PRELIMINARY ECOLOGICAL APPRAISAL
&
SUPPORTING ECOLOGICAL MITIGATION SCHEME

in relation to
PROPOSED DEVELOPMENT at
42 CHURCH LANE, THORNHILL,
DEWSBURY WF12 0JZ
West Yorkshire

2025

Planning Application No. 2024/60/92353/E

ENTOTAX CONSULTANTS UK
ENTOTAX CONTRACT SCIENCE
REPORT No. EC/25/1190 (JULY 2025)

Quality Assurance

This report has been prepared and is provided in accordance with :

(1) British Standard 42020 : 2013 **Biodiversity – Code of practice for planning and development 2018.**
(2) **Guidelines for Preliminary Ecological Appraisal (GPEA)** (CIEEM, 2017).
(3) **Code of Professional Conduct (**CIEEM, 2022).

Contents

Executive Summary

1 Introduction

1.1 Development Proposals
1.2 Objectives
1.3 Application Site Location

2 Provisional Ecological Appraisal (PEA)

2.1 Site Description
2.2 Choice of Survey
2.3 Desk Study
2.4 Ecological Walkover Survey Methodology
2.5 Caveat
2.6 Survey Constraints

3 Results and Evaluation

3.1 Statutory Sites for Nature Conservation
3.2 Habitats
3.3 Flora
3.4 Protected and Notable (Kirklees BAP) Species
3.4.1 Birds
3.4.2 Amphibians
3.4.3 Reptiles
3.4.4 Mammals
3.4.5 Invertebrates

4 Limitations of Survey

5 Legislation and Policy

5.1 Caveat
5.2 Legislation, National Policy & Guidance
5.3 Local Policy & Guidance
5.3.1 Kirklees Local Plan 2019

6 Biodiversity Assessment

6.1 Context
6.2 The Mitigation Hierarchy
6.3 Baseline Impact Assessment
6.4 Habitat Enhancement and Creation

7 Appendices

Appendix 1 - Baseline Habitat Plan
Appendix 2 - Habitat Creation Plan

Appendix 3 - Good Practice Principles for Development
Appendix 4 – Kirklees Biodiversity Action Plan
Appendix 5 - Authors
Appendix 6 - References

EXECUTIVE SUMMARY

This summary should be read in conjunction with the final report to T. J. Coates Ltd. (Entotax Contract Science Report EC/25/1190) covering the period up to and including 01 July 2025.

A **Preliminary Ecological Appraisal (PEA)** and **Supporting Ecological Mitigation Scheme (EMS)** was undertaken at **42 Church Lane, Thornhill, Dewsbury, West Yorkshire WF12 0JZ** by **Entotax Consultants UK** (ecological consultants) on behalf of **T. J. Coates Ltd.** (agent acting on behalf of the applicants

The purpose of the PEA/EMS is to inform a planning application for a proposed development at the site and to determine the site baseline biodiversity value. The PEA/EMS also aims to determine if sufficient biodiversity enhancement opportunities are available within the site boundary to compensate for any biodiversity loss resulting from the proposed development and to mitigate any potential negative impacts upon protected species or species of nature conservation importance that could be present within or adjacent to the site boundary.

The proposed development has been determined as **Biodiversity Net Gain exempt** (see Application Forms [id 1065170] Self-build and Custom Build), and as such, the Statutory Biodiversity Metric has not been used to calculate the baseline biodiversity value of all existing habitats present at the site, or to determine the comparative measure of habitat retention, enhancement or creation required to achieve a minimum mandatory Biodiversity Net Gain (BNG) of 10%. However, mitigation is still required for species that may be affected by the development proposals in keeping with the National Planning Policy Framework (NPPF) and the Kirklees Local Plan (2019) and is provided in the **Supporting Ecological Mitigation Scheme (EMS)** section of this report.

The conclusions drawn from this report indicate that the proposed development is unlikely to impact upon species of nature conservation/biodiversity importance if the mitigation proposals contained within the **Supporting Ecological Mitigation Scheme (EMS)** section of the report are adhered to. The site is considered to be of low ecological value with the mitigation provided also aimed at enhancing the site for local wildlife. As such, the report recommends that the planning application is approved subject to compliance with the mitigation contained therein.

In order to ensure that species of nature conservation/biodiversity importance are detrimentally unaffected by the proposed development scheme, the mitigation proposals provided within this document must be adhered to wherever practically possible, and certainly wherever non-compliance of this mitigation could result in an offence under the relevant legislation.

1 INTRODUCTION

1.1 DEVELOPMENT PROPOSALS

re proposing to undertake development works at **42 Church Lane, Thornhill, Dewsbury, West Yorkshire WF12 0JZ.** The application site comprises a detached, single-storey residential building (bungalow), together with surrounding hard and soft landscaping (garden). The building is currently unoccupied and the development proposals constitute demolition of the existing building and erection of a detached, double-storey residential dwelling, together with the erection of a detached, single-storey annexe within the curtilage of the existing garden. The development proposals are therefore subject to a planning decision notice :

Outline application for Erection of Annex and single detached dwelling

Planning Application Number : **2024/60/92353/E**
Application Received by Planning Department : **20 August 2024**
Application Validated by Planning Department : **29 August 2024**
Status : **Awaiting Decision**

1.2 OBJECTIVES

During February 2025 **Entotax Consultants UK** (ecological consultants) were commissioned by **T. J. Coates Ltd.** (agent acting on behalf of the applicants **Mr. & Mrs. Paul Mellor**) to undertake a **Preliminary Ecological Appraisal (PEA)** and **Supporting Ecological Mitigation Scheme (EMS)** in order to :

- Determine the ecological baseline biodiversity value of the site by appropriate survey of all the habitats present;

- Determine the likelihood of the presence/absence of species of biodiversity/nature conservation importance at the site (wherever possible), and provide appropriate mitigation (where necessary) aimed at ensuring species of biodiversity/nature conservation importance are unaffected by the development proposals;

- Provide a report to Kirklees Council (Planning Services) detailing the results of the **Preliminary Ecological Appraisal (PEA)** and supporting **Ecological Mitigation Scheme (EMS)** for the application site.

1.3 APPLICATION SITE LOCATION

The application site lies approximately 3.0 km to the south-southeast of Dewsbury town centre (approximately 8.25 km to the west-southwest of Wakefield city centre and approximately 11.0 km to

the east-northeast of Huddersfield town centre). The application site is located towards the eastern edge of Thornhill village (approximately 90m to the northwest of the Church Lane/Frank Lane road junction and to the immediate west of the B6117 Church Lane) within 1 km national grid reference square SE 2518 (Central National Grid Reference: SE 25443 18652 = 425443E 418652N) at an altitude of approx. 95m Above Ordnance Datum (AOD).

Figure 1: Application Site Location



The application site lies within a semi-rural landscape and is surrounded by residential development to the immediate south and west with significant areas of agricultural land beyond. Extensive parkland (Thornhill Rectory Park) lies to the immediate north and east with significant areas of agricultural land to the north and east beyond and with the wetland habitats associated with the Calder and Hebble Navigation and the River Calder approximately 750m and 1.2 km to the northeast respectively.

