

**Transpennine Route Upgrade (TRU)  
Fitzwilliam Street Temporary Staff Car Park  
Ecological Impact Assessment (EclA)  
Network Rail**

**Document Ref: 151667-TSA-00-TRU-REP-W-EN-001955**

**August 2025**



**Table of Contents**

**1. INTRODUCTION ..... 3**

    1.1 Background ..... 3

    1.2 Proposed Development..... 3

**2. METHODOLOGY ..... 5**

    2.1 Scope of the Assessment..... 5

    2.2 Desk Study ..... 7

    2.3 Field Survey ..... 9

    2.4 Daytime Bat Walkover..... 9

    2.5 Ground Level Tree Assessment..... 10

    2.6 Limitations ..... 11

**3. BASELINE ..... 12**

    3.1 Site Overview ..... 12

    3.2 Designated Sites ..... 12

    3.3 Ancient Woodland and Priority Habitats ..... 13

    3.4 European Protected Species Mitigation Licenses ..... 13

    3.5 Site Habitats..... 14

    3.6 Protected and Priority Species ..... 17

    3.7 Invasive Non-Native Species ..... 20

**4. IMPACT ASSESSMENT, MITIGATION AND RESIDUAL EFFECTS ..... 21**

**5. CONCLUSIONS ..... 26**

**6. BASELINE BNG ASSESSMENT ..... 27**

**7. PHOTOGRAPHS ..... 28**

**APPENDIX A. LEGISLATION AND RELEVANT PLANNING POLICY..... 37**

## 1. INTRODUCTION

### 1.1 Background

- 1.1.1 This an Ecological Impact Assessment (EclA) supports the submission of an application for planning permission (under the Town and Country Planning Act 1990, as amended by the Levelling-up and Regeneration Act 2023) for temporary staff car park facilities for TRU and Train Operating Companies (TOC) staff, to facilitate the construction works for the W3 section of the TRU between Huddersfield and Westtown (Dewsbury) ('the Scheme').
- 1.1.2 The TransPennine Route Upgrade (TRU) is a programme of works to enhance/upgrade the existing railway infrastructure between Manchester and York.
- 1.1.3 The Network Rail (Huddersfield to Westtown (Dewsbury) Improvements) Order (a Transport and Works Act Order (TWAO), referred to subsequently in this planning statement as "the TWAO") was made by the Secretary of State in October 2022 and came into force on 3rd November 2022.
- 1.1.4 Network Rail is proposing to implement a temporary staff car park in Huddersfield (hereby referred to as "the Site" within the former Kirklees College site which was granted planning permission for a mixed used development, in 2022 (ref 2018/92647).
- 1.1.5 This EclA report seeks to provide the following:
- Identify important ecological features (IEFs) present within the Site and zone of influence<sup>1</sup> (Zoi) of the development;
  - Describe potentially significant ecological effects associated with the development;
  - Set out environmental measures in line with the Mitigation Hierarchy required to comply with relevant planning policies and nature conservation legislation; and
  - Provide an assessment of significant residual effects.

### 1.2 Proposed Development

- 1.2.1 The Proposed Development is located at the former Kirklees College site between Fitzwilliam Street and the A629 New North Road in Huddersfield. The approximate National Grid Reference (NGR) is 414040, 416931, see **Figure 1** for the Site boundary.
- 1.2.2 The Proposed Development comprises the temporary use of the northern portion of the former Kirklees College site as a car park to support the TRU programme. The car park is anticipated to be operational from August 2025 until the end of April 2028 (i.e. approximately 32 months). Following this period, the Proposed Development will revert to a vacant lot, and the approved planning permission for these northern plots of the mixed-use development can be implemented.

---

<sup>1</sup> The Zoi is the area(s) over which ecological features may be impacted by the biophysical changes caused by the proposed development.

## Ecological Impact Assessment (EclA)

- 1.2.3 The Proposed Development will provide a total of 300 parking spaces, including 3 accessible bays and 7 designated lorry bays. Of these, 35 spaces will be reserved for use by Train Operating Company (TOC) staff. The car park will operate a one-way traffic system, with entry via the existing access point on Fitzwilliam Street and exit via the existing egress onto the A629 New North Road. During periods of intensified activity, such as railway blockades, the car park will require 24-hour access.
- 1.2.4 There is no vegetation clearance requirement as part of the proposed development. All boundary and on-site vegetation will be protected and retained throughout the works and compound use. There will be some maintenance (e.g. pruning/strimming) of boundary vegetation..
- 1.2.5 Small tower lights will be installed to provide security for site users. There will be no increase in artificial light spill onto adjacent habitats or structures, with consideration to the current lighting levels from adjacent street lighting.
- 1.2.6 Access to the site will be via the existing access point from Fitzwilliam Street. Egress will be via the existing point on New North Road. There will be no alterations to the existing access/egress arrangements as part of the proposed development.

## 2. METHODOLOGY

### 2.1 Scope of the Assessment

- 2.1.1 The scope and methodology of this EclA is based on current guidelines<sup>2</sup>. Consideration is applied to identifying IEFs within the Zol, as detailed below. If IEFs are identified, they are subject to evaluation and impact assessment.
- 2.1.2 The Zol is the area(s) over which ecological features may be impacted by the biophysical changes caused by the proposed development. Based on the scale and nature of the development, it has been assessed that the Zol arising from these works is unlikely to be greater than 1 km from the Site and 2 km for Statutory Designated Sites. Therefore, these distances have been used to collect the ecological data search information.
- 2.1.3 In this report, designated sites, habitats and species that fall into the categories in Table 1 and Table 2 have been identified as being IEFs.

**Table 1. Important Ecological Feature categories**

Geographical Level of Importance	Category
International	<p>Statutory designated sites: Special Areas of Conservation (SAC), Special Protection Areas (SPA) and Ramsar sites (including candidate SACs and proposed SACs, SPAs and Ramsar sites).</p> <p>A viable area of a habitat type listed in Annex I of the Habitats Directive, or smaller areas of such habitat essential to maintain the viability of a larger whole.</p> <p>Regularly occurring populations of a species large enough in number to be of international importance where:</p> <ul style="list-style-type: none"> <li>• The loss or degradation of these populations would adversely affect the conservation status or distribution of the species at this geographic scale; or</li> <li>• The population forms a critical part of a wider population at an international level; or</li> <li>• The species is at a critical phase of its life cycle at this scale.</li> </ul>
National	<p>Statutory designated sites: Sites of Special Scientific Interest (SSSI) and National Nature Reserves (NNR).</p> <p>Ancient Woodland Inventory.</p> <p>A viable area of a Habitat of Principal Importance (HoPI) as listed on Section 41 of the Natural Environments Rural Communities (NERC) Act 2006 or smaller areas of such habitat essential to maintain the viability of a larger whole.</p> <ul style="list-style-type: none"> <li>• Resident, or regularly occurring, populations of species<sup>3</sup> significant at a National level where:</li> </ul>

<sup>2</sup> CIEEM (2018): 'Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine.' Chartered Institute of Ecology and Environmental Management, Winchester.

<sup>3</sup> Legally protected and other notable species including listed on Section 41 of the NERC Act 2006.

