Ecological Impact Assessment

Lower Blacup Farm, Cleckheaton

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Basis of Report

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Executive Summary

An Ecological Impact Assessment (EcIA) has been prepared by SLR Consulting in respect of the proposed residential development of 67 dwellings at a Site situated at Lower Blacup Farm, Cleckheaton, Kirklees, West Yorkshire. The Site has been subject to a UKHab Survey and condition assessment, species assessment and desk study to establish the baseline ecological conditions of the Site and its value.

The ecological studies have found that the Site is not designated as a statutory or non-statutory site for nature conservation and that none are present nearby with the potential to be affected. There are no Ancient Woodlands within 1 km of the Site and the one priority habitat, deciduous woodland, is sufficiently distanced not to be impacted by the construction works.

The UKHab Survey identified a series of modified grassland fields, several lines of trees and hedgerows, an artificial unvegetated unsealed track and a river, Blacup Beck, to the north of the Site. The lines of trees, hedgerows and river are considered important at a local level. The Site is also considered locally important for bats and hedgehog, with the following ecological receptors included for further assessment due to their legal protection: reptiles, nesting birds and Two Schedule 9 invasive non-native species (INNS): Himalayan balsam and giant hogweed were also identified as ecological constraints.

A Pollution Prevention Plan will be implemented to ensure no significant negative impacts on the river during construction. River enhancement works are proposed, which shall be undertaken in low flow conditions, shall limit bank disturbance of the existing watercourse and minimise the construction time period. No operational impacts are anticipated.

During construction, protective fencing shall be installed around retained vegetation and dust suppression techniques shall be implemented. Air, noise and light pollution measures will be in place during construction and a sensitive lighting scheme shall be adopted.

A pre-commencement survey for INNS shall be undertaken and strict biosecurity measures shall be implemented along the western and northern boundary. Both INNS shall be removed from the Site.

A pre-commencement survey for shall also be undertaken, and hedgehog highways installed in all garden fences. A bat box shall be installed on a retained tree in the north of the Site to mitigate for the loss of one tree with limited bat roosting potential. Impacts on reptiles, nesting birds, bats, and hedgehog are to be avoided or managed through timing of works and implementation of measures within a Construction Environmental Management Plan (CEMP).

The Landscape Masterplan details areas of retained vegetation, enhancement of the tree line and additional hedgerow and tree planting across the Site. Integrated bat boxes and nest boxes will both be installed on 15% of the 67 plots. Blacup Beck will also be enhanced through minor tree trimming to ensure that the bank tops and face can maintain long grass and shrub cover, as well as removal of large trash and INNS.

No significant cumulative effects were identified, and it is concluded that the development proposals would be compliant with national and local planning policies and relevant legislation. Provided that the avoidance and mitigation measures as set out in this EcIA are implemented in full, residual effects on important ecological features will not be significant and there will be minor positive effects for breeding birds, bats and hedgehog.

This report updates the version previously submitted for a very similar scheme[1].

[1] SLR Consulting (5 September 2024) Lower Blacup Farm, Cleckheaton EcIA v1 ref 424.065278.00001

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Appendix B Relevant Legislation and Planning Policy

B.1 Relevant Legislation

B.1.1 Environment Act 2021

B.1.2 Conservation of Habitats and Species Regulations 2017 (as amended)

B.1.3 Natural Environment and Rural Communities Act 2006

B.1.5 Wildlife and Countryside Act 1981

B.2 Relevant Planning Policy

Appendix C Target Notes

Acronyms and Abbreviations

BNG	Biodiversity Net Gain
CIEEM	Chartered Institute of Ecology and Environmental Management
CEMP	Construction Environmental Management Plan
DEFRA	Department for Environment, Food & Rural Affairs
EcIA	Ecological Impact Assessment
ECoW	Ecological Clerk of Works
EPSL	European Protected Species Licence
GCN	Great Crested Newt
GLTA	Ground Level Tree Assessment
HAP	Habitat Action Plan
INNS	Invasive Non-Native Species
MAGIC	Multi-Agency Geographic Information for the Countryside
NIA	Nature Improvement Area
POS	Public Open Space
PRF	Potential Roost Feature
PRoW	Public Right of Way
SAC	Special Area of Conservation
SLR	SLR Consulting Limited
SPA	Special Protection Area
SSSI	Sites of Special Scientific Interest
TN	Target Note
UKHab	UK Habitat Classification
WYES	West Yorkshire Ecology Service

1.0 Introduction

SLR Consulting Limited (SLR) was commissioned by Newett Homes Limited to prepare an Ecological Impact Assessment (EcIA) for a proposed residential development at Lower Blacup Farm, Cleckheaton, Kirklees, West Yorkshire, BD19 5JE (approximate central OS grid reference SE 18615 24799).

This report has been informed by the following:

- Desk study;
- UK Habitat survey and Condition Assessment;
- River Condition Assessment;
- Ecological walkover survey; and
- Statutory biodiversity metric calculations.

A Biodiversity Net Gain (BNG) assessment has also been completed, which is provided in a separate report[2].

1.1 Site Description

The application site (herein referred to as the 'Site') is 2.37 hectares (ha) in extent and comprises several fields of modified grassland, several of which were grazed by livestock at the time of survey. An unsealed track runs east to west across the centre of the Site, along which also runs a Public Right of Way (PRoW). The northern side of this track is planted with a native hedgerow, while on the southern side of the track a shorter line of trees is present. A further hedgerow is located on the southern boundary of the Site, and two further lines of trees are located running east to west across the middle of the Site, and north to south, extending from the southern boundary. Blacup Beck is present on the northern boundary of the Site, flowing west to east.

The Site is located on the western edge of the town of Cleckheaton, and approximately 8 km south of the centre of Bradford. Residential developments are located immediately to the south and east of the Site, while further agricultural land is present to the west. An industrial estate is present to the north of the Site, on the far side of Blacup Beck. Immediately surrounding the Site is further agricultural land, used both for arable and livestock grazing.

1.2 Details of the Proposed Development

The proposed development (Appendix A) involves the construction of a residential area with 67 dwellings, associated gardens and roads. The development also includes an area of Public Open Space (POS) in the centre of the Site and in the north of the Site. A Sustainable Drainage System (SuDS) basin will also be constructed in this northern POS. Access to the proposed development will be gained from Ashbourne View and Ashbourne Drive on the east of the Site. The track through the centre of the Site will be retained, including the current PRoW.

[2] SLR Consulting (5th December 2025) Lower Blacup Farm, Cleckheaton. Biodiversity Net Gain Assessment. 424.065687.00001

1.3 Purpose of this Report

This report:

- Describes the baseline data collection and assessment methodologies used;
- Summarises the baseline ecological conditions and identified important receptors, where relevant;
- Identifies and describes all potentially significant ecological effects associated with the proposed development upon important receptors (or confirms that no potentially significant effects will occur);
- Sets out the mitigation and compensation measures required to ensure compliance with nature conservation legislation and/ or to address any potentially significant ecological effects, where relevant;
- Identifies how mitigation and/ or compensation measures will be delivered, where relevant;
- Provides an assessment of the significance of any residual effects to important receptors, and the legal and policy implications of the proposals; and
- Identifies ecological enhancement measures, where appropriate.

1.4 Evidence of Technical Competence and Experience

The desk study was undertaken by Charlotte Baldwin, a Graduate Ecologist with SLR and Ellie Tew, Ecologist with SLR. Charlotte has a year's experience in ecological surveying. Ellie is a Qualifying member of the Chartered Institute of Ecology and Environmental Management (CIEEM) and has two years relevant experience within ecological consultancy including writing EcIAs.

This report was written by Lucy Sumner, a Senior Ecologist with SLR. Lucy is an Associate member of CIEEM, with over five years' relevant experience in ecological consultancy.

The report has been reviewed by Associate Ecologist Hazel Douglas. Hazel is a Full member of the Chartered Institute of Ecology and Environmental Management (MCIEEM). Hazel has over ten years' relevant experience within ecological consultancy, is a competent botanist and holds Level 2 bat (number 2016-23781-CLS-CLS) and great crested newt (number 2016-20414-CLS-CLS) survey licences. Hazel has extensive experience in EcIA.

1.5 Relevant Legislation and Policy

Relevant Legislation and National Planning Policy are provided in Appendix B. Relevant extracts from Local Planning Policy have been provided below[3].

1.1.1 Kirklees Local Plan[4]

The Kirklees Local Plan was adopted in 2019, and sets out the vision, objectives and strategy for future development of Kirklees, from 2013-2031. Relevant policies are outlined below.

[3] Note that the summary provided here is intended for general guidance only and the original policy documents should be consulted for definitive information. For local planning policy relevant to biodiversity the relevant local plans should be consulted.

[4] Kirklees Local Plan Strategy and Policies

1.1.1.1 Policy LP30 Biodiversity and 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 (SSSI), 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 SSSI, 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 (NIA) 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) (iv) incorporate biodiversity enhancement measures to reflect the priority habitats and species identified for the relevant Kirklees Biodiversity Opportunity Zone."

1.1.1.2 Policy LP31 Strategic Green Infrastructure Network

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

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

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

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

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

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

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

Policy LP33 Trees

"The Council will not grant planning permission for developments which directly or indirectly threaten trees or woodlands of significant amenity. Proposals should normally retain any valuable or important trees where they make a contribution to public amenity, the distinctiveness of a specific location or contribute to the environment, including the Wildlife Habitat Network and green infrastructure networks. Proposals will need to comply with relevant national standards regarding the protection of trees in relation to design, demolition and construction. Where tree loss is deemed to be acceptable, developers will be required to submit a detailed mitigation scheme."

Biodiversity Net Gain

"All development in Kirklees, as set out in national policy and the policies described in this document, will be expected to not result in significant loss or harm to biodiversity through avoidance, mitigation and compensatory measures and seek opportunities to enhance biodiversity value and ecological links. Opportunities to achieve net gains in biodiversity within development proposals will be sought through good design, including specific habitat creation and biodiversity enhancements. Regard will need to be given to the relevant Biodiversity Opportunity Zone in which the proposed development is located and biodiversity enhancement measures will be sought which reflect the priority habitats and species identified for each zone."