There are significant areas of natural habitat within the immediate environs with Thornhill Rectory Park (CNG SE 25586 18771 = 425586E 418771N) lying near adjacent (within 20m) to the east of the application site boundary, and many large surrounding gardens that offer a wide range of resources to wildlife. The habitats within the application site red line boundary are shown in **APPENDIX 1.** (**Application Site Layout – Baseline DRAWING REFERENCE: EC/25/1190_01**).

2 PROVISIONAL ECOLOGICAL APPRAISAL

2.1 SITE DESCRIPTION

The property comprises a detached, single-storey residential building (bungalow), together with surrounding hard and soft landscaping (garden). The application site is broadly rectangular in shape and orientated along a northeast–southwest axis and is enclosed by five boundaries which are correspondingly northeast-facing, northwest-facing and southeast-facing, but with no southwestern boundary due to the landform topography being sharply projected to the southwest resulting in a south-facing and west-facing boundary (see **Figure 1.**).

The northeastern site boundary comprises a small (approx. 0.5m in height) brick wall immediately fronting a tall Garden Privet *Ligustrum ovalifolium* hedge (approx. 1.75m in height) and set back approximately 3m from the B6117 (Church Lane). The wall and hedge are interrupted by a pair of wrought iron gates (approx. 1.75m in height and approx. 2.5m total width) which access the driveway of the property and are flanked on each side by supporting brick pillars (approx. 0.5m in width and approx. 1.25m in height with ornamentation atop).

From the inflexion with the northeastern boundary, the southeastern boundary comprises a tall hedgeline oversailed by the broad-leaved canopy of tall trees located within the adjacent property (44 Church Lane). The hedgeline is dominated by Hawthorn *Crataegus monogyna* with frequent Common Ivy *Hedera helix*. The hedgeline also supports occasional Bramble *Rubus fruticosus agg.* and Holly *Ilex aquifolium* with Dog-rose *Rosa canina* present but rare (a single plant). Continuing southwestwards, the hedgeline grades into a dense stand of bramble continuing behind a small detached garage and along the remainder of the boundary until eventually terminating in adjoinment with the southern boundary (there being no southwestern boundary as such). A large, ivy-clad Yew *Taxus baccata* is located immediately behind the garage proximal to the southeastern boundary hedgeline.

The southern boundary extends westwards from its inflexion with the southeastern boundary and comprises a stand of dense bramble oversailed by the broad-leaved tree canopy of trees located within the adjacent property to the south (2 Frank Lane). The boundary extends for some 20m or so and is poorly demarcated.

From its inflexion with the southern boundary, the western boundary extends northwards for approximately 15m and comprises a garden privet hedgeline (initially gappy) oversailed and densely shaded by the broad-leaved tree canopy of tall trees located within the adjacent property to the south (8 Frank Close). A tall Cherry Laurel *Prunus laurocerasus* and a small Camillia *Camillia sp.* are present at the inflexion with the northwestern boundary which then extends northeastwards for some 35m before terminating in an inflexion with the northeastern boundary. The northwestern boundary is demarcated by 2m fence panels with only a few scattered, small ornamental shrubs present internally (see **Application Site Layout – Baseline DRAWING REFERENCE: EC/25/1190_01**).

The red line boundary for the application site encompasses a total area of approximately **0.065 ha** with the lawned areas (modified grassland) covering approximately **0.03 ha** (**270m^2**). Approximately **0.01 ha** (**115m^2**) of the lawn grassland habitat will be permanently lost to the development during construction of the new buildings. However, the grassland flora is ecologically poor and comprises mainly a mixture of coarse grasses (dominated by Perennial Rye-grass *Lolium perenne*), together with several very common associate plant species typical of this habitat type.

A full Ecological Impact Assessment (EcIA) is not considered to be a mandatory requirement for the planning application and has not been requested by the Local Authority (Kirklees Council). However, a Provisional Ecological Appraisal (PEA) is required in order to ensure that the habitats and other potential ecological receptors to this scheme are taken into consideration and are adequately assessed.

2.2 CHOICE OF SURVEY

An initial visit was made to the proposed development site on 16 February 2025 and determined that the habitats present on-site were of sufficiently limited size (0.065 ha in total) and were sufficiently uniform (lacking structural complexity) as to be easily surveyed by an Ecological Walkover Survey & Evaluation.

2.3 DESK STUDY

A data search for internationally, nationally and locally designated statutory sites for nature conservation was undertaken using the **Multi-Agency Geographic Information for the Countryside (MAGIC)** website. A search radius of 6 km from the site centroid was undertaken for internationally designated statutory sites and a corresponding search of 2 km from the site centroid for nationally and locally designated statutory sites. A search for Habitats of Principal Importance (HPIs) on or near the proposed development site was also undertaken using MAGIC. Close proximity aerial photographs were screened for presence of any waterbody within 500m of the application site boundary in order to assess the application site for potential presence of protected amphibian species.

2.4 ECOLOGICAL WALKOVER SURVEY METHODOLOGY

The Ecological Walkover Survey was undertaken on 16 February 2025 by three Entotax ecologists (between 10:30hrs. and 12:30hrs.) when the site was mapped, and the habitats present at the site were systematically surveyed and assessed. A plant survey was also undertaken at the site and the national, regional and local status of the plant species recorded. A semi-quantitative assessment using the Standard **DACFOR** methodology was also undertaken for the species recorded. On-site habitats were also surveyed for the presence (or field signs indicating presence) of protected or notable (e.g. Kirklees BAP) species of amphibians, reptiles, birds or mammals.

All on-site habitats were mapped and classified using the standard UK Habitat Classification and methodology (UK Habs Ltd., 2023). The list of plant species was compiled in accordance with

methodology required to establish UK Habitat Classification types up to at least level 3 (to levels 4 or 5 wherever possible). Plant species nomenclature follows that of Stace (2010).

Habitats of priority importance were recorded (where present) and habitats were classified and assessed in terms of both their nature conservation importance and their potential to support protected and/or notable species. Invasive plant species were also mapped as recorded.

The results of the Ecological Walkover Survey & Evaluation are fully discussed in the relevant sections of this report, which details the findings of the surveys in respect of the proposed works and describes the methodologies used throughout this process. Measures to avoid, compensate or mitigate potentially significant adverse impacts upon species of biodiversity/nature conservation importance are included as appropriate.

2.5 CAVEAT

The baseline conditions described in this report were accurate at the time when the walkover survey was undertaken. Should conditions on-site significantly change prior to the commencement of the development proposals, an updated survey will be required.

2.6 SURVEY CONSTRAINTS

There were no limitations to the survey in terms of weather conditions.

16 February 2025
Weather conditions throughout the duration of the survey were fine & dry with no survey constraints.
Temperature: cold (3.0°C);
Cloud cover: passing scattered cloud with intermittent clear skies and sunny spells;
Wind: light breeze (approx. 10.0 mph) more or less constantly from the east-southeast;
Humidity: 81%.
Environmental Data: environmental data was generated throughout the survey by a
Ubibot WS1-PR-GSM WiFi Cloud Data Logger
Temperature sensor (-20°C to +60°C);
Humidity sensor (0-100%);
Ambient light sensor (0 to 83 klux).

