

## Ecological Impact Assessment (EclA)

**Survey site:**

Dewsbury Library, Wellington Road, Dewsbury, West Yorkshire WF13 2PQ

**Client:**

Orange Design Studio

**Survey date:**

6<sup>th</sup> October 2025

**Project:**

This report is prepared to inform a planning application with Kirklees Council. The proposal is described as:

*Conversion of former library into apartments.*

The EclA is informed by the following methodology:

PEA survey methodology and legislation can be found in the Arbtech Supplement: [PEA Methodology and Legislation - 2024.](#)

PRA survey methodology and legislation can be found in the Arbtech Supplement: [PRA Methodology and Legislation - 2024.](#)

The survey results and recommendations contained within this report are valid for 18 months. An updated site visit may be required if the report is to be used any longer than 18 months after completion.

Site Location and Context					
<p>The survey site is centred on National Grid Reference SE 24291 21609 and has an area of approximately 0.085ha. The site comprises a former library, that is in a significant state of disrepair, along with associated access and areas of hardstanding. The site is located within the town of Dewsbury, within a heavily urbanised environment. It is bound by Wellington Road to the north, Old Westage road to the south and commercial units to the east and west. The River Calder lies 115m to the south of the site, which may be of elevated value for foraging and commuting bats.</p> <p>The underlying geology for the site comprises sandstone (Emley Rock), which is overlaid by slowly permeable seasonally wet acid loamy and clayey soils, typical habitats of which include seasonally wet pastures and woodlands.</p>					
Survey Details					
<p>The site survey was undertaken by Gareth Hey BSc (Hons), MSc, ACIEEM (Natural England Protected Species Licence Numbers: [Bats] (2021-51195-CLS-CLS) [Great Crested Newts] (2017-30374-CLS-CLS) [Barn Owl] (CL29/00097) (Natural Resource Wales Protected Species Licence Number: [Bats] (S094455/1)</p>					
Date of survey	Temperature (°C)	Humidity (%)	Cloud Cover (%)	Wind (mph)	Rain
06/10/2025	18	75	20	2	None
Survey limitations					
<p>It should be noted that whilst every effort has been made to describe the baseline conditions within the survey area, and evaluate these features, this report does not provide a complete characterisation of the site. This assessment provides a preliminary view of the likelihood of protected species being present. This is based on suitability of the habitats on the site and in the wider landscape, the ecology and biology of species as currently understood, and the known distribution of species as recovered during the searches of historical biological records.</p> <p>A biological records data search has not been undertaken. However, given the location of the site, the nature of the habitats present and the assessed suitability of the site for protected or notable species, it is not anticipated that the purchase of biological records data will add any significant weight or alter the conclusions and recommendations outlined in this report.</p> <p>The survey was completed outside of the optimal survey period (April to October) for ground flora, and as such the accuracy of botanical assessment and condition assessment data may be limited. However due to the habitats present on site this is not considered to be a significant limitation.</p>					

The building was confined on the western and southern boundaries by adjacent commercial units, which made it difficult to observe these elevations. Some of these elevations were able to be viewed from internal courtyard areas and windows, however, it is possible that some potential roosting features may have been missed. In any case, the building has been determined to be of high value to roosting bats, owing to the identifiable potential roosting features and as such, three additional nocturnal surveys will be required. These additional surveys should provide full coverage of the building to determine if any bats may be utilising it for roosting purposes.

<b>Ecological Survey Factor</b>	<b>Detailed using desk study and site survey (carried out under good weather conditions). Any specific limitations noted within relevant section. This table may include further work you will need to commission (if any) to obtain planning permission or comply with legislation for other consent. All clients are expected to read and understand this section, or to contact the lead surveyor for advice.</b>
<b>Conclusion, Impact or Recommendations</b>	<b>for other consent. All clients are expected to read and understand this section, or to contact the lead surveyor for advice.</b>
<b>Habitats and plants (see habitat map in appendix 1, location plan in appendix 2, proposal plan in appendix 3 and photos in appendix 4). Botanical species are described with reference to the DAFOR scale (D = Dominant; A = Abundant, F = Frequent, O = Occasional, R = Rare).</b>	
<i>Summary of Survey Findings</i>  <i>(UKHab codes used)</i>	<p>The site does not contain any habitats listed as a habitat of principal importance under Section 41 of the Natural Environment and Rural Communities (NERC) Act (2006). Overall, the habitats within the site are common and widespread and have low ecological value. Notable habitats are present within 2km.</p> <p><b>On-site habitat descriptions</b></p> <p><b><u>u1b5 – Buildings</u></b></p> <p>The building present within the site comprises a complex network of structures of varying construction. It comprises a former library structure that is in a significant state of disrepair, with signs of deterioration and vandalism apparent throughout the building. The buildings suitability for roosting bats is discussed further in this report.</p> <p>BNG Condition Assessment – N/A (pre-determined by the metric)</p> <p><b><u>u1b6 – Other developed land</u></b></p> <p>Located in the southern sections of the site are several sections of hardstanding, utilised for former access to the site. There is no associated vegetation, and the areas are of minimal ecological value.</p>