Ecological Impact Assessment (EclA)

Geographical Level of Importance	Category
	<ul style="list-style-type: none"> <li>The loss of these populations would adversely affect the conservation status or distribution of the species at a national level; or</li> <li>The population forms a critical part of a wider population at this scale; or</li> <li>The species is at a critical phase of its life cycle at this scale.</li> </ul>
County	<p>Local Nature Reserves (LNR); and</p> <p>Non-statutory designated wildlife sites of county value.</p> <p>Areas which meet the published selection criteria for county site designations, but which are not themselves designated as such.</p> <p>Species – as per National level but where the loss of these populations would negatively affect the conservation status or distribution of the species at a county level and where populations/species are critical at the county scale.</p> <p>This may include locally significant populations of a species listed in county Biodiversity Action Plan (Kirklees Local Biodiversity Action Plan<sup>4</sup>) on account of its regional rarity or localisation.</p>
District/Borough	<p>Non-statutory designated wildlife sites of district/borough value.</p> <p>Species – as per County level but where the loss of these populations would negatively affect the conservation status or distribution of the species at a district level and where populations/species are critical at the district scale.</p> <p>This may include locally significant populations of a species listed in a District/Borough BAP on account of its regional rarity or localisation (Kirklees Species of Principal Importance and Kirklees Habitats of Principal Importance<sup>5 6</sup>).</p>
Local	<p>Non statutory designated sites of local value (e.g. where degradation in conditions does not meet higher levels).</p> <p>Areas of habitat considered to appreciably enrich the habitat resource within the local context (e.g. species-rich hedgerows, ponds etc.). It may also include sites that retain other elements of semi-natural vegetation that due to their size, quality or the wide distribution of such habitats within the local area are not considered for local designations.</p> <p>Populations/assemblages of species that appreciably enrich the biodiversity resource within the local context. Populations of county level important species that are not threatened or rare in the county and are not integral to maintaining those populations.</p>
Site	<p>Habitats and/or species that are of limited ecological importance due to their size, species composition or other factors. Areas of heavily modified or managed vegetation of low species diversity.</p> <p>Low or moderate numbers of common and widespread species.</p>

<sup>4</sup> Kirklees Council (2015). Kirklees Local Plan. Available at: <https://www.kirklees.gov.uk/beta/planning-policy/pdf/supportingDocuments/methodologyTechnicalPapers/DLP-Environmental-Designations-Technical-Paper.pdf>

<sup>5</sup> Kirklees Council (2007). Kirklees Species of Principal Importance. Available at: <https://www.kirklees.gov.uk/beta/delivering-services/pdf/biodiversity-species.pdf>

<sup>6</sup> Kirklees Council (2007). Kirklees Habitats of Principal Importance. Available at: <https://www.kirklees.gov.uk/beta/delivering-services/pdf/biodiversity-habitats.pdf>

**Table 2. Legally protected species**

**Legislation**

Species included on Schedules II<sup>7</sup> and V<sup>8</sup> of The Conservation of Habitats and Species Regulations 2017 (as amended);

Species included on Schedules 1<sup>9</sup>, 5<sup>10</sup> and 8<sup>11</sup> of the Wildlife and Countryside Act 1981 (as amended), excluding species that are only protected in relation to their sale (Section 9[5] and 13[2]);

Invasive Non-Native Species (INNS) listed on Schedule 9<sup>12</sup> of the Wildlife and Countryside Act 1981 (as amended); and

Badgers, which are protected under the Protection of Badgers Act 1992<sup>13</sup>.

## 2.2 Desk Study

2.2.1 The sources of information and search areas used in the desk study are summarised in **Table 3**. The search areas reflect the likely maximum zone of influence of the development. Aerial photography for the area has also been reviewed using Multi-Agency Geographic Information for the Countryside (MAGIC) website<sup>14</sup> and Google Maps<sup>15</sup> and Google Earth.

<sup>7</sup> Legislation.gov.uk (2017) The conservation of Habitats and species regulations 2017, The Conservation of Habitats and Species Regulations 2017 - SCHEDULE 2 European Protected Species of animals. Available at: <https://www.legislation.gov.uk/ukxi/2017/1012/schedule/2/made> (Accessed: 16 February 2024).

<sup>8</sup> Legislation.gov.uk (2017) The conservation of Habitats and species regulations 2017, The Conservation of Habitats and Species Regulations 2017 - SCHEDULE 5 European Protected Species of plants. Available at: <https://www.legislation.gov.uk/ukxi/2017/1012/schedule/2/made> (Accessed: 16 February 2024).

<sup>9</sup> Legislation.gov.uk (2011) Wildlife and Countryside Act 1981, SCHEDULE 1 Birds which are Protected by Special Penalties. Available at: <https://www.legislation.gov.uk/ukpga/1981/69/schedule/1>

<sup>10</sup> Legislation.gov.uk (2011) Wildlife and Countryside Act 1981, SCHEDULE 5 Animals which are Protected. Available at: <https://www.legislation.gov.uk/ukpga/1981/69/schedule/5>

<sup>11</sup> Legislation.gov.uk (2011) Wildlife and Countryside Act 1981, SCHEDULE 8 Plants which are Protected. Available at: <https://www.legislation.gov.uk/ukpga/1981/69/schedule/8>

<sup>12</sup> Legislation.gov.uk (2022) Wildlife and Countryside Act 1981, SCHEDULE 9 Available at: <https://www.legislation.gov.uk/ukpga/1981/69/schedule/9>

<sup>13</sup> Legislation.gov.uk (1992) Protection of Badgers Act 1992. Available at: <https://www.legislation.gov.uk/ukpga/1992/51/contents>. The Conservation of Habitats and Species Regulations 2017 - SCHEDULE 5 European Protected Species of plants. Available at: <https://www.legislation.gov.uk/ukxi/2017/1012/schedule/2/made> (Accessed: 16 February 2024).

<sup>14</sup> <https://magic.defra.gov.uk/>

<sup>15</sup> <https://www.google.co.uk/maps>

**Table 3. Desk study data sources and search areas**

Data source	Ecological feature	Search area
Multi-Agency Geographic Information for the Countryside (MAGIC) website <sup>16</sup> (July 2024).	International Statutory designated sites for nature conservation: Ramsar, Special Areas of Conservation (SAC), Special Protection Areas (SPA),	10 km
	National Statutory designated sites for nature conservation: SSSI, NNR, LNR.	2 km
	Priority Habitats <sup>17</sup> and Ancient Woodlands.	1 km
	Granted European Protected Species Mitigation (EPSM) licences.	1 km
West Yorkshire Ecology Service (WYES) <sup>18</sup> supplied in May 2025	Non-statutory designated sites for nature conservation: Local Wildlife Site (LWS)	2 km
	Records of protected and priority flora and fauna <sup>19</sup> . Whilst a full set of records were requested and considered, only recent records (in the last 10 years) are described in this report unless more historic records are considered particular pertinent.	2 km
<a href="https://mapping.kirklees.gov.uk/">https://mapping.kirklees.gov.uk/</a> <a href="https://www.wyjs.org.uk">https://www.wyjs.org.uk</a>	Review of Kirklees Development Plan for the position of Wildlife Habitat Networks, Biodiversity Opportunity Zones and Bat Alert Zones.	2km
Online Ordnance Survey (OS) maps and publicly available satellite imagery (accessed May 2025).	Information on habitats (including ponds) and habitat connectivity relevant to the assessment of protected and priority species.	500 m
Huddersfield to Westtown (Dewsbury), Transport and Works Act Order <sup>20</sup>	A review of the information provided regarding different protected species report appendices in the Biodiversity of the Environmental Statement <sup>21</sup> that informed the Transport and Works Act Order.	Route Wide

<sup>16</sup> <https://magic.defra.gov.uk/>

<sup>17</sup> Priority Habitats are taken to Habitats of Principal Importance for nature conservation in England listed under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006; and habitats listed in Greater Manchester Biodiversity Action Plan. It should be noted that MAGIC.gov.uk provides a priority habitat layer taken from the (now superseded) UK BAP layers, but confirmation of whether these are HoPIs should be verified on site.

