

Demolition Environmental Management Plan (Biodiversity).

Storthes Hall Campus



Prepared for Ubrique Investments Ltd.

Quality Assurance

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The information, results and observations recorded within this document were accurate at the time of survey. We accept no liability for any errors or activities and changes to the survey area which may have occurred post survey.

Any protected species records will be submitted to the appropriate biological records centre on an annual basis.

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1. Introduction

1.1 Project introduction

This Demolition Environment Management Plan (Biodiversity) documents the relevant environmental and ecological aspects of the works to be carried out as part of the Storthes Hall Lane redevelopment project. It describes how these aspects are to be managed both before and during the demolition phase of the project to ensure environmental compliance and adherence to applicable planning requirements.

This report forms part of the wider project documentation and has been prepared alongside, and should be read in conjunction with, the Demolition Environmental Management Plan (Construction), prepared by D Hughes Demolition & Excavation Limited (May 2025, rev.2) and the associated Construction Phase Plan (CPP). This report updates the DEMP(C) information relating to ecological constraints, wildlife and protected species. This DEMP(B) does not provide any specification for the actual demolition of the buildings on site, it relates only to the ecological aspects to ensure compliance with existing environmental legislation.

The following documents should also be read to ensure any worker is fully apprised of the ecological situation on site:

- ✚ Bat Survey Report Update 2025, Storthes Hall Campus. S.A.P Ecology & Environmental Ltd
- ✚ Precautionary Method of Works, Storthes Hall Campus. S.A.P Ecology & Environmental Ltd
- ✚ Invasive Species Protocol, Storthes Hall Campus. S.A.P Ecology & Environmental Ltd
- ✚ EcIA Update, Storthes Hall Campus. S.A.P Ecology & Environmental Ltd
- ✚ BS 5837:2012 Arboricultural Survey, Storthes Hall Student Village, Kirkburton (ref: 1337.003.ENZ.XX.00.RP.AR.45.101. Enzygo Ltd.
- ✚ Bat Survey Report, Storthes Hall Student Village (ref: 1337.003.EC.R.002). Enzygo Ltd.
- ✚ Preliminary Ecological Appraisal, Storthes Hall Student Village (ref: SHF.1337.003.EC.R.001). Enzygo Ltd.

In summary the Enzygo reports recorded the presence of protected species, specifically bats, roosting within the buildings on site. The report also concluded that the site provides opportunities to incorporate appropriate measures to mitigate any potential impacts to ecological features and to demonstrate biodiversity net gain in accordance with NPPF and local planning policy. Daytime bat assessments and bat activity surveys were completed by SAP Ecology & Environment Ltd in May and June 2025 to update the survey data relating to bats, and to facilitate the application for a Natural England Bat Mitigation licence (BML) to allow the legal destruction of all identified bat roosts as part of the demolition project.

1.2 Aims

The Aims of this document are:

- ✚ To ensure procedures are implemented to control and limit the disturbance of areas of nature conservation interest and protected species and habitats;
- ✚ To provide a document for consultation with the relevant local authorities, Natural England and the Environment Agency, as appropriate;
- ✚ To produce a site-specific reinstatement plan, as required for consultation with the local authority.

1.3 Legislation Requirement

Under European and UK legislation, certain habitats and species are protected. Failure to comply with legislation could lead to the risk of negative ecological impacts, prosecution and/or severe financial penalties. Breach of

environmental legislation could also result in bad publicity and disruption of the project program. This plan aims to ensure compliance with contractual requirements, as well as the following legislation:

- ✚ Wildlife and Countryside Act 1981 as amended;
- ✚ The Conservation of Habitats and Species Regulations 2010 as amended;
- ✚ Protection of Badgers Act 1992;
- ✚ Wild Mammals (Protection) Act 1996;
- ✚ Town and Country Planning Act 1990;
- ✚ Environmental Protection Act 1990;
- ✚ Control of Substances Hazardous to Health Regulations 1994.

