

Consultation Response from KC,  
Ecology Unit

2023/91907 rear of, 18, Kingsley Avenue, Lockwood, Huddersfield, HD1 3SR

Demolition of dwelling to create access and erection of 10 dwellings

Date Responded: 03/08/2023

Responding Officer: Gareth Hey

Responding Ref:

## Assessment

In the absence of baseline ecological information, I am not able to provide definitive comments on the proposals in relation to national and local policies.

In the first instance, the applicant should engage a suitably qualified ecologist to undertake a **Preliminary Ecological Appraisal** (PEA) and Preliminary Roost Assessment (PRA) in accordance with national guidelines. This work should identify any important ecological features present (species or habitats), or make recommendations for further survey where this is necessary to determine presence/absence of a feature or to what extent a feature is important.

The purpose of PEA/PRA is to ensure scheme designers have access to sufficient information to apply the **ecological mitigation hierarchy** (described above). Accurate habitat survey will also be essential if a quantitative method of demonstrating a biodiversity net gain is to be used.

The results of the PEA, and any additional surveys, should be used to inform an ecological report to support the planning application. The most appropriate report format to support a planning application is an **Ecological Impact Assessment** (EclA) (CIEEM, 2017a & 2018). The standardised content and format of an EclA is defined in guidance by CIEEM (2018), and if followed will provide sufficient information to enable planning officers to understand if the proposals are in line with biodiversity policies. In order to provide sufficient information to support a planning application, the EclA should include a characterisation of the impacts to important ecological features, and identify any significant ecological effects resulting from these impacts.

In order to demonstrate a biodiversity net gain, the EclA should also include an accurate summary of the biodiversity net gain calculation using the **most up to date Biodiversity Metric** to demonstrate how policy requirements are met.

## Key Biodiversity Policies

Biodiversity policies are primarily provided in Section 15 of the National Planning Policy Framework (NPPF) and Local Plan Policy LP30. Guidance has been provided below to assist applicants in interpreting potentially problematic elements of the existing policies.

### Mitigation Hierarchy and Significant Harm

The NPPF and policy LP 30 both require development proposals to apply the ecological mitigation hierarchy in order to result in no significant ecological harm. Through the hierarchy, significant harm should be avoided in the first instance, mitigated where impacts cannot be avoided and compensated for only as a last resort.

Paragraph 19 of the Planning Practice Guidance on the [Natural Environment](#) (Reference ID: 8-019-20190721) provides more information on the application of the mitigation hierarchy.

### [Ecological Networks](#)

The NPPF requires local planning authorities to identify local ecological networks, which in Kirklees is undertaken through mapping of the Kirklees Wildlife Habitat Network. Policy LP 30 requires proposals to safeguard and enhance this network, and establish additional links where possible, in order to maximise the connective function of the network for wildlife.

Paragraphs 11 to 13 of the Planning Practice Guidance on the [Natural Environment](#) (Reference ID: 8-011-20190721 to 8-013-20190721) provide more information on policy concerning ecological networks

### [Biodiversity Net Gain](#)

Biodiversity net gain is encouraged through NPPF and required through policy LP 30. The NPPF also indicates that biodiversity net gain is a measurable approach that demonstrates a clear benefit to biodiversity.

The Environment Act will make a 10% biodiversity net gain mandatory for the majority of developments. In accordance with this and with Kirklees guidance, the [Technical Advice Note on Biodiversity Net Gain](#), it is advised that a **10% net gain** be demonstrated utilising the most up to date version of DEFRA's Biodiversity Metric. The metric excel spreadsheet and any GIS layers used to carry out the calculations should also be supplied along with the application to enable the LPA to verify the calculations.

Paragraphs 22 to 27 of the Planning Practice Guidance on the [Natural Environment](#) (Reference ID: 8-022-20190721 to 8-027-20190721) provide more information on biodiversity net gain.