail protection measures during construction. The grassland on site will be lost as a consequence of site clearance and preparation. It is not known whether the

Receptor	Presence/Potential Presence	Comments
		grassland habitat on site is a priority habitat owing to the time of year the survey was undertaken. An updated habitat survey is recommended to confirm the status of grassland habitat on site.
Badger	Moderate potential but setts likely absent	Impacts associated with the development include potential damage to setts and subsequent injury/death of badgers during site preparation, clearance and construction. As setts are considered likely absent, there is negligible risk of this impact, however a precautionary method of works should be adopted, as discussed below.
Foraging and commuting bats	Low potential	Impacts associated with the proposed development, in light of the proposed retention of all woodland habitat are limited to increases in the levels of external lighting on site. Further surveys are recommended to determine the levels and nature of bat activity on site, identify temporal or spatial trends in use of the site by bats and identify an approach to mitigation.
Roosting bats	High potential	Impacts during site preparation and clearance include potential destruction of roosts and/or injury/killing of bats. Further surveys are recommended to confirm the presence/likely absence of roosting bats from the site and identify the requirement for mitigation.
Reptiles	Moderate potential	Site clearance and preparation will result in the loss of potentially suitable reptile habitat and potentially result in injury/killing of reptiles. Further surveys are recommended to confirm the presence/likely absence of reptiles from the site and identify an approach to mitigation.
Birds	Moderate potential	In light of the proposed retention of all the woodland on site, impacts upon birds are

Receptor	Presence/Potential Presence	Comments
		limited to potential destruction of nests and/or killing of birds during demolition of the buildings on site and loss of foraging habitat associated with loss of grassland habitats.
Invertebrates	Low potential	All woodland habitat is proposed to be retained. The loss of grassland may result in a loss of value on site for pollinators. An updated habitat survey is recommended to confirm the status of the grassland on site and identify its potential for supporting invertebrates.
Protected plant species	TBC	An updated survey is recommended to confirm the presence/likely absence of protected plant species during an appropriate time of year.
Invasive/Non-native species	TBC	An updated survey is recommended to confirm the presence/likely absence of INNS during an appropriate time of year.
Other BAP species	Moderate potential to support hedgehogs	Site preparation and clearance has the potential to kill or injure hedgehogs. Clearance of grassland should be undertaken during the day when hedgehogs are less active, and during a time of year when they are not hibernating. An Ecological Clerk of Works (ECoW) should be present during clearance to dismantle potential refugia by hand.

5.2 DISCUSSION AND RECOMMENDATIONS

Discussion is provided below on the key ecological receptors that stand to be impacted/benefit from proposed works; high level commentary on appropriate mitigation, compensation and enhancement actions is also provided.

An Ecological Management Plan (EMP) and Construction Environmental Management Plan (CEMP) should be produced and implemented for the site providing greater detail on the below, which should be secured through planning condition in accordance with BS 42020: 2013 Biodiversity.

Notable/Rare habitats

All woodland habitat on and adjacent to the site should be protected during site preparation, clearance and construction. This is likely to include establishing construction exclusion zones around root protection areas and tree protection fencing (in line with recommendations set out in the Arboricultural Impact Assessment). Where hard surfaces/vehicle movements are required over root protection areas, suitable ground protection should be used to prevent compaction of soils. A CEMP should be secured through planning condition and produced to detail all protection measures to be implemented to ensure there are no detrimental impacts upon the woodland, including but not limited to dust mitigation, protocols for storage of hazardous chemicals, fencing and spills procedure.

An updated PEA should be undertaken during spring/summer 2023 to assess and categorise the grassland habitats at an appropriate time of year for botanical identification. Additionally, this updated survey should also cover the woodland to allow accurate descriptions of any ground-flora.