1.4 Site Description

The site consists of a disused early Edwardian-era mental health hospital. During the Second World War the hospital came under the management of the War Office for the treatment of injured servicemen. In 1948 the facility came under the management of the newly founded NHS. In the 1990's the site was used as a residential campus for students attending the University of Huddersfield which has been its most recent use until being abandoned in June 2024.

The current proposals for the site would see the demolition of the majority of the buildings on site, and all of the student accommodation. Approximately 260 residential properties will be erected on the newly vacant land.

2. Timing of Works

This DEMP (B) will be implemented at the outset of development and will be adhered to until the completion of all construction works, as necessary. Approximate timings for works relating to sensitive and protected species that are/may be present on site during the construction phase is shown on the table below. Please note, these timings **DO NOT** override any timings stipulated within the Natural England BML and an ecologist/Ecological Clerk of Works (ECoW) will be required to advise what works can occur within these time periods.

Table 1: Species Sensitive Periods

Ecological Receptor	Activity Period	Locations	Sensitive Periods
Bats	May – September	Buildings and Trees	May – September (Roosts), November – February (Hibernacular)
Breeding Birds	March - August	Buildings and Trees	March – August (INCLUSIVE)
Invasive Species (Cotoneaster, Rhododendron)	All Year	Grounds	All Year

3. Mitigation Measures

This section details the general requirements that will be implemented prior to construction and throughout the construction project relating to protected species, habitats and invasive species. In specific cases the site ECoW may put alternative provisions/mitigation measures in place to ensure legal compliance.

3.1 Bats

Bat activity surveys were conducted during the summer months of 2018 and 2022 which recorded the presence of 10 bat roosts on site. These surveys were updated during the 2025 survey season which recorded an additional four buildings with bat roosts.

Prior to demolition of any building which recorded a bat roost, it must be confirmed in advance that the Natural England BML is in place. All aspects of this licence must be followed exactly to ensure legal compliance. An appropriate bat licenced ECoW must be appointed prior the demolition works to carry out all activities detailed in the Natural England BML.

All contractors on site must be made aware of the transient nature of bats at different stages of the year, therefore although bats were not recorded in all buildings, it should be assumed that bats will be found in unexpected and unrecorded sites.

3.2 Breeding Birds

Prior to works commencing on site, and if works are due to commence during the sensitive time for Breeding birds (Table 1), an experienced ecologist will need to conduct a nesting bird check on each building to be demolished. Due to the nature and state of the buildings (most windows are fixed open), this should consist of both an internal room check, and an external vantage point survey to observe birds nesting behind barge boards and within gutters.

Any vegetation requiring removal will also be subject to a nesting bird check no more than 48 hours in advance of clearance works. If any nesting birds are recorded on site at any stage during operations, the works manager or ECoW will be informed immediately and appropriate mitigation measures will be put in place.

Mitigation measures for nesting birds will consist of clearly marking out exclusion zones around active nests. The size of exclusion zones depends on a range of factors, most notably the bird species, the location of the nest, how exposed the nest is at the start, how exposed the nest will be after the works. Initially exclusion zones around nests will be demarked with a radius of 5m but may be subsequently reduced subject to case-specific conditions as determined by the ECoW using their professional judgement.

3.3 Common Mammals

Although common mammals such as red fox and European hedgehog may not receive the level of protection awarded to protected species, all wild animals are protected against intentional acts of cruelty under Wild Mammals (Protection) Act 1996. To avoid possible contravention, due care and attention is taken when carrying out construction works (for example, operations near burrows).

No badger setts were recorded during the surveys therefore badgers setts do not pose a constraint to works. There is the potential for badgers whose setts are located in the wider area of the site to stray onto the site to forage. If any excavations are created as part of the demolition works, they will need to be either covered over night or fitted with a suitable exit ramp when the site is not attended.

3.4 Invasive Species

Two invasive species were identified during the May 2025 site walkover, cotoneaster species within the historic ornamental planting beds, and *rhododendron ponticum* within the mature woodland. Five-meter exclusion zones will be clearly marked (ideally with heras fencing) around these locations prior to works commencing. The invasive species will be removed at the earliest opportunity following the most updated version of approved protocols for those species.