	<p>BNG Condition Assessment – N/A (pre-determined by the metric)</p> <p><b>u1f – Sparsely vegetated urban land – tall forbs [16]</b></p> <p>To the south of the building is an area of land where some scrub and tall forb species have occupied areas of broken ground and hardstanding. The main species present includes buddleia, which covers approximately 45% of the total area of this parcel. The vegetation structure is not varied and does not contain different plant species that are beneficial for wildlife. There is an absence of invasive non-native plant species.</p> <p>BNG Condition Assessment – Poor</p> <p><b>Local notable habitats</b></p> <p>There are limited areas of priority habitat, as designated under Section 41 of the Natural Environment and Rural Communities (NERC) Act, 2006 within close proximity to the site. The closest is an area of deciduous woodland, located 260m east of the site.</p>
<i>Foreseen Impacts</i>	<p><b>On-site habitats</b></p> <p>The proposed development will result in the loss of a small area of sparsely vegetated land. This could result in a net loss in biodiversity at the site.</p> <p><b>Notable habitats</b></p> <p>No direct impacts to any notable habitats will occur as a result of the proposed development, due to the small scale of the site, urban location and separation from the site.</p>
<i>Recommendations</i>	<p><b>On-site habitats</b></p> <p>To compensate for the proposed habitat losses at the site, the following habitat creation measures should be incorporated:</p> <ul style="list-style-type: none"> <li>• Creation of species rich grassland; and</li> <li>• Planting of native trees and shrubs throughout the site.</li> </ul> <p><b>Notable habitats</b></p> <p>None required.</p>

	<p><b>Biodiversity net gain</b></p> <p>The Environment Act (2021) requires all developments (excluding exemptions) to deliver a 10% net gain in biodiversity. Therefore, the planning application must be accompanied by a landscaping/habitat creation and enhancement strategy, biodiversity net gain calculations and a habitat management and monitoring plan to ensure the proposed development delivers a 10% net gain.</p>
<p><b>Locality and Designated Sites</b></p>	
<p><i>Summary of Survey Findings</i></p>	<p><b>On-site designations</b></p> <p>The site is not subject to any designation.</p> <p><b>Statutory designated sites (within 2km)</b></p> <p>There are two statutory sites within 2km of the site, as detailed below:</p> <ul style="list-style-type: none"> <li>• Sparrow Wood Local Nature Reserve (LNR) – 1.2km south. Woodland habitat with the associated wildlife and flora.</li> <li>• Lower Spen Wildlife Area LNR – 1.5km west. Woodland, scrubland, meadow, wetland. The meadows contain flowers that attract butterflies and bees. Woodland areas provide shelter and nest sites for birds. The water quality in the River Spen is improving, and it supports a wide range of wildlife on the shallow stony bed and well-vegetated riverbanks.</li> </ul> <p>The site lies within the impact risk zone for Denby Grange Colliery Ponds SSSI.</p> <p><b>Statutory designated sites (within 10km)</b></p> <p>No national network sites (SAC, SPA, Ramsar) are located within 10km.</p> <p><b>Non-statutory designated sites</b></p> <p>The presence of non-statutory designated sites within 2km of the site cannot be established without data from the local records centre.</p>
<p><i>Foreseen Impacts</i></p>	<p><b>On-site designations</b></p> <p>No impacts foreseen.</p>

	<p><b>Statutory and non-statutory designated sites</b></p> <p>No impacts to designated sites are anticipated due to the small scale and distance of the proposed development from such sites (where known) as well as the urban location of the site with surrounding physical barriers.</p> <p>The site lies within the impact risk zone for Denby Grange Colliery Ponds SSSI. The proposed development type is not listed as a possible high risk for this designation.</p>
<i>Recommendations</i>	<p><b>On-site designations</b></p> <p>None required.</p> <p><b>Statutory and non-statutory designated sites</b></p> <p>None required.</p>
<b>Invasive / Non-native species</b>	
<i>Summary of Survey Findings</i>	No problematic invasive and non-native species recorded on site.
<i>Foreseen Impacts</i>	N/A
<i>Recommendations</i>	No further surveys but remain vigilant.
<b>Invertebrates</b>	
<i>Summary of Survey Findings</i>	The tall forbs on site likely provide common invertebrates with opportunities to forage and shelter. The site contains no further notable habitats which may provide niches for specialised or protected invertebrates.
<i>Foreseen Impacts</i>	None foreseen.
<i>Recommendations</i>	No further surveys.
<b>Bats</b>	
<i>Summary of Survey Findings</i>	<b>EPSL data</b>

A search of the magic.gov.uk database for granted EPSLs within a 2km radius of the site has been completed. Displaced bats from licensed sites <2km away from the survey site will find alternative habitat either within the mitigation measures implemented as part of the licence or will relocate to other known roosts sites in close proximity to the licensed site. There are two EPSLs within a 2km radius of site as detailed below:

EPSL reference	Bat species affected	Distance from site	Impacts allowed by licence
2019-38940-EPS-MIT	Common pipistrelle	0.5km west	Destruction of a resting place
EPSM2011-3454	Common pipistrelle	1.55km north-west	Destruction of a resting place



There are no Special Areas of Conservation designated for bats within 10km of the site.