Badger

In order to ensure there are no unforeseen detrimental impacts upon badgers, prior to commencement of site work, an updated badger scoping survey should be undertaken. Additionally, all site staff are to be informed of the potential for the site to support badgers and made aware of their legal responsibilities relating to protection of the species. If any badgers are encountered at any point during site works, works are to cease immediately and an ecologist is to be contacted for advise.

Bats

Foraging and Commuting

Bat activity surveys should be undertaken to assess the relative importance of the site and its habitats to local bat populations. This should consist of walked transect surveys (once per season between spring and autumn) supplemented by a 5-night period of remote monitoring using static bat detectors. This should determine the species present and using the site, behaviours exhibited and temporal/spatial trends. This will inform an approach to mitigation.

However, certain recommendations apply regardless of levels of activity present on site. Specifically, lighting should be designed in line with the Bat Conservation Trust and Institute of Lighting Professionals guidance;

- Light spill on valuable habitats (such as woodland edges) should be avoided through not installing light fixtures, use of cowls/shields and provision of buffer planting. Any external lighting bollards/posts should be at the lowest height possible;
- Levels of illumination should be kept to a minimum where possible;
- Luminaires should be in the warm-white spectrum; and
- External lighting should not be turned on when not required.

Landscaping proposals should also seek to improve the value of the site for bats through planting additional trees and hedgerows in linear rows and planting of night-scented flowering plants.

Roosting

Emergence/re-entry surveys of the buildings on site should be undertaken to confirm the presence/likely absence of roosting bats from the site. In line with Bat Conservation Trust survey guidelines, buildings of high potential to support bat roosts should be subject to three emergence and/or re-entry surveys and buildings of moderate potential should be subject to two to ensure reliable results are obtained. Surveys should be undertaken between May and September (with at least two for high potential, and one for moderate, taking place between May and August).

Reptiles

Reptile surveys should be undertaken to confirm the presence/likely absence of reptiles from the grassland habitats on site. Surveys should be undertaken in line with Froglife Advice Sheet 9[7] methodology whereby artificial refugia should be placed across the site at an appropriate density, and allowed to 'bed-in' for one week. Subsequently, seven survey visits should be undertaken to inspect above and below the artificial refugia (and any other features on site) to determine reptile presence/absence. Should reptiles be confirmed present, assessments of population size and importance should be made and an approach to mitigation described. If reptiles are considered likely absent, no further mitigation will be required relating to reptiles.

Birds

Demolition of the external walls of the buildings which are proposed for demolition (which does not include the building facades to be retained) should be undertaken outside of the nesting bird season (taken to run from March to August, inclusive - although this is not a fixed window and is subject to change depending upon weather conditions). Where this is not possible, a qualified ecologist should undertake appropriate checks for nesting birds to confirm their likely absence prior to demolition. Should any nests be identified, these should be protected throughout site works until chicks have fledged.

The loss of foraging habitat associated with the removal of grassland habitats should be compensated for through soft landscaping proposals. Native, seed-producing herbs should be included in planting palettes across the site.

Protected Plant Species

An updated survey will confirm the presence/likely absence of protected plant species and identify an approach to mitigation.

Invasive/Non-native species

An updated survey will confirm the presence/likely absence of INNS and identify an approach to mitigation. However as butterfly bush is confirmed as present on site, although not a WCA Schedule 9 species, it should be treated as an INNS, therefore any clearance of butterfly bush should involve disposal by licenced contractors in a manner that does not allow its spread in the wild.

BAP Species

Clearance of grassland should be undertaken during the day when hedgehogs are less active, and during the spring/summer months when hedgehogs are not hibernating. This allows hedgehogs the ability to move away from construction activities themselves. An ECoW should be present during clearance to dismantle potential refugia by hand and brief the site team on risks associated with site clearance.

Biodiversity Enhancements

In accordance with the National Planning Policy Framework, local policy drivers and recent changes to the legislative context, (Appendix C), proposals should seek to provide measurable net gains in biodiversity. These should aspire to a minimum of 10% net gain in biodiversity, which should be evidenced through a Biodiversity Impact Assessment (BIA) using the Natural England Biodiversity 3.1 metric[8] or similar.

