PRELIMINARY ECOLOGICAL APPRAISAL REPORT: Keeper's Cottage

Client: Jeni England

Date of Report: April 2025

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Contents

Quality Assurance

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Date	Version Number	Revision Comments	Author
15th April 2025	1.0	Final Version	Emma England

Disclaimer:

It is important that planning decisions are based on up-to-date and complete ecological reports and survey data. Preliminary ecological appraisal reports (PEARs) are generally not suitable for planning application submissions. PEARs are produced to inform the client and guide the design process, as well as provide advice regarding the requirement for further survey.

It is difficult to set a specific timeframe over which reports or survey data should be considered valid. The contents of this report are considered valid at the time of writing. Updated advice from a suitably qualified ecologist should be sought if more than 12 months from the date of the site visit have elapsed, or site conditions change[1]. Emma England shall not be held liable for any use of this report other than for the purposes for which it was produced. Ecological habitats and species can change significantly over time, sometimes quickly. Emma England shall not be held liable for any losses arising as a result of reliance by the client or any third party on this report more than 12 months after the date of this report's publication.

[1] Advice-Note.pdf

Summary

This preliminary ecological appraisal report (PEAR) has been prepared by Emma England on behalf of Jeni England. It sets out the findings and recommendations in line with CIEEM guidelines for preliminary ecological appraisal[2], and ecological report writing[3].

The PEAR was carried out to inform a planning application at a residential property, for the demolition of an existing garage and its replacement with a two-storey workshop/store, as well as a single storey extension to the dwelling on-site (the 'proposed development') at Keeper's Cottage, 18 Brownhill Lane, Holmbridge, HD9 2QW ('the site').

This PEAR should not be submitted as part of the planning application as this report recommends further survey work not yet completed. The correct document for submission with the planning application is an ecological impact assessment.

Key Findings and Recommendations

Following a preliminary ecological appraisal site visit on 26th December 2024, the site was found to comprise buildings and hardstanding. The site lies within Yateholme Reservoirs and Plantations Local Wildlife Site.

The buildings on-site were found to support low suitability for roosting bats. The dwelling supports several potential roost features that could be used by individual bats opportunistically. However, none of these potential roost features will be affected by proposals and so no further survey or mitigation measures are necessary for the dwelling.

The garage for demolition supported a potential roost feature within a fascia under the canopy area on the western elevation that could be used by individual bats opportunistically. During the December 2024 inspection, the feature could be clearly observed, and no evidence of roosting bats were seen. However, as this potential roost feature will be lost to proposals, a further inspection of this feature will need to be undertaken between May and August 2025 to search for evidence of roosting bats and inform the requirement for additional survey and licensing.

Standard habitat protection and pollution prevention control measures should be in place during site clearance and construction to prevent harm to the adjacent priority woodland habitat and the watercourse within the local wildlife site. No other constraints to development are considered relevant with regards to ecology matters.

[2] Guidelines for Preliminary Ecological Appraisal (GPEA) | CIEEM
[3] Guidelines for Ecological Report Writing | CIEEM

Introduction

Surveyor and Author Details

The site survey, desk study and report were completed by Emma England who has over 12 years of professional experience in environmental management (including ecology), ecological consultancy and as a local authority ecologist.

Emma has a Master of Science in Ecology, Biodiversity and Evolution with a specialism in Conservation Biology from the Université Pierre and Marie Curie, Paris VI, awarded in 2011. She also holds a Bachelor of Science degree (Honours) in Natural Sciences whole organism biology and psychology awarded by Durham University in 2009.

Emma is an Associate Member of the Chartered Institute of Ecology and Environmental Management (CIEEM) and a Practitioner Member of the Institute of Environmental Management and Assessment (IEMA).

Emma was assessed in July 2019 to have a Field Identification Skills Certificate Level 3 in botanical identification by the Botanical Society of Britain and Ireland. This assessment indicates she has the necessary skill to undertake botanical surveys such as UK Habitat Classification and Phase 1 surveys as part of ecological consultancy work (Botanical Society of Britain & Ireland, 2024).

