Gynn Lane, Honley

Ecological Impact Assessment (EcIA)

Report Ref. ER-7732-08

04/07/2025

Vivly Living

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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.

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Contents

Introduction 5
Method 6
Ecology Baseline 8
Description of the Proposed Development 13
Impacts and Effects of Development 14
Mitigation & Residual Effects 19
Timing Issues 24
Cumulative Effects 24
Offsite Measures or Compensation 24
Enhancement 24
Monitoring 24
Policy and Legislation 24
Conclusion 24

Summary

The Site is generally occupied by low distinctiveness habitats – primarily modified grassland under agricultural use. Small amounts of medium distinctiveness habitat is present on site in the form of trees and boundary scrub.

High distinctiveness habitats are present offsite (and partially onsite), within blue line land; including Lowland mixed deciduous woodland and a watercourse (Ludmill Dike).

The Site supports typical assemblages of foraging/ commuting bats and nesting birds.

A single day roost, occupied by a solitary common pipistrelle bat is present within the onsite building, which is set to be demolished.

Mitigation, to be agreed by standard conditions of planning, will be able to address most of the significant effects resulting from the development. There will be some residual impacts resulting from:

- Habitat loss (of a mix of grassland, trees and scrub) from the Site and the lag-time between loss and re-creation on or off-site. This will result in a short term, reversible negative impact acting on nesting birds, badgers and bats at a site level.

- Disturbance resulting from clearance and construction will result in a short term, reversible negative impact acting on birds, badgers and bats at a local scale.

The scheme is expected to result in a net loss for biodiversity on-Site, however biodiversity off-setting will be used to ensure that a minor positive impact (10% gain), acting in the long-term on all identified receptors can be achieved in this respect.

Introduction

1. Brooks Ecological Ltd was commissioned by Vivly Living to carry out an Ecological Impact Assessment (EcIA) for their proposed development Gynn Lane, Honley(SE 14554 12097).
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.
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.
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).

Ecological Impact Assessment (EcIA) Checklist

CIEEM

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		

Method

Scope of Assessment

5. The application site 'the Site' encompasses a plot of pasture/farmland with a house, and associated access track and garden, on the outskirts of the village of Honley.
6. The assessment uses a 2km area of search around the Site for records of protected and notable species and locally or nationally designated wildlife sites.
7. Thorough survey of the Site has been carried out by Brooks Ecological across 2024/2025. Surveys and reports informing this assessment comprise of the following:
    - Preliminary Ecological Appraisal, Ref. ER-4181-04B (Sep 2020). Brooks Ecological.
    - Updating Preliminary Ecological Appraisal, Ref. ER-7732-01 (Nov. 2024). Brooks Ecological.
    - Bat Emergence Survey, Ref. ER-7732-02 (Sept. 2024). Brooks Ecological.
    - River Condition Assessment, Ref. ER-7732-04B (Nov. 2024). Brooks Ecological.
    - Bat Activity Survey, Ref. R-4181-03 (Sep 2019). Brooks Ecological
    - Updating Bat Activity Survey, Ref. ER-7732-05 (TBC). Brooks Ecological.
    - Bat Mitigation Strategy, Ref. ER-4181-05 (May 2020). Brooks Ecological.
    - Biodiversity Net Gain Assessment, Ref. ER-7732-06 (April 2025). Brooks Ecological.
    - Badger Assessment, Ref R-4181-02 (Oct 2019). Brooks Ecological.
    - Updating Badger Assessment, Ref. ER-7732-07 (Nov. 2024). Brooks Ecological.
    - White-clawed Crayfish Survey, Ref. R-4181-01 (Sep 2019). Brooks Ecological.
    - White-clawed Crayfish eDNA, Ref. SI-7732-01 (Nov. 2024). Brooks Ecological.

Field Survey

8. 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.

Desk Study

9. A full desk study including consideration of local biological records, aerial photographs, local designations, and planning guidance has been carried out as part of the Preliminary Ecological Appraisal.

Figure 1 Site area assessed (red line)



Assessment Method

10. 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

11. 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.