To enable proposals to deliver the desired net gains, the following measures should be considered for incorporation into the landscaping plans:

- Public realm landscaping should feature high levels of native tree and shrub planting to improve tree cover and act as a buffer from light-spill into the retained woodland. Additionally, native wildflower areas should be incorporated where possible, to provide species-rich areas to provide value for pollinators. Any hedgerows provided on site should be dense and feature native thorny shrubs to provide nesting and foraging opportunities for notable birds, such as linnet;
- Residential gardens, whilst outside the control of the project as they will be under the ownership of eventual residents, should back onto the woodland to act as a buffer and retain permeable surfaces around the roots of retained trees. Native hedgerows should also be used to delineate properties and buffer the woodland from residential gardens; and
- Bird and bat boxes should be incorporated into the built form of new buildings. These should target species known to be in the area (in the case of bats, to be determined by emergence and activity surveys). Bird boxes should target house sparrow.

At the time of writing, a BIA has not been undertaken, however incorporation of the above ecological enhancements should contribute to the post-development habitat value.

6.0 SUMMARY & CONCLUSION

Greengage was commissioned by Connect Housing to undertake a PEA of a site known as Newsome Mill in Huddersfield in order to establish the ecological value of this site and its potential to support notable and/or legally protected species.

The PEA identified value for a number of notable and protected species and habitats, and further surveys are required as detailed within this report.

Key mitigation, compensation and enhancement actions are described to enable legislative and policy compliance (see context at Appendix C), aiming to achieve net gains in biodiversity for the site.

Key actions should be included within EMP and CEMP documents for the site which could be secured through planning condition.

APPENDIX A SITE PLAN AND HABITAT MAP

Figure A.1 Site plan and habitat map

NEWSOME MILLS

- Red Line Boundary
- Other woodland; broadleaved
- Ruderal/Ephemeral
- Vacant/derelict land/ bareground
- Buildings

Title: Figure A.1 Site Plan and Habitat Map

Drawn by: JT
Date: 24/03/2023

Reviewed by: CM
Date: 24/03/2023

Project number: 552257
Sources: ESRI World Topo, Google Satellite, Ordnance Survey

Greengage

APPENDIX B SITE PHOTOGRAPHS

APPENDIX C RELEVANT LEGISLATION AND POLICY

C.1 LEGISLATION

Current key legislation relating to ecology includes The Environment Act[9] Wildlife and Countryside Act 1981 (as amended)[10]; The Conservation of Habitats and Species Regulations 2019 ('Habitats & Species Regulations')[11], The Countryside and Rights of Way Act 2000 (CRoW Act)[12], and The Natural Environment and Rural Communities Act, 2006[13].

The Environment Act, 2021

The Environment Act, 2021 will mandate the requirement for new development in England to deliver a minimum 10% biodiversity net gain (BNG), as measured by the agreed metric (the current relevant version being the Natural England metric 3.0), secured through planning condition as standard (as per schedule 14 of the Act). Approach to the delivery of BNG must follow the mitigation hierarchy, with avoidance of impact and on-site compensation/gains prioritised, ahead of the use of offsite biodiversity unit offsets, or the purchase of biodiversity credits.

The Act introduces the condition that no development may begin unless a biodiversity net gain plan has been submitted and approved by the local planning authority (LPA).

The Act also amends requirements of the NERC Act, 2006, adding the need to not just conserve, but enhance biodiversity through planning projects. Furthermore, it introduces the need for the LPA to have regard to relevant local nature recovery strategies and relevant species/protected site conservation strategies, when making their decision.

Under the Act, the enhancements must be maintained for at least 30 years.

