

Sent: 03 September 2025 08:42

Subject: 2025/92352 at location Cambridge Road Car Park, Cambridge Road, Huddersfield, HD1 5BY

Please see ecological commentary below:

Designations

No issue

Onsite habitats and species

The Preliminary Ecological Appraisal is reasonable and acceptable.

There are recommendations for precautions concerning birds, and invasive species that can be covered by a CEMP.

There are also recommendations for enhancements, that will be conditioned.

BNG

BNG excel format of metric has not been provided, just the HCA spreadsheet. Please can the statutory metric be provided once the below is addressed:

It is mentioned in the PEA that two trees were felled in 2025, however these have not been included in the calculator.

According to guidance they are to be included as part of the BNG baseline assessment.

Degradation

- The Ecological Impact Assessment and letter in May 2025 from Future Ecology raises a concern. It is mentioned that site clearance had already taken place. This would imply that degradation has taken place on the site. The applicant would need to confirm that no works took place on-site between May 2020 and with comparative aerial imagery.

The applicant should either:

- o Provide evidence that the 'degradation' took place prior to 30th January 2020, if not under a planning consent, or after 25th August 2023 if to implement a planning consent; or
- o Resubmit the BNG report and metric based on an appropriately evidenced assumption as to the pre-degradation baseline.

As a result, the baseline assessment is considered to not be acceptable. Please can this be resolved prior to further commentary.

Yes, felled trees removed for health and safety must be recorded in the statutory biodiversity metric as a loss, as they reduce a site's baseline biodiversity value. Even though their removal is necessary, this still counts as a negative impact on the habitat, and you must then follow the biodiversity gain hierarchy to compensate for the loss and achieve the mandatory 10% net gain.

Why you must record the loss:

BNG measures habitat change:

The Biodiversity Metric measures the ecological value of habitats on a site. Removing a tree, even for safety reasons, causes a decrease in this value, resulting in a negative unit score in the metric.

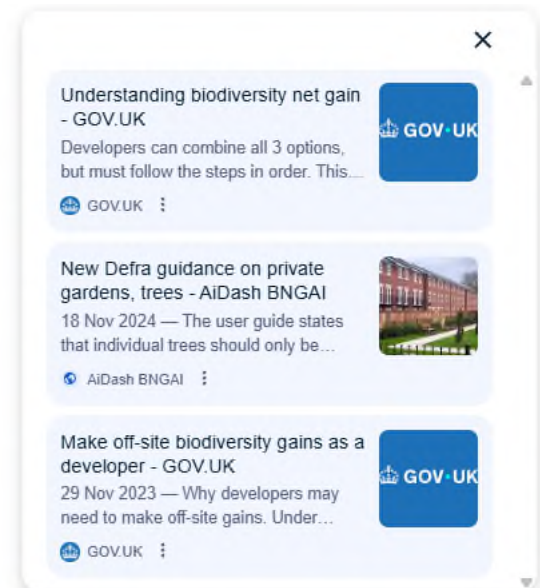
Baseline loss:

All felled trees, regardless of the reason for removal, are recorded as part of the baseline (pre-development) state of the site.

The Biodiversity Gain Hierarchy:

After recording the loss, you must follow the biodiversity gain hierarchy, which outlines the steps to achieve the 10% net gain:

1. **Prioritize on-site gains:** Enhance or restore biodiversity on your development site.
2. **Off-site gains:** If you can't achieve your target on-site, you can create or improve habitats on land outside the development site.
3. **Statutory biodiversity credits:** As a last resort, you can buy statutory biodiversity credits from the government to invest in habitat creation.



Reason: To ensure the development delivers a biodiversity net gain on site in accordance with Schedule 7A of the Town and Country Planning Act 1990

Suggested conditions

BNG conditions to be included once the above commentary is addressed.

Habitats / Species

A condition for a CEMP: Biodiversity (Construction Environment Management Plan) is advised, e.g. No works shall take place until a Construction Environmental Management Plan (CEMP: Biodiversity) has been submitted to and approved in writing by the local planning authority. The CEMP (Biodiversity) shall include the following:

- a) Summary of potentially damaging activities
- b) Identification of "biodiversity protection zones"
- c) Practical measures (both physical measures and sensitive working practices) to avoid or reduce impacts during construction (these may be provided as a set of method statements)
- d) The location and timing of sensitive works to avoid harm to biodiversity features.
- e) The times during construction when specialist ecologists need to be present on site to oversee works.
- f) Responsible persons and lines of communication.
- g) The role and responsibilities on site of an ecological clerk of works (ECoW) or similarly competent person.
- h) Use of protective fences, exclusion barriers and warning signs.

The approved CEMP: Biodiversity shall be adhered to and implemented throughout the construction period strictly in accordance with the approved details, unless otherwise agreed in writing by the local planning authority.

Reason: In the interests of biodiversity and in accordance with LP30 and NPPF15

Enhancements

A Biodiversity Enhancement Management Plan must be provided to the LPA prior to the commencement of works on-site. It must include the following items that will be installed post development:

- o Potential to improve connectivity locally by enhancing the treeline which lies adjacent to the Site with new planting and generally to plant more trees within the Site to compensate for the loss of two trees that were removed for health and safety reasons.
- o Installing roosting or nesting features on existing adjacent trees that are under the same land ownership as the Site.

- o Enhancing the existing mixed scrub by introducing native shrub planting, removal of non-native species and adding invertebrate boxes.

Reason: In the interests of biodiversity and in accordance with Policy LP30 and NPPF15

Many thanks,
Katie

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