Main Avenue, Kirklees

Interim Ecological Impact Assessment

11/12/2024

Strata Homes Ltd/Thirteen Group Ltd

Report Ref. ER-7172-04

Report reference	**ER-7172-04 Interim EcIA**
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Date	11/12/2024
Report duration	In accordance with CIEEM (2019), unless otherwise stated the findings of this report remain valid for a period of 18 months. After this period advice should be sought on the scope of any updating work required.

Contents

Summary

The Site is occupied primarily by medium distinctiveness habitats, with some smaller areas of low and very low distinctiveness habitats also present.

Proposals are expected to result in the loss of most of the habitats currently present on the Site.

Further surveys have been recommended for:

- Badgers (surveys to be carried out in winter 2024/25),
- roosting bats (tree assessment recommended once removal plan has been finalised),
- bat activity (three out of three seasonal activity surveys completed, monitoring data collected across summer and autumn 2024 with spring data collection to take place in 2025; and
- breeding birds (surveys to be carried out in 2025).

Using the Defra Statutory Metric Calculator tool, the scheme is expected to result in a net loss in Habitat Units. For the scheme to achieve a 10% net gain, an additional 28.81 Habitat Units will need to be generated through Biodiversity Offsetting.

Habitat Units will need to meet trading rules, with 26.93 habitat units of medium distinctiveness habitat (within the suitable broad habitat categories) required.
A total of 0.16 Hedgerow Units will be gained as part of the proposals, from 0 Hedgerow Units prior to development.

The following mitigation is recommended to deal with residual significant effects; these documents could be secured via standard conditions provided in the British Standard BS:42020.

- A BS:42020 Biodiversity Management Plan (BMP) or a Habitat Management and Monitoring Plan (HMMP)
- A BS:42020 Construction Environmental Management Plan (CEMP: Biodiversity)
- A Lighting Plan

1. Introduction

1.1.1 Brooks Ecological Ltd was commissioned by Strata Homes Ltd/Thirteen Group Ltd to carry out an Ecological Impact Assessment (EcIA) for their proposed development at Main Avenue, Kirklees.

1.1.2 The British Standard BS:42020 recommends that a proportional assessment of ecological impacts should be made - such that decision making relating to the NPPF 'mitigation hierarchy', the planning balance', and the use of conditions is suitably informed.

1.1.3 The purpose of the EcIA report is to use the information gathered, alongside the proposals for the Site, to:

- identify any significant effects associated with the proposed development,
- set out any mitigation (including monitoring) required to address these effects, and to ensure compliance with legislation and policy,
- identify suitable enhancement,
- identify measures required to secure mitigation and enhancement,
- identify and assess any residual effects and their legal, policy and development management consequences.

1.1.4 This report adapts the format set out in the Chartered Institute for Ecology and Environmental Management (CIEEM) guidelines for Ecological Report Writing (December 2017).