#### **Foraging and commuting habitat**

The habitats within the site are of minimal value for foraging and commuting bats. The River Calder located 115m south of the site provides elevated value for foraging and commuting bats, as it provides a linear feature for bats to commute throughout the wider landscape, while also being able to support an abundance of invertebrate species, which bats will prey on and as such, providing elevated value for foraging bats.

#### **Roosting habitat**

Buildings to be impacted by the proposed development are assessed for their suitability to support roosting bats below. No evidence of roosting bats was identified on or within B1.

<b>B1 Building description</b>	<b>Photographs</b>
<p><i>Summary</i></p> <p>Building B1 comprises the only building present within the site, it comprises a grade II listed building comprised of a mosaic of differing structures, formerly associated with Dewsbury Library. The building comprises a two and three-storey, brick-built structure with a stone façade. The roof structure comprises a network of hipped roofs, covered in slate tiles. The following features were identified on the building that could be utilised by roosting bats:</p> <ul style="list-style-type: none"><li>• On the northern, eastern and southern elevations of the building, several slipped or missing tiles were present;</li><li>• On the northern elevation of the building, there is a timber tower structure present that has a number of gaps present within its structure;</li><li>• On the base of the tower structure, there are gaps underneath sections of lead flashing;</li><li>• On the southern and northern elevations of the building, around timber bargeboards, there are gaps; and</li><li>• On the eastern and southern elevations, there are gaps around boards positioned over smashed windows, that could be utilised by bats to access the internal areas of the building.</li></ul> <p>Internally, the building was in a significant state of disrepair, with a large number of debris, mould and rotting timbers present throughout the building. Only one enclosed void was identified within the building, within a small stairwell, in the northern section of the building. It was not possible to undertake a throughout inspection of this area, due to health and safety concerns. The other areas of the building mainly comprise vaulted ceilings, with only limited or no voids present within them.</p>	 <p><b>Northern elevation of B1</b></p>  <p><b>Missing tiles present on northern elevation of B1</b></p>

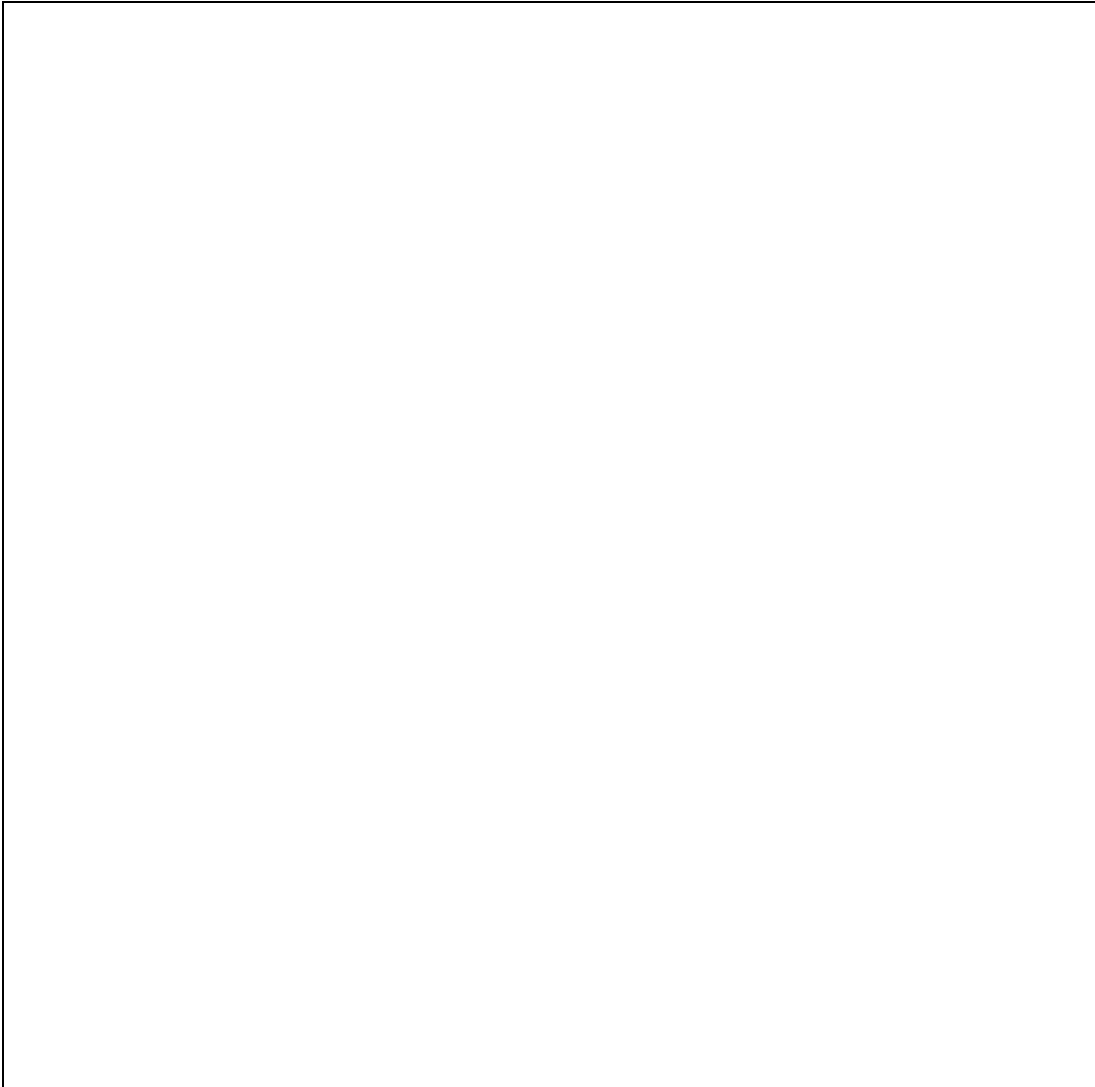
Owing to the presence of a significant number of features on B1, it is determined that it provides **high value for roosting bats.**