1.1.2 Kirklees Biodiversity Action Plan[5]

The Kirklees Biodiversity Action Plan includes habitat action plans, the following of which may be of relevance to the Site: semi-natural pasture, lowland and upland meadows, lowland deciduous and other woodland, wet woodland, arable field margins, hedgerows, rivers, riverine corridors and associated habitats and reedbeds. Relevant species action plans for this Site also include: great crested newt (*Triturus cristatus*), water vole (*Arvicola amphibius*) and white-clawed crayfish (*Austropotamobius pallipes*).

[5] Kirklees Council (2024) Kirklees Biodiversity Action Plan. Available at: https://www.kirklees.gov.uk/beta/delivering-services/policies-and-strategies.aspx [Accessed: 27/8/24].

2.0 Methodology

2.1 Scope

The scope of this EcIA, i.e. the collection of baseline data, description and evaluation of ecological receptors, and assessment of the significance of impacts, follows guidelines set out by CIEEM[6] and references therein. Ecological surveys have been based upon the relevant guidance for each feature concerned; further details are provided in the following sections.

2.2 Baseline Data Collection

2.2.1.1 Desk Study

The West Yorkshire Ecology Services (WYES) was commissioned to conduct a search of statutory and non-statutory designated sites for nature conservation as well as protected and notable species, within the Site and a 2 km radius of its centre. This data was obtained on 25th June 2024.

Information on statutory designated sites for nature conservation and geological interest and granted European Protected Species Licences (EPSLs) for the Site and 1 km radius, was also obtained from the MAGIC website managed by Natural England[7]. This was extended to 10 km for international designations (such as Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar sites).

2.2.2 Field Surveys

2.2.2.1 UK Habitat Survey

A UK Habitat Classification (UKHab) Survey and mapping exercise[8] of the Site was carried out by Lucy Sumner on 3rd July 2024 to identify the broad habitat types present. The survey was carried out on a cloudy and showery day with an ambient temperature of 15°C. The survey area is shown in Figure 1.

The habitat survey was extended to include an assessment of the potential of the Site to support legally protected or notable species, and a search for field signs of such species, including the following:

- A search for and field signs within the survey area and 30 m radius, where accessible;
- An assessment of trees within the survey area boundary to ascertain their potential for roosting bats, based on criteria within the fourth edition of the Bat Conservation Trust's Good Practice Guidelines[9] (see Section 2.2.2.2) (the Site does not contain any buildings);
- An assessment of the Site's potential to support breeding birds, reptiles, great crested newt (although access to standing waterbodies within 500 m was not

[6] CIEEM (2022) Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine, September 2018. Version 1.2 – Updated April 2022.

[7] Natural England (2023) Multi-Agency Geographic Information for the Countryside. Available at: www.magic.defra.gov.uk

[8] UK Hab Ltd (2023) UK Habitat Classification Version 2.0. Available at: https://www.ukhab.org

[9] Collins, J. (ed.) (2023) Bat Surveys for Professional Ecologists: Good Practice Guidelines. Fourth Edition. Bat Conservation Trust, London.

possible at the time of survey for a Habitat Suitability Index (HSI) assessment[10]), water vole and otter (*Lutra lutra*); and

- An assessment of whether the survey area supports, or has potential to support, priority species or habitats, particularly those which are rare in the UK or West Yorkshire.

Any incidental evidence or sightings of protected or notable species were recorded.

Searches were also made for invasive species, including those listed on Schedule 9 of the Wildlife and Countryside Act 1981, such as Japanese knotweed (*Fallopia japonica*), giant hogweed (*Heracleum mantegazzianum*) and Himalayan balsam (*Impatiens glandulifera*).

Habitats were mapped and features of interest were recorded using Target Notes (see Figure 1 and Appendix C). A Habitat Condition Assessment was also carried out in conjunction with the UKHab survey using standardised habitat condition assessment criteria contained within the Department for Environment, Food & Rural Affairs (DEFRA) Statutory Biodiversity Metric guidance[11]. Habitat condition is reported separately within the BNG report[1].

2.2.2.2 Assessment of the Potential of Trees for Roosting Bats

In compliance with best practice guidelines and as part of the UK Habitat Survey, a Ground Level Tree Assessment (GLTA) of the trees within, and overhanging into, the survey area was undertaken. The aim of the survey was to determine the need, or otherwise, for further survey (for example dusk bat detector surveys) and/ or mitigation.

The survey comprised a detailed inspection of the exterior of the trees from ground level to search for potential bat access points and features that bats could use for roosting (Potential Roosting Features (PRFs)). Trees were inspected systematically and consistently from all sides (where accessible). Binoculars were used to scan for potential features from the ground. The following table, adapted from current best practice guidelines[12] was used as a guide to assess the potential suitability of PRFs within trees for roosting bats:

Table 2-1: Guidelines for Categorising the Potential Suitability of PRFs within Trees for Bats

Suitability	Description of Potential Roosting Features (PRFs)
No PRFs	No PRFs noted within a tree which could be exhaustively searched from the ground.
PRF-I	PRF is only suitable for individual bats or very small numbers of bas either due to size or lack of suitable surrounding habitats.
PRF-M	PRF is suitable for multiple bats and may therefore be used by a maternity colony.

2.2.2.3 River Condition Assessment

A River Condition Assessment of Blacup Beck on the northern Site boundary was undertaken during the field survey. This assessment is most relevant to the BNG assessment and is discussed in further detail within the separate BNG report[1].

[10] Idham R.S., Keeble J., Swan M.J.S. & Jeffcote M. (2000). Evaluating the suitability of habitat for the Great Crested Newt (*Triturus cristatus*). Herpetological Journal 10(4), 143-155.

[11] https://www.gov.uk/government/publications/statutory-biodiversity-metric-tools-and-guides

[12] Collins, J. (ed.) (2023) Bat Surveys for Professional Ecologists: Good Practice Guidelines. Fourth Edition. Bat Conservation Trust, London.

2.2.3 Limitations

2.2.3.1 Desk Study

Desk study data is unlikely to be exhaustive, especially in respect of species, and is intended mainly to set a context for the study. It is therefore possible that important habitats or protected species not identified during the data search do in fact occur within the vicinity of the site. Interpretation of maps and aerial photography has been conducted in good faith, using recent imagery, but it has not been possible to verify the accuracy of any statements relating to land use and habitat context outside of the field study area.

2.2.3.2 Field Survey

An ecological study provides only a "snapshot" of the conditions prevailing at the time of survey. Lack of evidence of a particular species does not necessarily preclude them from being present on Site at a later date. Whilst it is considered unlikely that any significant evidence of activity by protected or notable species has been overlooked, due to the nature of the subjects of ecological surveys it is feasible that species that use the Site may not have been recorded by virtue of their seasonality, habit or random chance. It is considered unlikely however, that additional surveys of the Site at this time would materially alter the conclusions of this report.

The survey was undertaken in the optimal period for botanical survey, and all areas were accessible for survey. Access to Blacup Beck was hindered by the presence of giant hogweed and dense vegetation; however, it was possible to access the banks at distinct points to view upstream and downstream to ensure sufficient coverage of this homogenous watercourse. Access to the standing waterbody within 500m for a HSI assessment was not possible. However, a review of aerial imagery indicates that this area is surrounded by an active industrial site with storage of materials adjacent to this waterbody with limited connectivity to the Site. Further discussion on this is provided in Section 3.4.3. As such, no significant limitations have been identified.

2.3 Assessment Approach

The ecological evaluation and impact assessment approach used in this report is based on the CIEEM Guidelines[5]. The assessment outlined within this report is considered valid for 18 months in line with the Advice Note on the Lifespan of Ecological Reports and Surveys[13].

2.3.1 Important Ecological Features

Ecological features can be important for a variety of reasons and the rationale used to identify them is explained in the text. Importance may relate, for example, to the quality or extent of the site or habitats therein; habitat and/ or species rarity; the extent to which such habitats and/ or species are threatened throughout their range, or to their rate of decline.

2.3.1.1 Determining Importance

In accordance with the CIEEM guidelines only ecological receptors (habitats, species, ecosystems and their functions/ processes), which are considered to be important and potentially affected by the project should be subject to detailed assessment. It is not necessary to carry out detailed assessment of features that are sufficiently widespread, unthreatened and resilient to project impacts and will remain viable and sustainable,

[13] CIEEM (2019) Advice Note on the Lifespan of Ecological Reports and Surveys. Available online at: https://cieem.net/wp-content/uploads/2019/04/Advice-Note.pdf [Accessed: 22/8/24].

although these can be included in the assessment in order to demonstrate ecological enhancements, for example.

The importance of an ecological feature should be considered within a defined geographical context. The following frame of reference has been used in this case, relying on known/ published accounts of distribution and rarity where available, and professional experience:

- International;
- National (i.e. UK);
- Regional (i.e. Yorkshire);
- County (i.e. West Yorkshire); and
- Local (i.e. within 2 km).

The above frame of reference is applied to the ecological features identified during the desk study and surveys to inform this report.

The value of habitats has been measured against published selection criteria where available. Examples of relevant criteria include: descriptions of habitats listed on Annex 1 of the Habitats Directive, descriptions of priority habitats[14], e.g. those included in Section 41 of NERC Act 2006, Local Wildlife Site Criteria, and Habitat Action Plans (HAPs) contained within the Local Biodiversity Action Plan.

In assigning a level of value to a species, it is necessary to consider its distribution and status. Reference has therefore been made to published lists and criteria where available. Examples of relevant lists and criteria include: species of European conservation importance (as listed on Annexes II, IV and V of the Habitats Directive), and UK priority species, e.g. Section 41 species and Birds of Conservation Concern[15].

For the purposes of this assessment ecological features of Local importance or greater and/ or subject to legal protection have been subject to detailed assessment. Effects on other ecological features are considered unlikely to be significant in legal or policy terms.

2.3.2 Impact Assessment

The impact assessment process involves the following steps:

- identifying and characterising potential impacts;
- incorporating measures to avoid and mitigate (reduce) these impacts;
- assessing the significance of any residual effects after mitigation;
- identifying appropriate compensation measures to offset significant residual effects (if required); and
- identifying opportunities for ecological enhancement.