CIEEM

Ecological Impact Assessment (EcIA) Checklist

ALGE Association of Local Government Ecologists

	EcIA Criteria (to ensure decisions are based on adequate information in accordance with Clauses 6.2 and 8.1 of BS42020:2013)	Yes No n/a	Paragraph reference number(s)
Pre-app/ scope	1. Where pre-application advice has been received from the Local Planning Authority and/or an NGO and/ or statutory body (e.g. NE DAS, NRW DAS)[i], it has been fully accounted for in the EcIA		
	2. The scope, structure and content of the EcIA is in accordance with published good practice[ii, iii and iv]		
Surveys, Sites, Species and Habitats	3. Adequate[v] and up-to-date[vi]: a. Desk study has been undertaken[vii] b. Phase 1 habitat survey (or equivalent) has been undertaken[viii] c. Phase 2 ecology surveys have been undertaken (where necessary)[viii]		
	4. All statutory and non-statutory sites likely to be significantly affected are clearly and correctly identified		
	5. All protected or priority species and priority habitats[ix] likely to be significantly affected are clearly and correctly identified, and adequate surveys have been undertaken to inform the baseline		
	6. Any invasive non-native plant species present are clearly and correctly identified		
	7. Where a separate PEA Report states that Phase 2 ecology surveys are required, these have been undertaken in full and results submitted with the application (or lack of such surveys is justified)		
Impacts and Effects	8. The assessment is based on clearly defined development proposals along with relevant drawings/plans (and any plans used are the same version number as those submitted with the application) or 9. The residual ecological effects are considered to be not significant at any geographical scale irrespective of the detailed development proposals, and the assessment is based on a worst-case-scenario		
	10. The report describes and assesses all likely significant ecological effects (including cumulative effects) clearly stating the geographical scale of significance (where relevant)		
Mitigation, Compensation and Enhancement	11. The mitigation hierarchy has been clearly followed[x]		
	12. The report: a. Clearly identifies the proposed mitigation and compensation measures, and explains how these will adequately address all likely significant adverse effects b. Includes, where necessary, proposals for post-construction monitoring c. Recommends how proposed measures may be secured through planning conditions/obligations and/ or necessary licences		
	13. A summary table of proposed mitigation and compensation measures has been provided		
	14. The need for any mitigation licences required in relation to protected species is clearly identified		
	15. Proposals to deliver ecological enhancement/Biodiversity Net Gain have been provided		
Competence/Good Practice	16. Limitations[xi] of the ecological work have been correctly identified and the implications explained		
	17. All relevant key timing issues (e.g. site vegetation clearance or roof removal) that may constrain or adversely affect the proposed timing of development have been identified		
	18. All ecological work and surveys accord with published good practice methods and guidelines OR deviation from such guidelines is made clear and fully justified, and the implications for subsequent conclusions and recommendations made explicit in the report[xii]		
	19. All ecologists and surveyors hold appropriate species licences (where relevant) and/or have all necessary competencies to carry out the work undertaken		
Conclusions	20. The report clearly identifies where the proposed development complies with relevant legislation and policy, highlighting any possible non-compliance issues, and highlighting circumstances where a conclusion cannot be drawn as it requires an assessment of non-ecological issues (such as socio-economic ones)		
	21. The report provides a clear summary of losses and gains for biodiversity, and a justified conclusion of an overall net gain for biodiversity		
	22. Justifiable conclusions[xiii] based on sound professional judgement[xiv] have been drawn as to the significance of effects on any designated site, protected or priority habitat/species or other ecological feature, and a justified scale of significance has been stated		

2. Method

2.1. Scope of Assessment

2.1.1 The application site 'the Site' encompasses a parcel of unmanaged land on the southern edge of Cowlersley, Kirklees. The extent of this assessment is the development area within the red line boundary and a small area of adjacent blue-line land, defined in Figure 2.1, opposite.

2.1.2 The assessment uses a 2 km area of search around the Site for records of protected and notable species and locally or nationally designated wildlife sites.

2.1.3 Ecological surveys and reports informing this assessment comprise of the following:

- Preliminary Ecological Appraisal, Brooks Ecological Ltd ER-7172-01A. June 2024
- Biodiversity Net Gain – Part 2, Brooks Ecological Ltd ER-7172-03A. December 2024
- Interim Bat Activity, Brooks Ecological Ltd ER-7172-05. November 2024.

2.2. Field Survey

2.2.1 Full details of the methodologies used, and the results obtained are contained in the relevant documents referenced above. Unless stated otherwise these followed the relevant survey guidelines refenced in reports.

2.2.2 Bat surveys have been undertaken across spring, summer and autumn of 2024 and it has been possible to draw a conclusion about how the Site is used and by which species from this group. Additional monitoring is to be carried out in spring of 2025 to complete this assessment.

2.3. Desk Study

2.3.1 A full desk study including consideration of local biological records, aerial photographs, local designations, and planning guidance has been carried out.