**Gaps present around vertical tiles on northern elevation of B1**



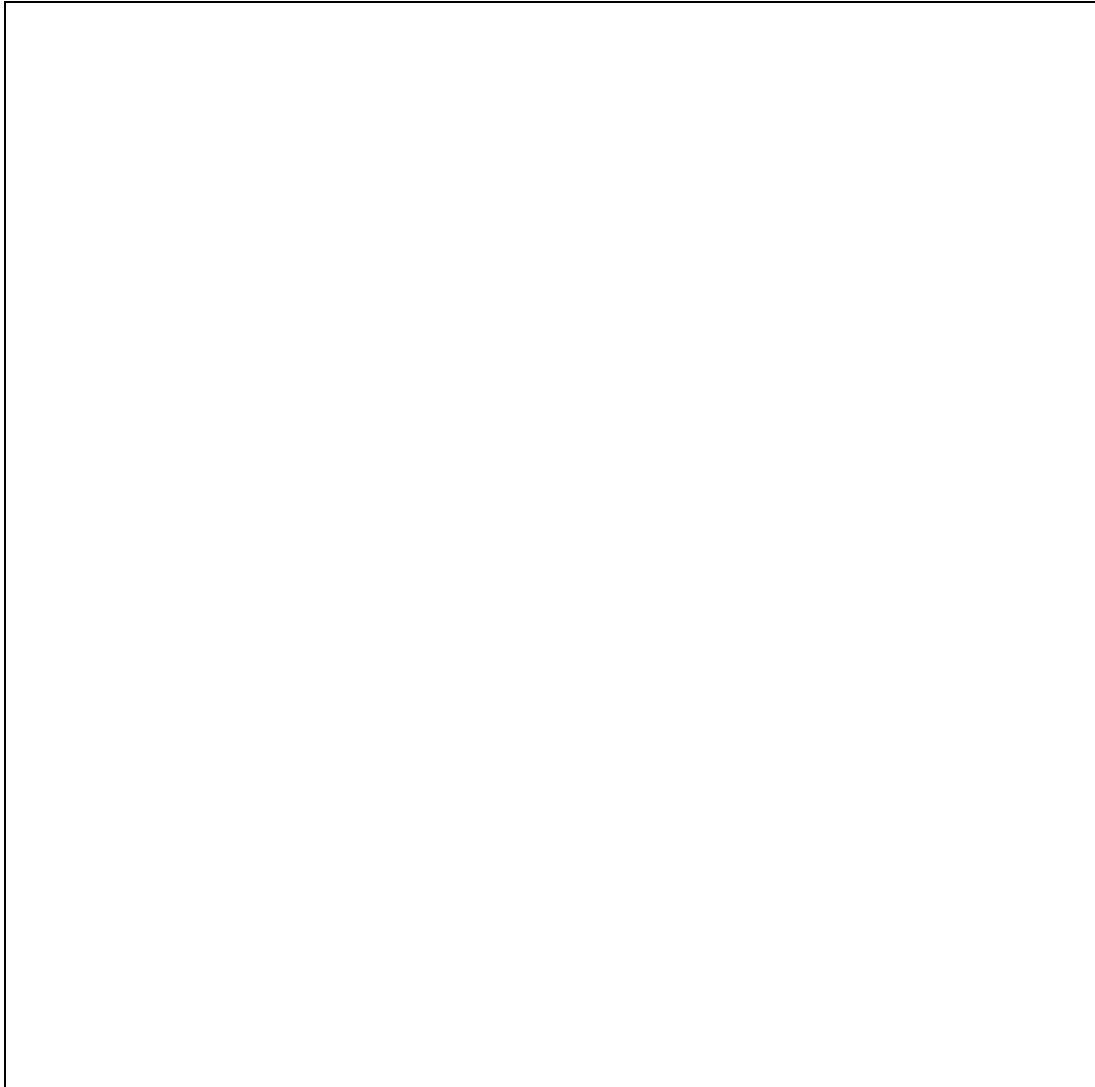
**Gaps present around base of tower structure on northern elevation of B1**