12. 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

13. 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.

Ecology Baseline

14. A *summary* of the points salient to this assessment are set out below, further detail is available in the referenced reports:

Designated Sites and Conservation Areas

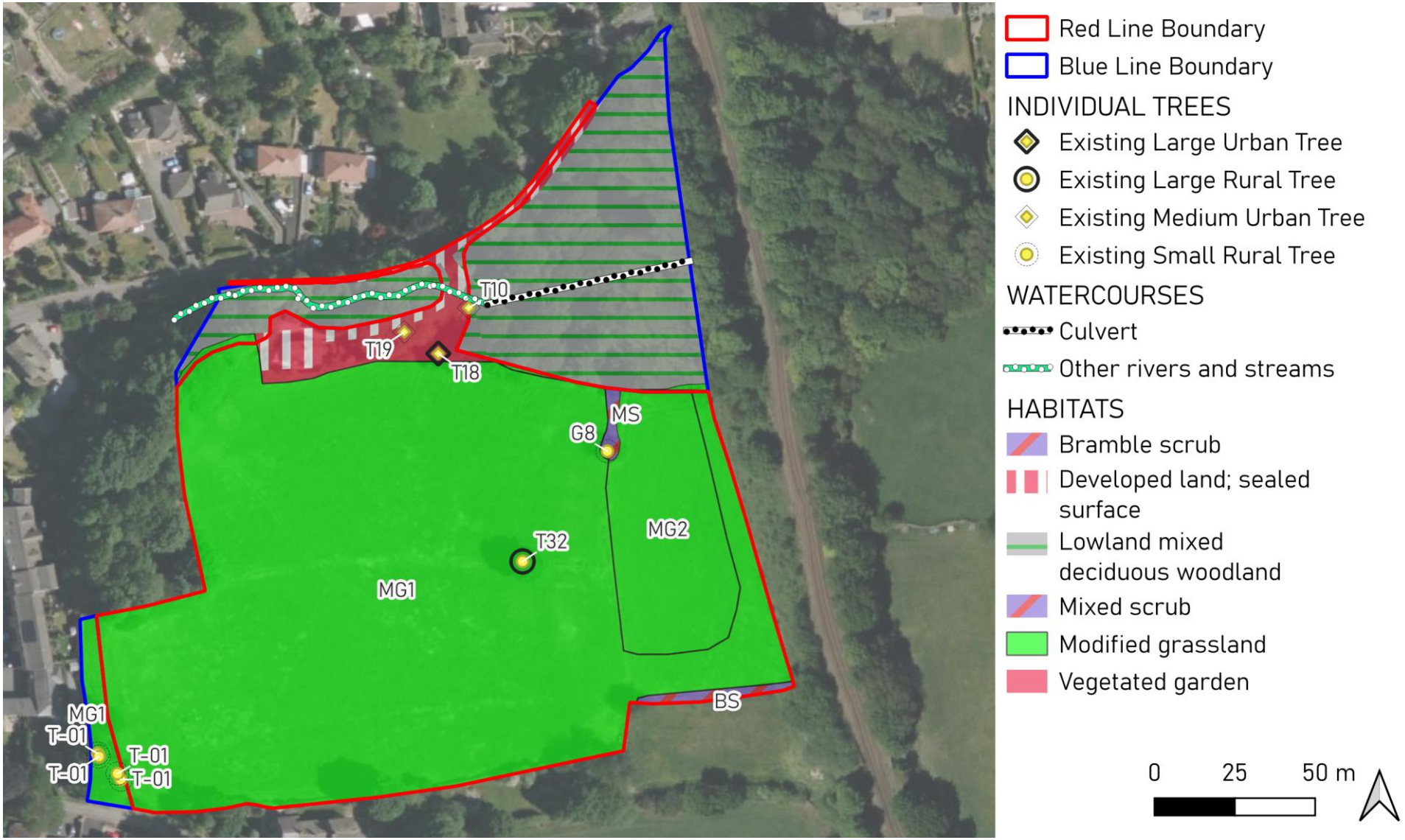
15. Impacts on Statutory (International and National) designations or their interests have been ruled out at PEA Stage – a summary of this assessment is set out in table 3.1 below.