When describing impacts, reference has been made to the following characteristics, as appropriate:

- Positive or negative;
- Extent;

[14] i.e. Priority habitats and species as listed in the UK and devolved administrations, as listed: http://jncc.defra.gov.uk/page-5705

[15] Stanbury, A.J., Eaton, M.A., Aebischer, N.J., Balmer, D., Brown, A.F., Douse, A., Lindley, P., McCulloch, N., Noble, D.G. & Win, I. (2021) Birds of Conservation Concern 5: the population status of birds in the UK, Channel Islands and Isle of Man. British Birds, 114.

- Magnitude;
- Duration;
- Timing;
- Frequency; and
- Reversibility.

The impact assessment process considers both direct and indirect impacts: direct ecological impacts are changes that are directly attributable to a defined action, e.g. the physical loss of habitat occupied by a species during the construction process. Indirect ecological impacts are attributable to an action, but which affect ecological resources through effects on an intermediary ecosystem, process or feature, e.g. the creation of roads which cause hydrological changes, which, in the absence of mitigation, could lead to the drying out of wet grassland.

Consideration of conservation status is important for evaluating the effects of impacts on individual habitats and species and assessing their significance:

- Habitats – conservation status is determined by the sum of the influences acting on the habitat that may affect its extent, structure and functions as well as its distribution and its typical species within a given geographical area.
- Species – conservation status is determined by the sum of influences acting on the species concerned that may affect its abundance and distribution within a given geographical area.

2.3.3 Significant Effects

The concept of ecological significance is addressed in paragraphs 5.24 through to 5.28 of CIEEM guidelines. Significance is a concept related to the weight that should be attached to effects when decisions are made. For the purpose of EcIA, a ‘significant effect’ is an effect that either supports or undermines biodiversity conservation objectives for ‘important ecological features’ or for biodiversity in general. Conservation objectives may be specific (e.g. for a designated site) or broad (e.g. national/ local nature conservation policy) or more wide-ranging (enhancement of biodiversity). Effects can be considered significant at a wide range of scales from international to local and the scale of significance of an effect may or may not be the same as the geographic context in which the feature is considered important.

2.3.4 Cumulative Effects

Cumulative effects can result from individually insignificant but collectively significant actions taking place over a period of time or concentrated in a location. Cumulative effects can occur where a proposed development results in individually insignificant impacts that, when considered in-combination with impacts of other proposed or permitted plans and projects, can result in significant effects.

A review of the planning portal indicates an approved scheme located approximately 80 m northwest of the Site. The scheme includes the demolition of existing commercial buildings and erection of 180 dwellings with associated works (2021/62/93567/E). The proximity of this scheme has potential to further exacerbate effects, which is discussed further in Section 4.10.

2.3.5 Avoidance, Mitigation, Compensation and Enhancement

When seeking mitigation or compensation solutions, efforts should be consistent with the geographical scale at which an effect is significant. For example, mitigation and compensation for effects on a species population significant at a county scale should ensure

no net loss of the population at a county scale. The relative geographical scale at which the effect is significant will have a bearing on the required outcome which must be achieved.

Where potentially significant effects have been identified, the mitigation hierarchy has been applied, as recommended in the CIEEM Guidelines. The mitigation hierarchy sets out a sequential approach beginning with the avoidance of impacts where possible, the application of mitigation measures to minimise unavoidable impacts and then compensation for any remaining impacts. Once avoidance and mitigation measures have been applied residual effects are then identified along with any necessary compensation measures, and incorporation of opportunities for enhancement.

It is important for the EcIA to clearly differentiate between avoidance mitigation, compensation and enhancement and these terms are defined here as follows:

- Avoidance is used where an impact has been avoided, e.g. through changes in scheme design;
- Mitigation is used to refer to measures to reduce or remedy a specific negative impact *in situ*;
- Compensation describes measures taken to offset residual effects, i.e. where mitigation *in situ* is not possible; and
- Enhancement is the provision of new benefits for biodiversity that are additional to those provided as part of mitigation or compensation measures, although they can be complementary.

3.0 Baseline Ecological Conditions

3.1 Designated Sites

There are no statutory or non-statutory designated sites within 2 km of the Site. There are no international or European statutory designated sites within 10 km of the Site. Therefore, designated sites are not considered further within this report.

3.2 Ancient Woodland and Priority Habitats

There are no Ancient Woodlands within 1 km of the Site.

There is one Priority Habitat within 1 km of the Site, Deciduous Woodland located 310 m northeast; however, this is sufficiently distanced from the Site not to be impacted by the works confined to the Site boundary.

3.3 Habitats

The results of the UKHab survey are illustrated in Figure 1, with each habitat polygon assigned a unique reference code (e.g. B1, B2, B3 etc.). Further details on the habitats are provided below. Target Notes are provided in Appendix C.

3.3.1 River (r2b)

Blacup Beck flows eastwards on the northern Site boundary with woodland present on the left bank. The watercourse is approximately 1 m wide and is heavily shaded and over sailed by vegetation. Himalayan balsam is present upstream of the Site (TN2, Appendix C) and giant hogweed was present within the watercourse (TN3, Appendix C). This habitat is considered locally important and has been scoped in for further assessment.

3.3.2 Modified grassland (g4)

The Site comprises of a series of modified grassland fields with low species diversity and several tall forbs present within the northern and central fields. These habitats are not considered locally important as they are species-poor and well represented within the wider landscape and are therefore, not carried forward for further assessment.

The northernmost field (habitat reference B1) comprised of a longer sward as horses were excluded from grazing this area (Plate 3-2). Species present included dominant Yorkshire fog (*Holcus lanatus*), abundant common nettle (*Utrica dioica*) and creeping thistle (*Cirsium arvense*), and frequent creeping buttercup (*Ranunculus repens*) and cock's-foot (*Dactylis glomerata*). Occasional species included ragwort (*Senecio jacobaea*), broad-leaved dock (*Rumex obtusifolius*), ribwort plantain (*Plantago lanceolata*), bramble (*Rubus fruticosus*) and rare cleavers (*Galium aparine*) associated with the southern edge. Common nettle and creeping thistle were dominant on the banks of Blacup Beck.

Similar species were present within the horse grazed field (habitat reference B2), dominated by Yorkshire fog (Plate 3-3). There was frequent ribwort plantain and meadow buttercup, occasional ragwort, creeping thistle, broad-leaved dock and rare nettle. Common hogweed (*Heracleum sphondylium*) was also present in the southwest corner adjacent to the hedgerow, where a strip of taller vegetation was able to develop as grazing was excluded by an electric fence.

The central field was dominated by perennial ryegrass (*Lolium perenne*), with frequent crested dog's-tail (*Cynosurus cristatus*) and common bent (*Agrostis capillaris*). There was frequent creeping thistle, occasional ragwort, red clover (*Trifolium pratense*), creeping buttercup and Yorkshire fog with rare common nettle (Plate 3-4). Farm equipment was also present to the west of this field (TN4, Appendix C).

Plate 3-1: Blacup Beck. Habitat reference WB1.

Plate 3-2: Modified grassland at the northern end of the Site. Habitat reference B1.

Plate 3-3: Modified grassland grazed by horses. Habitat reference B2.

Plate 3-4: Central modified grassland field. Habitat reference B4.

Two fields dominated by Yorkshire fog were present to the south of the Site, which were grazed by cows (Plate 3-5). Abundant species included crested dog's-tail and false oat-grass (*Arrhenatherum elatius*) with frequent cock's-foot and occasional creeping buttercup, ribwort plantain and dandelion (*Taraxacum officinale*). Rare species included spear thistle (*Cirsium vulgare*), common nettle and broad-leaved dock.

Plate 3-5: Southern modified grassland field. Habitat reference B6.

3.3.3 Artificial unvegetated unsealed surface (u1c)

A gravel track is present in the centre of the Site off Ashbourne Way with less than 10% vegetation cover associated with the central line (Plate 3-6). This habitat is not considered important at a local scale and is therefore scoped out of further assessment.

Plate 3-6: Central track off Ashbourne Way. Habitat reference B3.

3.3.4 Native Hedgerow (h2a6)

A hawthorn (*Crataegus monogyna*) hedge (habitat reference LB1) with rare elder (*Sambucus nigra*) was present to the north of the track off Ashbourne Way (Plate 3-7). Bramble, common nettle and cleavers were present in the understorey. The hedge was approximately 2-3 m high and 3 m wide.

Plate 3-7: Hawthorn hedge to the north of the track off Ashbourne Way. Habitat reference LB1.

An overgrown hawthorn hedge was present along the eastern Site boundary (Plate 3-8). Further lengths of hawthorn hedge were also present along the southern boundary with elder and ash (*Fraxinus excelsior*) also present within the extent of habitat reference LB7.

Plate 3-8: Hawthorn hedge along the eastern Site boundary. Habitat reference LB9.

Hedgerows are considered locally important and scoped in for further assessment.

3.3.5 Line of trees (w1)

A small line of hawthorn trees was present to the south of the central access track on a steep bank (Plate 3-9).

Plate 3-9: Small line of trees to the south of central track. Habitat reference LB2.

A line of trees crossed the Site comprising of hawthorn, elder and holly (*Ilex aquifolium*) (Plate 3-10). Ash trees were also present as this line of trees extended off-Site (habitat reference LB4).

Plate 3-10: Line of trees across the width of the Site. Habitat reference LB3.

A line of trees bordered the two southern fields of the Site with species including hawthorn, English oak (*Quercus robur*), ash and hawthorn (Plate 3-11).

Plate 3-11: Line of trees bordering two southern fields. Habitat reference LB5.

Lines of trees are considered locally important and are scoped in for further assessment.

3.4 Species

3.4.1 Plants

3.4.1.1 Native Plant Species

WYES returned one record of bluebell (*Hyacinthoides non-scripta*), located 960 m northeast of the Site. This species is sufficiently distanced from the Site and proposed residential development and is therefore not considered for further assessment. No protected, rare or notable plant species were recorded on-Site; therefore, they are scoped out of further assessment.