Full view of tower structure on B1



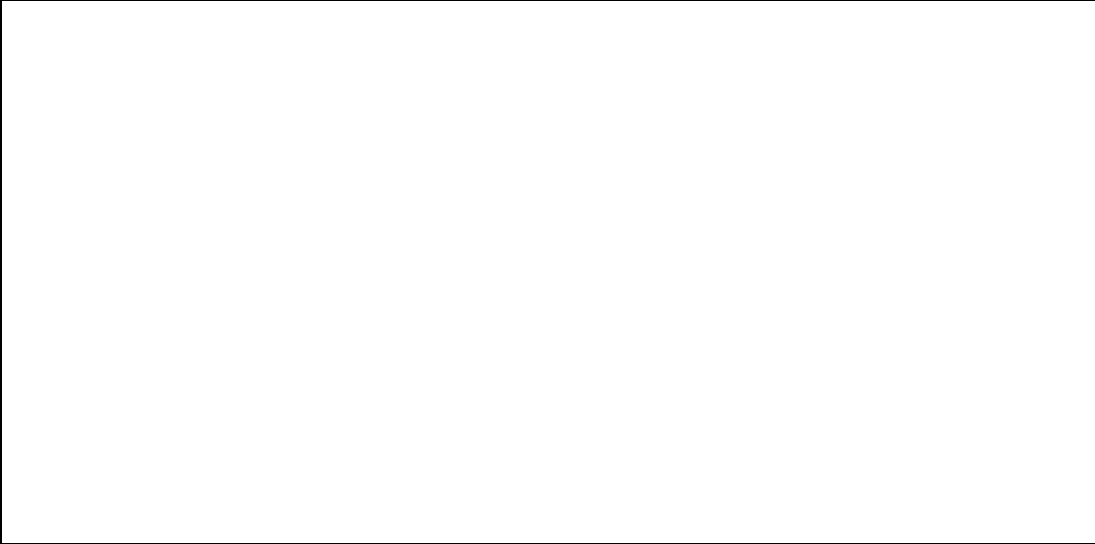
Eastern elevation of B1



**Southern elevation of B1**



**Enclosed void present within northern section of B1**



**Example of additional rooms present within B1**

<p><i>Foreseen Impacts</i></p>	<p><b>Roosting habitat [Buildings]</b></p> <p>The proposed development will result in significant alterations to this building including likely maintenance works to the external roof. This could result in the destruction of any bat roosts present and could cause disturbance, death or injury to bats.</p> <p><b>Foraging and commuting habitat</b></p> <p>The proposed development will result in the loss of small areas of tall forbs, but given their low value and the presence of more extensive areas of foraging and commuting habitat in the locality, this is likely to be inconsequential for bats.</p> <p><b>Artificial lighting</b></p> <p>The proposed development may lead to an increase in the amount of current lighting of surrounding habitats or buildings without mitigation. This may disturb commuting bats.</p>
<p><i>Recommendations</i></p>	<p><b>Roosting habitat [Buildings]</b></p> <p>Three bat emergence/re-entry surveys are required on B1 during the active bat season (May – September) to confirm presence/likely-absence of bats roosting in or on the building.</p> <p>These survey visits should be completed during the optimal survey period mid-May to August inclusive. The survey visits should be at least three weeks apart.</p> <p>Sub-optimal: early May and September. Would require greater justification of timing e.g., weather conditions, known local bat activity.</p> <p>One of the surveys could be a dawn re-entry survey, or all three can be at dusk if supported by night vision aids (NVA).</p> <p>Seven surveyors positioned evenly around the perimeter of the building are required to provide full coverage of the building’s elevations to look for emerging/re-entering bats. An infrared camera should also be employed as part of the survey to see where any specific roost locations are located.</p> <p>Lighting mitigation may be required based on the outcome of the night bat survey(s).</p> <p>If any bat roosts are confirmed from this survey schedule, a bat licence would be required to demolish the buildings as it would involve the destruction of roosts. This is applied for with the help of a class 2 licensed bat ecologist after planning permission is granted, but before commencement of works.</p>