Table 1 Potentially relevant designations

Site Name	Designation	Level	Located	Comments
Upper Park Wood	Local Nature Reserve (LNR)	National	800m north	Mosaic of meadow, heathland and mixed deciduous woodland featuring well-developed shrub layer.
Castle Hill	LNR	National	1.8km north	Characteristic landscape features with locally typical examples of habitat mosaic, featuring acid grassland, semi-improved grassland and scrub typical of Pennine fringe farmland.
Honley Station Cutting	Site of Special Scientific Interest (SSSI)	National	300m north	Geological
South Pennine Moors	Special Area of Conservation (SAC)	International	6km southwest	Features habitats such as European dry heath, blanket bog and old sessile oak woods.
South Pennine Moors	Special Protection Area (SPA)	International	6km southwest	Habitat for species such as breeding populations of merlin, short eared owl and golden plover.
Cliff Wood	Local Wildlife Site (LWS)	Local	360m south	Designated for its species rich acid woodland and native bluebell cover.
Kirklees Wildlife Habitat Network	n/a	Local Authority	Northern boundary	The woodland to the north and east of the Site is within the mapped Kirklees Wildlife Habitat Network, with some small parts of this being within the red line boundary. Any works affecting the wildlife habitat network must ensure that existing functionality of the network is retained

Habitats

Figure 2 Site habitats



Potential future changes to the baseline

16. The Site's use and ecological baseline will likely be unchanged until the time of the proposed development.
17. Left unmanaged, the grassland would succumb to natural succession, first to scrub, then eventually broadleaved woodland.
18. The table below sets out the habitats at this Site and their relevance in this assessment.

Table 2 Site Habitat Summary

Habitat Feature	Notes	Valued at what scale
Developed land; sealed surface	House & associated hard standing, including parts of access track.	None – Negligible value
Vegetated Garden	Garden associated with house, including unsealed, partially vegetated access track. Includes shrubs surrounding the house and sloped area to the south of the access track. Species noted include several small native and non-native trees & shrubs such as ash, holly, apple, cypress, oak, rhododendron, mock orange and box honeysuckle. Typical garden grasses such as bent & rye grasses, and forbs such as pink purslane, herb Robert, nettle, creeping thistle, ivy and cleavers are present, particularly along the track & the area to the south of this.	None – Negligible value
Modified Grassland	Grassland forming most of the site, historically subject to some degree to agricultural improvement giving rise to a reasonably uniform, perennial rye and Yorkshire fog dominated sward. Exceptions to this are areas associated with an old dry-stone wall bisecting the parcel, along which is found a higher diversity of forbs, and to a small patch of more nutrient enriched land to the northwestern corner of Site. Small, scattered patches of bramble encroaching the northeastern corner from the adjacent woodland, and marginal encroachment of bracken is present to parts of the southern and western boundaries. Red fescue, cock's-foot and sweet vernal grass also noted within the sward. Forbs are infrequent but indicative of its historic improvement, with species such as such as white clover, common sorrel, broad-leaved dock, meadow buttercup and creeping thistle. Some very small fragments of former neutral grassland are present, where forb cover is higher. Additional species found here include catsear, red clover, common mouse-ear, creeping cinquefoil and occasionally lesser stitchwort. These are not of mappable scale. Average of species 6 spp. Per m2 with <2 being forbs.	Site level
	Area of grassland to northeast of Site similar to MG1, but seemingly less influenced by agricultural improvement and separated by an old drystone wall. The sward here is more varied in height, with a wider range of grasses present, dominated by common bent and Yorkshire fog. Rye grass is still present here, and with meadow foxtail, and sweet vernal grass present in greater abundance than MG1. Crested dog's tail, timothy and creeping bent are also noted, with occasional compact rush indicating damper conditions. A similar suite of forbs are present, but increased abundance, with additional species noted including creeping buttercup, red clover, common mouse-ear, cuckoo flower and common vetch. Average of species 8 spp. Per m2 with 2 being forbs.	
Mixed Scrub	A group of shrubs and scrub, most closely resembling mixed scrub within habitats available in UKHabs.	Site level
Bramble scrub	A line of bramble-dominated scrub bordering the eastern parcel of the Site to its south.	Site level
Other Lowland Mixed Deciduous Woodland	Small parcels where site boundary overlaps with adjacent woodland. Wider woodland is characterised by sycamore, oak, birch and ash, with hawthorn and holly found in the understorey.	Local level