3.4.1.2 Schedule 9 Invasive Non-Native Plant Species (INNS)

WYES returned records of six different Schedule 9 non-native invasive species within 2 km of the Site. Floating pennywort (*Hydrocotyle ranunculoides*), giant hogweed (*Heracleum mantegazzianum*), Himalayan balsam (*Impatiens glandulifera*), Himalayan cotoneaster (*Cotoneaster simonsii*), Montbretia (*Crocosmia pottsii x aurea = C. x crocosmiiflora*), and New Zealand pigmyweed (*Crassula helmsii*) are all within 2 km of the Site. The closest Schedule 9 non-native invasive species are Himalayan cotoneaster and Montbretia, both recorded 630 m southeast from the Site.

During the UKHab survey on the 3rd July both giant hogweed and Himalayan balsam were recorded on Site (TN 2, 3 and 6 in Appendix C). Due to the presence of these Schedule 9 INNS on Site, and adjacent to the Site boundary, this group has been scoped in for further assessment.

3.4.2 Invertebrates

A record of one white-letter hairstreak (*Satyrium w-album*) egg was recorded in 2007, within 2 km of the Site. No further invertebrate records were returned by WYES. The Site comprises of grazed grassland fields, which are considered sub-optimal for invertebrates due to a lack of species diversity and suitable food sources for a range of species. Suitable habitat is well represented within the wider landscape and therefore, invertebrates are not assessed further within this report.

3.4.3 Amphibians

A total of 29 records of great crested newt (GCN) (*Triturus cristatus*) were provided, located approximately 1.9 km northwest of the Site, with the most recent record dating back to 2017. Since 2016, the land where most amphibian records were found has been developed into housing. Two GCN records from 2017 were provided from a field, 2 km west of the housing development. All prior GCN records, dating from 2007-2015, were located on the now-developed land. Records were provided for common frog (*Rana temporaria*) and smooth newt (*Lissotriton vulgaris*), which are all associated with the records of GCN, apart from one record of six adult frogs and spawn located within a residential property 150 m north of the Site.

The desk study identified one potential standing waterbody located 330 m west of the Site (OS grid reference: SE 18216 24948); however, a review of aerial imagery indicates that this area is surrounded by an active industrial site with storage of materials adjacent to this waterbody. There is limited connectivity between this waterbody and the Site via culverted and open sections of Blacup Beck and across the industrial site, which present significant barriers to terrestrial movement of amphibians, including GCN. Suitable habitats on-Site are restricted to the longer grassland sward in the northern part of the Site adjacent to Blacup Beck and the farm equipment (TN4, Appendix C), which may be utilised as hibernacula although the central access track may hinder terrestrial movement to this central field. Furthermore, the Site topography results in all land draining northwards to Blacup Beck with no standing water present on-Site and all other fields comprise of short, grazed swards. The Site is considered sub-optimal for amphibians, including GCN, and the risk that they will be encountered on-Site is low and they are therefore scoped out of further assessment.

3.4.4 Reptiles

There were no records provided for reptile species within 2 km of the Site. The longer sward of the grassland in the northern part of the Site adjacent to Blacup Beck offers limited suitable habitat for reptiles, mainly grass snake (*Natrix helvetica*) and the farm equipment stored in the central field may be utilised as hibernacula (TN4, Appendix C). The Site is considered unlikely to support a locally significant population of reptiles; however, given their protected status reptiles are taken forward for further assessment as a precaution.

3.4.5 Birds

A total of 104 records were returned for 39 species of birds within a 2 km radius of the Site. Records were provided for common redpoll (*Acanthis flammea*), skylark (*Alauda arvensis*), kingfisher (*Alcedo atthis*), swift (*Apus apus*), greenfinch (*Chloris chloris*), house martin (*Delichon urbicum*), yellowhammer (*Emberiza citrinella*), brambling (*Fringilla montifringilla*), linnet (*Linaria cannabina*), house sparrow (*Passer domesticus*), tree sparrow (*Passer montanus*), willow tit (*Poecile montanus*), starling (*Sturnus vulgaris*), redwing (*Turdus iliacus*), fieldfare (*Turdus pilaris*), mistle thrush (*Turdus viscivorus*), barn owl (*Tyto alba*) and lapwing (*Vanellus vanellus*).

Overall, the Site is assessed as having less than local importance for nesting birds, which could utilise farm equipment (TN4, Appendix C), existing trees, hedges and grassland,

particularly if left ungrazed. However, given the legal protection afforded to birds and active bird nests and the potential impact of the scheme during construction, if carried out within the bird breeding season, nesting birds have been subject to further assessment.

3.4.6 Mammals

3.4.6.1 Bats

The desk study returned a total of 86 records of bats within 2 km of the Site. The most abundant species was common pipistrelle (*Pipistrellus pipistrellus*) with 48 records, including 12 specified as roosts. The closest roost was unspecified and recorded in 2017, 450 m northwest of the Site. There are eight records of Leisler's (*Nyctalus leisleri*), three of which are maternity roosts. The closest maternity roost was recorded in 2007, 820 m northwest of the Site. Other species records returned include brown long-eared bat (*Plecotus auritus*), soprano pipistrelle (*Pipistrellus pygmaeus*), Myotis species (*Myotis*) and noctule (*Nyctalus noctula*). There were also nine records of unidentified bat species.

Three trees were assessed as having PRF-I suitability for roosting bats (TN1, 5 and 7 in Appendix C). Commuting and foraging bats may utilise the Site hedgerows and treelines with wider suitable habitat well-represented in the wider landscape. Due to these factors, the Site has been assessed as having local importance for bats which have been included for further assessment.

3.4.6.2

WYES returned no records of within 2 km of the Site and the Site boundary falls outside the area of increased probability for activity.

During the UKHab survey on the 3rd July 2024, no signs of were recorded on Site or within a 30 m buffer of the Site. However, due to their legal protection a pre-commencement survey is recommended as a precaution, and this species has been included for further assessment.

3.4.6.3 Otter & Water Vole

WYES returned just one record of otter (*Lutra lutra*) located 1 km northeast of the Site in 2006. No water vole (*Arvicola amphibius*) records were returned within 2 km of the Site.

The northern boundary watercourse (Blacup Beck) is heavily overgrown with no in-channel vegetation and limited flows. No field evidence for otter or water vole was observed during the Site walkover on the 3rd July 2024, where access was possible, and both species are unlikely to utilise this habitat as it is limited in open extent and hydrological connectivity before it is culverted below Cleckheaton. The single record of otter is associated with Spen Valley Bottoms, and there is a lack of hydrological connectivity between this area and Blacup Beck on the Site. Therefore, both otter and water vole have been excluded from further assessment.

3.4.6.4 Other Mammals

Three records for hedgehog (*Erinaceus europaeus*) were returned by WYES, the closest record being 840 m north of the Site. The habitats on Site, particularly the hedgerows, are suitable for hedgehog hibernation, foraging and commuting and this species has therefore been taken forward for further assessment.

3.5 Summary of Important Ecological Features

Ecological features assessed as having local importance or greater, as well as legally protected species, are outlined in Table 3-1.

Table 3-1: Summary of Important Ecological Features Subject to Detailed Assessment

Ecological Feature	Scale at which Feature is Important	Comments on Legal Status and/or Importance
River (Bacup Beck)	Local	Rivers are listed under the Kirklees BAP.
Hedgerow and lines of trees	Local	Hedgerows are a NERC Act 2006 Section 41 habitat of principal importance for nature conservation. Lines of trees are undesignated habitats; however, they have intrinsic value as they are likely to support a range of species and act as general wildlife corridors.
Schedule 9 INNS: Himalayan balsam and giant hogweed	Local	Under Schedule 9 of the Wildlife and Countryside Act 1981 (as amended), INNS cannot be spread off-Site as a result of the works.
Reptiles	Less than local, if present	All species are protected from killing/ injury under the Wildlife and Countryside Act 1981 (as amended); some species are NERC Act 2006 Section 41 species of principal importance.
Nesting birds	Less than local	All species are protected whilst nesting under the Wildlife and Countryside Act 1981 (as amended) (some species are also protected from disturbance whilst nesting under Schedule 1); some species are NERC Act 2006 Section 41 species of principal importance. The Site provides suitable nesting habitat.
Roosting bats	Local	European and UK protected species (Habitats Directive and Wildlife and Countryside Act 1981 (as amended)). Some species are NERC Act 2006 Section 41 species of principal importance.
Hedgehog	Local	NERC Act 2006 Section 41 species of principal importance and Kirklees BAP priority species.

4.0 Assessment of Effects and Mitigation Measures

4.1 Embedded Mitigation and Best Practice

The following design principles and "designed-in" mitigation have informed the assessment of impacts.

- Within the design of the proposal good practice environmental and pollution control measures are employed with regard to current best practice guidance such as, but not limited to, the following:
  - CIRIA C532, 'Control of water pollution from construction sites: guidance for consultants and contractors' (2001); and
  - CIRIA C741, 'Environmental good practice on site guide' (2015 4th Ed.).
- In line with the Landscape Masterplan[16], the following design principles include:
  - No residential development within at least 20 m of Blacup Beck to the north of the Site and retention/enhancement of vegetation to the north of the Site, with the nearest construction works associated with the creation of a SuDS basin, 20 m south of Blacup Beck;
  - Planting of a 226m long native species-rich hedgerow along the central part of the western Site boundary;
  - Retention and enhancement of 644m^2 of existing grassland in the north of the Site;
  - Creation of 2718m^2 of species-rich grassland and 860m^2 of wildflower meadow;
  - Planting of 115m^2 of native scrub; and
  - Planting of 39 new native trees across the Site, along residential roads and around the POS.

The following sections describes the predicted effects and proposed mitigation measures, focussing on the important ecological features identified in Table 3-1. Potential direct and indirect effects during the construction phase as well as the operational phase are assessed. Further details on proposed enhancement measures are provided in Section 4.11.

4.2 River (Blacup Beck)

4.2.1 Potential Impacts

The Site topography presents a significant risk during the construction phase for Site run-off to reach Blacup Beck on the northern Site boundary. Works will involve Site clearance and enhancement of the river itself (woodland thinning, removal of INNS and removal of large trash, Section 4.11) which may result in direct pollution impacts on the river. Due to the design layout, the nearest construction works include the creation of the SuDS basin, 20 m south of the river. No lighting is proposed within this northern area.