Emma also holds several licences for protected species:

- Barn Owl: Survey licence for development projects. Licence number: CL29/00452;
- Bats: Survey or research level 1 licence. Licence number: 2017-27747-CLS-CLS
- Great Crested Newts: Survey or research level 1 licence. Licence number: 2018-35835-CLS-CLS
- Beavers: Licence to modify or remove dams and damaged burrows. Licence number: 2023-112-BVR-CLASS.

Purpose of the Report

In December 2024, Jeni England commissioned a preliminary ecological appraisal of Keeper's Cottage, 18 Brownhill Lane, Holmbridge, HD9 2QW hereafter referred to as 'the site'. The site is located at approximate grid reference SE 11828 06426.

The site is located approximately 10m from a watercourse, and approximately 170m east of Brownhill Reservoir and on the edge of the settlement of Holmbridge. The site is directly adjacent to woodland listed as priority woodland habitat on MAGIC.gov.uk mapping tool.

The purpose of this PEAR is:

- To identify key ecological constraints to the proposed development;
- To inform the design to allow significant ecological effects to be avoided or minimised wherever possible;
- To identify the need for further ecological surveys to inform an ecological impact assessment;
- To inform the likely mitigation, compensation and enhancement measures.

Methodology

Scope of Assessment

Designated sites, habitats and species of principal importance for nature conservation, and protected species were considered when making the preliminary ecological appraisal.

The likely zone of influence for the proposals was determined following the site survey and desk study, and through professional judgement.

Desk Study

The Multi-Agency Geographic Information for the Countryside (MAGIC) mapping system[4] and the Kirklees Council Interactive Policies Map[5] were consulted to inform this report, with the scale, location and nature of proposals considered when determining the likely zone of influence of the project.

Due to the small and localised scale of proposals and following review of the Natural England Site of Special Scientific Interest Impact Risk Zone for the site, the zone of influence for the project was considered likely to comprise the red line boundary and immediate surrounds only.

However, for completeness and to inform potential impacts on-site, the presence of internationally, nationally and locally important statutory designated sites and non-statutory designated sites, ancient woodland, priority habitats, granted European Protected Species (EPS) licences, great crested newt class survey licence returns and great crested newt pond surveys 2017-2019, within 2km of the site were explored.

The desk study also reviewed previous ecology reports available on Kirklees Council public register for the site, and drawings for proposals provided by the architect:

- Ribble Ecology (May 2012) Bat Survey and Assessment, plus consideration of breeding birds. No. 18 Brownhill Lane, Holmbridge, HD9 2QW.
- ROOM (March 2025) Site Plan As Existing. Keeper's Cottage, 18 Brownhill Lane, Holmbridge, West Yorks, HD9 2QW. 2409.HBY 000.
- ROOM (March 2025) Elevations As Existing. Keeper's Cottage, 18 Brownhill Lane, Holmbridge, West Yorks, HD9 2QW. 2409.HBY 010.
- ROOM (March 2025) Ground and Roof Plans As Existing. Keeper's Cottage, 18 Brownhill Lane, Holmbridge, West Yorks, HD9 2QW. 2409.HBY 001.
- ROOM (March 2025) Elevations As Proposed. Keeper's Cottage, 18 Brownhill Lane, Holmbridge, West Yorks, HD9 2QW. 2409.HBY 110.
- ROOM (March 2025) Ground, First and Roof Plans As Proposed. Keeper's Cottage, 18 Brownhill Lane, Holmbridge, West Yorks, HD9 2QW. 2409.HBY 101.

Field Survey

The site survey was undertaken by Emma England MSc BSc ACIEEM PIEMA, on 26th December 2024, in general accordance with the Joint Nature Conservation Committee (JNCC) Handbook

[4] Magic Map Application
[5] Kirklees Development Plan | Kirklees Council

for Phase 1 Habitat Survey (2010)[6] and the Bat Conservation Trust (BCT) Bat Surveys for Professional Ecologists Good Practice Guidelines 4th Edition (2023)[7].

The site survey was carried out at 11am, in good light, dry weather and very low wind. Only the habitats within the red line boundary have been mapped, with a habitat walkover assessment undertaken for habitats within 30m of the red line boundary for the site.

