KNIGHT SKY ECOLOGY
PRACTICAL ECOLOGY SOLUTIONS

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ECOLOGY TECHNICAL NOTE	
PROJECT	Land off Lidget St, Lindley, Huddersfield
SUBJECT	**PRELIMINARY ECOLOCIAL APPRAISAL (REVALIDATION AND UPDATE) & BIODIVERSTY NET GAIN STRATEGY**
DATE	11 December 2024
AUTHOR	Ryan Knight MCIEEM
ISSUED TO	Robert Halstead Chartered Surveyors & Town Planners

INTRODUCTION & BACKGROUND

Knight Sky Ecology Ltd was commissioned to provide ecological consultancy services in relation to a housing development located off Lidget St, Lindley Huddersfield. The development received outline planning permission on 29th April 2022 (Application no. 2021/60/90887/W). It is the intention to renew this consent.

A Preliminary Ecological Appraisal Report (PEAR) was submitted to the application in February 2021 (Quants Environmental Ltd, 2021). In light of the intervening time between the submission of the PEAR and the potential changes to the baseline ecological conditions, an update of ecological information was deemed to be required in order to revalidate the previous findings.

In addition, the commission also included the production of a Statutory Biodiversity Metric calculation tool (hereafter referred to as 'the metric tool') for the outline development. This technical note has also been produced to accompany the metric tool and provide an overview of the results.

In England, the primary legislation for the statutory framework for biodiversity net gain (BNG) is principally set out under Schedule 7A (Biodiversity Gain in England) of the Town and Country Planning Act 1990. This legislation was inserted into the 1990 Act by Schedule 14 of the Environment Act 2021, and was amended by the Levelling Up and Regeneration Act 2023.

Under the statutory framework for BNG, subject to some exceptions, every planning permission is subject to a condition that the biodiversity gain objective is met ("the biodiversity gain condition"). This objective is for development to deliver at least a 10% increase in biodiversity value relative to the pre-development

biodiversity value of the on-site habitat. This increase can be achieved through on-site biodiversity gains, registered off-site biodiversity gains or through statutory biodiversity credits.

METHODS

DESK STUDY

The information within this document is based upon a full audit of the following report:

- 1133b – Land off Lidget Street, Huddersfield. Updated Preliminary Ecological Appraisal. Quants Environmental Ltd 2021.

The desk study for the PEAR included an Ecological Records Search Report as provided by West Yorkshire Ecology Service (WYES). The information provided by WYES and as summarised in the 2021 PEAR remains valid and should be read in conjunction with this document. In addition, the report was informed by site surveys undertaken on 18th June 2018 and 12th February 2021.

FIELD SURVEY

A site visit was undertaken on 28th November 2024 by Ryan Knight MCIEEM (Full member of the Chartered Institute of Ecology and Environmental Management) to provide updated ecological information for the site. All habitats within the site were described and mapped using UK Habitat Classification (UKHab) definitions (UKHab Ltd, 2023). Dominant and notable plant species were recorded, and relative abundance was expressed using the DAFOR scale: dominant, abundant, frequent, occasional and rare.

In addition, the site visit included a search for incidental evidence of protected / notable species and an assessment of the sites potential to support protected / notable species.

The site visit was undertaken outside the main period for botanical surveys (i.e., the growing season of April to September). However, the site habitats were relatively basic and detailed botanical assessments were also obtained from the previous report (Quants Environmental Ltd, 2021).

BASELINE RESULTS

DESIGNATED SITES

Internationally & Nationally Designated Sites

The proposed development is not located within 2km of any statutory sites which are designated for their ecological interests.

Locally Designated Sites

No Local Wildlife Sites are located within 1km of the site.

Kirklees Wildlife Habitat Network

The site is not within or adjacent to the wildlife habitat network.

HABITATS

Photos which provide a general overview of the site and supporting data for the metric tool are provided in Appendix A. Figure 1 in Appendix B provides an overview of the habitat baseline as existing in November 2024.

General Overview

The site was a former development which contained a large building and annexes along with a car park and associated landscaping. The building was demolished between 2011-2015 (as based on Google Earth imagery); however, the associated car parking and access remains along with the stands of ornamental planting and lawn areas. The site appears to have remained largely unused since the demolition of the building. **No fundamental habitat changes have occurred since the previous ecology survey was undertaken in 2021.** Table 1.1 provides a summary of the habitat data for the site and includes the conversion of the Phase 1 Habitat definitions from the previous report to UK Habitat Classification definitions.