4.2.2 Proposed Mitigation Measures

Enhancement works shall be undertaken in low flow conditions, to limit bank disturbance and these works should minimise the construction time period where possible. INNS removal is discussed in further detail in Section 4.4.2.

[16] Highstone Master Plan version C dated 4th December 2025 (H24-0012_001C)

A Pollution Prevention Plan shall be developed and implemented on Site to ensure no water pollution events occur during construction. This must include the use of silt fencing, cut off drains, or similar measures, on the top of the field to prevent Site run off from travelling eastwards down the slope; therefore, protecting both the woodland and stream habitats. The Site compound and storage are to be sited at least 10 m from the watercourse with no refuelling within 10 m of the watercourse. Spill kits shall be readily available on Site at key locations, such as adjacent to the watercourse, and all staff shall be trained in spill response. Further guidance is provided in CIRIA C532, 'Control of water pollution from construction sites: guidance for consultants and contractors'[17].

With the above measures in place, no significant residual effect is predicted, and no contravention of wildlife legislation is anticipated.

4.3 Hedgerow and lines of trees

4.3.1 Potential Impacts

The majority of the existing hedgerows will need to be removed, to accommodate the development, including extensive 'cut and fill' operations. Only a 10m long section (the western end) of the central tree line (BL3) shall be retained. However, this will be mitigated for the planting of a 226 m long native species-rich hedgerow, on the western Stie boundary.

4.3.2 Proposed Mitigation Measures

To protect retained vegetation during construction, sturdy protective fencing would be erected around retained vegetation for the duration of construction, including the root protection areas, in compliance with British Standard BS 5837: 20121. Machinery would not be permitted within these areas. Good practice dust suppression techniques shall be used during construction to prevent dust from damaging the adjacent habitats, such as sheeting of materials and wetting down of excavated areas in dry conditions.

Tree planting of a new 226m native species-rich hedgerow and 39 trees (in addition to a number of trees in front gardens) will compensate for the loss of the hedgerows and treelines.

With the above measures in place, no significant residual adverse effect upon these habitats is predicted.

4.4 Schedule 9 INNS: Himalayan balsam and Giant Hogweed

4.4.1 Potential Impacts

Two Schedule 9 INNS were identified within the Site boundary in close association with Blacup Beck, namely Himalayan balsam and giant hogweed. There is potential for construction works to result in the wider spread of these INNS within the Site itself and off-Site.

4.4.2 Proposed Mitigation Measures

A pre-commencement INNS survey shall be undertaken between May and September to confirm the existing extent has not altered. Both species shall be removed as part of enhancement works to Blacup Beck which shall be undertaken in advance of construction works within the northern area adjacent to the river i.e. Site clearance or construction of the

[17] Masters-Williams et al., (2001) Control of water pollution from construction sites. Guidance for consultants and contractors (C532).

SuDS. Strict biosecurity measures will need to be implemented along the northern boundary, when working in close proximity to these INNS, which will be detailed in a Biosecurity Management Plan.

Himalayan balsam will be hand pulled or strimmed (ensuring the cut is below the first stem nodule) in spring prior to flowering and seed capsule production in July, as the seed capsules are sensitive to movement/ touch and will explode and spread seeds when ripe. Good practice management is available online at: https://www.nonnativespecies.org/assets/Good_Practice_Management_-_Himalayan_balsam.pdf.

Giant hogweed will be removed between mid-April and mid-May, via a specialist contractor due to the toxic sap produced by this species. Chemical removal is likely to be most effective, combined with mechanical control if possible. Good practice management is available online at: https://www.nonnativespecies.org/assets/Good_Practice_Management_-_Giant_hogweed.pdf.

With these measures in place, no significant residual effect is predicted, and no contravention of wildlife legislation is anticipated.

4.5 Reptiles

4.5.1 Potential Impacts

There is a small risk that reptiles, such as occasional grass snake traversing the Site, could be killed or injured during Site clearance and construction works.

4.5.2 Proposed Mitigation Measures

Precautionary working measures would be most appropriate to safeguard the low numbers of reptiles that may be encountered on-Site. This includes:

- Any features within the construction zone which could act as refugia/ hibernacula (such as farm equipment (TN4, Appendix C) or log and brash piles) would be carefully checked and removed by hand under the supervision of the Ecological Clerk of Works (ECoW). Any natural features would be moved into areas of retained vegetation within the Site. This shall be undertaken in the mid-March to mid-October active period, to avoid potentially disturbing hibernating species.
- Ground-level vegetation would then be cut in a directional manner, to encourage any reptiles that may be present to naturally disperse from the working area. Before vegetation clearance, the area would first be subject to a hand search by the ECoW. The cutting will be undertaken in a directional manner (within the area north of the central access track, this would be undertaken south to north and east to west within the southern area of the access track), to encourage reptiles to naturally disperse into suitable habitat off-Site. Vegetation within the construction footprint would be maintained at ground level for the duration of construction. Ground-level vegetation removal would be undertaken in the mid-March to mid-October active period (with the exception of above-ground tree and shrub habitat which would need to be removed in the September – February period outside of the nesting bird season, or a nesting bird check undertaken).
- If any reptiles are found during this process, they would be carefully moved by the ECoW to an area of suitable habitat well away from the construction zone. Similarly, if any other species are found during this process, such as hedgehog (*Erinaceus europaeus*), they would also be moved to an area of safety outside of the construction zone.

The above precautionary working methods shall also protect other fauna during the Site clearance and construction operations.

Logs and brash from vegetation clearance operations would be used to make habitat piles (a minimum of two) at the bases of the retained vegetation, in order to mitigate for the loss of refugia/ hibernacula opportunities.

Following the implementation of the proposed mitigation measures, no significant residual negative effect is predicted, and no contravention of wildlife legislation is anticipated.

4.6 Nesting birds

4.6.1 Potential Impacts

The Site offers suitable habitat for nesting birds in the form of existing hedges, trees and grassland, if left ungrazed, as well as farm equipment (TN4, Appendix C). There will be a minor loss of nesting and foraging habitat for birds and potential for construction works to damage or destroy nests and harm or kill birds.

4.6.2 Proposed Mitigation Measures

Wherever practical, all works to remove suitable nesting bird habitat, as detailed above, would be undertaken outside of the main nesting bird season, which extends between March and August inclusive. If works are required within this period, they would be preceded by a search for active bird nests by a suitably qualified ecologist. As a precaution, this would also include a check for ground-nesting birds within the grassland, if construction was to commence within the nesting bird season. If active nests are found, the nest itself and a suitable 'Biodiversity Protection Zone' buffer (to be determined by the ECoW) would be safeguarded until the young have fledged or the nesting attempt is otherwise complete.

With these measures in place, no significant residual effect is predicted, and no contravention of wildlife legislation is anticipated.

The planting of 39 trees, hedgerows and scrub, and the creation of wildflower grassland shall provide enhanced nesting and foraging opportunities for birds. In addition, integrated bird boxes shall be installed on 15% of the housing units, targeting swift (*Apus apus*), house sparrow (*Passer domesticus*), and starling (*Sturnus vulgaris*).

4.7 Bats

4.7.1 Potential Impacts

The residential development will result in the loss of one tree assessed as PRF-I (TN7, Appendix C). All other trees with roosting features will be retained. There is potential for temporary indirect impacts during construction for noise and light disturbance. The Site has been designed to maintain a buffer area around retained vegetation, such as to the north of the Site along Blacup Beck, north of the central access track and south of the POS.

Upon completion of the residential development, there is potential for light disturbance impacts on retained vegetation which may be utilised by bats. There will be a minor loss of commuting and foraging habitat for bats on Site.

4.7.2 Proposed Mitigation Measures

The oak tree (TN7, Appendix C) shall be soft felled under the supervision of a licenced bat ecologist, in accordance with current Bat Conservation Trust guidelines[8]. All limbs shall be carefully lowered to the ground after removal and left overnight prior to removal from Site.

One bat box shall be installed on the retained tree to the south of the Site to mitigate for the loss of the potential roosting resource within this tree.

Tree protection measures as outlined in Section 4.3.2 shall be implemented. Noise and light disturbance shall be minimised wherever possible with works undertaken in daylight hours. Should lighting be necessary during construction, this shall be kept to a minimum and avoid illuminating retained vegetation through the use of hoods and cowls to direct light away from bat habitat and minimise light spill.

To minimise light disturbance impacts upon completion of the residential development, a sensitive lighting scheme shall be adopted which ensures that light spill is minimised to the north of the Site, along the central access track corridor, POS and retained vegetation to the south of the POS. This can be achieved within these areas by implementing the following[18]:

- Use of narrow spectrum light with no UK or warm white light;
- Direct lighting downwards;
- Use of low-level lighting (e.g. 2 m high lighting columns);
- Use of hoods and cowls to direct lighting onto required areas and not onto adjacent habitats; and
- Restrict hours of light.

The planting of 39 trees, hedgerows and scrub, and the creation of wildflower grassland shall provide enhanced foraging opportunities for bats.

There will be additional tree and hedgerow planting across the Site to compensate for the loss of commuting and foraging habitats.

A bat box shall also be erected on a tree in the north of the Site, to provide a replacement alternative roosting feature.

In addition, integrated bat boxes shall be installed on 15% of the housing stock to enhance the Site for the following species, based on the desk study data: common pipistrelle, soprano pipistrelle, Leisler's, brown long-eared and noctule

4.8

4.8.1 Potential Impacts

Whilst no occur on Site, an active does occur in the surrounding area. The exact location shall not be released into the Public Domain, for animal welfare reasons, though detailed discussions have been held, and will continue to be held, with the Group and SLR Consulting, to ensure that works commence without adversely affecting the .

The is located on relatively high ground, and a sufficient distance from the Site, not to be directly impacted.

There will be a minor loss of commuting and foraging habitat for this species; however, connectivity will not be appreciably impacted.

[18] Stone, E. L. (2013) Bats and Lighting. Overview of current evidence and mitigation. Bats and Lighting Research Project, University of Bristol.