	<p><b>Artificial lighting</b></p> <p>A low impact lighting strategy will be adopted for the site during post-development which outlines the areas of the site that will be retained as dark corridors. Parameters can be found on the Bat Conservation Trust website: <a href="https://www.bats.org.uk/our-work/buildings-planning-and-development/lighting">https://www.bats.org.uk/our-work/buildings-planning-and-development/lighting</a>.</p> <p><b>Suggested biodiversity enhancements</b></p> <p>Enhancements are dependent on the outcome of further surveys.</p>
<b>Birds</b>	
<p><i>Summary of Survey Findings</i></p>	<p><b>Buildings</b></p> <p>Nesting pigeons were identified within the internal areas of B1, with evidence of them observed in numerous rooms within the building. The building also provides suitability for additional species such as house sparrow.</p> <p><b>Trees and vegetation</b></p> <p>No suitable habitat present on site for nesting birds.</p> <p><b>Barn owls</b></p> <p>The site does not appear to provide any suitable nesting sites for barn owls.</p> <p><b>Overwintering birds</b></p> <p>Due to the small size of the site and the extent and type of the habitats recorded, the site not considered suitable to support a significant assemblage of protected and/or notable birds.</p>
<p><i>Foreseen Impacts</i></p>	<p><b>Buildings</b></p> <p>The proposed development could result in the destruction or the disturbance and subsequent abandonment of active bird nests.</p>

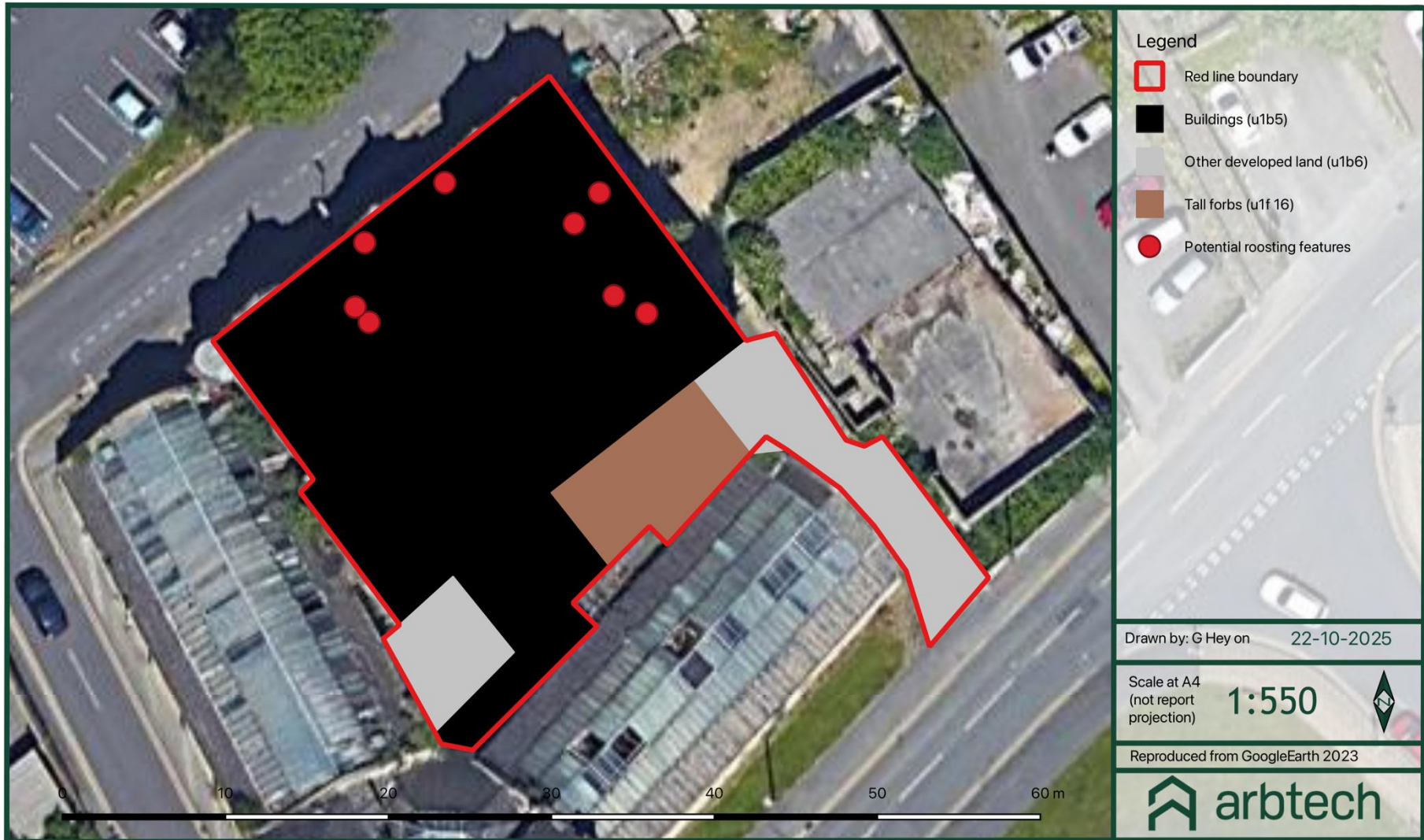
	<p><b>Barn owls</b> None foreseen.</p> <p><b>Overwintering birds</b> None foreseen.</p>
<i>Recommendations</i>	<p><b>Buildings</b> Any building removal should be undertaken outside the period 1st March to 31st August. If this timeframe cannot be avoided, a close inspection of the building should be undertaken immediately, by a qualified ecologist, prior to the commencement of work. All active nests will need to be retained until the young have fledged.</p> <p>Precautions should be taken with machinery and noise levels when working close to any retained nests so as not to disturb any nearby nesting birds during construction works. At least a 3-5m buffer should be created between any machinery and active nests until the young have fledged.</p> <p><b>Barn owls</b> None required.</p> <p><b>Overwintering birds</b> None required.</p> <p><b>Suggested biodiversity enhancements</b> The installation of a minimum of six bird boxes on the retained building will provide additional nesting habitat for birds e.g. Schwegler No 17 Swift Nest Box Schwegler 1SP Sparrow Terrace</p>