Figure 2.1 Site area under assessment

2.4. Assessment Method

2.4.1 In assessing the significance of effects, we refer to Section 5 of CIEEM (2018) - that a 'significant effect' is an effect that either supports or undermines biodiversity conservation objectives for 'important ecological features' or for biodiversity in general. In relation to ecological features, we consider the following factors in combination, including;

- the feature's value on an ascending scale, from Site to international value,
- the site's position in the local landscape,
- its current management, and
- its size, rarity, or threats to its integrity

2.4.2 There are several tools available to aid this consideration, including established frameworks such as Ratcliffe Criteria or concepts such as Favourable Conservation Status. Also of help is reference to Biodiversity Action Plans in the form of the Local BAP and Section 41 of the NERC Act (2006) to determine if the Site supports any Priority Habitats or Habitats of Principal Importance, or presents any opportunities in this respect.

2.4.3 The assessment considers the development proposals set out below, from which the potential impacts can be summarised as:

- Vegetation and habitat removal
- Disturbance, pollution, or interference arising from the Site's construction
- Disturbance, pollution, or interference arising from the Site's operation

2.4.4 This report deals with any significant effects potentially arising from these impacts. It looks at how the mitigation hierarchy can be applied to any effects and the implications of any residual significant effects.

3. Ecology Baseline

3.1.1 A *summary* of the points salient to this assessment are set out below:

3.2. Designated Sites and Conservation Areas

3.2.1 Impacts on Statutory (International and National) designations or their interests have been ruled out at PEA Stage.

3.2.2 Part of the mapped West Yorkshire Habitat Network is present off-site to the south-east and recommendations have been made to prevent impacts on this feature.

3.3. Habitats

3.3.1 The Site comprises habitats mapped opposite and described in the table overleaf.

3.4. Potential future changes to the baseline

3.4.1 The Site's use and ecological baseline will likely be unchanged until the time of the proposed development.

3.4.2 In the absence of development, the small, developed areas of the site will remain in use at the current levels, with vegetated areas likely to slowly become more rank, until native scrub covers the areas of grassland. The Site would eventually succeed to woodland.

Figure 3.1 The Site's habitat baseline (Brooks Ecological PEA Report, June 2024)

3.4.3 The table below sets out the habitats at this Site and their relevance in this assessment.

Table 3.1 Site Habitat/Hedgerow/River Summary

Habitat Feature	Notes	Valued at what scale
Developed Land; sealed surface	Tarmacadam roads and concrete bases under detached garages.	None – Negligible
Artificial unvegetated, unsealed surface	Loose gravel car park, now with blocked access.	None – Negligible
Vegetated garden	A small area of managed garden with lawn and shrubs.	None – Negligible
Introduced shrub	Small area of dense non-native shrub associated with housing	None – Negligible
Bramble scrub	Areas of dense scrub with bramble the dominant species	Site level
Mixed scrub	An area of scrub with a mix of woody species	Site level
Other broadleaved woodland	A small area of woodland straddles the northern Site boundary, with half within the red-line boundary.	Local level
Other lowland acid grassland	A small section of a field in the south-east of the Site, where sloping ground leads to more acidic soil conditions with associated plant species.	Site level.
Other neutral grassland	The dominant habitat covering the Site. Unmanaged grassland, with informal footpaths throughout. A mix of grasses and forbs are present, as well as scattered taller forbs.	Site level
Individual trees	A total of 134 trees are present, ranging from small to large in size, with a mix of broadleaved species.	Local level

3.5. Species and Species Groups

3.5.1 Potential constraints relating to relevant groups were investigated through the surveys listed above. Those highlighted are of relevance to the Site and are referenced later in the assessment.