The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019

The Conservation of Habitats & Species Regulations replace The Conservation (Natural Habitats, etc.) Regulations 1994 (as amended)[14], and transpose Council Directive 92/43/EEC on the Conservation of Natural Habitats and Wild Fauna and Flora ('EU Habitats Directive')[15], and Council Directive 79/409/EEC on the Conservation of Wild Birds ('Birds Directive')[16] into UK law (in conjunction with the Wildlife and Countryside Act).

Regulation 43 and 47 respectively of the Conservation of Habitats & Species Regulations makes it an offence (subject to exceptions) to deliberately capture, kill, disturb, or trade in the animals listed in Schedule 2 (European protected species of animals), or pick, collect, cut, uproot, destroy, or trade in the plants listed in Schedule 5 (European protected species of plant). Development that would contravene the protection afforded to European protected species requires a derogation (in the form of a licence) from the provisions of the Habitats Directive.

Regulation 63 (1) states: 'A competent authority, before deciding to undertake, or give any consent, permission or other authorisation for, a plan or project which —

(a) is likely to have a significant effect on a European site or a European offshore marine site (either alone or in combination with other plans or projects); and

(b) is not directly connected with or necessary to the management of that site;

must make an appropriate assessment of the implications for that site in view of that site's conservation objectives.'

Wildlife and Countryside Act 1981 (as amended)

The Wildlife and Countryside Act 1981 (as amended) is the principal mechanism for the legislative protection of wildlife in Great Britain. This legislation is the means by which the Convention on the Conservation of European Wildlife and Natural Habitats[17] (the 'Bern Convention') and the Birds Directive and EU Habitats Directive are implemented in Great Britain.

The Countryside and Rights of Way Act 2000

The Wildlife and Countryside Act has been updated by the CRoW Act. The CRoW Act amends the law relating to nature conservation and protection of wildlife. In relation to threatened species it strengthens the legal protection and adds the word 'reckless' to the offences of damaging, disturbing, or obstructing access to any structure or place a protected species uses for shelter or protection, and disturbing any protected species whilst it is occupying a structure or place it uses for shelter or protection.

The Natural Environment and Rural Communities Act 2006

The Natural Environment and Rural Communities Act 2006 states that every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity. Biodiversity Action Plans provide a framework for prioritising conservation actions for biodiversity.

Section 41 of the Natural Environment and Rural Communities Act requires the Secretary of State to publish a list of species of flora and fauna and habitats considered to be of principal importance for the purpose of conserving biodiversity. The list, a result of the most comprehensive analysis ever undertaken in the UK, currently contains 1,149 species, including for example, hedgehog (Erinaceus europaeus), and 65 habitats that were listed as priorities for conservation action under the now defunct UK Biodiversity Action Plan[18] (UK BAP). Despite the devolution of the UK BAP and succession of the UK Post-2010 Biodiversity Framework[19] (and Biodiversity 2020 strategy[20] in England), as a response to the Convention on Biological Diversity's (CBD's) Strategic Plan for Biodiversity 2011-2020[21] and EU Biodiversity Strategy (EUBS)[22], this list (now referred to as the list of Species and Habitats of Principal Importance in England) will be used to guide decision-makers such as public bodies, including local and regional authorities, in implementing their duty under section 41 of the Natural Environment and Rural Communities Act 2006 'to have regard' to the conservation of biodiversity in England, when carrying out their normal functions.

Biodiversity Action Plans

Non-statutory Biodiversity Action Plans (BAPs) have been prepared on a local and regional scale throughout the UK over the past 15 years. Such plans provide a mechanism for implementing the government's broad strategy for conserving and enhancing the most endangered ('priority') habitats and species in the UK for the next 20 years. As described above the UK BAP was succeeded in England by Biodiversity 2020 although the list of priority habitats and species remains valid as the list of Species of Principal Importance for Nature Conservation.

Regional and local BAPs are still valid however and continue to be updated and produced.

Detail on the relevant BAPs for this site are provided in the main text of this report.