<sup>18</sup> West Yorkshire Ecology Service (2024) Ecological Records Search for Flint Street. Ref: 20240702 K1235 LM

<sup>19</sup> As listed under Schedules 1, 5 and 8 of the Wildlife and Countryside Act 1981 (as amended); Schedules 2 and 4 of The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019; Species of Principal Importance for nature conservation in England listed under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006; and species listed in the Greater Manchester Biodiversity Action Plan. Records of invasive non-native plant species (listed under Schedule 9 of the Wildlife and Countryside Act 1981 (as amended)) were also reviewed.

<sup>20</sup> [Huddersfield to Westtown \(Dewsbury\) - Network Rail](#)

<sup>21</sup> Network Rail (2022) *Huddersfield to Westtown (Dewsbury) – Environmental Statement: Volume 2i Main Statement (Scheme-Wide), Chapter 9: Biodiversity*. [Huddersfield to Westtown \(Dewsbury\) - Network Rail](#) (Accessed: 01 May 2025).

## 2.3 Field Survey

- 2.3.1 The Site Boundary is indicated in **Figure 2**. It should be noted that the Survey Area comprised the Site Boundary with the exception of parcel US1 which did not comprise the Site Boundary at the time of Survey (see limitations section).
- 2.3.2 A UK Habitat Classification survey (hereafter referred to as the UKHab Survey) within the Survey Area, was undertaken on the 1<sup>st</sup> May 2025 by Zinnia Pennington (Consultant ecologist Qualifying CIEEM, FISC Level 3<sup>22</sup>) and Tonisha Lawrence (Graduate ecologist Qualifying CIEEM). Weather conditions were good (24°C, dry, sunny, wind 6 mph south-westerly). The survey was conducted during an appropriate time of year (April to September) when flowering plants are most visible.
- 2.3.3 Habitats were characterised using the UKHab classification system<sup>23</sup>, and their condition was assessed according to Statutory Condition Assessment Criteria<sup>24</sup>. The value and sensitivity of ecological features present within the Site were determined based on guidance given by CIEEM<sup>25,26</sup>. Any evidence of protected and priority species or groups encountered during the survey was recorded<sup>27</sup>. This included observation of field signs and an assessment of the suitability of the habitats present to support protected species.
- 2.3.4 Any evidence for the presence of invasive non-native species listed on Schedule 9 of the Wildlife and Countryside Act 1981 (as amended) was also recorded. A fine scale Minimum Mapping Unit (MMU) was deemed an appropriate level for mapping habitats i.e. a habitat area was only mapped if the habitat was greater than 25m<sup>2</sup> (area habitats) or 20m in length / 5m width (linear habitats). Trees were only mapped whereby their stem diameter was >30cm.

## 2.4 Daytime Bat Walkover

- 2.4.1 Habitats on Site were deduced to have the ability to support bats, therefore a Daytime Bat Walkover (DBW) was undertaken as part of the Field Survey. The aim of the DBW was to identify and record structures, trees and other features that could be suitable for bats to roost in and any habitats that could be suitable for bats to commute, forage or swarm in/at. One building (B1) was adjacent to Site but close access was restricted, therefore a detailed inspection of the exterior and interior was not possible, with observations made from vantage points approximately 10m away from the building. An assessment of the Site was made in terms of its suitability to support bats using the criteria set out within current guidance<sup>28</sup> and summarised in **Table 4** below.

<sup>22</sup> Field Identification Skills Certificate – Botanical Society of Britain and Ireland.

<sup>23</sup> UK Habitat Classification Working Group (2023). UK Habitat Classification – Habitat Definitions V2.0.

<sup>24</sup> Defra. Statutory Biodiversity Metric. Habitat Condition Assessment Sheets and Instructions

<sup>25</sup> CIEEM (2018) 'Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine.' Chartered Institute of Ecology and Environmental Management, Winchester.

<sup>26</sup> CIEEM (2017) Guidelines for Preliminary Ecological Appraisal, 2nd edition. Chartered Institute of Ecology and Environmental Management, Winchester.

<sup>27</sup> Species listed under Schedules 1, 5 and 8 of the Wildlife and Countryside Act 1981 (as amended); Schedules 2 and 4 of The Conservation of Habitat & Species Regulations 2017 (as amended); species of Principal Importance listed under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006; and species listed in the Greater Manchester Biodiversity Action Plan.

<sup>28</sup> Collins, J. (ed) (2023) Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th edn). The Bat Conservation Trust, London. ISBN 978-1-7395126-0-6

**Table 4: Daytime Bat Walkover<sup>28</sup>**

Suitability	Roosting within Structures	Foraging and Commuting
<b>None</b>	No habitat features on Site likely to be used by any roosting bats at any time of the year (i.e. a complete absence of crevices/suitable shelter at all ground/underground levels).	No habitat features on Site likely to be used by any commuting or foraging bats at any time of the year (i.e. no habitats that provide shade/protection for flight-lines, shelter, or insect populations for foraging bats).
<b>Negligible</b>	No obvious habitat features on Site likely to be used by roosting bats; however, slight uncertainty.	No obvious habitat features on Site likely to be used as flight-paths or by foraging bats; however a small element of uncertainty still remains for non-standard bat behaviour.
<b>Low</b>	A structure with one or more potential roost sites that could be used by individual bats opportunistically at any time of the year, however, they do not provide factors to support large numbers of bats.	Habitats that could be used by a small number of bats as flightpaths or foraging locations such as gappy hedgerows or lone trees, respectively. However, these habitats are isolated from other suitable habitats.
<b>Moderate</b>	A structure with one or more potential roost sites that could be used by bats due to their size, shelter, protection, conditions and surrounding habitat but unlikely to support a roost of high conservation status (with respect to roost type only).	Continuous habitat with suitable connectivity to the wider habitat/landscape that supports foraging and flight-paths such as lines of trees, scrub, grasslands or water.
<b>High</b>	A structure with one or more potential roost sites that are obviously suitable for use by larger numbers of bats on a more regular basis and potentially for longer periods of time due to their size, shelter, protection, conditions and surrounding habitat.	Continuous high-quality habitat well connected to the wider landscape that supports foraging and flight-paths such as river valleys, woodland edged, grazed parklands or hedgerows.

## 2.5 Ground Level Tree Assessment

- 2.5.1 The UKHab survey identified habitats to have the ability to support bats therefore a Ground Level Tree Assessment (GLTA) was undertaken as part of the Field Survey. The aim of the GLTA was to assess each tree for the ability to support potential roosting features such as knot holes, woodpecker holes, cracks and splits in the bark etc. The survey consisted of a visual inspection (including the use of binoculars and torches where required) of the exterior of the tree for suitable roosting features and evidence of bat use (e.g. droppings, scratch marks, staining and sightings) from ground-level only. The assessment of the Site was made in terms of its suitability to support bats using the criteria set out within current survey guidelines<sup>29</sup> and summarised in **Table 5** below.

<sup>29</sup> Collins, J. (ed) (2023) Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th edn). The Bat Conservation Trust, London. ISBN 978-1-7395126-0-6

**Table 5: Tree Suitability for Roosting Bats Guidelines<sup>28</sup>**

Suitability	Roosting within Structures
<b>None</b>	Either no PRFs in the tree or highly unlikely to be any
<b>FAR</b>	Further assessment required to establish if PRFs are present in the tree
<b>PRF</b>	A tree with at least one PRF present

## 2.6 Limitations

- 2.6.1 The red line boundary for the Site was amended after the survey was completed. As a result the area US1 was assessed retrospectively by the surveyors using photographs taken during the survey, of the areas in the immediate surroundings of the Site. Building B1 is also located in this area, was not able to be subject to a detailed inspection with regards to bats due to restricted access. Given the low quality of the habitat present and understanding that B1 will not be directly impacted by works, this is not considered to be a constraint to the assessment given the prevailing site conditions.