Table 3.3 Summary of relevant faunal issues

Species/ Group (Feature)	Notes	Valued at what scale
Bats	Monitoring and surveys to establish the current baseline of how bat's use the Site is currently ongoing, through seasonal activity surveys. The Spring, Summer and Autumn activity survey found that the Site attracts only low levels of bat activity, with walked transects only recording common pipistrelle. Activity was focussed on the scattered trees in the centre of the Site, and off-site towards the south and a mature woodland edge. Remote monitoring has logged a total of five species of bat making use of the Site, with common pipistrelle being by far the most recorded. Daubenton's, noctule, brown long-eared and Leisler's bat. were also recorded, but at much lower levels. Overall, the seasonal bat activity surveys have found the Site to be of low importance to bats. Spring monitoring will be carried out in 2025 to confirm this assessment. A Bat Roost Suitability Assessment of the trees to be felled or pruned as part of proposals is recommended.	Site Level
Birds	With a variety of habitats present on-site, breeding bird surveys were recommended and will be carried out between March and June 2025.	TBC
Badger	Suitable habitat is present for badgers throughout the Site. A detailed badger survey has been recommended and will be carried out during autumn/winter of 2024/25, when vegetation has died back allowing better access.	TBC
Other fauna	Other species have been considered in previous reporting and scoped out of further assessment. Standard precaution applies to hedgehogs, to be outlined in a CEMP.	N/A

4. Description of the Proposed Development

4.1.1 Proposals are for the Site's development, with the construction of new houses and associated access roads and pathways.

4.1.2 Outline proposals have had the opportunity to respond to the PEA, with modifications possible following the completion of protected species surveys scheduled for 2024/5. The following sections examine impacts resulting from the proposals which could not be avoided.

4.1.3 Impacts are assessed on the basis of the effects impacting the valued habitats, species, or sites which have been identified above.

4.1.4 The following plans have been provided by the client to inform this assessment:

- Landscape Masterplan (Figure 3) 500@A1 dwg. R/2784/1E (FDA Landscape, December 2024).

Figure 4.1 Site Layout R/2784/1E (FDA Landscape, December 2024)

5. Impacts and Effects of Development

5.1.1 Figure 5.1 shows the development footprint (black hatch) in relation to the mapped habitats.

5.1.2 The development footprint shows the sum extent of proposed built development and associated clearance works.

5.1.3 Based on the illustrative masterplan, it is assumed that all onsite habitats will be impacted by the proposals, with the Site to be cleared to allow for development.

Figure 5.1 Development footprint in relation to existing on-Site habitats

5.1.4 Figure 5.2 summarises the impacts of development on existing vegetation.

5.1.5 Areas shown in red will be cleared of existing vegetation and subject to extensive earthworks, which will result in the permanent loss of baseline habitats.

5.1.6 Areas marked red will then be built out, as part of new houses and hard-standing access.

5.1.7 As part of the proposals, areas marked orange will be subject to new landscaping and management regimes, to facilitate POS. The baseline habitats are expected to change in line with the new landscaping.