The survey was undertaken at sub-optimal time of year for identifying many plant species and some species may have been missed due to seasonal constraints. However, the majority of the application site comprised a readily identifiable flora and as a consequence, misidentification of habitats is not considered to be a significant constraint and there were no limitations to the survey in terms of access (the Ecological Walkover Survey was undertaken within the red line site boundary which is surrounded by hardstanding – buildings and roads).

3 RESULTS & EVALUATION

3.1 STATUTORY SITES FOR NATURE CONSERVATION

No nationally or locally designated statutory sites for nature conservation lie within 2 km of the site centroid and the extended search radius of 6 km shows no internationally designated statutory sites. There are no Habitats of Principal Importance (HPIs) on or proximal to the proposed development site. The nearest site of nature conservation interest is Thornhill Rectory Park which lies approximately 20m to the east of the northeastern site boundary (CNG SE 25586 18771 = 425586E 418771N). Whilst this site is not formally designated as a site of nature conservation/biodiversity importance, it is owned and actively managed by Kirklees Council assisted by **The Friends of Thornhill Rectory Park** (a voluntary local residents group formed in 2010) as an area of **open green space** for enjoyment by the public but also (in accordance with the Group's aims) :

(vi) To conserve and improve the natural history and heritage value of the park together with the protection and extension of wildlife and botanical habitats.

To support our objectives we try to:

manage the changes in the landscape whilst encouraging biodiversity;
protect wildlife and the associated habitats;
make the Park a local green space to use and be proud of.

In keeping with species afforded legal protection and species of nature conservation/biodiversity importance subject to consideration under the National Planning Policy Framework (NPPF); the site should be recognized as a **local site of wildlife interest** and appropriate mitigation measures should be provided in order to ensure that negative ecological impacts upon species associated with Thornhill Rectory Park are avoided.

3.2 HABITATS

There are no waterbodies within the red line boundary of the application site but there are three waterbodies within 500m of the application site boundary that could potentially support protected mammal species e.g. **Water Vole *Arvicola amphibius*** or protected amphibian species e.g. **Great Crested Newt *Triturus cristatus*.** These comprise waterbodies located at :

- CNGR SE 25681 18882 (= 425681E 418882N) – approx. 280m to the northeast of the application site boundary at Thornhill Hall moat (approx. 35m to the south of Hall Lane);
- CNGR SE 25831 19004 (= 425831E 419004N) – approx. 410m to the northeast of the application site boundary (approx. 35m to the south of Hall Lane);
- CNGR SE 25071 19013 (= 425071E 419013N) – approx. 480m to the northwest of the application site boundary (approx. 70m north of Wells Road).

Whilst there are no records for protected mammal or amphibian species from these waterbodies, it is nevertheless prudent to adopt a **Precautionary Principle** approach to the development proposals in order to ensure that the risk to these species is given appropriate consideration.

Four habitat types are present within the red line boundary of the application site and comprise :

VEGETATED GARDEN – including modified grassland (lawns)
HEDGEROWS
TALL TREES & SHRUBS
BRAMBLE SCRUB

(1) VEGETATED GARDEN
Description
Private garden that has no public access and is principally vegetated i.e. garden that has a large area of grass and/or flower beds but excluding built-up areas i.e. not including paving or decking.
The lawned areas to the front and rear of the property are areas of modified grassland but within the private garden environment are classified as **Vegetated Garden**. The grassland area (lawn) to the front of the property (approx. 45m^2) will be entirely lost to the proposed development and replaced with a gravel substrate. The grassland area (lawn) to the rear of the property (approx. 225m^2) will be partially lost to the proposed development and replaced with the new annex building.

EC/25/1190/PEA.EMS.P1 42 Church Lane, Thornhill, Dewsbury, West Yorkshire.
Front garden lawn (modified grassland) with Garden Privet *Ligustrum ovalifolium* hedge (right) and small Japanese Cherry *Prunus serrulata* (rear centre) [northwest perspective].



EC/25/1190/PEA.EMS.P2 42 Church Lane, Thornhill, Dewsbury, West Yorkshire.
Rear garden lawn (modified grassland) [due north perspective].



(2) HEDGEROWS – UKHab (h2)
There are hedgerows demarcating four of the five application site boundaries, varying in length, composition and condition. These criteria determine the ecological value of the hedgerow and its potential retention or replacement.

HEDGEROW (PRIORITY HABITAT) – UKHab (h2a)
Description
A boundary line of shrubs, more or less continuous that consists predominantly (80% or more cover) of at least one woody UK native species.

(1) **Southeast-facing boundary** (approx. 28m)
The southeast-facing boundary comprises mainly Hawthorn *Crataegus monogyna* along most of its length (>25m) and is of high ecologically value. The hedgerow will be retained during the proposed development (**EC/25/1190/PEA.EMS.P3** below).

EC/25/1190/PEA.EMS.P3 42 Church Lane, Thornhill, Dewsbury, West Yorkshire.
Driveway with garage flanked by tall mixed-species hedgerow (left) along southeast-facing boundary [southwest perspective].



OTHER HEDGEROW – UKHab (h2b)
Description
A boundary line of shrubs, more or less continuous that does not consist predominantly (80% or more cover) of at least one woody UK native species.

(2) **Northeast-facing boundary** (approx. 15m)
The northeast-facing boundary comprises entirely Garden Privet *Ligustrum ovalifolium* a non-native UK species. The hedgerow is monospecific and ecologically poor and will be replaced by a more ecologically valuable UK native, mixed-species hedgerow (see **EC/25/1190/PEA.EMS.P1** previous).

(3) **South-facing boundary** (approx. 20m)
The south-facing boundary is gappy with extensive areas of Bramble *Rubus fruticosus agg.* Bramble scrub is ecologically valuable to nesting birds and foraging invertebrates such as bees but will be partially lost to the development. However, it will be replaced by an ecologically valuable UK native, mixed-species hedgerow (**EC/25/1190/PEA.EMS.P4** below).

EC/25/1190/PEA.EMS.P4 42 Church Lane, Thornhill, Dewsbury, West Yorkshire.
Poorly demarcated and gappy hedgerow along southern boundary [southwest perspective].



(4) **West-facing boundary** (approx. 15m)
The west-facing boundary is initially very gappy and comprises mainly Garden Privet *Ligustrum ovalifolium* a non-native UK species. The hedgerow is mainly monospecific and ecologically very poor and will be replaced by a more ecologically valuable UK native, mixed-species hedgerow (**EC/25/1190/PEA.EMS.P5** below).

EC/25/1190/PEA.EMS.P5 42 Church Lane, Thornhill, Dewsbury, West Yorkshire.
Western boundary hedgerow inflexion with northwestern boundary (wooden fence panels) showing Garden Privet *Ligustrum ovalifolium* oversailed by tree canopy from tall trees located in neighbouring garden (8 Frank Close) [west-northwest perspective].



(3) TREES & SHRUBS

There is a single large Yew *Taxus baccata* located internally at the inflexion of the southeast-facing and south-facing hedgerows. This tree will be retained during the proposed development. The shrubs present within the red line boundary are small, ornamental species of low ecological value but will be retained during the proposed development.

(4) BRAMBLE SCRUB (– UKHab (h3d)

Description

Dense scrub with dominant Bramble Rubus fruticosus agg.