Removal must be completed by professional contractors and will likely involve the mechanical excavation of surrounding soils prior to the waste being sent to a licensed landfill for destruction.

3.5 Lighting

It is not expected that 'night work' will be part of the construction process as the majority of work will be conducted during the hours of 7.30am – 5pm, however during the winter months this time period will fall outside of day light hours. To reduce any impact on biodiversity, light spill onto the adjacent habitat must be limited. Mitigation measures can include, but are not limited to, the use of sensitive lighting to ensure that any adjacent commuting routes and foraging habitat for bats are not disturbed or severed; the height of any light columns are minimised and any semi-permanent lights, where required, are fitted with hoods and directed away from adjacent semi-natural habitats.

3.6 Unexpected Ecological Discoveries

While no additional protected species have been recorded on site, in the unlikely event that any other protected species such as reptiles or great crested newts are found at any point during construction works, those works will be halted immediately and the Site Manager/ECOW will be informed. The ECoW will immediately establish appropriate on-site mitigation measures and any arrange any necessary consents. The measures will be discussed and agreed (prior to implementation) as necessary with the appropriate bodies site contractors and governing bodies. Examples of unanticipated discoveries may include the following:

- Presence of reptiles using rubble piles created by demolition operations;
- Wildlife trapped on site e.g. foxes;
- Alternative invasive species, e.g. Japanese Knotweed

3.7 Roles and Responsibilities

Specific duties for site staff in relation to ecological management are listed below:

Table 2: Roles & Responsibilities

Role	Responsibility
Project Manager	- Overall responsibility for implementation of this plan. - Notify the appropriate authorities of any unexpected ecological discoveries. - Assess training needs
Safety Health and Environment (SHE) Manager	- Carry out weekly checks / inspections - Approve ecological sections of method statements and risk assessments. - Act as main point of contact with the ecologist and site teams with respect to ecological issues.
Ecologist	- Advise and supervise on any works that have the potential to impact on ecological receptors. - Survey areas prior to the onset of works, and routinely during works. - Produce and implement a tailored management strategy for each ecological receptor identified.
Site Manager	- Integrate this plan into all sites activities. - Ensure all works are carried out in line with consents.

	- Ensure all personnel are fully briefed on this plan during induction and receive regular toolbox talks. - Implement the response procedure in the event of an environmental incident. - Inform the environmental manager of any ecological issues or unexpected discoveries.
Consents Manager	Manage the obtaining of any ecological consents required (e.g. licenses).

4. Training

All personnel will be made aware of the ecological issues covered by this plan during the site induction. Regular toolbox talks will be given to all site personnel covering all aspects of ecology on the site, wildlife and environmental legislation, the identified receptors and constraints on site, and the measures in place to protect the ecological receptors.

Toolbox talks should be accompanied by briefing notes and information sheets where applicable and a copy of the NE BML will always be available on site. A designated area will be defined so that all site personnel have access to the appropriate information. These areas can include notice boards and within welfare facilities.

5. Ecological Site Induction

All site personnel will attend an ecological site induction prior to works commencing. The site induction will include the following topics:

- Legislation;
- Species known to be present on site;
- Constraints posed by protected species;
- Constraints posed by invasive species;
- Ecological receptor exclusion zones.

6. Records and Monitoring

Method statements and risk assessments will be prepared, and all site personnel will be briefed on these to ensure the protection of sensitive ecological receptors and compliance with environmental law. The method statements will identify case-specific ecological receptors and provide tailored measures to ensure compliance with ecological legislative requirements.

The ecologist, SHE manager and site manager will monitor all site activities and undertake weekly inspections to ensure all works are proceeding in accordance with this DEMP(B) and the Natural England BLM. This will ensure compliance with environmental legislation, licencing documents and planning conditions.

7. Review

This document will be reviewed and updated on an ongoing basis as site work progresses and if ecological constraints change. This will ensure that this document remains current and reflects the situation on site. Reviews will be undertaken at six-month intervals, following any material changes to works, or when required changes are identified by the ecologist/ECOW or environmental manager.