	<p>Or a similar alternative brand.</p> <p>Swift and sparrow boxes should be positioned at the eaves of a building and can be incorporated into the fabric of the building during construction.</p>
<b>Reptiles</b>	
<p><i>Summary of Survey Findings</i></p>	<p><b>EPSL data</b></p> <p>A review of the MAGIC database returned no granted EPSL records for protected reptiles within 2km of the site.</p> <p><b>Habitat suitability</b></p> <p>There is no suitable habitat present on site for reptiles due to a lack of habitats such as scrub and rank grassland which would offer refuge for these species. Further, the site is surrounded by urban development (i.e. roads and buildings) which is considered sub-optimal for reptile migration and therefore reptiles are considered unlikely to migrate from any nearby suitable habitats to the development site. As such it is likely that reptiles are absent from the development site.</p>
<i>Foreseen Impacts</i>	No impacts are anticipated on reptiles as a result of the proposed development.
<i>Recommendations</i>	None required.
<b>Amphibians</b>	
<p><i>Summary of Survey Findings</i></p>	<p><b>EPSL and survey data</b></p> <p>A review of the MAGIC database returned no granted EPSL records for great crested newts within 500m of the site. Further, no positive class survey licence return or DLL historic survey data (2017 – 2019) were present within 500m of the site.</p> <p><b>Aquatic habitat suitability (including ponds within 500m)</b></p> <p>Great crested newts (GCN) exist in metapopulations and are known to utilise ponds and their connecting terrestrial habitat during their life cycle; great crested newts are typically found within terrestrial habitats up to 500m from breeding ponds (Langton et al. 2001).</p> <p>No ponds are present on site or within 500m of the site.</p>