Not normally an inclusion within a private garden environment (which would otherwise be classified as vegetated garden) but sometimes present due to deliberate tolerance by gardeners or long-term neglect. Areas of varying size may occur ranging from very small stands within a hedgerow etc. to extensive stands occupying many square metres.

An extensive stand is present along the southern boundary and is spreading inwards and encroaching upon the lawned areas adjacent. Much of this bramble will be lost to the proposed development and replaced with the new annex building (**EC/25/1190/PEA.EMS.P6** below).

EC/25/1190/PEA.EMS.P6 42 Church Lane, Thornhill, Dewsbury, West Yorkshire.
Dense Bramble *Rubus fruticosus agg.* scrub developing along the southern boundary [southwest perspective].



3.3 FLORA

A Plant Survey was undertaken in order to determine the plant species present within the application site boundary including those species present within the modified grassland (lawn) habitat. The primary aim of the Plant Survey was to identify important plant communities or scarce species present within the site boundary. The Results of the Plant Survey are presented in **Table 1** (below).

All plant species recorded during the survey follow the nomenclature as detailed in Stace (2005) and adopted by the Botanical Society of the British Isles (BSBI).

Plant species recorded were classified according to the **DACFOR** methodology of abundance ratings, the standardized terms being as follows:

D = Dominant
A = Abundant
C = Common
F = Frequent
O = Occasional
R = Rare

Legend
H1(NE) = northeast-facing boundary hedgerow
H2 (SE) = southeast-facing boundary hedgerow
H3 (S) = south-facing boundary hedgerow
H4 (W) = west-facing boundary hedgerow
B5 (NW) = northwest-facing boundary
L1/L2 Lawn = front garden lawn & rear garden lawn (combined)
Drive = hard standing between entrance gates and garage

Table 1: Results of Plant Survey undertaken at 42 Church Lane, Thornhill, Dewsbury, West Yorkshire (16 February 2025).

SPECIES	BSBI	H1 (NE)	H2 (SE)	H3 (S)	H4 (W)	B5 (NW)	L1/L2 Lawn	Drive
Yew *Taxus baccata*	274		R					
Creeping Buttercup *Ranunculus repens*	344						R	O
Lesser Celandine *Ranunculus ficaria*	363				R			
Common Nettle *Urtica dioica*	554			R				
Common Chickweed *Stellaria media*	864						O	
Common Sorrel *Rumex acetosa*	1109						R	
Broad-leaved Dock *Rumex obtusifolius*	1172						R	R
Winter-cress *Barbarea vulgaris*	1606							F
Bramble *Rubus fruticosus agg.*	2468		A	C	R			
Dog-rose *Rosa canina*	2633		R					
Cherry Laurel *Prunus laurocerasus*	2712				R			
Japanese Cherry *Prunus serrulata*	2716					O		
Hawthorn *Crataegus monogyna*	2889		A					
White Clover *Trifolium repens*	3117						O	
Holly *Ilex aquifolium*	3482		R					
Herb-Robert *Geranium robertianum*	3652			R				R
Common Ivy *Hedera helix*	3717		A	A	F			O
Hedge Bindweed *Calystegia sepium*	4025		R	C				
White Dead-nettle *Lamium album*	4257			R				
Ribwort Plantain *Plantago lanceolata*	4410						R	
Garden Privet *Ligustrum ovalifolium*	4445	D			D			
Common Field-speedwell *Veronica persica*	4590						R	
Cleavers *Galium aparine*	4891			O	O			
Creeping Thistle *Cirsium arvense*	5044							R
Hawkbit sp. *Leontodon sp.*	-						O	
Dandelion *Taraxacum officinale agg.*	5370						R	R
Daisy *Bellis perennis*	5824						R	
Common Ragwort *Senecio jacobaea*	5945						R	
Perennial Rye-grass *Lolium perenne*	6746						D	
Annual Meadow-grass *Poa annua*	6785						F	
Creeping Soft-grass *Holcus mollis*	6877						O	
Common Soft-brome *Bromus hordeaceus*	6986							R
Common Couch *Elytrigia repens*	7043							O
False Oat-grass *Arrhenatherum elatius*	6846			O				
Camellia sp. *Camillia sp.*	-				R			
35		1	7	8	7	3	14	9

A **total of 35 plant species** were recorded from within the site boundary during the Ecological Walkover Survey. The species recorded are all common species that can be readily found within the near-wider environs.

3.4 PROTECTED & NOTABLE (KIRKLEES BAP) SPECIES

3.4.1 BIRDS

Passerine birds such as Robin *Erithacus rubecula* and Blackbird *Turdus merula* are likely to be associated with the site. The site is only of value for birds at the immediate local level with the few **(8)** species recorded during the Walkover Survey being common and widely distributed.

Table 2: Bird species recorded at 42 Church Lane, Thornhill, Dewsbury, West Yorkshire (16 February 2025).

Species	BTO No.	BoCC 2021	No.	Comment
Wood Pigeon *Columba palumbus*	284	Green	2	
Wren *Troglodytes troglodytes*	362	Green	1	
Dunnock *Prunella modularis*	366	Amber	1	
Robin *Erithacus rubecula*	369	Green	1	consider provision of nestbox
Blackbird *Turdus merula*	400	Green	2	
Blue Tit *Cyanistes caeruleus*	464	Green	2	consider provision of nestbox
Great Tit *Parus major*	465	Green	2	consider provision of nestbox
Magpie *Pica pica*	487	Green	1	
8 species				

Dunnock *Prunella modularis* is listed on the Birds of Conservation Concern (BoCC) Amber List since this species has suffered a significant decline within recent years. The northeast-facing garden privet hedgerow is valuable breeding habitat for this species and a suitable length of this hedgerow type should be created on site if retention is not possible at the front of the property.

3.4.2 AMPHIBIANS

There is no habitat suitable for breeding protected amphibian species such as **Great Crested Newt** *Triturus cristatus* within the proposed development site boundary although there is potential presence of Common Toad *Bufo bufo*. The lack of aquatic habitat features within the application site boundary precludes the presence of breeding amphibians with the nearest proven great crested newt breeding habitat more than 500m distant. However, several waterbodies are present between 280m and 480m of the application site boundary and although it is highly unlikely that protected amphibians will be a receptor to this scheme, it is recommended that a fingertip search by a licenced ecologist for great crested newts (and toads) is undertaken immediately prior to, and during any site clearance activity.

3.4.3 REPTILES

There is no habitat suitable for reptiles such as **Grass Snake** *Natrix natrix* within the proposed development site boundary. The routinely cut grass habitat at the site offers no refugia for reptiles. It is therefore highly unlikely that reptiles will be a receptor to this scheme.

3.4.4 MAMMALS

Badgers
The nearest recorded badger activity is **more than 1 km distant** from the application site centroid and whilst badgers could potentially enter and forage across the site, they are unlikely to do so. The proposed development will not obstruct badgers and badgers are therefore unlikely to be a receptor to this scheme.

Bats
Bats will probably forage across the site but there are no potential roosting features within the site boundary such as mature trees with cavities etc. However, the building has the potential to support roosting bats, and as such, bats are a potential receptor to this scheme and appropriate mitigation (a **Bat Survey & Evaluation** undertaken at appropriate time of year) is required prior to demolition of the existing building.