5.1.8 Areas marked green will be retained.

Figure 5.2 Summary of impacts on existing habitats

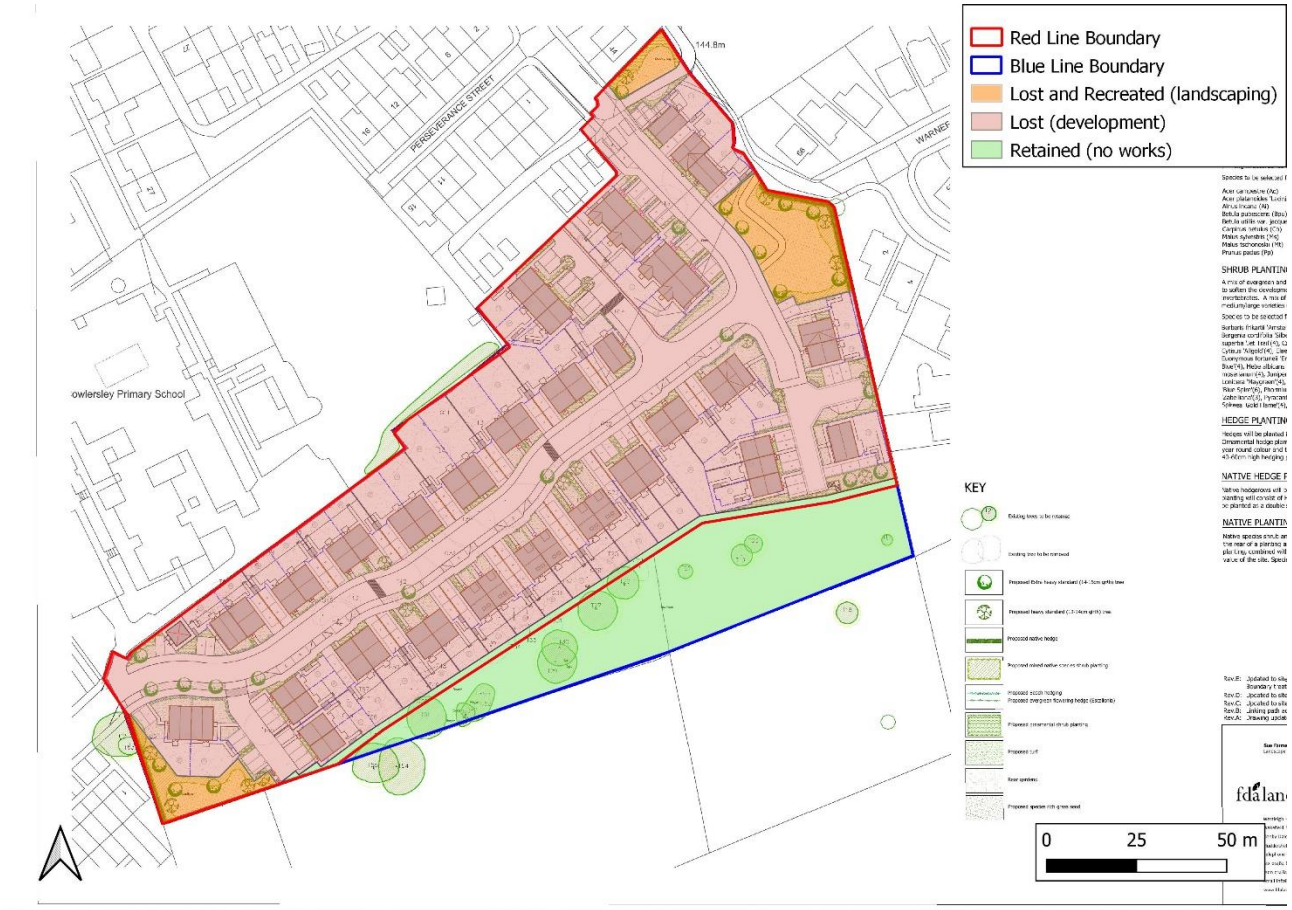

Table 5.1 Lists the anticipated Impacts and Effects associated with the proposals.

	Impacts during Site Clearance	**Stage**
1	**Habitat will be removed** from the Site by clearance and soil stripping using heavy machinery.	*Clearance*

	Significant Effects - in the absence of mitigation	**Acting on**	**Acting at scale (Maximum)**
1a	**Direct habitat loss**. There will be a loss of habitat which will be managed through the Biodiversity Net Gain process Habitat loss will affect connectivity through and around Site. Most of the habitats that will be impacted by clearance works are of moderate ecological value such as other neutral grassland, woodland, scrub and individual trees. These habitats are expected to be of some value to bats and breeding birds.	Site habitats including very low, low and medium distinctiveness habitats. Birds Bats	Local
1b	**Damage to retained and adjacent habita**t such as by storage of clearance machinery or materials in these areas.	Other neutral grassland Other lowland acid grassland Individual trees	Local
1c	**Disturbance**. The noise and activity at the Site will render it and areas immediately off-site inhospitable to wildlife during this period. Wildlife is likely to be habituated to some level of noise associated with the adjacent road, houses and farms, but given the size of the Site and species/habitats it supports, this is likely to be very low.	Birds Bats	Site
1d	**Pollution**. There is a very low potential for sediment or chemicals to be released from the Site, or into retained habitat during this stage.	Retained on-site habitats	Local
1e	Potential effects on **Protected Species**. Precautions will be required to ensure that potential impacts on bats, nesting birds and can be avoided.	Protected Species	Criminal Offence