Habitat Feature	Notes	Valued at what scale
	The ground layer is varying, with some pockets of ivy and bramble, and some showing remains of bluebell and ramsons. Fern and wood melick are also present, with frequent pockets of clear ground also.	
Individual Trees	A number of trees ranging from small to very large, located within and on the boundaries of the Site. Species include a mixture of native and non-native broadleaf and conifers, including Scots pine, larch, cypress, beech, ash, sycamore, holly, oak, birch, apple.	Site level
	Medium wild cherry within patch of mixed scrub in grassland.	
	Medium semi-mature multi-stemmed sycamore within centre of field along old wall	
Other rivers and streams	Ludhill Dike runs east to west along the north of the Site through the woodland, running through or within 10m of the site boundary for 68m. It is characterised by its cobble and gravel sediment, shallow, silted banks and unvegetated channel bed, likely due to a combination of shading from the surrounding woodland. Iron oxide pollution, evident in form of ochred channel bed, likely due to historic mining practices in the area. This will also inhibit the establishment of aquatic plant and invertebrate communities. The watercourse, its character and condition, are discussed in greater detail in the River Condition Assessment report, ER-7732-04.	Local level

Species and Species Groups

19. Potential constraints relating to relevant groups were investigated through desk study and the surveys listed above. The highlighted species / groups below are of relevance to the Site and are referenced later in the assessment.

Table 3 Summary of relevant faunal / species issues

Species/ Group (Feature)	Notes	Valued at what scale
Bats (Emergence)	Bat Emergence Surveys were undertaken on the single on-site building (during optimal survey conditions and time of year); this confirmed the presence of a single small day-roost occupied by a solitary common pipistrelle bat. . A Bat Mitigation Class Licence will be secured prior to any works commencing on the building.	Site Level
Bats (Activity)	A typical pattern of bat activity has been recorded on site, with low numbers of common bat species recorded foraging along the woodland habitat to the north. This feature is also likely to be a key commuting feature for local bat populations.	Local
Amphibians	The PEA identified no ponds within 250m of the Site but confirmed the presence of suitable terrestrial habitat in the form of scrub and dense grassy vegetation. However, the distance between the site and any potential breeding ponds made it very unlikely that it would be of importance to amphibian populations, and in respect of GCN their likely absence can be assumed. Further survey was scoped out at the PEA stage.	n/a – likely absent
Birds	Of the habitats within the Site's boundary, the trees in the garden and field and the patches of scrub within the grassland are likely to be of most value to nesting and foraging birds. The grassland is likely to be of low value to ground-nesting birds due to frequent disturbance from agricultural practices, its dense high sward, and this this habitat is frequent throughout the wider landscape. Based on its size and habitats the Site is not considered to be significant to local bird populations Further survey was scoped out at the PEA stage. Offsite woodland to the north is likely to be of greater value to local bird populations but will not be significantly impacted by proposals.	Onsite – Site level Offsite – Local level
White Clawed Crayfish (WCC)	Manual search and eDNA sampling were undertaken to confirm the status of WCC within Ludhill Dike as it runs along the northern boundary of the Site. Both survey techniques confirmed likely absence of WCC from the watercourse.	
Invasive non-native plant species (INNS)	No INNS were noted during initial walkover survey1	n/a – likely absent

[1] Whilst our ecologists are trained in the identification of invasive species, this report is not a dedicated invasive species survey. Detectability of invasive plant species can be affected by several factors, and conclusive determination status, or extent, is not possible through preliminary survey alone. As the presence of invasive species can generate significant costs to development, the client may wish to instruct a dedicated invasive species survey prior to entering into contracts.