Table 1.1. Summary of Site Habitats

Phase 1 Habitat Survey Category (Quants Environmental, 2021)	UKHab Classification	General Description	Habitat Condition
Species-poor semi-improved grassland.	g4 - Modified grassland	The site contained five distinct areas of modified grassland (nos.1-5 on Figure 1). Parcel 1 comprised a species poor, managed lawn area entirely dominated by rye grasses with frequent creeping buttercup, occasional cocks-foot and occasional creeping thistle. Parcel 2 comprised a former lawn area that has not been managed for several years. As a result, the grassland was transitioning into a rank, more diverse sward. However, it did not yet meet the criteria of a neutral grassland (g3c – Other neutral grassland) and did not	Poor (all parcels)

		contain more than six vascular plant species per m^2. A species list is provided in the habitat condition assessment. Parcels 3-5 were small grassland margins along the former car park and access road.	
Hard standing	u1b6 - Other developed land	The former car park and access road.	N/A
Broad-leaved trees	34 - Ecologically valuable line of trees (x2) and 32 – Scattered Trees	The western boundary contained a line of mature sycamore with occasional beech, wych elm, oak and ash. The access route off Lidget St (and bounding the adjacent St Stephen's Parish Church) contained a line of sycamore, holly, beech and whitebeam. Scattered trees within the site included sycamore, cherry and beech.	Moderate (all trees assumed moderate).
Semi-natural broad-leaved woodland	828 – Vegetated garden with 32 – scattered trees.	Land comprised a previous allotment plot, much of which was covered in a weed-control membrane. However, young trees / tree seedlings were beginning to establish. The ground was bare aside from some bramble cover. Most trees seedlings were under a 7.5cm diameter aside from x3 willow, x1 horse-chestnut and x1 oak.	All trees assumed moderate.
Not listed	H2b – Non-native and ornamental hedgerow	The above-described allotment plot was bound on the west, east and south side by a garden privet hedge.	N/A
Hedgerow	H2a – Native hedgerow	A beech hedgerow lined the south boundary of the site.	Moderate
Not listed	847 – Introduced shrub	There were several small plots of non-native shrubs associated with the landscaping of the former car park. In addition, there was also occasional garden privet underneath the tree canopies of the line of trees along the access road.	N/A

Invasive species	Invasive species	As per the findings of the PEAR (Quants Environmental Ltd, 2021), three species listed on Schedule 9 of the Wildlife and Countryside Act 1981 (as amended) were identified at the site: • Japanese rose *Rosa rugosa* • Entire-leaved cotoneaster *Cotoneaster integrifolius* • Rhododendron *Rhododendron ponticum*	N/A

PROTECTED AND NOTABLE SPECIES OF FAUNA

No incidental evidence of protected / notable species was recorded during the site visit. Table 1.2 provides an overview of the relevant site survey results from 2021 and the updated survey in 2024.

Table 1.2. Summary of site survey findings

Ecological Feature	Results (2021)	Results (2024)
Birds	A range of common species may nest in trees, shrubs and hedgerows at the site including notable species such as dunnock, song thrush, starling and house sparrow. It is considered unlikely that specially protected species such as barn owl would occur at the site	No change.
Bats	Several mature trees along the site's western boundary were assessed as having low bat roost potential. In addition, three mature sycamore trees adjacent to the access route off Lidget St were assessed as having low bat roost potential.	No significant changes. Two further trees with potential roost features were observed. These comprised a beech with a knot hole (facing south at 6m height) and a sycamore with a knot hole (facing south-east at 5m height). However, both features were viewed adequately from the ground and both were not sufficiently recessed for use by bats.
Great crested newt	One waterbody was identified within 500 metres of the site. This was a highly ornamental water feature located approximately 90 metres south-west of the site. The waterbody extended to approximately 80 x 50 metres and had a concrete plinth around	No change.

	the entire perimeter along with a large number of permanent fishing pitches. The waterbody was understood to support a large population of fish including carp as well as numerous ducks. Based on the large population of fish including carp, which are known to be significant predators of great crested newts, it was considered that the waterbody is not suitable for breeding great crested newts.	
Other Fauna	The site provided poor quality habitat for reptiles. No evidence of badger was identified. Hedgehog could occur in the site.	No change.