	Impacts during Construction	Stage
2	**Construction activities** generally take place over a 1-2 year period. Construction of roads and sewers will be followed by footings and then above ground construction of buildings.	*Construction*

	Significant Effects - in the absence of mitigation	Acting on	Acting at scale (Maximum)
2a	**Damage to retained habitat** such as by storage of machinery or materials in these areas, or further earthworks. In the absence of a well-defined and enforceable 'No Works Area' area shown as retained on planning drawings could be damaged or destroyed by contractors working on Site.	Retained on-site habitats	Local
2b	**Disturbance**. The noise and activity at the Site will render it and areas immediately off-site inhospitable to wildlife during this period.	Bats Birds	Site
2c	**Pollution**. There is a very low potential for sediment or chemicals to be released from the Site, or into retained habitat during this stage.	Retained on-site habitats	Local

	Impacts during Construction	Stage
3	**Landscaping activities** will take place period during the construction period and will, be phased around completion of roads and units.	*Construction*

	Significant Effects - in the absence of mitigation	Acting on	Acting at scale (Maximum)
3a	**Damage to retained habitat** such as by storage of machinery or materials in these areas. Access will be required to retained areas to commence management and in itself could result in damage.	Retained on-site habitats	Local
3b	**Pollution**. There is the potential for hazardous chemicals (i.e. herbicides, insecticides, fertilisers) to be used on retained/newly created habitats by landscape contractors. This could lead to increased mortality of retained vegetation or make it harder for retained habitats to be enhanced in line with the Defra Metric.	Retained on-site habitats	Local
3c	**Inappropriate habitat creation or management** techniques could mean that the proposals fail to deliver on BNG commitments	All habitats and species	Local

	Impacts during Operation	**Stage**
4	**The Site will become occupied.** Units will be completed and be used, and traffic will access the Site regularly. Pedestrian access across the Site will increase. Retained and created habitat will be managed by the Site Management Company.	*Operation*

	Significant Effects - in the absence of mitigation	**Acting on**	**Acting at scale (Maximum)**
4a	**Damage** to retained and created habitat such as by inappropriate use, littering, release of invasive species.	New and retained habitats	Local
4b	**Disturbance**. Noise, lighting and increased human activity at the Site will be present of a lower order and will likely be tolerable to species habituated to the urban conditions prevailing locally. The additional disturbance caused by the occupied units may cause displacement, but construction activities will have already caused displacement to a certain level, likely to be above disturbance during operation.	Bats Birds	Local
4c	In the **absence of correct management** retained and created habitats will not provide the necessary biodiversity units committed to through the BNG process, which already does not meet 10%.	New and retained habitats	Local

6. Mitigation & Residual Effects

6.1.1 Where feasible, the **avoidance** of unnecessary impacts has been considered at the design stage and worked into the outline plan, though the layout may change in response to data collected during species surveys. The proposals will incorporate the following **mitigation** in relation to the identified **effects** above, as set out in the table below.

6.1.2 Habitat creation and management will need to be applied to the proposals, to achieve the calculated BNG position set out in the plan below. These themes would need to be the subject of a suitable Biodiversity Management plan which would provide a means of achieving the required habitats and condition.

6.1.3 Achieving the required Biodiversity Net Gain position will ensure that effects relating to habitat loss are addressed - both in respect of the habitats identified as valued features, and also the lower value habitats which would previously have been scoped out of Impact Assessments. Our impact assessment therefore only highlights where habitats present place a particular constraint on the protection of, or delivery of habitats on Site; or on off-set agreements.