Hedgehogs
There is a potential presence of **Hedgehog** *Erinaceus europaeus* at the site and hedgehogs could therefore be a receptor to this scheme. Hedgehogs are primarily nocturnal and often go unnoticed during daylight hours. A fingertip search for hedgehogs is therefore recommended immediately prior to, and during any site clearance activity.

3.4.5 INVERTEBRATES

A number of invertebrate species are likely to be receptors to this scheme, in particular flightless or weakly dispersive species. Noticeable species such as large ground beetles should be removed and released in nearby suitable habitat if encountered during the fingertip searches for great crested newts, toads and hedgehogs.

4 LIMITATIONS OF SURVEY

This report has been prepared and provided in accordance with **British Standard 42020: Biodiversity – Code of practice for planning and development 2018** and CIEEMs **Code of Professional Conduct**.

This report should not be seen in any way as the definitive ecological survey of the site – it presents a description and assessment of the site on the basis of the data gathered. However, it is considered more than adequate to make a reasonable assessment as to the presence/absence of species of nature conservation importance, and the risk of any significant negative impact upon these species as a result of the development proposals.

5 LEGISLATION AND POLICY

5.1 CAVEAT

This report has been prepared and provided in accordance with **British Standard 42020: Biodiversity – Code of practice for planning and development 2018** and CIEEMs **Code of Professional Conduct**. The report takes into account the legislation and policy protection afforded to specific habitats and species. Entotax Consultants UK does not provide specialist legal advice and where necessary the reader should consult the original legislation, referenced in this report. Legislation, planning policies and planning guidance relevant to the protection, conservation and enhancement of sites of nature conservation interest are detailed below :

5.2 LEGISLATION, NATIONAL POLICY AND GUIDANCE

Potential ecological receptors to a development scheme including habitats and species of nature conservation importance, receive legal protection under a wide range of legislation and planning policies. These include :

- The Environment Act 2021.
- The National Planning Policy Framework (NPPF, revised 2023).
- The Conservation of Habitats and Species Regulations 2017 (as amended).
- The Wildlife and Countryside Act (WCA) 1981 (as amended).
- The Countryside and Rights of Way (CRoW) Act 2000.
- The Natural Environment and Rural Communities Act (NERC) 2006.
- The Hedgerow Regulations 1997; and
- The Protection of Badgers Act 1992.

5.3 LOCAL POLICY AND GUIDANCE

Local planning policies relating to ecology and biodiversity are generally based upon national planning policy; conservation of those species protected under the respective legislation (above) and the protection of designated sites. However, relevant local policy and guidance documents are outlined below:

- Kirklees Local Plan 2019.
- Kirklees District Biodiversity Action Plan (BAP).

5.3.1 KIRKLEES LOCAL PLAN 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.

South Pennine Moors

Proposals which may directly or indirectly compromise achieving the conservation objectives of a designated or candidate European protected site will not be permitted unless the proposal meets the conditions specified in Article 6 (3) - (4) of the Habitats Directive.

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.

The Dark Peak Nature Improvement Area

Proposals that contribute to the aims and objectives of the Dark Peak Nature Improvement Area will in principle be supported, subject to other policies in this plan. Development likely to have an adverse impact on the aims and objectives of the NIA will not be permitted.

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

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

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.

POLICY LP57 - THE EXTENSION, ALTERATION OR REPLACEMENT OF EXISTING BUILDINGS

Proposals for the extension, alteration or replacement of buildings in the Green Belt will normally be acceptable provided that:

a. *in the case of extensions the original building remains the dominant element both in terms of size and overall appearance. The cumulative impact of previous extensions and of other associated buildings will be taken into account. Proposals to extend buildings which have already been extended should have regard to the scale and character of the original part of the building;*

b. *in the case of replacement buildings, the new building must be in the same use as and not be materially larger than the building it is replacing;*

c. *the proposal does not result in a greater impact on openness in terms of the treatment of outdoor areas, including hard standings, curtilages and enclosures and means of access; and*

d. *the design and materials should have regard to relevant design policies to ensure that the resultant development does not materially detract from its Green Belt setting.*

6 BIODIVERSITY ASSESSMENT

6.1 CONTEXT

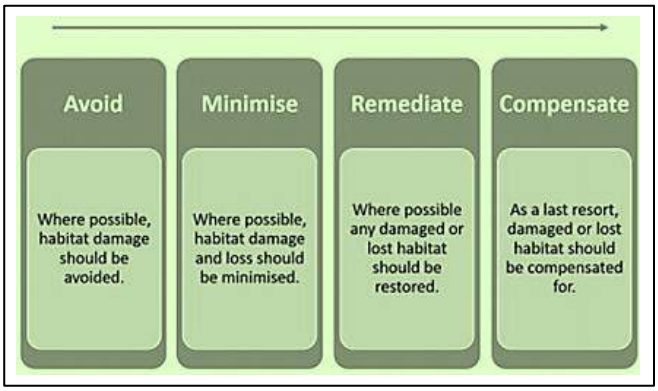
Biodiversity is impossible to determine exactly. However, the use of Metrics (computer programs allocating values to different biodiversity attributes) are able to provide surrogate measures of overall biodiversity. The **Statutory Biodiversity Metric** produced by DEFRA in 2024 determines the biodiversity impacts and compensation requirements associated with development proposals. The Metric provides comparative measures of each on-site habitat in terms of biodiversity units (BU) by multiplying habitat area (in hectares), distinctiveness (of habitat type) and condition (habitat quality). Net impacts between habitat loss due to the development and onsite gains due to habitat retention, enhancement and/or creation can be calculated in order to determine if a measurable biodiversity net gain will be achieved on-site, as a consequence of the development proposals. Where measurable on-site net gain cannot be achieved, **Biodiversity Offsetting** must be undertaken. Biodiversity offsetting is the creating or restoring of new wildlife habitat (in a measurable way) in a different place to where it was lost. Biodiversity offsetting (as with other forms of compensation) is the last step in the **Mitigation Hierarchy** (avoid > minimize > reduce > compensate) and is applied as the last resort to otherwise policy-compliant development proposals. Whilst biodiversity offsetting provides a mechanism for quantifiable compensation and net gain, it also provides reliable biodiversity outcomes in the long-term (30 years) since biodiversity offsetting can be monitored and is enforceable (with adaptable management plans) for optimum success.

Since 12 February 2024, all development proposals are required to achieve a minimum mandatory Biodiversity Net Gain (BNG) of 10% as determined by the **Statutory Biodiversity Metric** produced by DEFRA unless deemed to be exempt from Biodiversity Net Gain.

The proposed development has been determined as **Biodiversity Net Gain exempt** (see Application Forms [id 1065170] Self-build and Custom Build), and as such, the Statutory Biodiversity Metric has not been used to calculate the baseline biodiversity value of all existing habitats present at the site, or to determine the comparative measure of habitat retention, enhancement or creation required to achieve a minimum mandatory Biodiversity Net Gain (BNG) of 10%. However, mitigation is still required for species that may be affected by the development proposals in keeping with the National Planning Policy Framework (NPPF) and the Kirklees Local Plan (2019) and is provided in the **Supporting Ecological Mitigation Scheme (EMS)** section of this report.