BIODIVERSITY NET GAIN

On-site: baseline

A metric tool is to be submitted separately. The metric tool was completed without information obtained from an arboricultural assessment. Therefore, the diameter at breast height for each individual tree has been estimated only. A total of 11 small, three medium and one large tree have been included in the metric tool (lines of trees are assessed separately). In relation to the habitat parcels described in Table 1.1, the baseline biodiversity values of the site are as follows:

- 2.12 Habitat Units
- 1.8 Hedgerow Units

On-site: post development

A proposed site layout was not available at this outline stage. Therefore, an accurate evaluation of the post-development value of the site could not be made. However, a metric tool has been submitted based on an estimated value. Several important assumptions have been made for the post-development site including:

- All ecologically valuable lines of trees will be retained.
- All medium and large trees will be retained.
- Grassland parcels 4-5 (Figure 1) will be retained.
- Grassland parcels 1-3 will be lost.
- All ornamental planting will be lost.
- A total of 8 small trees will be lost.

- A ratio of 30% / 70% vegetated gardens to sealed surfaces (housing, driveways etc) has been calculated.

Based on these assumptions, the post development biodiversity value of the site would be:

- 1.12 Habitat units
- 1.8 Hedgerow Units

This would result in a net loss of -0.99 units (-47.01%) for habitats and -0.08 units (-4.29%) for hedgerows.

EVALUATION, CONLCUSIONS & RECOMMENDATIONS

Table 1.3 summaries the findings of the desk and field-based information for the site and provides an outline of the mitigation requirements for any potential impacts posed by the construction of the development. Ecological enhancements have also been recommended where relevant.

Table 1.3. Evaluation, Conclusions and Recommendations

Ecological Feature	Changes to original PEAR findings	Recommended Mitigation & Enhancements
Designated sites (statutory and non-statutory sites)	No change	No further assessment or mitigation required.
Site habitats	Minimal changes to site habitats as described above.	See BNG requirements set out below.
Invasive Species	No change.	An invasive species management plan is recommended in order to detail the measures that will be implemented to treat and manage the invasive species on the site.
Birds	No change.	It is assumed that all mature tree lines can be retained and as a result, no further assessment is recommended. Standard mitigation precautions recommended as detailed in the PEAR including the avoidance of vegetation clearance in the nesting bird season (March to August inclusive). Any such works undertaken within the bird nesting period (March to August inclusive) should be supervised by a suitably qualified ecologist. The supervising ecologist will advise all site personnel of the potential presence of nesting birds, their legal protection

Ecological Feature	Changes to original PEAR findings	Recommended Mitigation & Enhancements
		and the need to minimise disturbance of nesting birds. If active nests are present, they must be retained in situ undisturbed until the nests are no longer in active use. A nest is classed as active when it contains eggs or chicks and when it is being built. A bird box scheme is recommended with bird boxes provided on at least 10% of the dwellings. It is recommended that bird nest boxes suitable for house sparrow, starling and swift should be provided.
Bats	No change	It has been assumed that all mature lines of trees are to be retained. Bat activity levels are expected to be relatively low within the site and no further activity surveys are recommended if the tree lines can be retained and protected. It is advised to avoid lighting the tree lines (particularly along the western boundary and along the boundary of St Stephen's Church). It should be noted that the public footpath adjacent to the western boundary does contain some lighting. It is advised to adopt good practice guidance for the lighting plans with reference to "Guidance Note 8 Bats and Artificial Lighting" (Bat Conservation Trust & Institution of Lighting Professionals, 2023). A bat box scheme is recommended with bat boxes to be installed on at least 10% of the new houses.
Other protected / notable species	No change	In order to protect animals including hedgehog during any construction phase, good practice methods should be implemented throughout works. These include covering or ramping any excavations to prevent mammals from falling in and becoming trapped, capping any open pipework over 200mm in diameter and ensuring any chemicals and machinery are stored within a secure compound.