6.1.4 Planning permission for the Site would be anticipated to be subject to standard conditions requiring the production of the following documents:

- A BS:42020 Biodiversity Management Plan (BMP)/Habitat Management and Monitoring Plan (HMMP)
- A BS:42020 Construction Environmental Management Plan (CEMP: Biodiversity)
- A Lighting Plan

Table 6.1 lists the mitigation put in place to address the effects identified in table 5.1

	Mitigation during Site Clearance	**Stage**
1	**Habitat will be removed** from the Site by clearance and soil stripping using heavy machinery.	*Clearance*

	Significant Effects - in the absence of mitigation	**Mitigation / Compensation**	**Residual Magnitude**
1a	**Direct habitat loss**.	Under the Environment Act, Kirklees Council require all developments schemes to demonstrate a 10% net gain in biodiversity. By complying with the Biodiversity Net Gain policy, the scheme will ensure that overall, the impacts of habitat loss will be fully addressed, either on Site, or through off-setting. The BMP/HMMP will detail the creation and management of new habitats, ensuring on-site habitats meet their target habitat types and condition scores, as shown in the Defra Metric. The BMP/HMMP will also detail the provision of faunal features, such as bird nesting and bat roosting boxes, and hedgehog access through landscaped areas. The CEMP will detail the 'No Works Area' and suitable protection fencing so any on-Site habitat to be retained or enhanced can be suitably protected through development.	Neutral / Minor Positive
1b	**Damage to retained habitat** such as by storage of clearance machinery or materials in these areas.	The CEMP will detail the installation of barrier fencing around the 'No Works Area' to protect retained and off-site habitat including the lagoons to the northeast of the Site.	Neutral
1c	**Disturbance**. The noise and activity at the Site will render it, and areas immediately off-Site, inhospitable to wildlife during this period.	The main contractors CEMP will detail time limits to work on Site and the installation of screened fencing to limit visual disturbance of sensitive habitat. However, some level of disturbance it unavoidable.	Minor Negative
1d	**Pollution**. There is the potential for sediment or chemicals to be released from the Site, or into retained habitat during this stage.	The CEMP will detail the installation of barrier fencing around the 'No Works Area' to protect retained and off-site habitat. Bunded compounds will be used for storage of machinery and materials.	Neutral
1e	Potential effects on **Protected Species**.	The CEMP will detail necessary pre-works checks for badgers and nesting birds. Precautions will be required to ensure that impacts on badgers and nesting birds can be avoided.	Avoided entirely, with further survey work to be completed.

	Mitigation during Construction	Stage
2	**Construction activities** will likely take place over a 1-2 year period. Construction of roads and sewers will be followed by footings and then above ground construction of buildings.	*Construction*

	Significant Effects - in the absence of mitigation	Mitigation / Compensation	Residual Magnitude
2a	**Damage to retained habitat** such as by storage of machinery or materials in these areas.	The CEMP will detail the installation of barrier fencing around the 'No Works Area' to protect retained and off-Site habitats.	Neutral
2b	**Disturbance**. The noise and activity at the Site will render it, and areas immediately off-Site, inhospitable to wildlife during this period.	The main contractors CEMP will detail time limits to work on Site and the installation of screened fencing to limit visual disturbance of sensitive habitat. However, some level of disturbance is unavoidable.	Minor Negative
2c	**Pollution**. There is the potential for sediment or chemicals to be released from the Site, or into retained habitat during this stage.	The CEMP will detail the installation of barrier fencing around the 'No Works Area' to protect retained and off-Site habitat. Bunded compounds will be used for storage of machinery and materials.	Neutral

	Mitigation during Construction	Stage
3	**Landscaping activities** will take place period during the construction period and will, be phased around completion of roads and units.	*Construction*

	Significant Effects - in the absence of mitigation	Mitigation / Compensation	Residual Magnitude
3a	**Damage** to retained habitat such as by storage of machinery or materials in these areas. Access will be required to retained areas to commence management, and in itself could result in damage.	The CEMP will detail the installation of barrier fencing around the 'No Works Area' to protect retained and off-site habitats including the LWS.	Neutral
3b	**Pollution**. There is the potential for hazardous chemicals (i.e. herbicides, insecticides, fertilisers) to be used on retained habitats by landscape contractors. This could lead to increased mortality of retained vegetation or make it harder for retained habitats to be enhanced in line with the Defra Metric.	The BMP/HMMP will specify preparation and establish works for all new and retained habitats covered by the Defra Metric. This will detail where hazardous chemicals can and cannot be used.	Neutral