### 3. BASELINE

#### 3.1 Site Overview

- 3.1.1 The Site is a former car park situated in an urban area of Huddersfield, West Yorkshire, comprising a mix of residential, commercial, and transport infrastructure in the wider area. The Site is located south of Fitzwilliam Street bounded by New Road to the east, derelict buildings to the west and a construction site to the south. Huddersfield Railway Station is located approximately 100 m to the northeast, with the nearest section of the River Colne flows approximately 200 m to the south. The wider landscape comprises pockets of amenity green space and tree cover located intermittently along the river and railway corridor. See **Figure 1** for aerial context of the Site.
- 3.1.2 The Site lies within the 'Valley Slopes and Built-up Areas' Biodiversity Opportunity Zone; however, it is located outside the boundaries of the designated Wildlife Habitat Network. Both designations are as defined within the Kirklees Local Plan<sup>30</sup>.

#### 3.2 Designated Sites

- 3.2.1 **Table 6** outlines designated sites within the Zol and their description and value (see **Figure 3**). Whilst these are located within the search areas, further review has identified no habitat connectivity or hydrological connectivity between the Site and these designated sites. As such they are not considered further in this assessment.

**Table 6 Designated sites for nature conservation within Zol**

Name and Designation	Approximate distance and direction from the Site	Description and value
Gledholt Woods LNR and LWS	0.7 km west  No habitat connectivity identified.	The area contains mature broadleaved woodland and a rough meadow. The woodlands support an unusual range of fungi for a site so close to a town centre. White clawed crayfish <i>Austropotamobius pallipes</i> , the UK's only native species, have also been found in pond within the LWS.
South Pennine Moors (Phase 1 & 2) SPA and SAC	8.6 km northwest in an uplands (>25m)  No habitat connectivity identified.	These moors were selected as an Annex 1 habitat based on the following habitats European dry heaths, Blanket bogs, and Old sessile oak woods with <i>Ilex</i> and <i>Blechnum</i> in the British Isles. The majority of the habitat is comprised of Heath, Scrub with Maquis and Garrigue, Phygrana the secondary

<sup>30</sup> Kirklees Council (2019) *Kirklees Local Plan: Strategy and Policies*. Huddersfield: Kirklees Council. Available at: <https://www.kirklees.gov.uk/beta/planning-policy/pdf/local-plan-strategy-and-policies.pdf> (Accessed: 1 June 2025).

Name and Designation	Approximate distance and direction from the Site	Description and value
		habitat is comprised of Bogs, Marshes, Water fringed vegetation, Fens.

3.2.2 The Site also falls within two SSSI risk zones<sup>31</sup> that trigger further considerations in the following development categories:

- Infrastructure: Airports, helipads and other aviation proposals.
- Minerals, Oil and Gas: Oil & gas exploration/extraction.
- Air Pollution: Livestock & poultry units with floorspace > 500m<sup>2</sup>, slurry lagoons > 750m<sup>2</sup> & manure stores > 3500t.
- Combustion: General combustion processes >20MW energy input. Including: energy from waste incineration, other incineration, landfill gas generation plant, pyrolysis/gasification, anaerobic digestion, sewage treatment works, other incineration/ combustion.

3.2.3 As the development is not associated with these development categories, further consideration of SSSIs is not considered necessary.

### 3.3 Ancient Woodland and Priority Habitats

3.3.1 The Priority Habitat Inventory<sup>32</sup> shows several areas of deciduous woodland within 1km of the Site scattered throughout the wider area (including Gledholt wood LNR/LWS), the closest area is located 0.5 km to the north. Other habitats of importance included one traditional orchard 0.2 km northwest, five wood pasture and parkland 0.2 km west, nine open mosaic 0.9 km east.

3.3.2 The search identified no ancient woodlands within 1km, and no pathways have been identified connecting the Site to the ancient woodland.

### 3.4 European Protected Species Mitigation Licenses

3.4.1 One EPS licence was recorded within 1 km of the Site, for the destruction of a common pipistrelle *Pipistrellus pipistrellus* resting site (2014-856-EPS-MIT), located 0.9 km southeast of the Site in 2014. The distance of this EPS within the context of an urban environment is assessed as not significant.

<sup>31</sup> The Impact Risk Zones (IRZs) are a GIS tool developed by Natural England to assess the potential risks posed by development proposals to Sites of Special Scientific Interest (SSSIs). The zones define areas around each SSSI that reflect the sensitivities of the features for which it is notified and indicate the types of development proposals that could have adverse impacts. Local planning authorities use the IRZs to determine whether a proposed development is likely to affect a SSSI and whether they need to consult Natural England for advice on how to avoid or mitigate potential impacts. The SSSI IRZs can also be used by developers, consultants, and the public to consider potential impacts and seek pre-application advice from Natural England. SSSI IRZ User Guidance MAGIC.pdf (defra.gov.uk)

<sup>32</sup> <https://magic.defra.gov.uk/>

- 3.4.2 Both the record and the Site fall within the Bat Alert Zone as defined by West Yorkshire joint services Kirklees Alert Zone<sup>33</sup>.

### 3.5 Site Habitats

- 3.5.1 Habitats within and immediately adjacent to the Site are described in **Table 7**, illustrated on **Figure 2** and correlate with **Photographs** within **Appendix B**. Importance is evaluated in accordance with guidance outlined in Section 2.1. The Condition of the habitats with regards to biodiversity net gain (BNG) value is given. This is discussed further in Section 6.

**Table 7 Description of Site Habitats**

Habitat	Description and Evaluation	Condition
Mixed scrub h3h	A single area of mixed scrub was located along the northern boundary of the Site. Species included dogrose <i>Rosa canina</i> , wych elm <i>Ulmus glabra</i> , oak <i>Quercus robur</i> , cotoneaster ( <b>Photograph 4</b> ).  This habitat is common and widespread and is of importance to nature conservation at the Site level.	Assessed as <b>Poor</b> due to meeting 1 Condition assessment Criteria Criterion C - An absence of invasive non-native plant species and species (INNS) indicative of suboptimal condition make up less than 5% of ground cover.
Modified grassland g4	Two patches of modified grassland were located along the eastern boundary of the Site ( <b>Photographs 2 and 3</b> ). Species included bramble <i>Rubus fruticosus</i> agg. dandelion <i>Taraxacum officinale</i> , cocksfoot <i>Dactylis glomerata</i> , ribwort plantain <i>Plantago lanceolata</i> , horse chestnut saplings and young trees, <i>Aesculus hippocastanum</i> meadow buttercup <i>Ranunculus acris</i> , ragwort <i>Jacobaea vulgaris</i> , cut leaved crane's-bill <i>Geranium dissectum</i> , Spanish bluebell <i>Hyacinthoides hispanica</i> (an invasive non-native species <sup>34</sup> ), and perennial ryegrass <i>Lolium perenne</i> .  This habitat is common and widespread and is of negligible importance to nature conservation.	Assessed as <b>Poor</b> due to meeting 4 Condition assessment Criteria Criterion C – any scrub present accounts for less than 20% of the total grassland area. Criterion D – physical damage is evident in less than 5% of total grassland area. Criterion F – Cover of bracken <i>Pteridium aquilinum</i> is less than 20%. Criterion G – an absence of INNS. without passing Criterion A – the presence of 6-8 vascular plant species per m2.
Artificial unvegetated,	A small area of artificial unvegetated, unsealed surface ( <b>Photograph1</b> ) was located along the south boundary of the Site and	N/A

<sup>33</sup> West Yorkshire Ecology Service (n.d.) Planning Issue Guidance: Bats and Birds. West Yorkshire Joint Services. Available at: <https://www.wyjs.org.uk/ecology/planning-issues/> (Accessed: 1 May 2025)

<sup>34</sup> HMSO (1981) 'Wildlife and Countryside Act 1981 (as amended)'