Biodiversity Net Gain

Based on current plans, the development will not meet the BNG condition as the 10% net gain for habitats and hedgerows will not be achieved. Aside from small trees, the development will result in the loss of habitats of low distinctiveness only. No priority habitats will be impacted and the mitigation hierarchy will be adhered to (provided that mature trees are retained).

In order to achieve a net gain of at least 10%, the developer must consider the following options:

- Maximise biodiversity enhancements within the site by incorporating green spaces (either for public amenity use or as designated wildlife areas) and provide habitats of higher biodiversity value in such areas such as mixed scrub, neutral grassland, trees etc.
- Set up a purchase agreement for the required habitat units from a third-party provider (e.g., the Environment Bank). This is considered a simple purchasing process in which the third party provides a quote for providing the required biodiversity units and for all the management and monitoring commitments (on their own land) without any further onus on the developer. This is considered to be the most feasible option.
- Achieve net gain on a parcel of land under the ownership of the developer and ideally within the same locality as the site. This land would need to be subject to a UKHab survey. Any land proposed for use for off-site BNG must be a registered biodiversity gain site. To be eligible for registration on the biodiversity net gain site register, land must be secured by legal mechanisms. In order to register a biodiversity site and allocate to the development at the same time, a planning application decision notice is needed along with several other requirements (see – https://www.gov.uk/guidance/register-a-biodiversity-site-and-allocate-to-a-development).
- Contact the council regarding using their habitat bank vehicle as the council may be in a position to sell biodiversity units by the time the application is consented and the relevant planning condition needs to be discharged.
- As a last resort, purchase statutory biodiversity credits from the Government.

Please be aware that a 'spatial risk multiplier' (SRM) will apply which may increase the number of biodiversity units needed to achieve a 10% gain if there are no suitable options for off-site net gain within the local authority area.

The information provided in this document is considered sufficient in suggesting that the BNG condition is more than capable of being discharged.

FURTHER REQUIREMENTS

The following documents are advised to be submitted as part of the BNG and biodiversity protection and enhancement requirements:

- A Species Enhancement Plan - in respect to bats, birds and other relevant wildlife.
- An Invasive Non-native Species Management Plan – in respect of the invasive species on the site.
- An amended metric tool along with a Biodiversity Gain Plan (BGP) once the development layout has been finalised.

The BGP should be submitted and approved by the planning authority to discharge the biodiversity gain condition prior to the commencement of development. The BGP should detail the measures undertaken to achieve the required 10% net gain as outlined in the options above. The statutory framework for biodiversity net gain involves the discharge of the biodiversity gain condition following the grant of planning permission to ensure the objective of at least 10% net gain will be met for a development. The determination of the BGP under this condition is the mechanism to confirm whether the development meets the biodiversity gain objective. Development may not be begun until the BGP is approved.