Description of the Proposed Development

20. The Site is subject to a Full Planning Application for the demolition of an existing dwelling and the erection of 50 dwellings with associated access, infrastructure and associated works.

21. A copy of the Site Layout, Drawing No. 247-0301-R13 (August. 2024), produced by Heneghan Architecture, is provided here for reference.

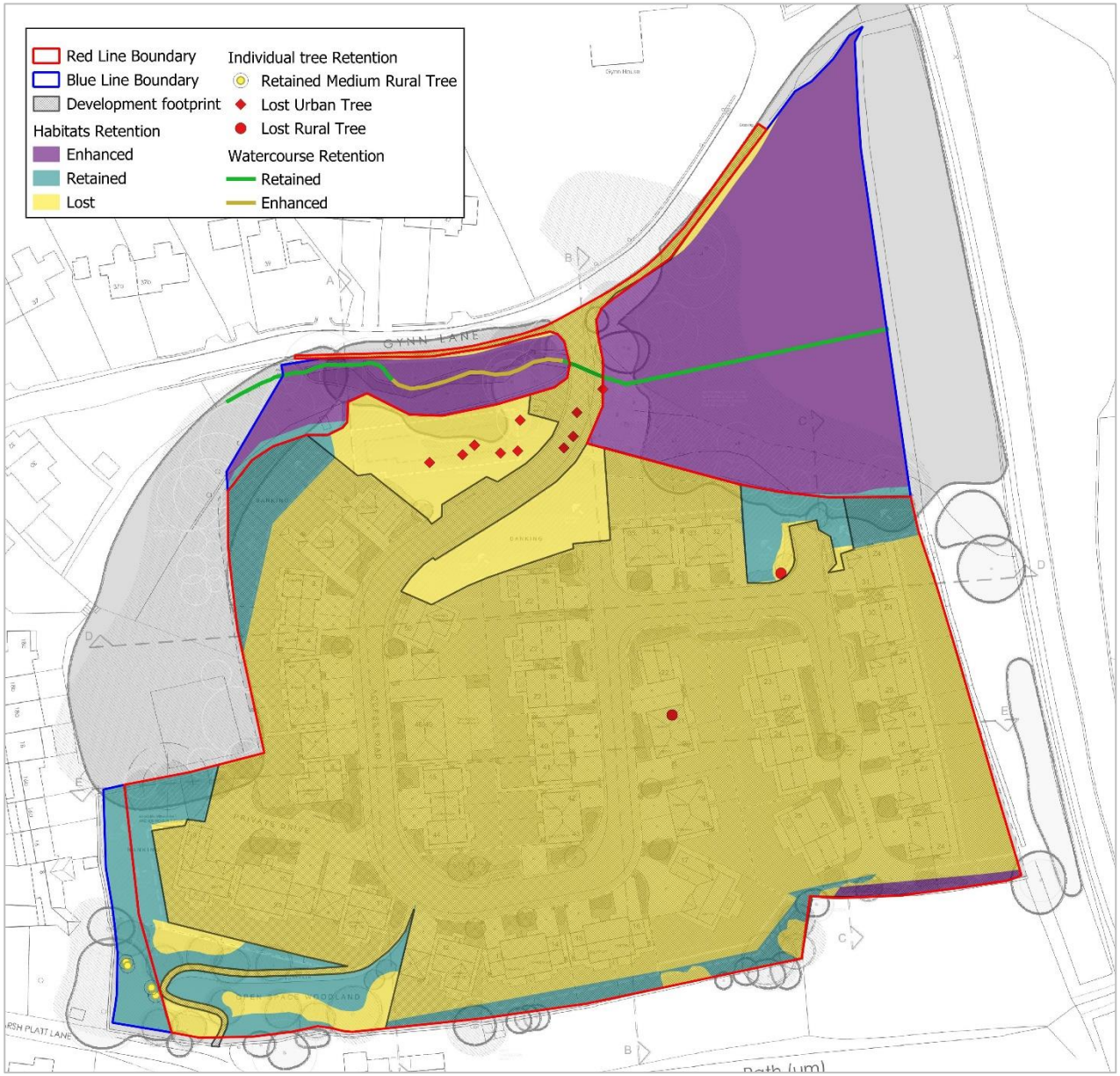
Figure 3 Site Layout



Impacts & Effects of Development

22. Figure 4 shows an overlay of the development footprint (i.e. roads, housing, private gardens) and the Habitat Retention Plan.
23. Much of the onsite habitat will be lost to built development, with some areas lost and recreated within POS.
24. Several small areas of peripheral habitat will be retained and protected from development.
25. Offsite woodland and a short section of watercourses will be retained and enhanced as part of the proposals.

Figure 4 Development footprint in relation to phase



Post development Habitats

26. Figure 5 shows the habitats that are proposed as part of the planning application. This is based on the landscape plans provided, and has been used to inform the BNG Calculations.

Figure 5 Post-development habitats



Table 4 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. This will take place in phases as set out in the above section.	*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 generally which will be managed through the Biodiversity Net Gain process – this is set out in the accompanying Biodiversity Net Gain Report. A small area of priority woodland (Lowland mixed deciduous woodland) will be lost. This also falls within the Kirklees Wildlife Habitat Network (KWHN), however, the scale of loss proposed would not be expected to have an impact on its function as a wildlife corridor. Vegetation clearance will result in a loss of nesting habitat for common bird species. If works were carried out between March and August, there is the potential for active nests to be destroyed. Demolition of the existing building will result in the destruction of a single solitary common pipistrelle day roost. In the absence of mitigation, there is a risk of killing/ injuring a small number of bats. Clearance of vegetation will result in the loss of bat foraging habitat. Given the retention of woodland to the north, impacts on commuting routes would not be expected.	On-site habitats of very low, low and medium distinctiveness types. Lowland mixed deciduous woodland Nesting Birds Bats (Roosting) Bats (Foraging/commuting) Badgers	Site Local Site Site Site Site