## Ecological Impact Assessment (EclA)

Habitat	Description and Evaluation	Condition
unsealed surface  u1c	<p>comprised of large bricks, stone and pebble as well as a finer sandy substrate.</p> <p>A large area of bare ground was located to the west of the Site (<b>Photograph 14</b>)</p> <p>This habitat is common and widespread and is of negligible importance to nature conservation.</p>	
Developed land -sealed surface  u1b	<p>The majority of the Site comprised of sealed surface and functioned as a car park (<b>Photograph 11</b>).</p> <p>The hard surfaces are of no nature conservation value and are not discussed further in this report.</p>	N/A
Sparsely vegetated land  US1	<p>A small area of sparsely vegetated land (<b>Photograph 13</b>) was present to the southeast of the Site, species included broadleaved dock <i>Rumex obtusifolius</i>, dandelion, willow <i>Salix</i> sp. saplings, Spanish bluebells, maple <i>Acer</i> sp. saplings, wych elm saplings, perennial ryegrass, buttercup <i>Ranunculus</i> sp., and ribwort plantain <i>Plantago lanceolata</i>.</p> <p>One area of sparsely vegetated land was located west, adjacent to the Site. The substrate was comprised of large bricks, smaller rocks and stones.</p> <p>This habitat is common and widespread and is of negligible importance to nature conservation.</p>	<p>Assessed as <b>Moderate</b> due to meeting 2 of the core criteria of the Condition assessment criteria.</p> <p>Criterion A - Vegetation structure is varied, providing opportunities for vertebrates and invertebrates to live, eat and breed. A single structural habitat component or vegetation type does not account for more than 80% of the total habitat area.</p> <p>Criterion B - The habitat parcel contains different plant species that are beneficial for wildlife for example, flowering species providing nectar sources for a range of invertebrates at different times of year.</p>
Non-native and ornamental hedgerow h2b	<p>A privet sp. <i>Ligustrum</i> hedgerow was located along the eastern boundary directly after the old carpark entrance to the Site.</p> <p>This linear habitat is common and widespread and is of negligible importance to nature conservation.</p>	<p>Automatically assigned <b>Poor</b> in the metric due to being an ornamental hedgerow.</p>
Built linear features	<p>A stone wall was located on the east boarder of the Site.</p>	N/A

Ecological Impact Assessment (EclA)

Habitat	Description and Evaluation	Condition
u1e	The built linear features are of no nature conservation value and are not further discussed in this report.	
Line of Trees  SC 33	<p>A single line of trees was located along the southeastern boundary of the Site (<b>Photograph 11</b>). The species included two young wych elm and three young wild cherry <i>Prunus avium</i>.</p> <p>This linear habitat is common and widespread and is of importance to nature conservation at the Site level.</p>	<p>Assessed as <b>Poor</b> meeting 1 Condition assessment Criteria. Criterion A - At least 70% of trees are native species.</p>
Individual Tree	<p>Six individual trees were located around the Site. Three horse chestnut trees (one semi-mature and two mature) (Photographs 5–7) are present along the eastern boundary. In addition, three ornamental semi-mature laurel <i>Laurus nobilis</i> trees (Photographs 9–10) are present on site.</p> <p>These urban trees are common and widespread and of importance to nature conservation at the Site level.</p>	<p>T3-4 Assessed as <b>Good</b> meeting 6 Condition assessment criterion. Criterion A - The tree is a native species (or at least 70% within the block are native species). Criterion B - The tree canopy is predominantly continuous, with gaps in canopy cover making up &lt;10% of total area and no individual gap being &gt;5 m wide (individual trees automatically pass this criterion). Criterion C - The tree is mature (or more than 50% within the block are mature)<sup>1</sup>. Criterion D - There is little or no evidence of an adverse impact on tree health by human activities. And there is no current regular pruning regime, so the trees retain &gt;75% of expected canopy for their age range and height. Criterion E - Natural ecological niches for vertebrates and invertebrates are present, such as presence of deadwood, cavities, ivy or loose bark.</p>

Habitat	Description and Evaluation	Condition
		<p>Criterion F - More than 20% of the tree canopy area is oversailing vegetation beneath.</p> <p>T5-6 Assessed as <b>Poor</b> meeting 2 Condition assessment criterion. Criterion B and D.</p> <p>T1 Assessed as <b>Poor</b> meeting 2 Condition assessment criterion. Criterion B and F.</p> <p>T2 Assessed as <b>Moderate</b> meeting 3 Condition assessment criterion. Criterion A, B, and F.</p>

### 3.6 Protected and Priority Species

3.6.1 **Table 8** provides a summary of desk study and Field Survey results for protected species and species of principal importance.

**Table 8 Summary of results for protected species and species of principal importance**

Species	Summary Results and Evaluation
Bats	<p>WYE returned 48 records of bats within 2km of the Site in the last 10 years. This comprised; Brown Long-eared Bat <i>Plecotus auritus</i> (2 records), Common Pipistrelle <i>Pipistrellus pipistrellus</i> (one record), Lesser Noctule <i>Nyctalus leisleri</i> (2 records), Myotis Bat species <i>Myotis</i> (2 records), Noctule Bat <i>Nyctalus noctula</i> (five records), Pipistrelle <i>Pipistrellus pipistrellus</i> (31 records), Pipistrelle Bat species <i>Pipistrellus</i> (one records), and Soprano Pipistrelle <i>Pipistrellus pygmaeus</i> (4 records). The closest record to the Site was a field record of a Daubenton's bat 0.32km north-east of the Site.</p> <p>These records indicate commonly occurring species occur in the local area with no records of particularly rare species.</p> <p><u>Roosting</u> Individual trees T3 and T4 (<b>Figure 2</b>) were assessed as containing one or more PRF and were therefore considered suitable to support roosting bats. Further details of the PRFs are located within <b>Appendix B</b>.</p>

Species	Summary Results and Evaluation
	<p>Two semi-mature trees (T3 and T4) within the Site boundary exhibit features with potential to support roosting bats, including natural cavities and areas of flaking bark. These trees were located along the eastern boundary and form part of a vegetated edge that links to the wider woodland areas via scattered trees. While no confirmed roosts have been identified, the presence of suitable roosting features and the trees' position within a connected linear habitat network, suggest that they could be used by individual or low numbers of roosting bats on occasion. As such, these trees are considered to be of importance to roosting bats at a Site level. The remainder of the Site habitats, offers negligible value for roosting bats.</p> <p>It should be noted that there may be trees within the ZoI of the Site (outside of the site boundary) that may have unidentified bat roosts present. This is considered in Section 4.</p> <p>There were no structures or buildings present within the Site, however, there was a large derelict building located adjacent to the Site to the west (outside of the Site boundary) which was not subject to survey. The building was within the ZoI and may have unidentified bat roosts present. This is considered in Section 4.</p> <p><u>Foraging and Commuting</u>  The Site is located within the Bat Alert Zone<sup>33</sup> for Kirklees which identifies areas with increased likelihood of supporting bat activity.</p> <p>The Site is assessed as being low suitability for foraging and commuting bats owing to the minimal suitable flightline habitats present within the Site, the residential and industrial habits surrounding the Site, and the buildings, roads with streetlights and other man-made infrastructure surrounding the Site resulting in noise and light intrusion. These factors combined reduce the overall value of the foraging and commuting habitat onsite for bats.</p> <p>The surveys confirm that the Site itself provides low foraging and commuting value for bats. As such habitats on Site are of importance to foraging and commuting bats at a Site level.</p>
Birds	<p>WYE returned 21 recent records of notable bird species from within 2 km of the Site. The closest record is that of a Mallard <i>Anas platyrhynchos</i> located within the site boundary.</p> <p>The following incidental species were noted within or adjacent to the Site during the survey: wood pigeon <i>Columba palumbus</i> and blackbird <i>Turdus merula</i> may nest within scrub and individual tree habitats onsite.</p> <p>The Site provides limited nesting habitats within trees, hedgerow and scrub. The Site is not considered suitable to support ground nesting birds.</p> <p>No nesting birds were identified on Site during the Field Survey.</p>