Legislation Relating to Nesting Birds

Nesting birds, with certain exceptions, are protected from intentional killing, destruction of nests and destruction/taking of eggs under the Wildlife and Countryside Act 1981 (as amended) and the CRoW Act. Any clearance of dense vegetation should therefore be undertaken outside of the nesting bird season, taken to run conservatively from March to August (inclusive), unless an ecologist confirms the absence of active nests prior to clearance.

Legislation Relating to Bats

All UK bats and their roosts are protected by law. Since the first legislation was introduced in 1981, which gave strong legal protection to all bat species and their roosts in England, Scotland and Wales, additional legislation and amendments have been implemented throughout the UK.

Six of the 18 British species of bat have Biodiversity Action Plans (BAPs) assigned to them, which highlights the importance of specific habitats to species, details of the threats they face and proposes measures to aid in the reduction of population declines.

Although habitats that are important for bats are not legally protected, care should be taken when dealing with the modification or development of an area if aspects of it are deemed important to bats such as flight corridors and foraging areas.

The Wildlife & Countryside Act 1981 (WCA) was the first legislation to provide protection for all bats and their roosts in England, Scotland and Wales (earlier legislation gave protection to horseshoe bats only.)

All eighteen British bat species are listed in Schedule 5 of the Wildlife and Countryside Act, 1981 and under Annexe IV of the Habitats Directive, 1992 as a European protected species. They are therefore fully protected under Section 9 of the 1981 Act and under Regulation 43 of the Conservation of Habitats and Species Regulations 2017, which transposes the Habitats Directive into UK law. Consequently, it is an offence to:

- Deliberately capture, injure or kill a bat;
- Intentionally or recklessly disturb a bat in its roost or deliberately disturb a group of bats;

- Damage or destroy a bat roosting place (even if bats are not occupying the roost at the time);
- Possess or advertise/sell/exchange a bat (dead or alive) or any part of a bat; and
- Intentionally or recklessly obstruct access to a bat roost.

This legislation applies to all bat life stages.

The implications of the above in relation to the proposals are that where it is necessary during construction to remove trees, buildings or structures in which bats roost, it must first be determined that work is compulsory and if so, appropriate licenses must be obtained from Natural England.

Legislation Relating to Reptiles

All species of reptile native to the UK are protected to some degree under national and/or international legislation, which provides mechanisms to protect the species, their habitats and sites occupied by the species.

Sand lizards and smooth snakes are European protected species and are afforded full protection under Section 9 of the Wildlife and Countryside Act 1981 and Regulation 43 of the Conservation of Habitats and Species Regulations 2017. However, these species are rare and highly localised. Their occurrence is not considered as relevant in this instance, as the ranges and specialist habitats of these species do not occur at this site.

The remaining widespread species of native reptiles (adder, grass snake, slow worm and viviparous lizard) are protected under part of Section 9(1) and all of Section 9(5) of the Wildlife and Countryside Act 1981. They are protected against intentional killing and injury and against sale, transporting for sale etc. The habitat of these species is not protected. However, in terms of development, disturbing or destroying reptile habitat during the course of development activities while reptiles are present is likely to lead to an offence under the Wildlife and Countryside Act 1981. It is therefore important to identify the presence of these species within a potential development site. If any of these species are confirmed, all reasonable measures must then be taken to ensure the species are removed to avoid the threat of injury or death associated with development activities.

Each species of native reptile has specific habitat requirements but general shared features include a structurally diverse habitat that provides for shelter, basking, foraging and hibernating.

All reptiles are BAP species and as such are also of material consideration in the planning process due to the NPPF.

C.2 PLANNING POLICY

National

National Planning Policy Framework

The National Planning Policy Framework (NPPF) 2021[23] sets out the Government's planning policies for England, including how plans and decisions are expected to apply a presumption in favour of

sustainable development. Chapter 15 of the NPPF focuses on conservation and enhancement of the natural environment, stating plans should 'identify and pursue opportunities for securing measurable net gains for biodiversity'.