During the survey, particular attention was given to the suitability of the buildings on-site to support roosting bats and breeding birds.

A ground level, external assessment was carried out of all structures within the red line boundary to look for evidence of potential access and roosting/nesting features for bats and birds. This included looking for signs of live or dead animals, feathers, droppings, pellets, nest debris/eggs, urine staining, feeding remains and grease marks. Binoculars and a high-powered torch were used to assist the survey.

In addition to the ground level assessment, an internal assessment was carried out of the garage, and of the roof void of the dwelling. The assessment of the roof void in the dwelling was made from the loft hatch using binoculars and a high-powered torch as it was not considered safe to enter the loft space.

Limitations and Assumptions

The findings of this report do not represent legal advice.

Although due to the time of year the site survey was conducted some plant species were not identifiable, due to the broad habitats identified, the findings, recommendations and conclusions of this report are considered valid at the time of writing and are considered to represent an accurate reflection of site conditions at the time the survey was carried out. Updated advice from a suitably qualified ecologist should be sought if more than 12 months from the date of the site visit have elapsed, or site conditions change[8].

A desk study and site visit were carried out to inform this preliminary ecological appraisal. However, no local biological records data were reviewed to inform this report. This is not considered to pose a significant limitation to the results and conclusions of this report due to the location, scale and nature of proposals.

Tree root protection is beyond the scope of this report and impacts to tree roots have not been considered.

Baseline Ecological Conditions

General

The site covers an area of approximately 420m^2 and comprises a garage, residential dwelling and hardstanding. There is priority woodland habitat immediately south, east and west of the site, with a garden, priority woodland habitat and watercourse to the north.

[6] Handbook for Phase 1 habitat survey – a technique for environmental audit (2010) | JNCC Resource Hub
[7] Bat Surveys for Professional Ecologists: Good Practice Guidelines 4th edition - Guidance for professionals - Bat Conservation Trust
[8] Advice-Note.pdf

Designated Sites

The site lies within Yateholme Reservoirs and Plantations Local Wildlife Site. The site is also within 930m of designated ancient woodland and approximately 900m east of Rake Dike Site of Special Scientific Interest (SSSI) and the Peak District National Park. The site is within 2km of the Peak District Moors (South Pennine Moors Phase 1) Special Protection Area (SPA) and the South Pennine Moors Special Area of Conservation (SAC) and Dark Peak SSSI.

The MAGIC.gov.uk mapping tool, SSSI Impact Risk Zone layer indicates that Natural England does not need to be consulted on this application with regards to the potential risk to statutorily protected designated sites.

Habitats

A baseline habitat plan for the site is shown overleaf in Figure 1. Within the red line boundary there are two buildings: a residential dwelling and a garage (as shown in Photo 1, below). The rest of the 'habitat' within the red line boundary comprises hardstanding. Adjacent to the red line boundary to the north of the site is a vegetated garden and watercourse (tributary to the River Holme). Immediately adjacent to the site to the south, east and west is priority woodland habitat, with further woodland habitat beyond the property's garden to the north.

Photo 1: To show the dwelling, garage, woodland to the rear of the property and garden area.

The dwelling on-site is built into a wooded embankment. It is a two-storey property with a pitched, stone tiled roof, and a modern extension on the eastern elevation. The garage has a largely metal frame, and concrete walls. It is detached from the dwelling. It has a pitched, corrugated metal roof with no loft space or underlay.

The woodland to the rear of the property included the following species: oak *Quercus robur*, sycamore *Acer pseudoplatanus*, conifer species, cherry laurel *Prunus laurocerasus*, ferns, bramble *Rubus fruticosus* agg., holly *Ilex aquifolium*, mosses Bryophyta, variegated yellow archangel *Lamiastrum galeobdolon argentatum*. Both cherry laurel and yellow archangel are considered invasive in native woodland.