6.2 THE MITIGATION HIERARCHY

The **Mitigation Hierarchy** is a widely used good practice framework that guides users towards limiting (as far as possible) the negative impacts from development proposals upon biodiversity. It is based upon a sequence of four iterative actions: **avoidance**; **minimization** of negative impacts (e.g. prevention); **remediation** (restoration etc.) and finally **compensation** offsetting any residual impacts.



6.3 BASELINE IMPACT ASSESSMENT

The baseline habitat plan produced for the proposed development site (drawing number: **EC/25/1190_01**) was overlain with the proposed landscape plan (produced by **T. J. Coates Ltd.**) and GIS software was then used to calculate the areas of habitat that would be lost to the proposed development. The areas of any retained/enhanced or created habitats proposed as part of the development proposals were also mapped in order to show the areas of proposed on-site compensation. Estimates of future condition, time for establishment and likelihood of success were then calculated using landscaping data (provided by the client) and professional judgement.

6.4 HABITAT ENHANCEMENT AND CREATION

The plan for habitats to be retained, enhanced or created at the proposed development site (drawing number: **EC/25/1190_02**) was overlain with the proposed landscape plan (produced by **T. J. Coates Ltd.**) and GIS software was then used to calculate the areas of these habitats, including areas of developed land assigned a very low (null) value e.g. buildings and roads etc.. The condition and strategic significance of each habitat was pre-determined using available ecological data or professional opinion about probable value.

7 APPENDICES

APPENDIX 1

BASELINE HABITAT PLAN

The Application Site Layout – Baseline Habitats Pre-Development plan produced for the proposed development site (drawing number **EC/25/1190_01**) is provided as an ancillary document :

EC_25_1190 _42_CHURCH_LANE_THORNHILL_PLANS_01.docx

APPENDIX 2
HABITAT CREATION PLAN

The Application Site Layout – Habitats Post-Development plan produced for the proposed development site (drawing number **EC/25/1190_02**) is provided as an ancillary document :

EC_25_1190 _42_CHURCH_LANE_THORNHILL_PLANS_02.docx

APPENDIX 3
GOOD PRACTICE PRINCIPLES FOR DEVELOPMENT

The adoption and adherence to Best Practice principles as set out in **Biodiversity Net Gain: Good practice principles for development (CIEEM, 2016)** below :

Principal 1. Apply the Mitigation Hierarchy.

Principal 2. Avoid losing biodiversity that cannot be offset by gains elsewhere.

Principal 3. Be inclusive and equitable.

Principal 4. Address risks.

Principal 5. Make a measurable Net Gain contribution.

Principal 6. Achieve the best outcomes for biodiversity.

Principal 7. Be additional.

Principal 8. Create a Net Gain legacy.

Principal 9. Optimise sustainability.

Principal 10. Be transparent.

APPENDIX 4
KIRKLEES BIODIVERSITY ACTION PLAN

The habitats and species listed in the **Kirklees Biodiversity Action Plan (BAP)** can be accessed via the hyperlinks below i.e. **by inserting the cursor anywhere in the hyperlink followed by <ENTER>**.

https://www.kirklees.gov.uk/beta/delivering-services/pdf/biodiversity-habitats.pdf
https://www.kirklees.gov.uk/beta/delivering-services/pdf/biodiversity-species.pdf

APPENDX 5
AUTHORS

Dr. David G. Hemingway, Senior Consultant Ecologist (Entotax Consultants UK)
(b. 1953)

BSc (Hons.) [1977]. Zoology.
MSc [1979]. Invertebrate Ecology.
PhD [1984]. Invertebrate Toxicology (unpublished thesis : 'Experimental Variables in Ground Beetle (Coleoptera: Carabidae) Predator-Prey Population Relationship Dynamics within Cereal Crop Production Environments').
Fellow Royal Entomological Society [1981].

David joined **Entotax Consultants UK** in 1981 and has more than 40-years' experience in ecological consultancy work, having worked on many ecological projects either directly or indirectly, for a very wide range and for a significant number of clients over a very long period of time. These include Natural England (NE); Countryside Council for Wales (CCW); Scottish National Heritage (SNH); DEFRA; The Highways Agency (HA); The National Trust (NT); The Environment Agency (EA); The Scottish Environmental Protection Agency (SEPA); British Ports Authority (BPA); RSPB; The Wildlife Trusts; numerous Local Authorities (including Wakefield); large commercial companies including UK Coal Mining Ltd. and Lafarge Aggregates Ltd. He has undertaken an extremely large number of ecological projects (ranging from autecological single species surveys to EIAs) and has overseen a very large number of planning applications for commercial and non-commercial clients. He has held licences for most protected species over time but now primarily oversees projects undertaken by Entotax ecologists.

Mr. Malcolm Jedynak, Field & Building Surveyor (Entotax Consultants UK)
(b. 1961)

Malcolm has worked for Entotax Consultants since 2012, having originally been self-employed in the construction industry. He has an extensive knowledge of the built environment and has undertaken numerous projects involving building assessment surveys e.g. surveys for bats, as well as undertaking land surveying project work for planning application submissions.

Ms. Colleen Mirfin, Field Surveyor (Entotax Consultants UK)
(b. 1963)

Colleen has worked for Entotax Consultants since 2024 having previously been employed in the Health Service. She has assisted in numerous projects involving ecological survey work for planning application submissions.

APPENDX 6
REFERENCES

Biodiversity

The British Standards Institution (BSI). 2013. Biodiversity – Code of practice for planning and development.

Business and Biodiversity Offsets Programme (BBOP). 2012. Standard on Biodiversity Offsets.

CIEEM, CIRIA & IEMA. 2016. Biodiversity Net Gain: Good practice principles for development.

DEFRA. 2023. Statutory biodiversity metric tools and guides. Includes User Guides, Metric Calculation tools, and Condition Assessment sheets.

Department for Levelling Up, Housing and Communities & Ministry of Housing, Communities and Local Government. 2019. Guidance: Natural environment.

Ministry for Housing Communities and Local Government. (2021). National Planning Policy Framework.

UKHab. 2023. The UKHab Classification System Version 2.01.

Legislation

Wildlife and Countryside Act (WCA) 1981 (as amended).

The Conservation of Habitats and Regulations (CHSR) 2017.

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

Natural Environment and Rural Communities (NERC) Act 2006.

Environment Act 2011.

Protection of Badgers Act 1992.

Countryside and Rights of Way Act 2000.

PROPOSED MITIGATION SCHEME

PROTECTED SPECIES AND SPECIES OF NATURE CONSERVATION IMPORTANCE

in relation to
PROPOSED DEVELOPMENT at
42 CHURCH LANE, THORNHILL,
DEWSBURY WF12 0JZ
West Yorkshire

2025

Planning Application No. 2024/60/92353/E

Contents

Executive Summary

1 Mitigation and Protected Species

1.1 Context

1.2 The Mitigation Hierarchy

2 Predicted Impacts

2.1 Rationale

2.2 Intrinsic Identification Phase

2.3 Pre-Construction Phase

2.3.1 Vertebrates

2.3.2 Invertebrates

2.4 Construction Phase

2.4.1 Site Access

2.4.2 Site Excavations

2.5 Post-Construction (Aftercare) Phase

3 Appendices

Appendix 7 – Method Statement – Scrub Clearance

EXECUTIVE SUMMARY

This summary should be read in conjunction with the final report to T. J. Coates Ltd. (Entotax Contract Science Report EC/25/1190) covering the period up to and including 01 July 2025.