It goes on to state: 'if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused'. Alongside this, it acknowledges that planning should be refused where irreplaceable habitats such as ancient woodland are lost.

Local

Kirklees Local Plan Strategy and Policies 2019

Policy LP30 - Biodiversity & Geodiversity

The council will seek to protect and enhance the biodiversity and geodiversity of Kirklees, including the range of international, national and locally designated wildlife and geological sites, Habitats and Species of Principal Importance and the Kirklees Wildlife Habitat Network.

Statutory Designated Sites

Statutory designated sites, including the South Pennine Moors Special Protection Area (SPA) and Special Area for Conservation (SAC) and Sites of Special Scientific Interest, are already highly protected through existing laws and legislation. In accordance with legislation, the Council will seek to ensure that harmful impacts to these areas as a result of development proposals are avoided.

Development proposed within or outside a designated Site of Special Scientific Interest, likely to have an adverse effect on the site's special nature conservation features, will not normally be permitted. Exceptionally development will be allowed where the benefits of the development clearly outweigh the impacts on the site's special conservation features and measures are provided to mitigate harmful impacts.

Local Designated Sites & Important Local Ecological Features

Proposals having a direct or indirect adverse effect on a Local Wildlife Site or Local Geological Site, Ancient Woodland, Veteran Tree or other important tree, will not be permitted unless the benefits of the development can be clearly shown to outweigh the need to safeguard the local conservation value of the site or feature and there is no alternative means to deliver the proposal. In all cases, full compensatory measures would be required and secured in the long term.

Habitats and Species of Principal Importance

Proposals will be required to protect Habitats and Species of Principal Importance 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.

Biodiversity and Development

Development proposals will be required to:-
(i) result in no significant loss or harm to biodiversity in Kirklees through avoidance, adequate mitigation

or, as a last resort, compensatory measures secured through the establishment of a legally binding agreement;

(ii) minimise impact on biodiversity and provide net biodiversity gains through good design by incorporating biodiversity enhancements and habitat creation where opportunities exist;

(iii) safeguard and enhance the function and connectivity of the Kirklees Wildlife Habitat Network 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;

(iv) establish additional ecological links to the Kirklees Wildlife Habitat Network where opportunities exist; and

(iv) incorporate biodiversity enhancement measures to reflect the priority habitats and species identified for the relevant Kirklees Biodiversity Opportunity Zone.

Policy LP31 - Strategic Green Infrastructure Network

Within the Strategic Green Infrastructure Network identified on the Policies Map, priority will be given to safeguarding and enhancing green infrastructure networks, green infrastructure assets and the range of functions they provide.

Development proposals within and adjacent to the Strategic Green Infrastructure Network should ensure:-

(i) the function and connectivity of green infrastructure networks and assets are retained or replaced;

(ii) new or enhanced green infrastructure is designed and integrated into the development scheme where appropriate, including natural greenspace, woodland and street trees;

(iii) the scheme integrates into existing and proposed cycling, bridleway and walking routes, particularly the Core Walking and Cycling Network, by providing new connecting links where opportunities exist;

(iv) the protection and enhancement of biodiversity and ecological links, particularly within and connecting to the Kirklees Wildlife Habitat Network.

The council will support proposals for the creation of new or enhanced green infrastructure provided these do not conflict with other Local Plan policies.

Policy LP33 - Trees

The Council will not grant planning permission for developments which directly or indirectly threaten trees or woodlands of significant amenity.

Proposals should normally retain any valuable or important trees where they make a contribution to public amenity, the distinctiveness of a specific location or contribute to the environment, including the Wildlife Habitat Network and green infrastructure networks.

Proposals will need to comply with relevant national standards regarding the protection of trees in relation to design, demolition and construction. Where tree loss is deemed to be acceptable, developers will be required to submit a detailed mitigation scheme.

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