APPENDIX A. PHOTOS

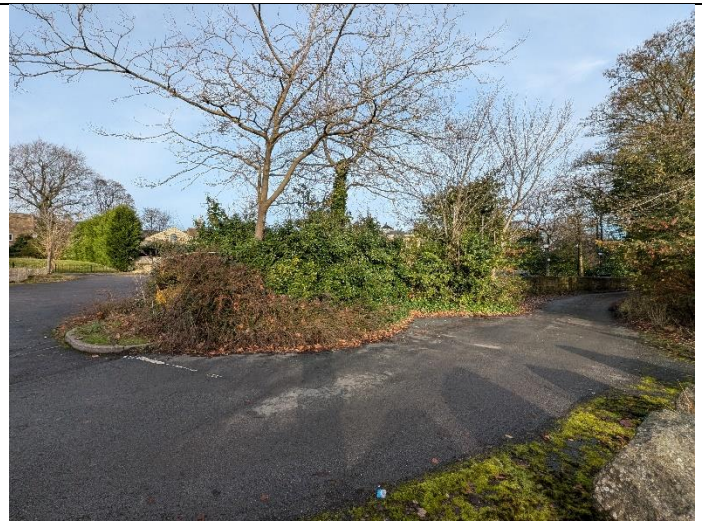
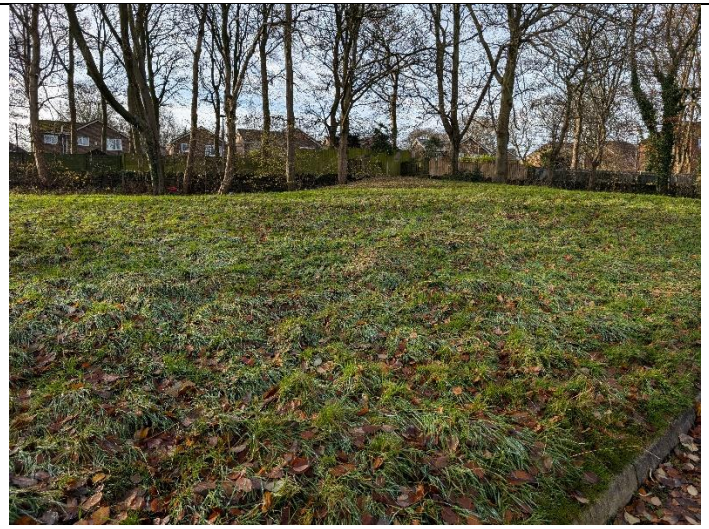
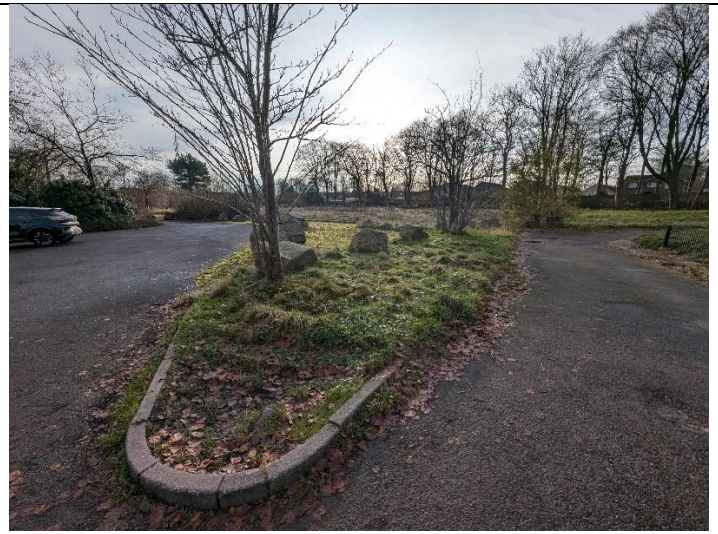
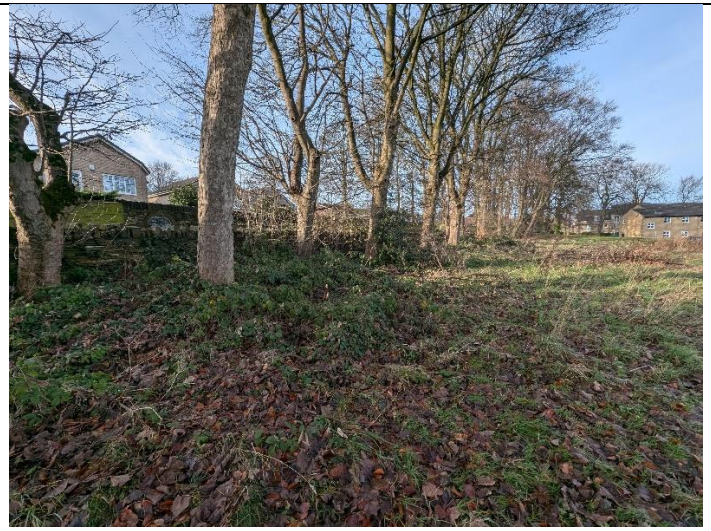
Photo 1. View of existing access to site from Lidget St.		**Photo 3.** Grassland parcel 1.	
Photo 2. View south over site.		**Photo 4.** View of west boundary line of trees.	