## Ecological Impact Assessment (EclA)

Species	Summary Results and Evaluation
	<p>Due to the Sites existing status (derelict bare earth site) and lacking large areas of vegetation, the Site is not considered suitable to support a notable assemblage of breeding birds. The value of habitat within the Site (scrub, trees and hedgerow) for local bird populations is considered to be at the Site level only.</p>
Amphibians including Great crested newt	<p>WYE returned 1 record of amphibian within 2 km of the Site, this being: common frog <i>Rana temporaria</i> located 1.73km south-east of the site in April 2020. No records of great crested newt <i>Triturus cristatus</i> were returned.</p> <p>There are no ponds located within 250m of the Site, and terrestrial habitat provides limited value due to presence of tarmac and disturbance arising from use of the site as a car park. Therefore, the Site is not considered suitable to support amphibians.</p> <p>Great crested newt are considered likely absent from the Site and are scoped out of the assessment.</p>
Reptiles	<p>WYE returned no records for reptiles from within 2 km of the Site, in the past 10 years.</p> <p>The habitats on Site lack the mosaic of warm, undisturbed open areas and dense vegetation for basking, foraging, and shelter required by reptiles. The Site also lacks connectivity to wider green areas and is an active car park causing high levels of disturbance.</p> <p>Given the minimal suitable habitat for reptiles, lack of records in 2km and high level of disturbance, reptile are considered absent from the Site.</p>
Invertebrates	<p>WYE returned 10 records terrestrial invertebrates within 2 km of the Site. These were for: <i>Amara praeterrmissa</i> (2 records), <i>Aphodius conspurcatus</i> <i>Chilothorax conspurcatus</i> (one record), <i>Aphodius merdarius</i> <i>Esymus merdarius</i> (one record), <i>Hydraena pygmaea</i> (one record), <i>Odonteus armiger</i> (2 records) and Poplar Borer <i>Saperda carcharias</i> (one record) . <i>Amongone</i> record of butterfly, cinnabar <i>Tyria jacobaeae</i>. The closest record is of a <i>Odonteus armiger</i> located 0.92km south of the Site.</p> <p>The Site lacks a large and complex mosaic of vegetation and is therefore not considered suitable to support a notable population of invertebrates. Invertebrates are not considered further in this assessment.</p>
Riparian Mammals and White-clawed Crayfish	<p>WYE returned no records for riparian mammals (otter <i>Lutra lutra</i> and water vole <i>Arvicola amphibious</i>) or white-clawed crayfish <i>Austropotamobius pallipes</i> from within 2 km of the Site, in the past 10 years.</p> <p>There are no watercourses on Site or directly adjacent to the Site. Riparian mammals and white-clawed crayfish are not considered further in this assessment</p>

### 3.7 Invasive Non-Native Species

3.7.1 WYE returned 125 records of invasive non-native plant species from within 2 km of the Site and no INNS listed on the WCA were located during survey. These species included Giant Hogweed *Heracleum mantegazzianum* (2 records), Himalayan Balsam *Impatiens glandulifera* (2 records), Japanese Knotweed *Fallopia japonica* (120 records) and *Rhododendron ponticum* (one record), all of which are listed on Schedule 1 of the WCA.

3.7.2 Within the Site, Spanish bluebell a schedule 9 invasive non-native species<sup>35</sup> was present. This was recorded amongst two different habitat types (modified grassland and sparsely vegetated grassland).

---

<sup>35</sup> HMSO (1981) 'Wildlife and Countryside Act 1981 (as amended)'

#### 4. IMPACT ASSESSMENT, MITIGATION AND RESIDUAL EFFECTS

4.1.1 The ecological features and potential impacts arising from the development are set out in **Table 9**, together with proposed avoidance or mitigation measures and anticipated residual effects from the development after mitigation has been implemented. See **Appendix A** for a summary of relevant legislation.

**Table 9 Impact Assessment, Mitigation and Residual Effects Table**

Important Ecological Feature	Importance	Summary of potential impacts	Pre – Construction Survey	Avoidance, Reduction and Mitigation	Residual Effects
<b>Habitats</b>					
Line of trees	Site	A line of trees is located along the eastern boundary of the Site. Construction activities and light vegetation maintenance within the Site have the potential to affect the trees. Damage to the trees would be significant on a Site level.	No	Works on site will retain and protect the line of trees. Damage will be avoided through implementing standard good practice avoidance measures in line with BS 5837:2012 <sup>36</sup> .	No
Hedgerow	Negligible	A non-native hedgerow is located along the eastern boundary of the Site. Construction activities and light vegetation maintenance within the Site have the potential to affect the hedge.	No	Works on site will retain and protect the hedgerow. Damage will be avoided through implementing standard good practice avoidance measures in line with BS 5837:2012 <sup>37</sup> .	No
Mixed scrub	Site	Mixed scrub to the north of the Site. The removal of this scrub would be significant at a Site level.	No	The proposed development will retain and protect the scrub on Site.	No

<sup>36</sup> BSI Standards Publication (2012) BS 5837:2012 Trees in relation to design, demolition and construction– Recommendations

<sup>37</sup> BSI Standards Publication (2012) BS 5837:2012 Trees in relation to design, demolition and construction– Recommendations

Ecological Impact Assessment (EclA)

Important Ecological Feature	Importance	Summary of potential impacts	Pre – Construction Survey	Avoidance, Reduction and Mitigation	Residual Effects
Sparsely vegetated land: ruderal ephemeral	Negligible	Ruderal ephemeral habitat is located to the southeast of the Site. This habitat has the potential to be damaged or removed during construction or operation.	No	The proposed development will retain this habitat.	No
Urban trees	Site	Six individual trees are located around the Site. Three horse chestnut are present along the eastern boundary and, three ornamental semi-mature laurel trees are present towards the southwest of the Site. Light vegetation maintenance may adversely affect the trees. The removal of these trees would be significant at a Site level.	No	The proposals for the Site will protect and retain these trees. Damage will be avoided through implementing standard good practice avoidance measures in line with BS 5837:2012	No
Modified grassland	Negligible	Modified grassland is along the eastern boundary of the Site, no impacts predicted.	No	The proposed development will retain this habitat on Site.	No
<b>Species</b>					
Invasive non-native plant species (INNS)	Site	Spanish bluebell is recorded amongst two different habitat types (modified grassland and sparsely vegetated grassland).	No	Uprooted plant material will be left to dry on site, where appropriate, in a designated area to ensure that these plants cannot recolonise, before being securely bagged and disposed of at a licensed waste facility. Biosecurity protocols will be followed throughout the process to avoid unintentional dispersal.	No

Important Ecological Feature	Importance	Summary of potential impacts	Pre – Construction Survey	Avoidance, Reduction and Mitigation	Residual Effects
Breeding birds (excluding ground nesting birds)	Site	<p>Common breeding birds may be present within scrub tree and Hedgerow habitats on site.</p> <p>Should vegetation clearance be planned beyond the works outlined in this EclA, this could cause damage to nests and eggs and/or killing and injury of young and adult birds and contravene wildlife legislation.</p>	Yes	<p>No vegetation removal is proposed as part of the development.</p> <p>Light vegetation management may be implemented.</p> <p>Should any vegetation management be required, Network Rail's guidance on vegetation works and conducting bird nesting checks will be complied with. This would be undertaken outside the core bird breeding season, which runs from 1st March to 31st August (inclusive). If this is not possible, a competent person would check for active nests within and around the vegetation to be cleared no more than 24 h prior to the clearance. This requirement will be fully described in the ESMP. If there is uncertainty about the possible presence of a nest, then an ecologist will be contacted for further advice. If an active nest were to be found, a no disturbance exclusion zone (area to be determined by an ecologist) would be established around the nest until it was satisfactorily proved that it was no longer in use.</p>	No