A **Preliminary Ecological Appraisal (PEA)** and **Supporting Ecological Mitigation Scheme (EMS)** was undertaken at **42 Church Lane, Thornhill, Dewsbury, West Yorkshire WF12 0JZ** by **Entotax Consultants UK** (ecological consultants) on behalf of **T. J. Coates Ltd.** (agent acting on behalf of the applicants The purpose of the PEA/EMS is to inform a planning application for a proposed development at the site and to determine the site baseline biodiversity value. The PEA/EMS also aims to determine if sufficient biodiversity enhancement opportunities are available within the site boundary to compensate for any biodiversity loss resulting from the proposed development and to mitigate any potential negative impacts upon protected species or species of nature conservation importance that could be present within or adjacent to the site boundary.

The proposed development has been determined as **Biodiversity Net Gain exempt** (see Application Forms [id 1065170] Self-build and Custom Build), and as such, the Statutory Biodiversity Metric has not been used to calculate the baseline biodiversity value of all existing habitats present at the site, or to determine the comparative measure of habitat retention, enhancement or creation required to achieve a minimum mandatory Biodiversity Net Gain (BNG) of 10%. However, mitigation is still required for species that may be affected by the development proposals in keeping with the National Planning Policy Framework (NPPF) and the Kirklees Local Plan (2019) and is provided in the **Supporting Ecological Mitigation Scheme (EMS)** section of this report.

Mitigation for the development proposals ('the scheme') is sub-divided into **4** distinct phases :

(1) **Intrinsic Identification Phase** (identification of potential ecological receptors to the scheme);
(2) **Pre-construction Phase** (site clearance and other pre-construction works);
(3) **Construction Phase** (the building program);
(4) **Post-development Phase** (landscaping and aftercare etc.).

In order to ensure that species of nature conservation/biodiversity importance are detrimentally unaffected by the proposed development scheme, the mitigation proposals provided within this document must be adhered to wherever practically possible, and certainly wherever non-compliance of this mitigation could result in an offence under the relevant legislation.

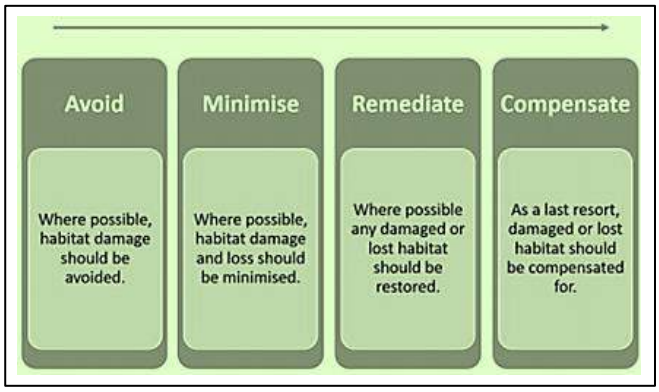
1 MITIGATION AND PROTECTED SPECIES

1.1 CONTEXT

Mitigation is a legal requirement wherever a development has the potential to impact upon a protected species; a designated site for nature conservation, or any other resource of ecological value.

1.2 THE MITIGATION HIERARCHY

The **Mitigation Hierarchy** is a widely used good practice framework that guides users towards limiting (as far as possible) the negative impacts from development proposals upon biodiversity. It is based upon a sequence of four iterative actions: **avoidance**; **minimization** of negative impacts (e.g. prevention); **remediation** (restoration etc.) and finally **compensation** offsetting any residual impacts.



The **Mitigation Hierarchy** approach has been adopted in the production of this report.

2 PREDICTED IMPACTS

2.1 RATIONALE

Potential impacts upon protected species or species of nature conservation importance that could be present at the site have been determined in terms of :

(1) the species or species assemblage likely to be an ecological receptor to the scheme;
(2) the magnitude of risk and the respective phase where an adverse impact upon the species or species assemblage is likely to occur;
(3) the mitigation considered to be pre-requisite to avoidance of any impact so identified.

2.2 INTRINSIC IDENTIFICATION PHASE

Potential ecological receptors of nature conservation importance that could be adversely impacted by the scheme are identified in the table below :

Table 2: Potential ecological receptors of nature conservation importance for 42 Church Street, Thornhill, Dewsbury, West Yorkshire.

POTENTIAL RECEPTOR TO THE SCHEME	**RISK OF ADVERSE IMPACT**	**ACTION REQUIRED TO MITIGATE ADVERSE IMPACT IF DISCOVERED ON SITE**
MAMMALS		
Badger *Meles meles*	LOW	stop works, leave site and inform LPA ecologist
Hedgehog *Erinaceus europaeus*	MEDIUM	hand capture and remove (site ecologist)
bats	LOW	further assessment, appropriate licence?
shrews	MEDIUM	shepherd gently away from the works
BIRDS		
nesting birds (Sched. 1)	V. LOW	stop works, leave site and inform LPA ecologist
nesting birds (other)	HIGH	retreat, stand-off determined by site ecologist
REPTILES		
Common Lizard *Zootoca vivipara*	V. LOW	shepherd gently away from works
Grass Snake *Natrix helvetica*	V. LOW	shepherd gently away from works
AMPHIBIANS		
Great Crested Newt *Triturus cristatus*	V. LOW	hand capture by **site-licenced ecologist** only
Smooth Newt *Lissotriton vulgaris*	LOW	hand capture and removal
Common Toad *Bufo bufo*	HIGH	hand capture and removal
TERRESTRIAL INVERTEBRATES	**RISK**	**ACTION REQUIRED IF PRESENT**
Red Data Book, BAP, LBAP species etc.	V. LOW	hand capture and removal

2.3 PRE-CONSTRUCTION PHASE

that the proposed development will necessitate clearance of much of the vegetation across the site including the front lawned area and the entire northeast-facing Garden Privet *Ligustrum ovalifolium* hedgerow. The remaining boundary hedgerows, trees and shrubs will be retained and will be unaffected by the development proposals.

Bramble scrub clearance should commence from the inner edges and progress radially outwards to the site periphery. This will allow small mammals disturbed by the clearance works e.g. **shrews** to move outwards to safety. Other species encountered will be similarly shepherded away from the clearance works or will be removed to safety (**see Table 2**).

2.3.1 VERTEBRATES

Badgers
There are no records for active setts within 500m of the proposed development site. The northeast-facing site boundary is potentially accessible to badgers if any of the gates in the retaining wall along Church Lane are left open. The south-facing and west-facing boundaries are also accessible from the gardens in Frank Lane and Frank Close respectively. Any large excavations observed on the site during clearance works will be further assessed (footprints, guard hairs or any potential entrance hole etc.) for presence of badger. However, badgers are very unlikely to be a receptor to this scheme.

Bats
Bats will probably forage across the site but there are no potential roosting features within the site boundary such as mature trees with cavities etc. However, the building has the potential to support roosting bats, and as such, bats are a potential receptor to this scheme and appropriate mitigation (a **Bat Survey & Evaluation** undertaken at appropriate time of year) is required prior to demolition of the existing building.