1b	**Damage to retained and adjacent habita**t such as by storage of clearance machinery or materials in these areas.	Mixed scrub Modified grassland Individual trees Lowland mixed deciduous woodland Watercourse	Site Site Site Local Local
	Damage to offsite woodland could lead to further loss of bat foraging habitat, and impact on connectivity for this group. This could also impact on nesting birds, either directly by destroying active nests, or indirectly by loosing further nesting opportunities.	Bats (Foraging/commuting) Nesting birds Badgers	Local Site Site
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 and industrial estate.	Nesting birds Bats (Foraging/commuting)	Local Local
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.	Lowland mixed deciduous woodland Watercourse	Local Local
1e	Potential effects on **Protected Species**. Precautions will be required to ensure that potential impacts on bats, badgers and nesting birds, and the spread of Invasive Non-Native Species (INNS) can be avoided.	Protected Species	Criminal Offence

	Impacts during Construction	Stage
2	**Construction activities** Construction of roads and sewers will be followed by footings and then above ground construction of buildings. Here construction will be phased according to market conditions.	*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.	Mixed scrub Modified grassland Individual trees Lowland mixed deciduous woodland Watercourse	Site Site Site Local Local
2b	**Disturbance**. The noise and activity at the Site will render it and areas immediately off-site inhospitable to wildlife during this period.	Nesting birds Bats (Foraging/commuting) Badgers	Local Local Site
2c	**Pollution**. There is a low potential for sediment or chemicals to be released from the Site, or into retained habitat during this stage.	Lowland mixed deciduous woodland Watercourse	Local Local

	Impacts during Construction	Stage
3	**Landscaping activities** will take place during the construction period and are likely the last works to be completed.	*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.	Mixed scrub Modified grassland Lowland mixed deciduous woodland	Site Site Local
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 BNG Metric.	Lowland mixed deciduous woodland Watercourse	Local Local
3c	**Inappropriate habitat creation or management techniques** could mean that the proposals fail to deliver on BNG commitments	All habitats and species	Site
3d	**Biodiversity Offsetting** will be enacted - securing a 10% net gain in terms of habitat value. This is likely to take place within the same district.	All habitats and species	Site