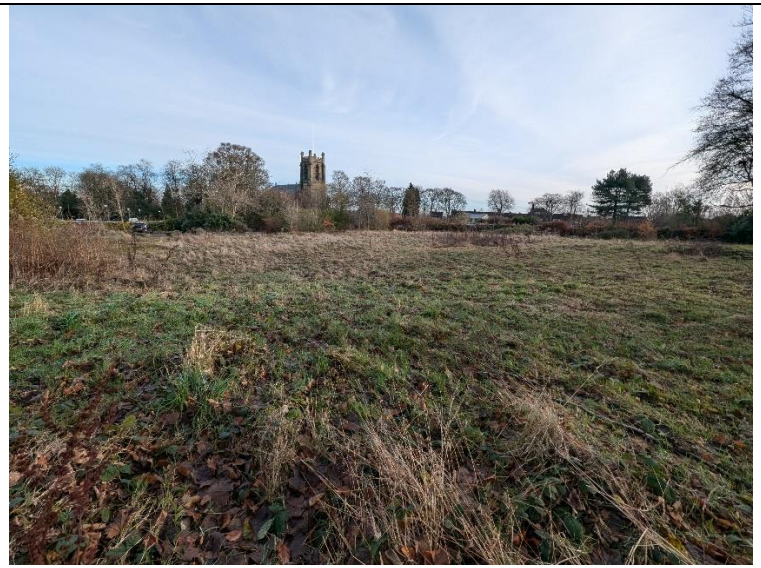
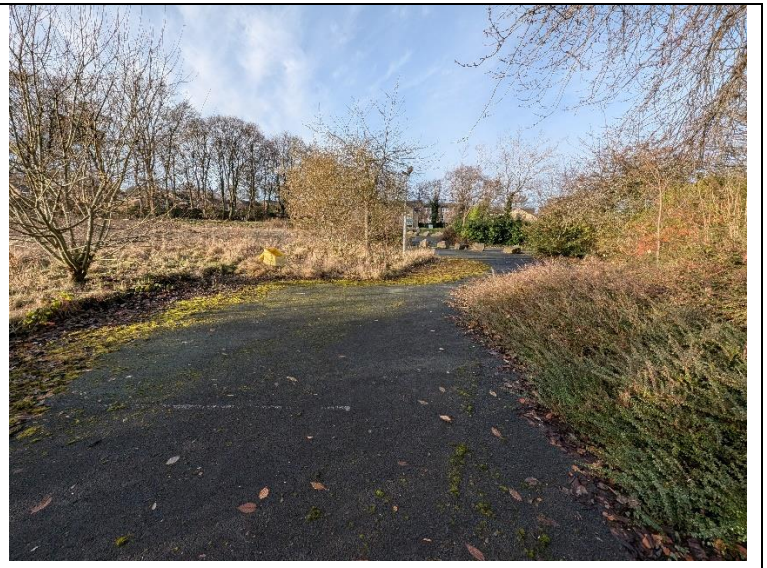
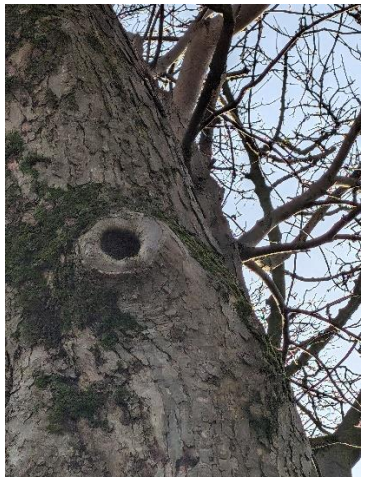
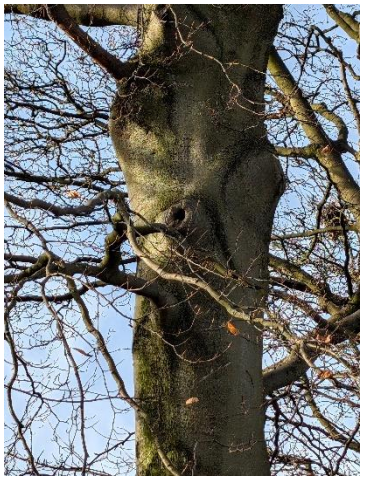
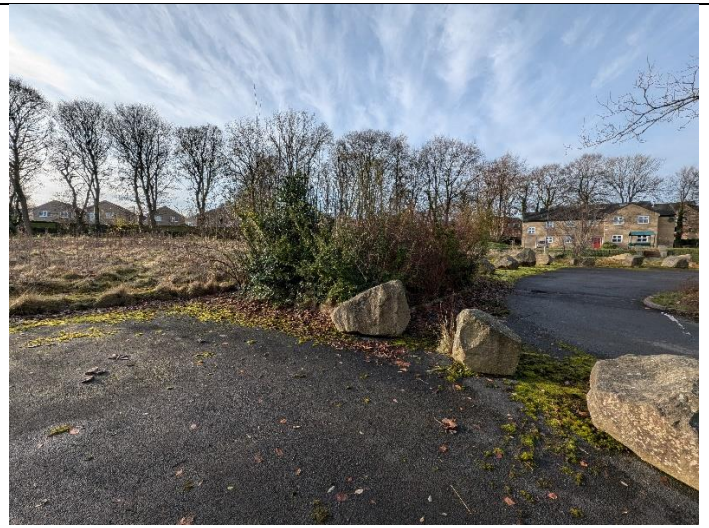
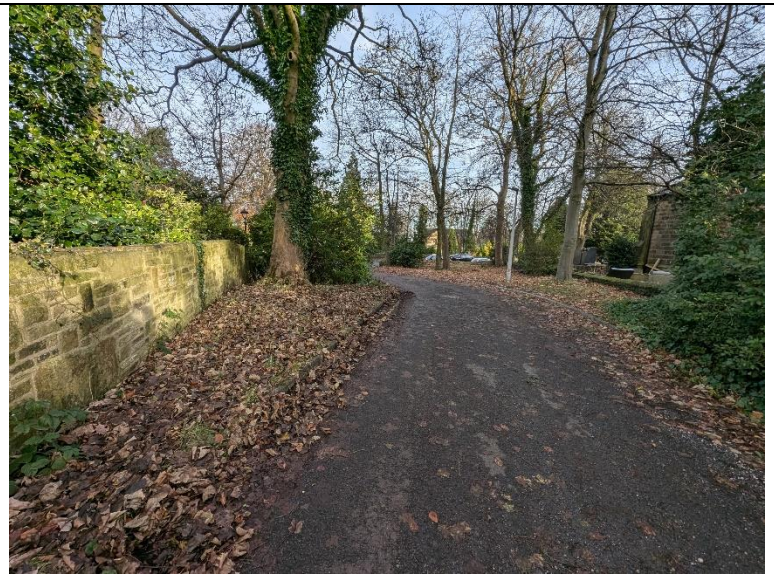
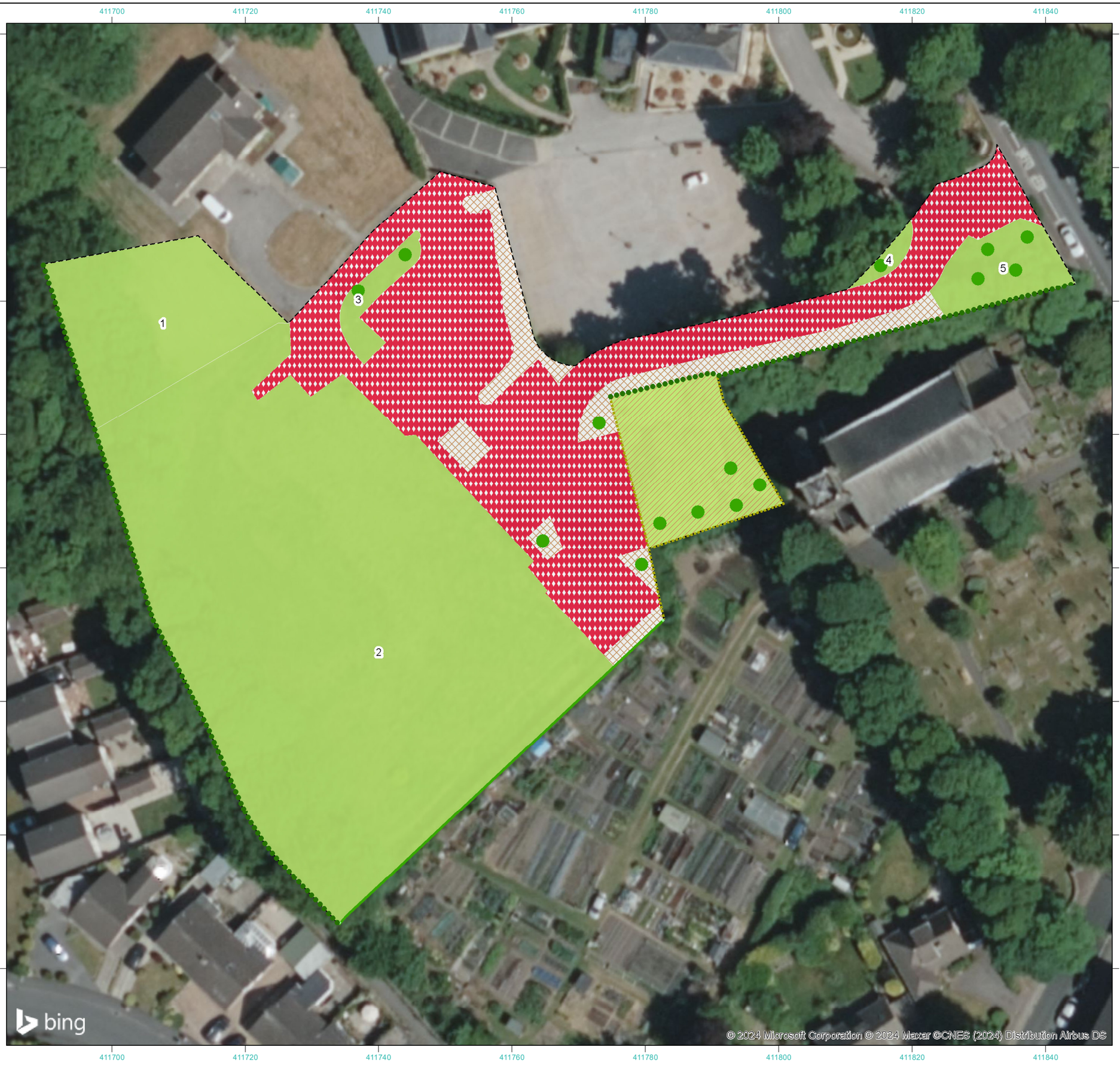
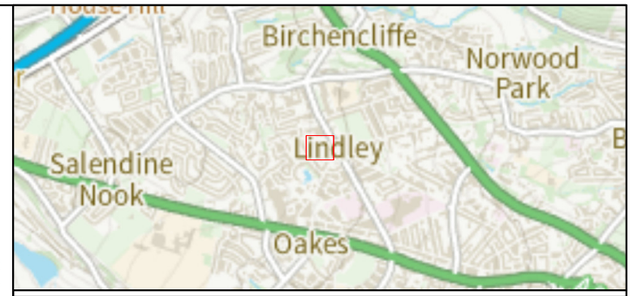
Photo 5. View over main grassland area within the site (Parcel 2).		**Photo 7.** View northwards.	
Photo 6. Knot holes in sycamore and beech tree on west boundary. Not recessed.	 	**Photo 8.** View westwards.	