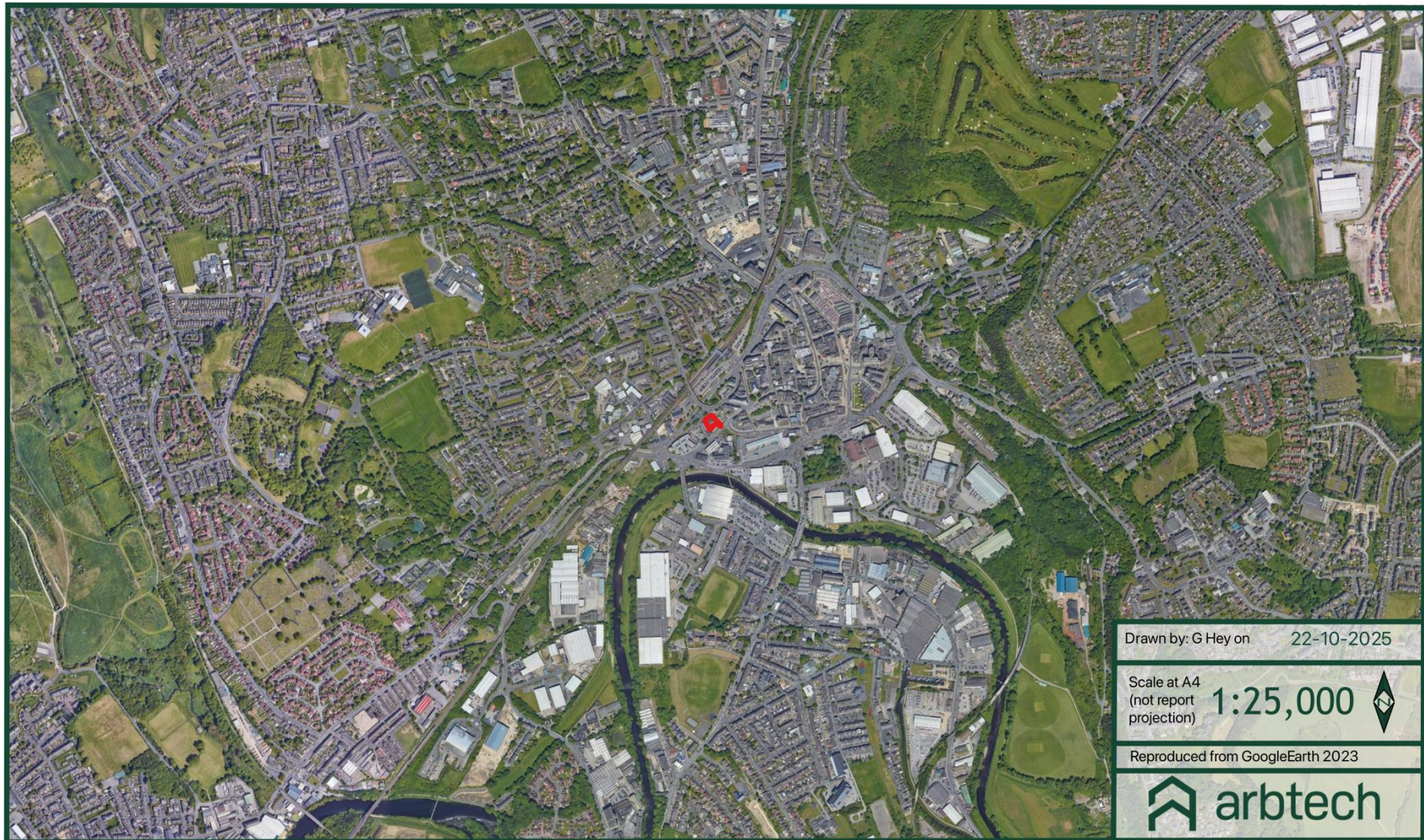
	<p><b>Terrestrial habitat suitability</b></p> <p>The site provides limited suitable terrestrial habitat for amphibians given the lack of optimal habitat (i.e. scrub, rank grassland). The areas of hard standing and amenity grass offer sub-optimal habitat for terrestrial amphibians. The hedgerows may offer refuge for these species, however given the urban nature of the surrounding landscape (i.e. dominated by roads and hard standing which are sub-optimal for amphibians) it is unlikely that amphibians will migrate on to site. Further, there is limited suitable terrestrial habitat across the wider landscape reducing the likelihood of amphibians being present on site and across the surrounding areas.</p>
<i>Foreseen Impacts</i>	Given the lack of suitably connected breeding ponds within 500m of the site, the presence of GCN on-site is considered unlikely and therefore impacts to amphibians as a result of the proposed development are deemed to be acceptably low.
<i>Recommendations</i>	None required.
<b>Badger</b>	
<i>Summary of Survey Findings</i>	No badger setts were noted on site or within a 30m radius of the site. The site is considered unsuitable for badgers given the lack of suitable sett excavation areas/ground. Further, there is limited suitable badger foraging habitat on site given the lack of fruiting trees/scrub. The site is also surrounded by urban development (i.e. roads and buildings), which is sub-optimal habitat therefore reducing the likelihood of badgers being present within the surrounding area of the site.
<i>Foreseen Impacts</i>	No impacts are anticipated on badgers as a result of the proposed development.
<i>Recommendations</i>	None required.
<b>Riparian animals</b>	
<i>Summary of Survey Findings</i>	A review of the MAGIC database returned no granted EPSL records for otters or water voles within 2km of the site. There are no water courses on or connected to the site. There are also no riparian habitats present on site or within an influencing distance.
<i>Foreseen Impacts</i>	No impacts are anticipated on riparian animals as a result of the proposed development.
<i>Recommendations</i>	None required.
<b>Hazel dormouse</b>	
<i>Summary of Survey Findings</i>	<p><b>EPSL data</b></p> <p>A review of the MAGIC database returned no granted EPSL records for hazel dormice within 2km of the site.</p>

	<p><b>Habitat suitability</b></p> <p>The site lies outside of the know current range for hazel dormice and there are no suitable habitats within the development area. As such it is considered likely that hazel dormice are absent from site.</p>
<i>Foreseen Impacts</i>	No impacts are anticipated on hazel dormice as a result of the proposed development.
<i>Recommendations</i>	None foreseen.
<b>Other e.g. hedgehog</b>	
<i>Summary of Survey Findings</i>	The tall forbs onsite provides limited foraging and commuting opportunities for hedgehogs. The presence of areas of built form within the immediate surrounding landscape presents a significant barrier to dispersal, with limited access to other pockets of suitable habitat. Given the above, hedgehogs are assumed to be likley absent from the site.
<i>Foreseen Impacts</i>	No impacts are anticipated on hedgehogs as a result of the proposed development.
<i>Recommendations</i>	None required.

Appendix 1: Survey/Habitat map





Appendix 2: Location map



**Appendix 3: Proposed plan**

Not available at time of writing report.

Appendix 4: Habitat Photos

Buildings	
Photograph	Description
	Figure 1: Main building (B1) on site
Sparsely vegetated land	
Photograph	Description
	Figure 2: Sparsely vegetated land to the southern section of the site.

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Draft	0.1	Gareth Hey BSc (Hons) MSc ACIEEM, Ecological Consultant	22/10/2025
Proof	0.2	Elen Griffin BSc (Hons), MRSB, Senior Ecologist, Natural England Class 2 Bat Licence Holder	27/10/2025
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