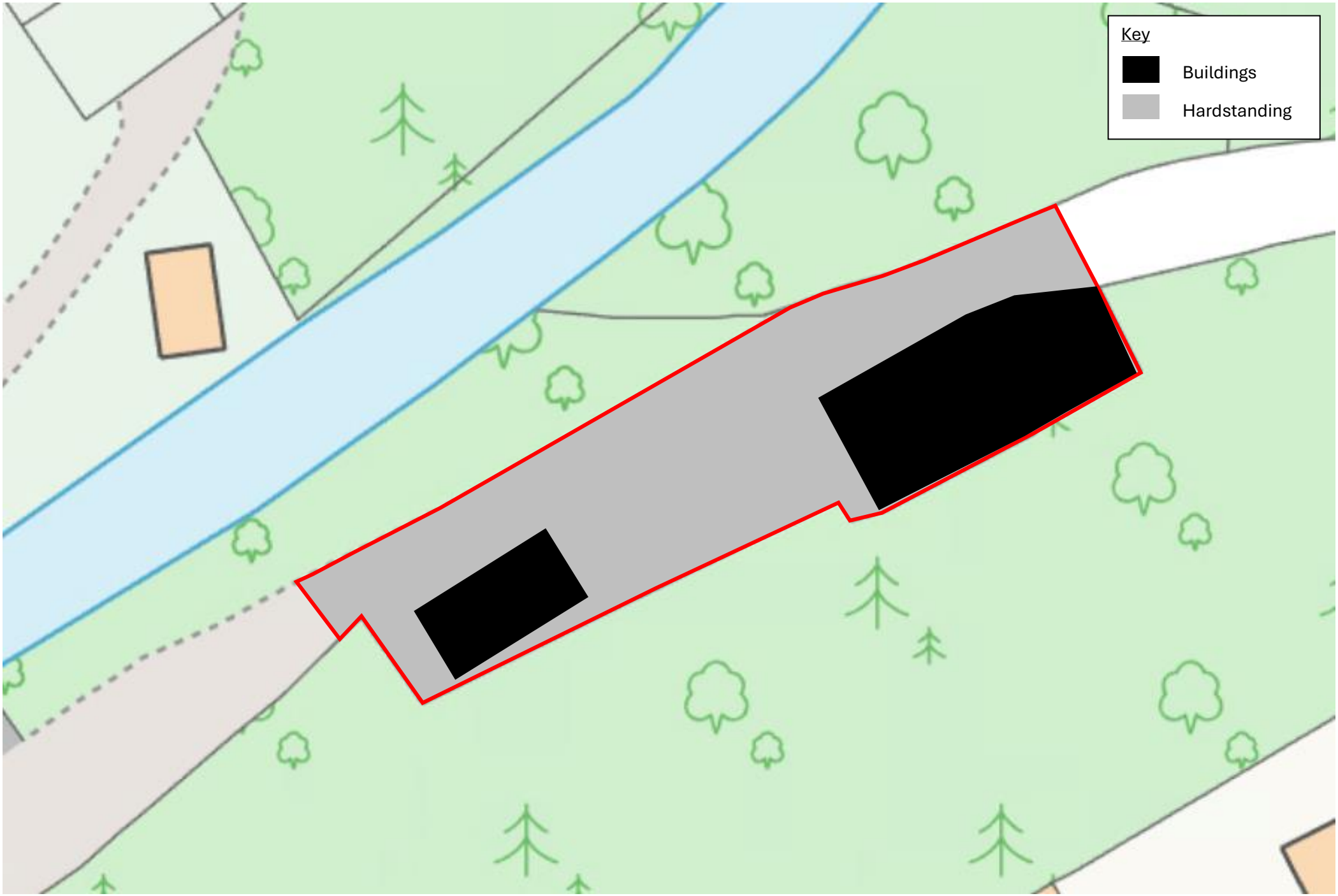

Figure 1: Baseline Habitat Plan – Not to Scale

Species and Species Groups

Due to the location, nature and scale of proposals, and findings on-site, the only notable species group of concern are bats. There is no or very limited suitable habitat for other protected and/or priority species on-site, including breeding birds, and there was no evidence of badger setts within 30m of the site.