Important Ecological Feature	Importance	Summary of potential impacts	Pre – Construction Survey	Avoidance, Reduction and Mitigation	Residual Effects
Bats	Site	<p>Potential roosting habitat within the Site has been noted. Two trees have been identified as containing one or more PRFs suitable for bats (T3 and T4). For the purpose of the EclA it is assumed that these trees support a low conservation bat roost.</p> <p>The building (B1) adjacent to site was not subject to survey as no impacts to the building are expected. In the absence of survey data it is assumed that this building may support unidentified bat roosts, however no impacts are predicted.</p> <p>Vegetation management could cause disturbance/ damage to these features which would be significant at a Site level and contravene wildlife legislation.</p> <p>Low numbers of common and widespread species of bats may commute and forage within the line of tree habitat to the east. Loss of foraging and commuting habitats expected to be significant on a Site level given the urban context and connectivity to other more optimum habitat.</p> <p>The Site is also located within the Bat Alert Zone for Kirklees which identifies areas with increased likelihood of supporting bat activity.</p>	No	<p>No vegetation or tree removal is proposed as part of the development.</p> <p>There will be no direct impact to building B1 as a result of the TRU works, no significant noise or vibration immediately adjacent to B1, and no light spill to B1. As no vegetation removal will occur, existing flightpaths to building B1 will be maintained. Should the planned operation of the site change such that the above avoidance measures cannot be adhered to, a bat survey on building B1 will be undertaken in advance and within the appropriate season.</p> <p>T3 and T4 will be identified as sensitive trees and will be protected from vegetation management. Should management of these trees be required, additional inspection and potential further survey would be undertaken on trees T3 and T4 to confirm roosting status and necessary measures implemented to avoid breach of wildlife legislation if required.</p>	No

Important Ecological Feature	Importance	Summary of potential impacts	Pre – Construction Survey	Avoidance, Reduction and Mitigation	Residual Effects
				<p>Night work will be avoided if possible. If night work is undertaken, lighting will be minimal and directional. Light spill will be avoided, and lighting will be switched off when not absolutely necessary, in line with standard guidance<sup>38</sup>.</p> <p>These requirements will be fully described in the Environmental ESMP. This will reduce the risk of temporary disturbance to roosting, foraging or commuting bats, as well as unknown bat roosts located outside of the Site boundary.</p>	

<sup>38</sup> Bat Conservation Trust (2018) Guidance Note 8 Bats and Artificial Lighting in the UK

## 5. CONCLUSIONS

5.1.1 The EclA considers the following IEFs are present within the Zol:

- Site Habitats (line of trees, urban trees and scrub) (Site importance)
- Bats; (Site importance)
- Nesting birds; (Site importance)

5.1.2 The following avoidance and standard mitigation measures will be implemented:

- There will be no vegetation removal arising from the proposals.
- Trees on and adjacent to the site will be protected through implementing standard good practice avoidance measures in line with BS 5837:2012<sup>39</sup>.
- Should any vegetation management be required, Network Rail's guidance on vegetation works and conducting bird nesting checks will be complied with. This would be undertaken outside the core bird breeding season, which runs from 1st March to 31st August (inclusive). If this is not possible, a competent person would check for active nests within and around the vegetation to be cleared no more than 24 h prior to the clearance. This requirement will be fully described in the ESMP. If there is uncertainty about the possible presence of a nest, then an ecologist will be contacted for further advice (good photographs of the area in question are usually helpful). If an active nest were to be found, a no disturbance exclusion zone (area to be determined by an ecologist) would be established around the nest until it was satisfactorily proved that it was no longer in use.
- Should vegetation management be required T3 and T4 will be identified as sensitive trees and protected from vegetation management. Should management of these trees be required, additional inspection/survey would be undertaken on trees T3 and T4 to confirm bat roosting status and necessary measures implemented to avoid breach of wildlife legislation if required.
- Night work will be avoided, if possible, but where it is required, lighting is required to satisfy Health and Safety requirements. If night work is undertaken, lighting will be minimal and directional. Light spill will be avoided, and lighting will be switched off when not absolutely necessary, in line with standard guidance<sup>40</sup>. These requirements will be fully described in the Environmental and Social Management Plan (ESMP). This will reduce the risk of temporary disturbance to foraging or commuting bats, and/or unknown bat roosts located outside of the Site boundary.
- Removal of Spanish bluebell should be undertaken in accordance with established best-practice guidance.

5.1.3 No residual effects are anticipated as a result of the development and the implementation of the above measures.

<sup>39</sup> BSI Standards Publication (2012) BS 5837:2012 Trees in relation to design, demolition and construction– Recommendations

<sup>40</sup> Bat Conservation Trust (2018) Guidance Note 8 Bats and Artificial Lighting in the UK

## 6. BASELINE BNG ASSESSMENT

- 6.1.1 A baseline Biodiversity Net Gain (BNG) assessment has been completed for the Site using the Statutory Metric in accordance with the Statutory Biodiversity Metric Guide User Guide<sup>41</sup> and to inform the baseline BNG assessment, a condition assessment of habitats present within the Site has been undertaken using the Habitat Condition Sheets<sup>42</sup>, the results of which are summarised in Table 7 of this EclA.
- 6.1.2 The baseline BNG value for the site is **0.76 habitat units** and **0.07 hedgerow units**.
- 6.1.3 The Site currently supports the following habitats: line of trees, modified grassland, sparsely vegetated land(ruderal/ephemeral), mixed scrub, urban trees and non-native hedgerow.
- 6.1.4 There will be no habitat removal arising from the development. As such it is the applicant's view that this development is exempt from Statutory BNG.

---

<sup>41</sup> Defra (2025): The Statutory Biodiversity Metric – User Guide.

<sup>42</sup> Defra (2025): Statutory Biodiversity Metric Condition Assessments

## 7. PHOTOGRAPHS



**Photograph 1:** Artificial Unvegetated, unsealed surface (UA1) facing south



**Photograph 2:** Modified Grassland (MG1) facing east



**Photograph 3:** Modified Grassland (MG2) facing southeast



**Photograph 4:** Mixed Scrub (MS1) facing north

Ecological Impact Assessment (EclA)



**Photograph 5:** Urban Tree – Horse chesnut I (T1)  
facing east



**Photograph 6:** Urban Tree – Horse Chesnut (T2)  
facing east



**Photograph 7:** Urban Tree – Horse Chestnut (T3)  
facing east



**Photograph 8:** Urban Tree – Horse Chestnut (T4)  
facing southeast

Ecological Impact Assessment (EclA)



