SAP Ecology & Environmental Ltd.

ADK ENVIRONMENTAL MANAGEMENT LTD

solway ecology

Invasive Species Protocol

Storthes Hall Campus

Prepared for Ubrique Investments Ltd.

'Providing honest, sound ecological advice and excellent service'

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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.

Contents

1. Introduction

1.1 Project Background

This Invasive Species Protocol (ISP) has been developed to facilitate the demolition works which are part of the Storthes Hall Lane redevelopment project. The ISP presents the protocol which should be followed if a non-native invasive species is encountered on site at any stage of the development. The Storthes Hall Lane redevelopment project involves the demolition of all student residential blocks and the renovation of the administration block and gate house.

This ISP document forms part of the wider project documentation and has been prepared using data collected on site since 2018. This document should be read in conjunction with the following reports:

- Bat Survey Report Update 2025, Storthes Hall Campus. July 2025. S.A.P Ecology & Environmental Ltd
- Precautionary Method of Works, Storthes Hall Campus. July 2025. S.A.P Ecology & Environmental Ltd
- EcIA Update, Storthes Hall Campus. July 2025. S.A.P Ecology & Environmental Ltd
- Demolition Environmental Management Plan (Biodiversity), July 2025, S.A.P Ecology & Environmental Ltd.
- Demolition Environmental Management Plan (Construction), May 2025, D Hughes Demolition & Excavation Ltd.
- Construction Phase Plan (CPP), May 2025, D Hughes Demolition & Excavation Ltd.
- BS 5837:2012 Arboricultural Survey, Storthes Hall Student Village, Kirkburton (ref: 1337.003.ENZ.XX.00.RP.AR.45.101. Enzygo Ltd.
- Arboricultural Survey Report, Storthes Hall Student Vilalge (ref:1337.003.ENZ.XX.00.R.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.

1.2 Aims

The aim of this document:

- To set out the measures to be taken should a non-native invasive species be encountered on site during any phase of development;
- To address the presence of Rhododendron and advise the best measures for removal;
- To highlight the species which are more likely to be encountered on the site due to either historic presence or due to presence within the wider area;
- To prevent the spread of non-native invasive species, ensure compliance with planning recommendations, be compliant with the aims and objectives of Policy LP30 of the Kirklees Local Plan and Chapter 15 of the National Planning Policy Framework.

1.3 Legislative context & Planning requirements

Detailed in UK legislation, specific non-native species (both plant and animal) have been assessed and classified as invasive within the UK context. These species are listed in Schedule 9 of The Wildlife and Countryside Act 1981 (Last updated 31st January 2025). Section 14 of the act prohibits the release of these plants & animals into the wild, which also includes the 'spread' of these species from site to site. For plants this spread can be vegetative through rhizomes under the ground, the transfer of viable materials on clothing, boots or machinery, or via seed.

In relation to the Storthes Hall Redevelopment Project, an invasive non-native species protocol is required to address the specific plant species identified on site during the preliminary ecological appraisal and subsequent site visit updates. Current draft planning conditions state:

'An invasive non-native species protocol' shall be submitted to, and approved in writing by, the Local Planning Authority. The protocol shall detail the containment, control, and removal Rhododendron species and any other invasive species identified within the site'

Reason:

'To prevent the spread of non-native invasive species, to safeguard and enhance the function of the application site, in line with the aims and objectives of Policy LP30 of the Kirklees Local Plan and Chapter 15 of the National Planning Policy Framework. This is a pre-commencement condition to ensure ecological measures are capable of being fulling integrated into the construction phase.'

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 site itself is located approximately 1.5km west of the village of Kirkburton, and approximately 5km south of the centre of Huddersfield. A small number of residential properties are located along the northwestern boundary, with mature woodlands, arable farms and amenity land being present to the north, east and south. A new housing development is currently under construction immediately to the west of site where the former Storthes hospital complex was sited.

The Storthes Hall site has been subject to ecological assessment since 2018 as various options for renovation/redevelopment have been discussed. In 2018 Enzygo Ltd conducted a series of surveys inclusive of a Preliminary Ecological Appraisal which recorded the presence of Rhododendron (*Rhododendron ponticum)* within the mature woodland which boarders the site, along with Japanese Knotweed in the far north-west of the site. A follow up survey in 2022 confirmed that the Japanese Knotweed was no longer present, suggesting that the species had been effectively treated and eradicated. The most recent ecological walkover was conducted by S.A.P Ecology & Environmental Ltd during an update of bat activity surveys in 2025, which recorded the presence of rhododendron only.

This document will focus on the proposed treatment/removal of Rhododendron from site but will also give a summary of what procedures should occur, should Japanese Knotweed be identified during the construction phase.