4.8.2 Proposed Mitigation Measures

A pre-commencement survey for shall be undertaken to determine if any new have been excavated on-Site, or in close proximity to the Site boundary. The following precautionary measures shall also be adopted during construction:

- Trenches or excavations should if possible be back-filled the same day. If this is not feasible, any trenches/ excavations left open overnight shall be provided with a sloping end or ramp to provide fauna that may fall in a means of escape; and
- Open pipes over 120mm in diameter shall be capped off at night to prevent fauna such as entering.

Tree and hedgerow planting as well as the creation of species rich grasslands shall mitigate for the loss of commuting and foraging habitat. With the above measures in place, no significant residual effect is predicted, and no contravention of wildlife legislation is anticipated.

4.9 Hedgehog

4.9.1 Potential Impacts

There is potential for hedgehog to become trapped or injured during construction works. There is also the potential for hedgehog to be prevented from accessing suitable habitat within gardens once the development has been built.

4.9.2 Proposed Mitigation Measures

The mitigation measures outlined above for shall also mitigate for construction impacts on hedgehog. Hedgehog highways would be created in all proposed garden fences, comprising minimum 15 cm x 15 cm gaps at the base of fencing, to allow hedgehogs unimpeded access across the Site and between gardens. The access gaps would be appropriately labelled with signs on both sides, to deter householders from blocking the purpose made gaps. An example of a hedgehog highway gap with appropriate labelling is shown in Plate 4-1. Hedgehog highway signs can be purchased from a number of manufacturers, such as The British Hedgehog Preservation Society[20].

[20] https://shop.britishhedgehogs.org.uk/product/hedgehog-highway-sign/

Plate 4-1: Example hedgehog highway fence gap with sign.

Tree and hedgerow planting will mitigate for the loss of suitable habitat for this species.

With the mitigation in place, no significant adverse effect is predicted.

4.10 Cumulative Effects

A review of the planning portal indicates an approved scheme located approximately 80 m northwest of the Site. The scheme includes the demolition of existing commercial buildings and erection of 180 dwellings with associated works (2021/62/93567/E).

The approved residential scheme located approximately 80 m northwest of the Site has potential to further exacerbate the impacts outlined in Sections 4.1 – 4.8. However, the mitigation proposed is considered sufficient to address cumulative effects of the two residential developments.

4.11 Proposed Biodiversity Enhancements

The proposed landscaping and habitat works on-Site would provide biodiversity enhancements by achieving at least 10% BNG, as detailed within the BNG report[1].

4.12 Summary of Effects

A summary of the potential impacts, proposed mitigation and residual effects is provided for each important ecological feature in Table 4-1.

Table 4-1: Summary of Potential Impacts, Proposed Mitigation, Meas of Delivery and Residual Effects.

Ecological Feature	Potential Impacts	Proposed Mitigation, Compensation and Enhancement	Means of Delivering Mitigation	Residual Effects
River (Blacup Beck)	Bank disturbance. Water pollution.	Limit bank disturbance. Pollution Prevention measures, using good practice guidance such as CIRIA C532. Enhancement of river.	Pollution Prevention Plan.	Not significant, no contravention of wildlife legislation.
Hedgerow and lines of trees	Loss of all but 10m of existing hedgerows and tree lines (loss of 320m in total).	Construction protective site fencing. Dust suppression. Additional tree and hedgerow planting on-Site.	Construction Environmental Management Plan (CEMP).	Not significant, no contravention of wildlife legislation.
Schedule 9 INNS: Himalayan balsam and giant hogweed	Spread within Site and off-Site.	Pre-construction survey. Removal of INNS.	Biosecurity Management Plan within CEMP.	Not significant, no contravention of wildlife legislation.
Reptiles	Small risk of inadvertent injury or killing during Site clearance.	Precautionary working measures during Site clearance operations, under supervision by the ECOW. Creation of log/ brash piles.	CEMP.	Not significant, no contravention of wildlife legislation.
Nesting birds	Killing or injuring birds. Damage or destruction of nests.	Removal of potential nesting habitat outside of main breeding bird season (i.e. September to February), or immediately following a search by an ecologist. Additional tree and hedgerow planting on-Site, enhancement of retained tree line and integrated bird boxes on 15% of properties.	Planning condition.	Not significant, no contravention of wildlife legislation.
Bats	Loss of one tree assessed as PRF-I (TN7). Noise and light disturbance. Loss of foraging/ commuting habitat.	Soft felling of tree (TN7) and bat box to be installed on retained tree. Tree protection measures. Minimise light and noise disturbance and direct light away from bat habitat.	CEMP. Planning condition.	Not significant, no contravention of wildlife legislation.

Ecological Feature	Potential Impacts	Proposed Mitigation, Compensation and Enhancement	Means of Delivering Mitigation	Residual Effects
		Sensitive lighting scheme. Additional tree and hedgerow planting on-Site, enhancement of retained tree line and integrated bat boxes on 15% of properties. Provision of a tree-mounted bat box in the north of the Site.		
Hedgehog	Killing or injuring hedgehog. Preventing access to suitable habitat.	Good practice construction measures. Hedgehog highways. Additional tree and hedgerow planting on-Site as well as enhancement of retained tree line.	CEMP.	Not significant, no contravention of wildlife legislation.

5.0 Conclusion

This report provides an assessment of the potential ecological impacts arising from a proposed residential scheme in Cleckheaton, West Yorkshire. The assessment has been informed by a desk study and ecological survey work undertaken in July 2024. The Site includes two locally important habitats (river and hedgerows/ lines of trees). Two Schedule 9 INNS: Himalayan balsam and giant hogweed were identified as ecological constraints. The Site is also considered locally important for bats and hedgehog with the following ecological receptors included for further assessment due to their legal protection: reptiles, nesting birds

Following the avoidance of sensitive ecological features, where possible, and reduction in impacts through sensitive design, and with the implementation of the proposed good practice measures and additional mitigation and compensation measures as outlined within this report, no residual significant adverse effects are predicted upon important ecological features, and no contravention of wildlife legislation is anticipated. A number of enhancements are proposed within this report.

Figure 1 UK Habitat Survey

Ecological Impact Assessment

Lower Blacup Farm, Cleckheaton

Newett Homes Limited

SLR Project No.: 424.065687.00001

12 December 2025

418400 418500 418600 418700 418800

424900 424800 424700

424.065278.00001.0001.0 UK Habitat Easeline

N

Hightown Road

Quaker Lane

Ashbourne Drive

Ashbourne Way

Ashbourne Avenue

Ashbourne Gardens

Ashbourne View

Ashbourne Croft

Penn Drive

Penn Grove

WB1 r2b

TN1 TN2 TN3 TN4 TN5 TN6 TN7

B1 g4 10 16 115 128 524

B2 g4 103

B3 u1c 528 839

B4 g4 10 16

B5 g4 101 108

B6 g4 101 108

B7 g4 101 108

B8 g4 108

B9 g4 10 16 128

LB1 h2a6

LB2 w1 33

LB3 w1 33

LB4 w1 33

LB5 w1 33

LB6 h2a6

LB7 h2a6

LB8 h2a6

LB9 h2a6

0 25 50 100

Metres

LEGEND

Site Boundary

Survey Boundary

Target Note

Primary Habitat Classification

Heathland and Shrub - Hedgerows

h2a6 - Other Native Hedgerow

Woodland and Forest

w1 - Broadleaved Mixed and Yew Woodland

Rivers and Lakes - Rivers and Streams

r2b - Other Rivers and Streams

Grassland - Modified Grassland

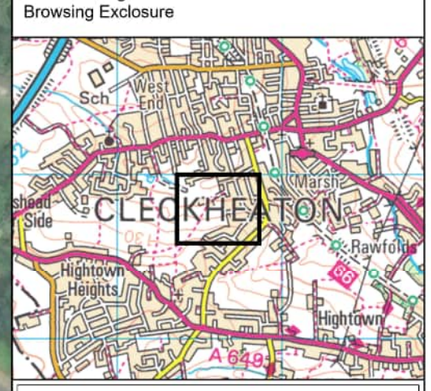
g4 - Modified Grassland

Urban - Built-up Areas and Gardens

u1c - Artificial Unvegetated, Unsealed Surface

Secondary Codes:

10 - Scattered Scrub
16 - Tall Forbs
33 - Line of Trees
101 - Cattle Grazed
103 - Horse Grazed
108 - Frequently Mown
115 - Grazing and Browsing Exclosure
128 - Tall or Tussocky Sward
524 - Invasive Non-native Species
528 - Walking or Cycling Route
839 - Track



NEWETT HOMES

SLR

Lower Blacup Farm, Cleckheaton

ECOLOGICAL IMPACT ASSESSMENT

UK HABITAT SURVEY

FIGURE 1

Scale 1:1,500 @ A3

Date SEPTEMBER 2024

Appendix A Landscape Masterplan

Ecological Impact Assessment

Lower Blacup Farm, Cleckheaton

Newett Homes Limited

SLR Project No.: 424.065687.00001

12 December 2025

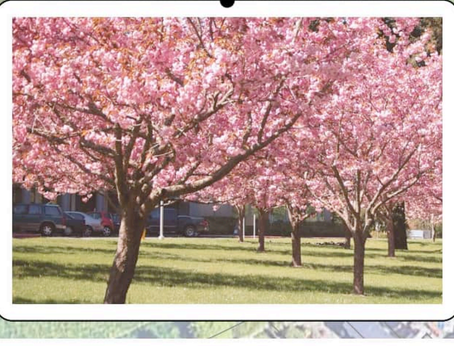
Enhanced meadow grassland beneath tree canopy - 644m²

Lawns, hedgerows, trees and ornamental planting will be a feature of the front gardens which will contribute to the character of the development whilst complimenting the surrounding area. This approach also creates clear separation between the public and private realms.

Opportunities to enhance the existing biodiversity of the site will be explored within the new open spaces. A combination of grassland and wildflowers will be incorporated into the new scheme to promote the creation of new habitats to boost local wildlife.

Retained tree line – 10m linear

The opportunity to include some seasonal interest at key nodal points within the scheme will be explored at the detailed design stage. The use of ornamental cherry could be incorporated into the scheme to provide some dramatic contrast to the streetscene. Evergreen shrub species will also be incorporated to balance the aesthetic of the scheme.