	Impacts during Operation	Stage
4	**The Site will become occupied.** Properties will be completed and become occupied, and traffic and articulated vehicles will access the Site regularly. Pedestrian access across the Site will increase. Retained and created habitat will be managed by the Site Management Company. Occupation of the Site will be phased based on market conditions.	*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	Site
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 Badgers	Local Local Site
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	Site

Mitigation & Residual Effects

27. Where feasible, the **avoidance** of unnecessary impacts has been considered at the design stage and worked into the outline plan, though the layout has not yet had a chance to respond 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.

28. There will be a requirement for the development to secure Biodiversity Net Gain at the mandatory 10% level. Some units will be created on the Site in the form of habitat units generated from the creation of scrub, grassland, trees and landscaping and the enhancement where possible of retained habitats such as scrub, grassland and the existing woodland. The shortfall in units will need to be offset through the creation of Biodiversity Units off-site through contributions to a third-party habitat bank, ensuring that Biodiversity Metric trading rules are complied with. Any Units achieved on Site through the creation or management of 'significant habitat' (generally those of moderate or higher distinctiveness) would need to be subject to a statutory Habitat Management and Monitoring Plan (HMMP) which would provide suitable management to achieve the required habitats and conditions.

29. 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 place a particular constraint on the protection of, or delivery of habitats on Site; or on off-set agreements.

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

- BS:42020 Biodiversity Management Plan (BMP)

  Would specify the provision of faunal habitat features, habitat creation within the Site and enhancement of offsite habitats (woodland and watercourse).

- Statutory Habitat Management and Monitoring Plan (HMMP)

  Would specify the creation and on-going management of any 'significant' habitats in the developed Site over a 30-year period. This plan would also specify the monitoring of habitats.

- BS:42020 Construction Environmental Management Plan (CEMP: Biodiversity)

  Here this would set out the precautions necessary in relation to risks from the construction phase to protected or notable species, significant retained habitats and local habitats which could be important or sensitive to activities on the Site.

- Lighting Plan

  This would protect habitats within the Site (retained or created) which could be valuable to sensitive nocturnal wildlife from unnecessary illumination. Here this would comprise of the Site boundaries, the pond and any key connective habitat created within the Site. Each phased application would be subject to its own Lighting Plan secured by standard condition.

- A Biodiversity Gain Plan

  This sets out the position of the proposals in relation to Biodiversity Net Gain (BNG) and provides information as to how the proposals will achieve the necessary gain. Due to the phased nature of the proposals the outline application will be accompanied by an 'Overall Biodiversity Gain Plan' and then each phased application would be subject to its own Phase Biodiversity Gain Plan secured by standard condition.

Table 5 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**.	There is a statutory requirement for the development to demonstrate a 10% net gain in biodiversity in line with the requirements of the Environment Act 2021. 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 offsetting. 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. The HMMP will detail the creation and management of new habitats, ensuring on-site habitats meet their target habitat types and condition scores, as set out in the proposals' Biodiversity Metric. The BMP will also detail the provision of faunal features, such as bird nesting and bat roosting boxes, and refugia for other locally occurring wildlife such as hedgehogs, amphibians and invertebrates. The BMP /HMMP will detail the creation and management of wildflower rich grassland and mixed native scrub / tree planting within areas of POS. It will also show the enhancement of offsite habitats, namely the lowland mixed woodland and watercourse to the north. Targeted management over a 30 year period will aim to uplift the condition score of these habitats. There will be a lag time between loss of habitat and creation on-Site / offsetting due to the nature of the proposals – this is seen a resulting in a negative impact of the relevant receptors here.	Minor Negative
1b	**Damage to retained habitat** such as by storage of clearance machinery or materials in these areas.	The CEMP will detail the installation of suitable barrier fencing around any retained or protected habitat - the 'No Works Area'.	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. Some level of disturbance is unavoidable.	Minor Negative