Table 1: Identification and Characteristics

Species	Identification and biology
Japanese Knotweed	Hardy perennial species with bamboo-like hollow, segmented stems, heart shaped bright green leaves and small white flowers clustered in a loose spike. All plants within the UK spread vegetatively via either an underground rhizome or by the transplantation of a viable growth node. In spring they emerge from the ground and look very similar to asparagus. These plants will then grow up to 10cm per day reaching a height of 3-4m, and can spread approximately 7m horizontally, with root systems up to 3m deep. Examples of ecological issues: - Outcompetes native vegetation and therefore reduces biodiversity of species. - Alters the soils chemistry and hydrology making future growth of native species difficult. - Increased erosion alongside riverbanks and increased flood risks due to the destabilisation of the riverbanks by the knotweeds root systems. - Causes significant structural damage to buildings and hardscapes, therefore devaluing properties.
Rhododendron ponticum	Evergreen shrub with dark green and glossy leaves, leaves are elliptical and can grow up to 22cm in length. Striking funnel shaped flowers in shades of pink and purple. This species can grow up to 8m in length and has a habit of 'spreading'. Often found within managed plantations. Examples of ecological issues: - This species can form dense thickets which shade out our native plants and compete for not only light but space and nutrients. With less native plant growth there are less opportunities for nesting species to thrive, but also less foodplants for our native wildlife. - Highly attractive to bees which will feed, and in turn pollinate the species, returning to their hives with the nectar. This nectar produces honey with grayanotoxins which can cause stomach upset and cardiac Arrhythmia in humans, pets, horses, birds and livestock. - Alters the soil chemistry in which it lives, therefore ensuring its survival but limiting any future growth of native plants.

2. Biosecurity Control Measures

This section details the general requirements that will be implemented prior to construction and throughout the construction project relating to invasive species. The site ECoW may be consulted for clarification on any discovery to ensure legal compliance.

In all cases a specialist contractor should be used to ensure appropriate treatment for each species identified a that the appropriate guidance is followed.

2.1 Prior to containment

Prior to the commencement of any demolition works and prior to the containment of any species, a ToolBox Talk shall be provided to all site personnel. The ToolBox talk will be conducted by a suitably qualified and experienced person and will include an introduction to the ecology of both Rhododendron and Japanese Knotweed (*Fallopia japonica)*, their impacts, management and identification.

An appropriate Risk Assessment and Method Statement (RAMS) will be adhered to whilst erecting fencing around the identified species. This RAMS will likely already form part of the DEMP(C) but will be updated/amended if needed.

Please note that all works in relation to invasive species must follow the most up to date UK guidance for control and removal, e.g. The treatment and Disposal of Invasive non-native plants: Regulatory Position Statement RPS 178 (Nov 2016).

2.2 Containment

Both Rhododendron and Japanese knotweed should be fenced off with a minimum buffer applied. As both plants spread via rhizome, it is advisable that a minimum of a 7m buffer be applied around any recorded stand. This no-go area should be demarcated by either Heras fencing or similar to ensure no encroachment of works personnel and vehicles. This buffer will ensure no damage to the plant roots and reduce the chance of accidentally spreading either species.

Any fencing erected will clearly display its purpose, advising no entry within the area other than by approved disposal contractors.

2.3 Control

Rhododendron

It is likely that multiple methods will need to be used to effectively control this species and the choice of treatment may vary depending on the life stage and size of the plant in question. For more mature plants stem treatment may be the most effective, whereas small bushes may respond well to a topical spray herbicide. An appropriate contractor should be employed to mange the eradication of the plant from site.

An alternative method would be to dig up the entire plant and its associate rhizome and remove any contaminated soils from site. Research has found that soil once occupied by Rhododendron does not enable native species to recolonise.

Japanese Knotweed

Control of this species should be through the targeted and systematic application of weed-killer (glyphosate based or similar). It is expected that repeat injections will be required during the growing season (March – October) and that treatment may take up to 3 years to be fully effective.

An appropriate and competent contractor will be commissioned to oversee/lead the removal of the species from site. All injections must be completed by a competent individual trained in the application of herbicide for the purpose of Japanese knotweed eradication.

The RAMS document will contain the Control of Substances Hazardous to Health (COSHH) assessment which will be completed for each and every chemical used. The chosen contractor will be responsible for ensuring all legal documentation is in place, including any Environment Agency permissions needed, if the plant is identified near any watercourse.

2.4 Off-site Removal (if required)

If deemed appropriate, excavation is a suitable control option for both Rhododendron and Japanese knotweed, however this will then require the controlled removal of all soils and associated vegetation from site.

This method must ensure that all associated rhizomes are removed, and this method can therefore include a large quantity of substrate which must be stored in a controlled zone on site, before being transported as contaminated and controlled waste by a registered waste carrier.

3. Conclusion

At present the only species recorded on site is Rhododendron, and the control measures mentioned in this document, when facilitated by an approved contractor should be appropriate and effective for this species.

Guidance has also been provided should Japanese knotweed again be identified on site and subject to the recommended treatment measures being followed, should not present considerable issues.