Bats

There are two recent records of granted Natural England bat licences within 1km of the site; the closest is around 300m from the site and was for the destruction of a resting site for common pipistrelle and whiskered bats. The other licence is for the destruction of a resting place for brown long-eared bats.

The desk study revealed that a bat daytime preliminary roost assessment and nocturnal emergence survey was carried out of the dwelling on-site 13th May 2012. The report produced for the site reported occasional gaps between small numbers of stone tiles on the roof, with suitability for individual, crevice roosting bats. No evidence of the current or former presence of roosting bats was found during the preliminary roost assessment. A single bat emergence survey was undertaken of the building, but there was no evidence found of bats emerging from the house or interacting with the building.

The 26th December 2024 preliminary roost assessment of the dwelling made similar findings to those in 2012. The building was assessed to have low suitability for roosting bats; having several potential roost features that could be used by individual bats opportunistically. During the December 2024 inspection, no signs of roosting bats were observed in either building.

On the dwelling's gable end on the western elevation (Photo 2, overleaf) there were no suitable accesses or roosting features for bats. The roof tiles on the dwelling were generally tight fitting, although there were a few lifted tiles. The south side of the roof was covered with fallen leaves and moss (Photo 3), and a large portion of the roof on the northern elevation was covered with solar panels. There was very limited roosting potential in lifted fascia boards on the northern elevation.

The dwelling had a relatively small and cluttered roof void (Photo 4), that was about 1.5m from the floor to ridge beam. The roof was lined with a modern breathable roofing membrane that appeared to be in good condition. Most of the roof beams were modern, although an old roof beam was visible, and contained gappy mortise and tenon joints. No evidence of bat droppings was observed from the loft hatch. However, it was evident that rodents were entering the loft space, and that mice had chewed electric cables.

The garage for demolition (Photo 5) had very limited suitability for roosting bats, although it supported a potential roost feature under boarding under the canopy area on the western elevation.

The site surrounds have good suitability for commuting and foraging bats.

Photo 2: To show the dwelling on-site, including the western gable end.

Photo 3: To show the roof of the dwelling on the southern elevation.

Photo 4: To show the roof void of the dwelling.

Photo 5: To show the garage on-site.

Photo 6: The red arrow shows the approximate location of the potential roost feature.

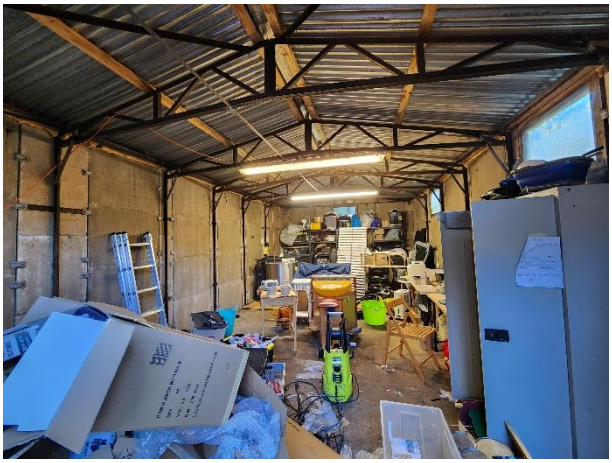

Photo 7: To show the interior of the garage on-site.

Recommendations for Mitigation and Further Survey

Surrounding Habitats

Standard habitat protection and pollution prevention control measures should be in place during site clearance and construction to prevent harm to the adjacent to priority woodland habitat and watercourse.

Ecologists are not generally competent to advise on matters of tree root protection. An arborist can advise with regards to root protection areas. Tree root protection is beyond the scope of this report.

Bats

No further survey work is considered necessary on the dwelling as no potential roost features will be affected by works. However, the potential roost feature in the garage will be lost to proposals. It is therefore recommended that a further inspection of this feature, or bat emergence survey be undertaken between May and August 2025 to search for evidence of roosting bats. Should the inspection or emergence survey find evidence of bats, additional surveys may be required to characterise the roost and provide enough information to support a Natural England bat mitigation licence application. Should a bat roost be discovered, a Natural England bat mitigation licence will need to be in place prior to works starting to comply with the law.