Hedgehogs
There is a potential presence of **Hedgehog** *Erinaceus europaeus* at the site and hedgehogs could therefore be a receptor to this scheme. Hedgehogs are primarily nocturnal and often go unnoticed during daylight hours. A fingertip search for hedgehogs is therefore recommended immediately prior to, and during any site clearance activity.

Shrews
(see **Table 2**).

Breeding Birds
The predicted risk to breeding birds is considered to be sufficiently high as to warrant mitigation. The breeding season commences at the beginning of March and mitigation should include a **Breeding Bird Survey & Assessment** undertaken immediately prior to commencement of any works (or within a maximum of 48 hours of such). If nesting birds are not considered to be a potential receptor to the

scheme i.e. there is *de minimis* risk (no evidence of presence), the works can progress in accordance with the specifics of the respective **Method Statement** appended (see **APPENDIX 7**).

Reptiles and Amphibians
Reptiles and amphibians (with the exception of toads), are considered to be at sufficiently low risk as to warrant limited mitigation. However, a fingertip search for **great crested newts** and **toads** should be undertaken by a fully licensed ecologist immediately prior to the undertaking of any clearance works. Animals should be moved to appropriate, suitable habitat if discovered at the site.

2.3.2 INVERTEBRATES

A number of invertebrate species are likely to be receptors to this scheme, in particular flightless or weakly dispersive species. Noticeable species such as large ground beetles should be removed and released in nearby suitable habitat if encountered during the fingertip searches for great crested newts, toads and hedgehogs.

2.4 CONSTRUCTION PHASE

Once the site has been cleared of vegetation, Temporary Mesh Fencing (TMF) should be erected around potential access points along the site perimeter (as appropriate). This type of fencing can be erected on ground with rubber feet or in ground on scaffolding tubes for greater security and durability. It can also be used to form tree protection to BS 5837: 2012. Upon completion of installation of the fencing, a Walkover Survey should be undertaken to ensure no mammals, reptiles or amphibians remain within the application site boundary.

2.4.1 SITE ACCESS

A closeable section of TMF will allow machinery to ingress and egress the site. Upon closure, sandbags should be laid along the foot of the TMF Gate in order to prevent access of mammals, reptiles or amphibians.

2.4.2 SITE EXCAVATIONS

Excavations for footings and facilities (drains etc.) should be checked first thing (daily) and should have wooden escape ramps placed within all trenches left uncovered overnight, in order to allow any mammals, reptiles and amphibians to escape should they fall into these features.

2.5 POST-CONSTRUCTION (AFTERCARE) PHASE

Post-construction (aftercare) mitigation should comprise sympathetic landscaping with a number of native and non-native shrubs aimed at providing sources of nectar, pollen, berries and seeds over as wide a seasonal period as possible.

Bats
In keeping with the NPPF and Kirklees Local Plan, bat boxes or bat tubes should be incorporated into the scheme. The locations of these are shown in **Application Site Layout – Habitats Post-Development** (drawing number **EC/25/1190_02**). Installation should be supervised by a qualified ecologist.

Integral Bat Tubes
A single 1FR Schwegler Bat Tube should be integrated on the upper south-facing elevation of each building as shown.

The **1FR Bat Tube** is designed to be installed on the external walls of buildings, either flush or beneath a rendered surface. This makes it ideal for situations where the box needs to be discrete since only the entrance hole will be visible. It can also be painted to match the building with air-permeable paint if desired.

The 1FR is specifically designed to meet the characteristic behavioural requirements of the types of bats that inhabit buildings. It has an integrated wooden panel onto which bats can cling and a ridged entrance slope which makes it easy for them to enter and leave the box safely. The design maintains excellent climatic conditions inside providing bats with a safe and stable environment in which to roost and it requires no maintenance because droppings fall out of the entrance ramp.

Breeding Birds
In keeping with the NPPF and Kirklees Local Plan, bird nesting boxes should be incorporated into the scheme. The locations of these are shown in **Application Site Layout – Habitats Post-Development** (drawing number **EC/25/1190_02**). Installation should be supervised by a qualified ecologist.

Bird Boxes
Two 1SP Schwegler Nest Boxes (26mm access hole x1 and 32mm access hole x1) should be installed along the south-facing walls of each building as shown.

Natural cavity nest sites have declined dramatically and provision of nest boxes can provide much-needed breeding and roosting space for cavity-nesting species. The **Schwegler 1B** is the bestselling nest box for garden birds and will attract a wide range of species and is available with different entrance hole sizes. Examples of bird species attracted to the different entrance hole sizes are :

- 32mm: great tit, blue tit, coal tit, redstart, nuthatch, tree and house sparrows (and bats).
- 26mm: blue tit, coal tit and possibly wren. All other species are prevented from using the nest box due to the smaller entrance hole.

Schwegler bird boxes provide a stable environment and mimic natural nest and roost sites with internal brood chamber dimensions that are similar to natural cavities. These are Woodcrete nest boxes and last for at least 20-25 years. Woodcrete is a breathable blend of wood, concrete and clay which will not rot, leak, crack or warp, whilst preventing condensation and maintaining more constant temperatures inside than wooden boxes.

Schwegler have a patented method of installation on trees that prevents the tree trunk from growing over the hanger from which the box is suspended. **The nest boxes should be attached to a suitable retained tree or to a wall 2m above the ground.**

HEDGEHOGS

In keeping with the NPPF and Kirklees Local Plan, hedgehog access points should be incorporated into the scheme. The locations of these are shown in **Application Site Layout – Habitats Post-Development** (drawing number **EC/25/1190_02**). Installation should be supervised by a qualified ecologist.

Hedgehog Highway Fence Holes

Two Timloc Hedgehog Highway Fence Hole Frames should be installed at ground level between the two new adjacent properties as shown.

Highway holes are approximately 13cm square and will let hedgehogs move around freely without letting pets such as dogs escape.

3 APPENDICES

APPENDIX 7

METHOD STATEMENT – SCRUB CLEARANCE

The following methodology should be adhered to throughout all scrub clearance activities and copies should be provided by the site ecologist to all site personnel in **Method Statement** format.

1. Scrub should only be cut by **strimmer or hedge cutter** and on foot and not by any mechanical vehicle.

2. For each patch or area of scrub, cutting and removal should be undertaken stratigraphically commencing at maximum height and descending layer by layer until a remnant vegetation with a **minimum height of 0.5m** above ground level is attained. The resultant exposed ground area and remnant vegetation should then be checked by fingertip search for **hedgehogs** prior to further cutting to ground level.

3. Should any bird's nest be encountered during the clearance works, the works in the immediate vicinity to a distance of **10m** must cease and the **site ecologist immediately informed**. He/she will ascertain whether the nest is old, recent or occupied (eggs or chicks). Under no circumstances whatsoever is the nest to be examined other than by direct observation and only by the site ecologist. If the nest is considered to be active, the works in that area must cease and the ecologist will determine an appropriate stand-off distance for the foreseeable future i.e. until fledglings have left the nest**. THIS IS A LEGAL REQUIEMENT.**

4. Should hedgehogs (or amphibians such as toads) be encountered during the clearance works, the site ecologist should be immediately informed. He/she will remove these animals to appropriate nearby (safe) habitat.