Photo 9. View east towards site entrance.		**NA**	NA

APPENDIX B. FIGURE

Figure 1. UK Habitat Classification Map (next page)





Survey Information	
	Site boundary (7,305.4m^2)

UKHab Habitat Survey	
	g4 - Modified grassland(4,579.2m^2)
	u1b6 - Other developed land(1,941.2m^2)
	828 - Vegetated garden(412.4m^2)
	847 - Introduced shrub(372.6m^2)
	h2a - Native hedgerow (66.8m)
	h2b - Non-native and ornamental hedgerow (77.2m)
	34 - Ecologically valuable line of trees (181.9m)
	32 - Scattered tree (15)

g4 - Modified grassland areas:

1 - 590.9m^2
2 - 3688.4m^2
3 - 81.9m^2
4 - 28.3m^2
5 - 189.7m^2

0 2.5 5 10 15 20 25
Metres

PROJECT TITLE

LAND OFF LIDGET STREET, LINDLEY, HUDDERSFIELD

DRAWING TITLE

Figure 1: UK Habitat Classification Map (Baseline)

VER	DATE	REMARKS	Drawn	Checked
1.2	10/12/24	UKHab	MP	RK

DRAWING NUMBER:

KSEcology/LidgetStreet/UKHab

SCALE	1:550	PLOT SIZE	A3	DATUM	OSGB	PROJECTION	BNG

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