The results of the additional required inspection/emergence survey (and any further survey that may be required subsequent to the inspection/emergence survey) should be carried out in advance of submitting the planning application. The results of the inspection/emergence survey (and any further surveys required) should be incorporated into an ecological impact assessment submitted with the planning application.

Opportunities for Enhancement

Under the Environment Act 2021, all minor planning applications in England submitted on or after the 2nd April 2024 will have to deliver at least a 10% biodiversity net gain (unless exempt). Mandatory 10% biodiversity net gain is unlikely to apply to this project as one or more exemptions are likely to apply. For example, we consider that the de-minimis exemption is likely to apply because:

- The development will not impact any onsite priority habitat; AND
- The development will not impact more than 25 square metres of onsite habitat with a biodiversity value greater than zero (buildings and hardstanding, comprising the entire red line boundary, have a biodiversity value of zero); AND
- The development will not impact more than 5 metres of onsite linear habitat.

Nevertheless, the National Planning Policy Framework 2024 supports proposals achieving a biodiversity net gain with no specific quantitative target. There is currently very limited biodiversity value within the red line boundary. Notwithstanding any necessary mitigation and compensation measures should a bat roost be discovered on-site, a Beaumaris Midi Woodstone Bat Box will be erected on the western elevation of the dwelling, at least 3m from ground level. Further, a wildflower green roof is proposed on the canopy over the kiln on the

workshop building, and another on the summer house building within the site's blue line boundary.

Conclusions

There are opportunities for this project to achieve a qualitative biodiversity net gain. However, further survey for roosting bats is required to inform a detailed assessment of all ecological effects.

Appendix 1: Key Policy and Legislation

Legislation

The main legislation relating to ecology within England includes:

- The Conservation of Habitats and Species Regulations 2017 (as amended)
- The Wildlife and Countryside Act 1981 (as amended)
- The Natural Environment and Rural Communities (NERC) Act 2006
- The Environment Act 2021
- Protection of Badgers Act 1992

Planning Policy

The recommendations of this report are in line with the key principles of the National Planning Policy Framework[9] and Government Circular 06/05[10].

Local planning policies relating to ecology are invariably based on the conservation of species protected under the above legislation, including species and habitats of principal importance listed under Section 41 of the NERC Act 2006; and the protection of designated sites. All of these features are considered within the scope of this ecological impact assessment and therefore any recommendations made herein are likely to be in line with this policy.

Kirklees Local Plan Policy LP30 is relevant to proposals, including:

"Biodiversity and Development

Development proposals will be required to:-

(i) result in no significant loss or harm to biodiversity in Kirklees through avoidance, adequate mitigation or, as a last resort, compensatory measures secured through the establishment of a legally binding agreement;

(ii) minimise impact on biodiversity and provide net biodiversity gains through good design by incorporating biodiversity enhancements and habitat creation where opportunities exist;

(iii) safeguard and enhance the function and connectivity of the Kirklees Wildlife Habitat Network at a local and wider landscape-scale unless the loss of the site and its functional role within the network can be fully maintained or compensated for in the long term;

(iv) establish additional ecological links to the Kirklees Wildlife Habitat Network where opportunities exist; and

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

The Holme Valley Neighbourhood Plan Policy 13 is relevant to proposals:

"Protecting Wildlife and Securing Biodiversity Net Gain

[9] https://www.gov.uk/government/publications/national-planning-policy-framework--2

[10] https://www.gov.uk/government/publications/biodiversity-and-geological-conservation-circular-06-2005

All development proposals should demonstrate how biodiversity will be protected and enhanced including the local wildlife, ecological networks, designated Local Wildlife Sites and habitats.

New development should create a measurable net gain in natural capital and biodiversity in accordance with the latest national and local guidance on Biodiversity Net Gain.

A biodiversity net gain will be expected to be achieved through development by:

1. *managing habitats retained within the development site to improve quality and / or;*
2. *securing local off-site habitat management to provide an overall benefit.*

Direct and indirect impacts upon biodiversity and/or geodiversity should be avoided. Where impacts cannot be avoided, mitigation and then as a last resort compensatory measures (for example biodiversity offsetting) should be provided".