	Significant Effects - in the absence of mitigation	**Mitigation / Compensation**	**Residual Magnitude**
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: Biodiversity will detail the installation of barrier fencing around the 'No Works Area' to protect retained and off-site habitat. The main contractors CEMP will detail bunded compounds which will be used for storage of machinery and materials.	Neutral
1e	Potential effects on **Protected Species**. Precautions will be required to ensure / demonstrate that impacts on badgers, nesting birds, harvest mice and the potential spread of Invasive Non-Native Species (INNS) can be avoided.	A Bat Mitigation Class Licence (BMCL) will be secured prior to any works commencing on the roost building. Demolition will then follow the methodology set out in the licence to ensure impacts on bats can be avoided (as far as reasonably possible). The CEMP: Biodiversity will detail necessary pre-works checks for nesting birds.	Avoided entirely

	Mitigation during Construction	Stage
2	**Construction activities** will likely take place over an anticipated 10-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. This will be aligned with any requirements identified in the Arboricultural Impact Assessment (AIA) and Tree Protection Plan (TPP).	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 but after the clearance phase identified above this will act on a decreasing amount of habitat.	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: Biodiversity will detail the installation of barrier fencing around the 'No Works Area' to protect retained and off-Site habitat including the LWS. 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. **Biodiversity Off-setting** will be enacted during this stage.	*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: Biodiversity will detail the installation of barrier fencing around the 'No Works Area' to protect retained and off-site habitats.	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 BNG Metric.	The HMMP / BMP will specify preparation, and establishment works for all new and retained habitats covered by the BNG 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 HMMP / BMP will specify preparation, and establishment works for all new and retained habitats covered by the BNG Metric.	Neutral
3d	**Biodiversity Offsetting** will be enacted - securing a 10% net gain in terms of habitat value. This is likely to take place within the same district.	Secured through the land-owner's HMMP, Developer's Biodiversity Gain Plan and the securing legal agreement - Conservation Covenant or S106.	Minor Positive

	Mitigation during Operation	**Stage**
4	**The Site will become occupied.** Units will be completed and become occupied, and traffic and articulated vehicles 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 will see existing and created habitats managed in an ecologically sensitive way, to maximise biodiversity benefit.	Neutral
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.	Landscaping will 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.	The BMP/HMMP 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

Timing Issues

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

32. Works to the onsite building will not commence until a Natural England licence is in place. The start of works will then need to be programmed in co-ordination with the Licenced Ecologist.

Cumulative Effects

34. The proposals are unlikely to act cumulatively with other developments locally.

Offsite Measures or Compensation

35. A Biodiversity Net Gain (BNG) Assessment has been completed as part of the application. This has identified a net loss of 0.25 Habitat Units (-3.58%) and a net gain of 0.01 Watercourse Units (+0.05%); see ER-7762-06 for details.

36. Biodiversity Offsetting will be required for the scheme to demonstrate a 10% net gain in Habitat Units and Watercourse Units, with Trading Rules also considered. Discussions are underway as to a means of securing a local off set for the requisite units.

Enhancement

37. Opportunities will be detailed in the Habitat Management and Monitoring Plan (HMMP) and the Biodiversity Management Plan (BMP) documents, to be produced as a standard condition of planning.

Monitoring

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

39. The BMP and HMMP documents 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.

Policy and Legislation

40. Given the implementation of the mitigation set out above, it is anticipated that the proposals will comply with the relevant policy and legislation relating to wildlife and ecology.

Conclusion

41. Mitigation to be agreed by standard conditions of planning will be able to address most of the significant effects resulting from the development. There will be some residual impacts resulting from:

    - Habitat loss (of a mix of grassland and scrub) from the Site and the lag-time between loss and re-creation on or off-site. This will result in a short term, reversible negative impact acting on birds, bats and badgers at a site level.
    - Disturbance resulting from clearance and construction will result in a short term, reversible negative impact acting on birds, badgers and bats at a local scale.

42. The scheme is expected to result in a net loss for biodiversity on-site. Biodiversity off-setting will be required to ensure that a minor positive impact (10% gain), acting in the long-term on all identified receptors can be achieved in this respect.

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