KEY

- Site boundary
- Existing PRoW
- Existing tree/vegetation (retained/removed)
  *Subject to Arboriculturist confirmation and production of Tree Retention Plan
- Proposed turf (front gardens) - 1,251m²
- Proposed POS tree
- Proposed street tree
- Proposed feature tree (eg. Cherry)
- Proposed front garden tree
- Proposed native scrub mix - 115m²
- Species rich grassland - 2,718²
- Proposed ornamental shrub - 170m²
- Formal low hedgerow (Private Gardens) - 355m linear
- Species rich native hedgerow - 226m linear
- Wildflower meadows - 860m²
- Gravel strips

NB. Rear gardens subject to customer preference - 4927m²

Maintenance
Planting and lawns in private areas will be maintained as detailed below until occupied. Once occupied, the planting and lawns in private areas shall be maintained by the individual plot holders.

All planting in open space areas shall be maintained as detailed below by the management company in good order with any plant material which dies within a five year period being replaced to the original specification.

Trees
All trees shall be regularly checked and any broken ties, guards or stakes replaced. Mulch shall be topped up to maintain original levels. In periods of dry weather all trees during years 1-5 shall be regularly watered to field capacity. The area around the base of each tree is to be kept mulched to 50mm depth minimum and weed free to a minimum diameter of 1 m during years 1-5. At the end of each growing season for years 1-5 all trees shall receive an application of slow release fertiliser. After approximately 5 years stakes and ties are to be removed once trees have established.

Hedgerows
All hedgerows shall be maintained weed and rubbish free and any loose plants re-firmed. All plant protection measures where employed shall be regularly checked and adjusted or replaced as required. All hedge lines shall be regularly watered in times of drought to field capacity during years 1-5 and shall receive an application of slow release fertiliser at the end of the growing season for years 1-5. Mulch shall be regularly topped up to original levels during years 1-5 Cutting hedgerows is to be undertaken outside the bird breeding season (March to end August). After approximately 5 years stakes and ties are to be removed once trees have established.

Ornamental Shrub Planting Areas
Plant borders are to be kept weed and rubbish free and any loose plants re-firmed. All borders to be regularly watered in times of drought during years 1-5 and receive an annual application of slow release fertiliser for years 1-5. Mulch shall be topped up annually to original levels during years 1-5.

Grass areas (front lawn of properties)
Any turfed areas which fail to provide a good quality initially vigorous grass sward shall be re-cultivated and resown/ re-turfed as required during the first season

Amenity Grass Areas
Areas of open space identified on the plan shall be mown regularly (maintained at approximately 25mm high). Collect and remove all arisings.

Meadow areas within open space
Meadow areas as identified on the plan shall be mown regularly throughout the first year of establishment to maintain the balance between faster growing grasses and slower developing wild flowers, and to remove competition from the first flush of annual weeds. From the second year of establishment onwards areas should be allowed to grow to full height and be cut once a year at the end of August. All arisings are to be allowed to lay in situ for ten days to allow seeds to be cast within the area prior to removal from site or composted in piles

Bulbs
Bulbs shall be allowed to die back within grass areas for a period of six weeks following flowering. Following this, mowing of these areas can be carried out (if applicable).

INDICATIVE PLANTING SCHEDULE

TREES

PLANT SPECIES	SIZE (GIRTH AND HEIGHT)
Acer campestre	12-14 cm 350-450 cm ht
Carpinus betulus	12-14 cm 350-450 cm ht
Fagus sylvatica	12-14 cm 350-450 cm ht
Betula pendula	12-14 cm 350-450 cm ht
Prunus subhirtella 'Autumnalis Rosea'	14-16 cm 450-600 cm ht

NATIVE HEDGEROW MIX

PLANT SPECIES	SIZE AND AGE	%
Acer campestre	B 60-90 ht 1+1	25
Alnus glutinosa	B 60-90 ht 1+1	20
Corylus avellana	B 60-80 ht 1+2	20
Fagus sylvatica	B 60-80 ht 1+1	10
Ilex aquifolium	B 40-60 ht 2lt	10
Viburnum opulus	B 40-60 ht 1+1	5

ORNAMENTAL HEDGEROW

PLANT SPECIES	SIZE AND AGE
Fagus sylvatica	90-120cm ht Instant Hedge
Prunus Lusitanica	90-120cm ht Instant Hedge
Euonymus japonicus 'Jean Hugues'	20-30cm ht (6 per linear metre)

SHRUBS

PLANT SPECIES	SIZE	DENSITY (/m2)
Aucuba japonica longifolia	5L pot 30-40cm	3
Ceanothus 'Autumnal Blue'	3L pot 40-60cm	3
Choisya ternata 'Aztec Pearl'	5L pot 40-60cm	3
Choisya x dewitteana 'Aztec Gold'	4L pot 40-60cm	3
Euonymous fortunei 'Emerald Gaiety'	5L pot 30-40cm	4
Euonymus fortunei 'Emerald 'n' Gold'	5L pot 30-40cm	4
Hebe albicans	5L pot 30-40cm	4
Lavandula angustifolia 'Hidcote'	5L pot 20-30cm	4
Photinia x fraseri 'Red Robin'	5L pot 40-60cm	3
Rosmarinus officinalis	5L pot, 40-60cm	4
Stipa tenuissima	5L pot, 30-40cm	4
Verbena bonariensis	3L Full pot	4

NATIVE SCRUB

PLANT SPECIES	SIZE	DENSITY
Acer campestre	B 60-90 ht 1+1	3
Ilex aquifolium	3L pot 30-40cm	3
Rosa canina	2L pot, 40-60cm	3
Sambucus nigra	B 60-90 ht 1+1	3
Viburnum opulus	B 60-90 ht 1+1	3

SPECIMEN SHRUBS

PLANT SPECIES	SIZE
Amelanchier lamarkii	10L pot 120-150cm
Buxus sempervirens	25L pot 100-120cm
Fatsia japonica	20L pot 70-100cm
Phormium 'Cream Delight'	15L pot 80-100cm

BULBS

PLANT SPECIES	SIZE (BULB GRADE)	Density (/m2)
Crocus bicolour mix	5-6 cm	25
Narcissus pseudonarcissus	7+ cm	30

Rev	Date	Note
D	08.12.25	Updated to reflect changes to visitor parking bays
C	04.12.25	Updated following clarifications regarding hedge retention
B	12.11.25	Updated to reflect layout changes - response to Landscape Officer

Lower Blacup Lane, Cleckheaton

N

Landscape Masterplan

DWG Ref. H24-0012_001D | Drawn/Checked By: SW | Scale - 1:500 @ A1 | Date: 08/12/25 | Client: Newett Homes

HIGHSTONE™ DESIGN

Appendix B Relevant Legislation and Planning Policy

Ecological Impact Assessment

Lower Blacup Farm, Cleckheaton

Newett Homes Limited

SLR Project No.: 424.065687.00001

12 December 2025

B.1 Relevant Legislation

A summary of legislation relevant to (onshore) biodiversity in England and Wales is provided below. Note that the summary provided here is intended for general guidance only and the original legislation should be consulted for definitive information.

B.1.1 Environment Act 2021

The Environment Act has wide ranging provisions including those around:

- Environmental governance;
- Environmental regulation;
- Waste and resource efficiency;
- Air quality and environmental recall;
- Water;
- Nature and biodiversity; and
- Conservation covenants.

Of particular relevance is Part 6 of the Act which introduces "biodiversity gain in planning" and will apply in England to planning applications under the Town & Countryside Act and the Planning Act. Schedule 14 now requires that biodiversity gain be a condition of planning permission in England. These changes will be enacted through subsequent secondary legislation or regulations. This part of the Act also changes the responsibilities that Government or public bodies have by strengthening the existing NERC Act biodiversity duty. Public authorities are now required to seek to conserve and enhance biodiversity in the exercise of their functions.

B.1.2 Conservation of Habitats and Species Regulations 2017 (as amended)

The Conservation of Habitats and Species Regulations 2017 (as amended) (the Habitats Regulations) consolidate the Conservation of Habitats and Species Regulations 2010 with subsequent amendments. The Regulations transpose Council Directive 92/43/EEC, on the conservation of natural habitats and of wild fauna and flora (EC Habitats Directive), into national law. Under the Habitats Regulations it is an offence to deliberately capture, kill or disturb[21] wild animals listed under Schedule 2 of the Regulations as well as damage or destroy a breeding site or resting place of such an animal (even if the animal is not present at the time). European Sites, including Special Areas of Conservation (SACs) and Special Protection Areas (SPAs), are also protected under the Habitat Regulations, and any proposal that could affect them will require an Habitats Regulations Assessment (HRA).

B.1.3 Natural Environment and Rural Communities Act 2006

Section 40 of the NERC Act 2006 places a duty on public authorities to have regard to the purpose of conserving biodiversity in the exercise of their functions. Public authorities include government departments, local authorities and statutory undertakers.

Section 41 of the Act (Section 42 in Wales) requires the publication of a list of habitats and species publish which are of principal importance for the purpose of conserving biodiversity. The Section 41 list is used to guide authorities in implementing their duty to have regard to the conservation of biodiversity.

[21] Disturbance, as defined by the Conservation of Habitats and Species Regulations 2010, includes in particular any action which impairs the ability of animals to survive, breed, rear their young, hibernate or migrate (where relevant); or which affects significantly the local distribution or abundance of the species.

B.1.5 Wildlife and Countryside Act 1981

The Wildlife and Countryside Act 1981, as amended by the Countryside and Rights of Way (CRoW) Act 2000 and the Natural Environment and Rural Communities (NERC) Act 2006, consolidates and amends existing national legislation to implement the Convention on the Conservation of European Wildlife and Natural Habitats (Bern Convention) and Council Directive 79/409/EEC on the Conservation of Wild Birds (Birds Directive), making it an offence to:

- Intentionally kill, injure or take any wild bird or their eggs or nests (with certain exceptions) and disturb any bird species listed under Schedule 1 to the Act, or its dependent young while it is nesting;
- Intentionally kill, injure or take any wild animal listed under Schedule 5 to the Act;
- intentionally or recklessly damage, destroy or obstruct any place used for shelter or protection by any wild animal listed under Schedule 5 to the Act;
- intentionally or recklessly disturb certain Schedule 5 animal species while they occupy a place used for shelter or protection;
- Pick or uproot any wild plant listed under Schedule 8 of the Act; or
- Plant or cause to grow in the wild any plant species listed under Schedule 9 of the Act.