3c	**Inappropriate habitat creation or management techniques** could mean that the proposals fail to deliver on BNG commitments	The BMP will specify preparation and establish works for all new and retained habitats covered by the Defra Metric. This will detail where hazardous chemicals can and cannot be used.	Neutral

	Mitigation during Operation	**Stage**
4	**The Site will become occupied.** Units will be completed and be used, and traffic will access the Site regularly. Pedestrian access across the Site will increase. Retained and created habitat will be managed by the Site Management Company.	*Operation*

	Significant Effects - in the absence of mitigation	**Mitigation/Compensation**	**Residual Magnitude**
4a	**Damage** to retained and created habitat such as by inappropriate use, littering, release of invasive species.	Landscaping has been designed to create new areas of POS. A small number of gardens are located adjacent to off-site woodland, with some impact possible. The BMP/HMMP will detail the installation of signage and suitable bins so that the issue of dog fouling on and off-site can be minimised.	Minor negative
4b	**Disturbance**. Noise, lighting and increased human activity at the Site will be present following the development, with some of the Site used for recreational activities. The additional disturbance may cause displacement, but construction activities will have already caused displacement to a certain level, likely to be above disturbance during operation.	Landscaping could be designed to maximise the amount of habitat which groups such as birds can use for cover, and to provide connectivity. New nesting (for birds) and roosting (for bats) will be proposed in suitable places away from disturbance.	Neutral
4c	In the **absence of correct management** retained and created habitats will not provide the necessary biodiversity units committed to through the BNG process, which already does not meet 10%.	The BMP will provide full details of habitats to be created and their suitable management suitable management The BMP will include monitoring so that evidence can be provided, or remedial action can put in place as required.	Neutral

7. Timing Issues

7.1.1 Standard constraints will apply to nesting birds and vegetation clearance.

8. Cumulative Effects

8.1.1 A site, approximately 400m to the south of the Site is currently awaiting a decision on being developed for residential use.

8.1.2 The Site will act in combination with this second development. However, as the developments share only loose links through the wider landscape, significant cumulative impacts are unlikely.

9. Offsite Measures or Compensation

9.1.1 A Biodiversity Net Gain (BNG) Assessment has been completed for the Outline Proposals – based on the latest Landscape Masterplan.

9.1.2 Based on the BNG assessment, the proposals are expected to result in a major net loss in Habitat Units and a minor net gain in Hedgerow Units; see ER-7172-03A for details.

9.1.3 Biodiversity Offsetting will be required in order for the scheme to demonstrate a 10% net gain in Habitat Units. Trading rules will need to be taken into account.

10. Enhancement

10.1.1 Opportunities will be detailed in the Biodiversity Management Plan, Landscaping Plan and other Protected Species survey reports, to be produced as a standard condition of planning.

11. Monitoring

11.1.1 The CEMP document will detail the role of an Ecological Clerk of Works (ECoW) in overseeing protection measures.

11.1.2 The BMP document will identify any management specific monitoring which might be required in respect of habitat enhancement proposed. The LPA will require regular Monitoring Reports for the Site, to demonstrate that on-site habitats are meeting the condition scores targeted.

12. Policy and Legislation

12.1.1 As part of the BNG process, the mitigation hierarchy should be followed. How the proposals interact with the hierarchy is detailed in Appendix 1 of report ER-7172-03A.

13. Conclusion

13.1.1 Mitigation to be agreed by standard conditions of planning will be able to address most of the significant effects resulting from the development.

13.1.2 The scheme is expected to result in a considerable net loss for biodiversity on-site. Biodiversity Offsetting will be required.

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