B.2 Relevant Planning Policy

A summary of national planning policy relevant to (onshore) biodiversity in England and Wales is provided below. Note that the summary provided here is intended for general guidance only and the original policy documents should be consulted for definitive information. For local planning policy relevant to biodiversity the relevant local plans should be consulted.

The National Planning Policy Framework (NPPF)[22] sets out guidance for local planning authorities and decisionmakers in how to apply planning policies when drawing up plans and making decisions about planning applications. Along with Government Circular 06/053, the broad policy objectives in relation to the protection of biodiversity and geological conservation in England through the planning system are set out. Specific policies relating to habitats and biodiversity are set out in paragraphs 131, 174 and 179-182 of the NPPF.

Paragraph 131 states that:

"Trees make an important contribution to the character and quality of urban environments and can also help mitigate and adapt to climate change. Planning policies and decisions should ensure that new streets are treelined, that opportunities are taken to incorporate trees elsewhere in developments (such as parks and community orchards), that appropriate measures are in place to secure the long-term maintenance of newly planted trees, and that existing trees are retained wherever possible. Applicants and local planning authorities

[22] Department for Levelling Up, Housing and Communities (2023) National Planning Policy Framework https://www.gov.uk/government/publications/national-planning-policy-framework--2

should work with highways officers and tree officers to ensure that the right trees are planted in the right places, and solutions are found that are compatible with highways standards and the needs of different users"

Paragraph 179 states that:

"To protect and enhance biodiversity and geodiversity, plans should:

a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and

b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity."

Paragraph 180 states that:

"When determining planning applications, local planning authorities should apply the following principles:

a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;

b) development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;

c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists; and

d) development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate."

Paragraphs 181-182 relate to European sites (referred to as habitats sites) and state:

"The following should be given the same protection as habitats sites:

a) potential Special Protection Areas and possible Special Areas of Conservation;

b) listed or proposed Ramsar sites; and

c) sites identified, or required, as compensatory measures for adverse effects on habitats sites, potential Special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites.

The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site."

Appendix C Target Notes

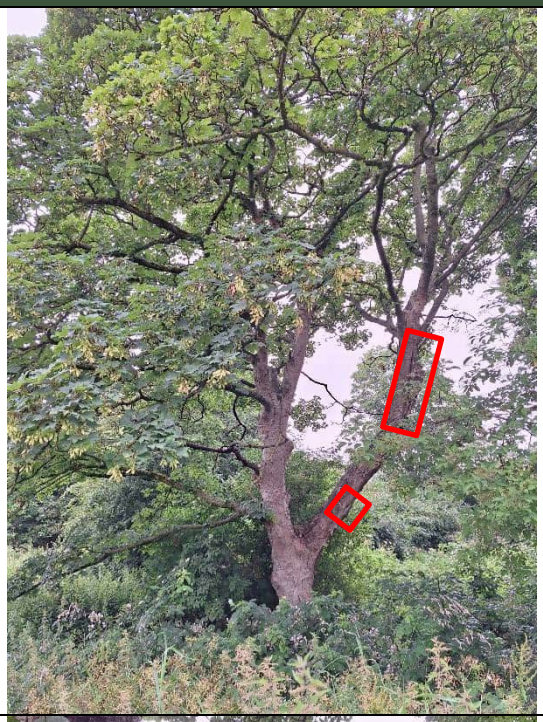
Ecological Impact Assessment

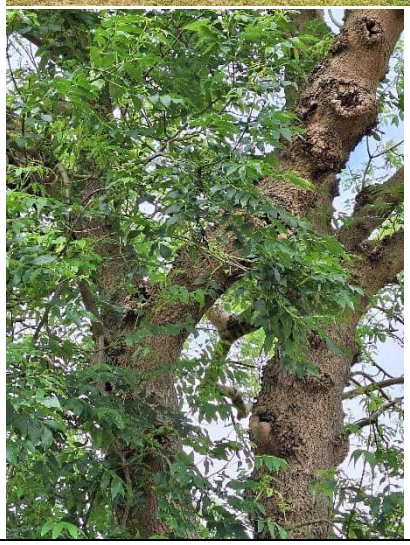
Lower Blacup Farm, Cleckheaton

Newett Homes Limited

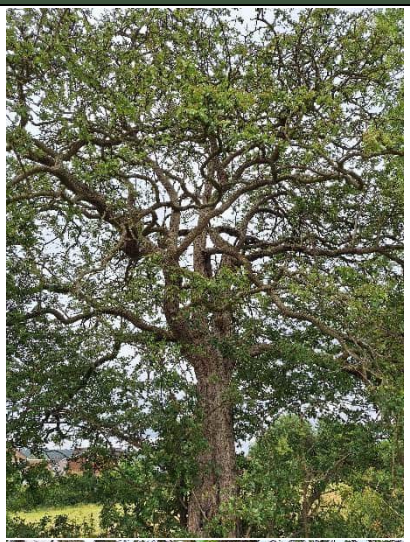
SLR Project No.: 424.065687.00001

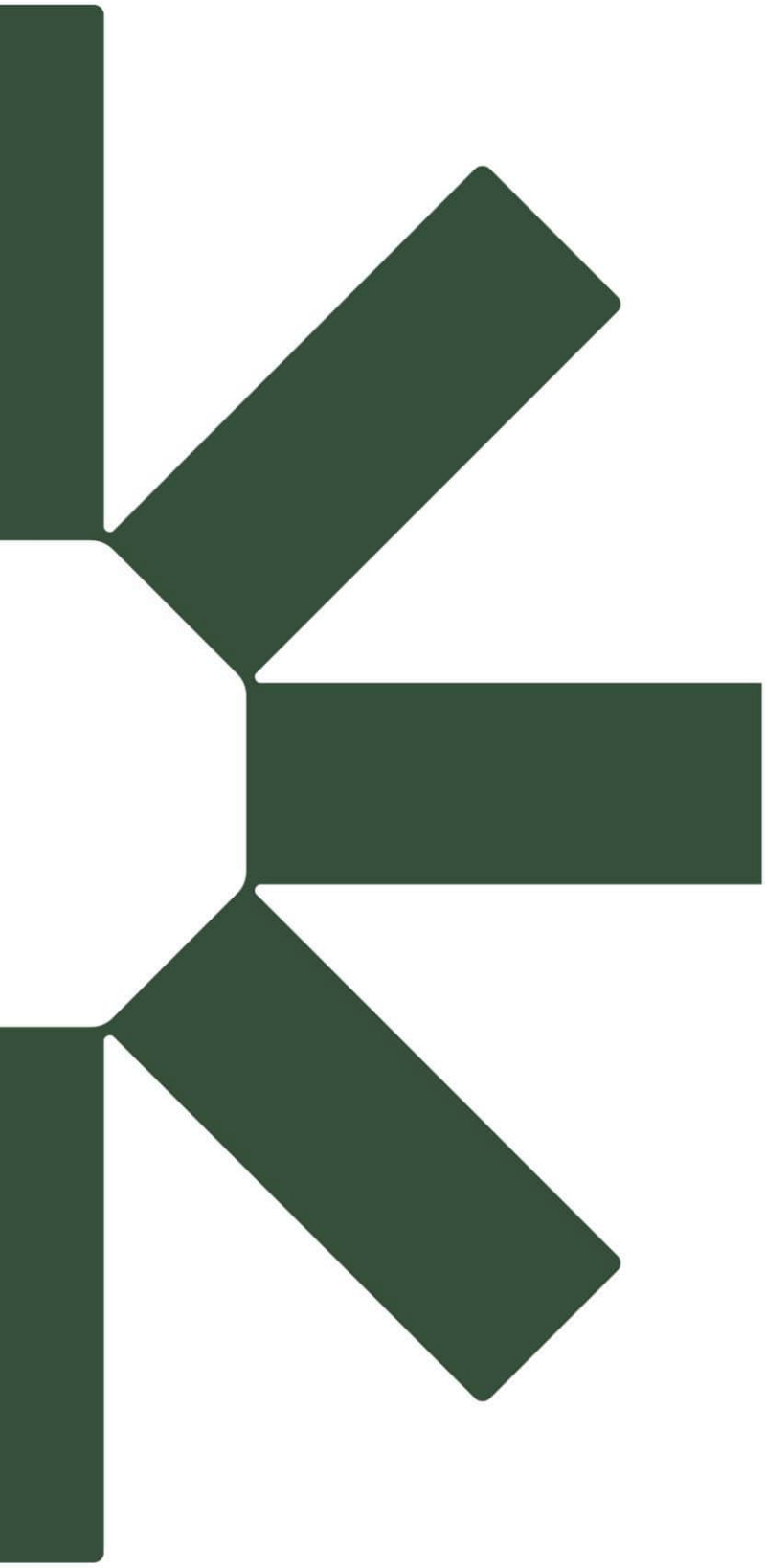
12 December 2025

Target Note Number	Description	Photograph
1	Mature sycamore tree to the northwest corner, immediately outside of the Site boundary. One small hole present on tree limb surrounding by larger tear out extending up tree limb, with small gaps only evident at upper extent. Roosting potential: PRF-I.	
2	Himalayan balsam evident within dense vegetation to the northwest of the Site, immediately upstream of the Site.	
3	Giant hogweed to the north of the Site, adjacent and within Blacup Beck.	

Target Note Number	Description	Photograph
4	Farm equipment in the centre of the Site.	
5	Ash tree on western Site boundary tree line with three small holes on limbs. Other deformities on tree limbs did not open into a hole or crevice suitable for roosting bats. Roosting potential: PRF-I.	 

Target Note Number	Description	Photograph
6	Schedule 9 INNS, Small-leaved cotoneaster within residential gardens on eastern Site boundary.	 

Target Note Number	Description	Photograph
7	Mature oak tree at the southern end of the Site. One small hole below a cracked tree limb and two small holes present below from torn our limbs. Roosing potential: PRF-I.	 



Making Sustainability Happen