**Photograph 9:** Urban Tree (laurel) (T5) facing south



**Photograph 10:** Two small laurel trees (T6&7) facing south



**Photograph 11:** Sealed surface with line of trees (LT1) facing northeast



**Photograph 12:** Non-native and ornamental hedgerow (H1) facing east

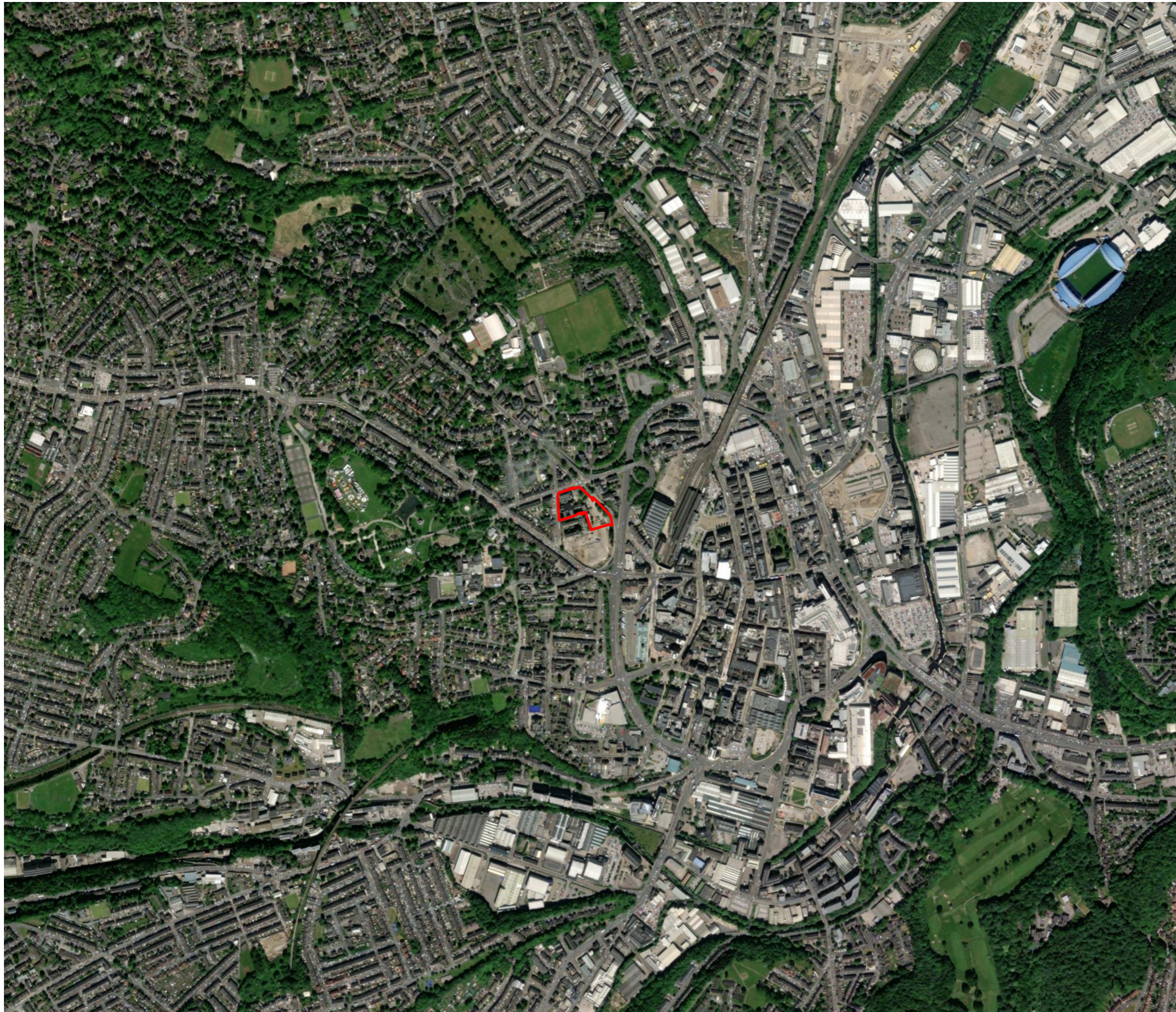


**Photograph 13:** Sparsely vegetated land (SV1) facing southeast



**Photograph 14:** Artificial unvegetated unsealed surface located to the west of the site facing southwest

# FIGURES



 Site Location



0 50 100 200 300 400 500 m

**Project Details** WIE21403-125: TRU: Fitzwilliam Street

**Figure Title** Figure 1: Site Location Plan

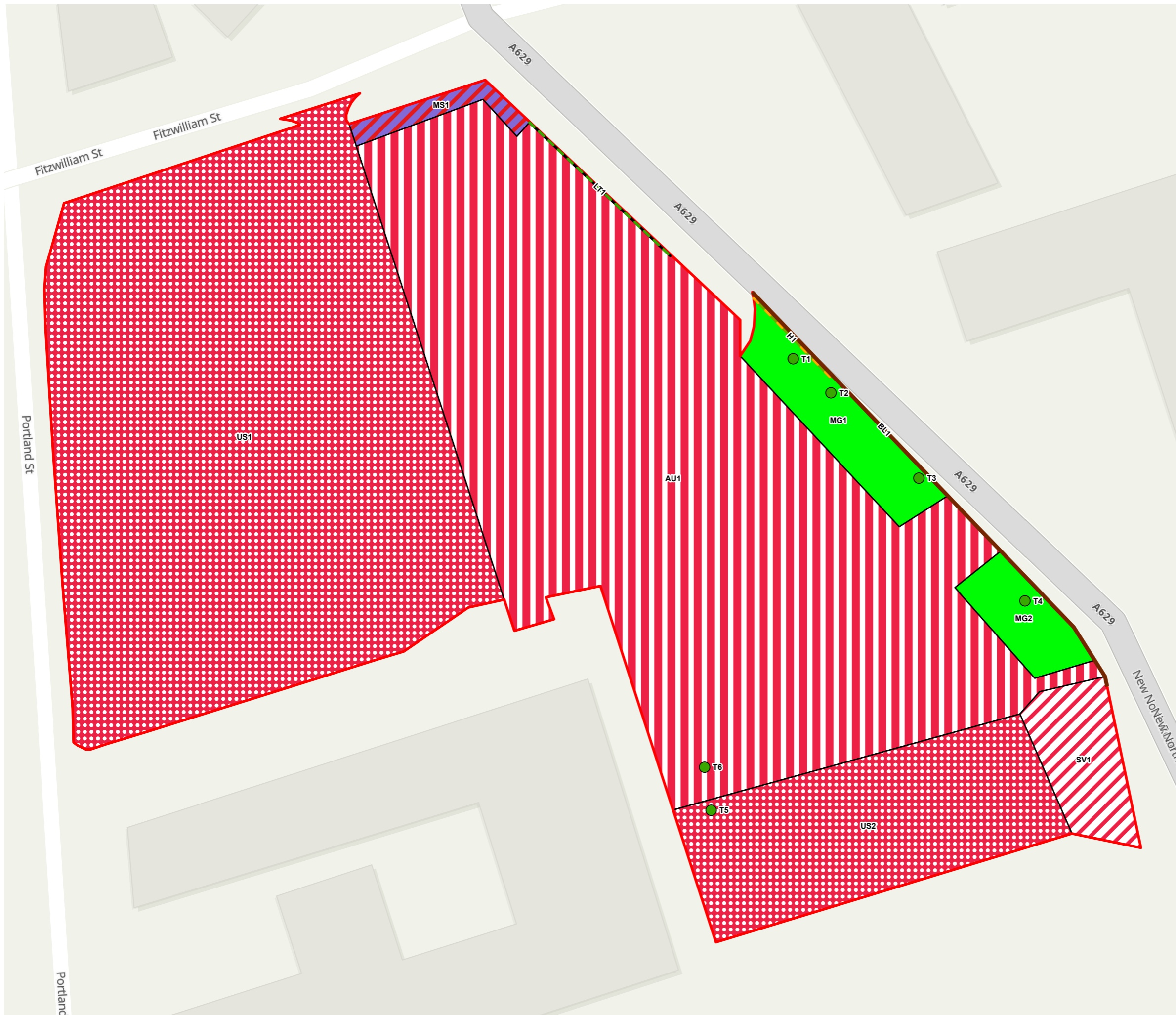
**Figure Ref** 21403125-WAT-XX-XX-GS-N-750001\_P02

**Date** June 2025

**File Location** WIE21403-125\9\_GIS\21403125-WAT-XX-XX-GS-N-75

[www.watermangroup.com](http://www.watermangroup.com)

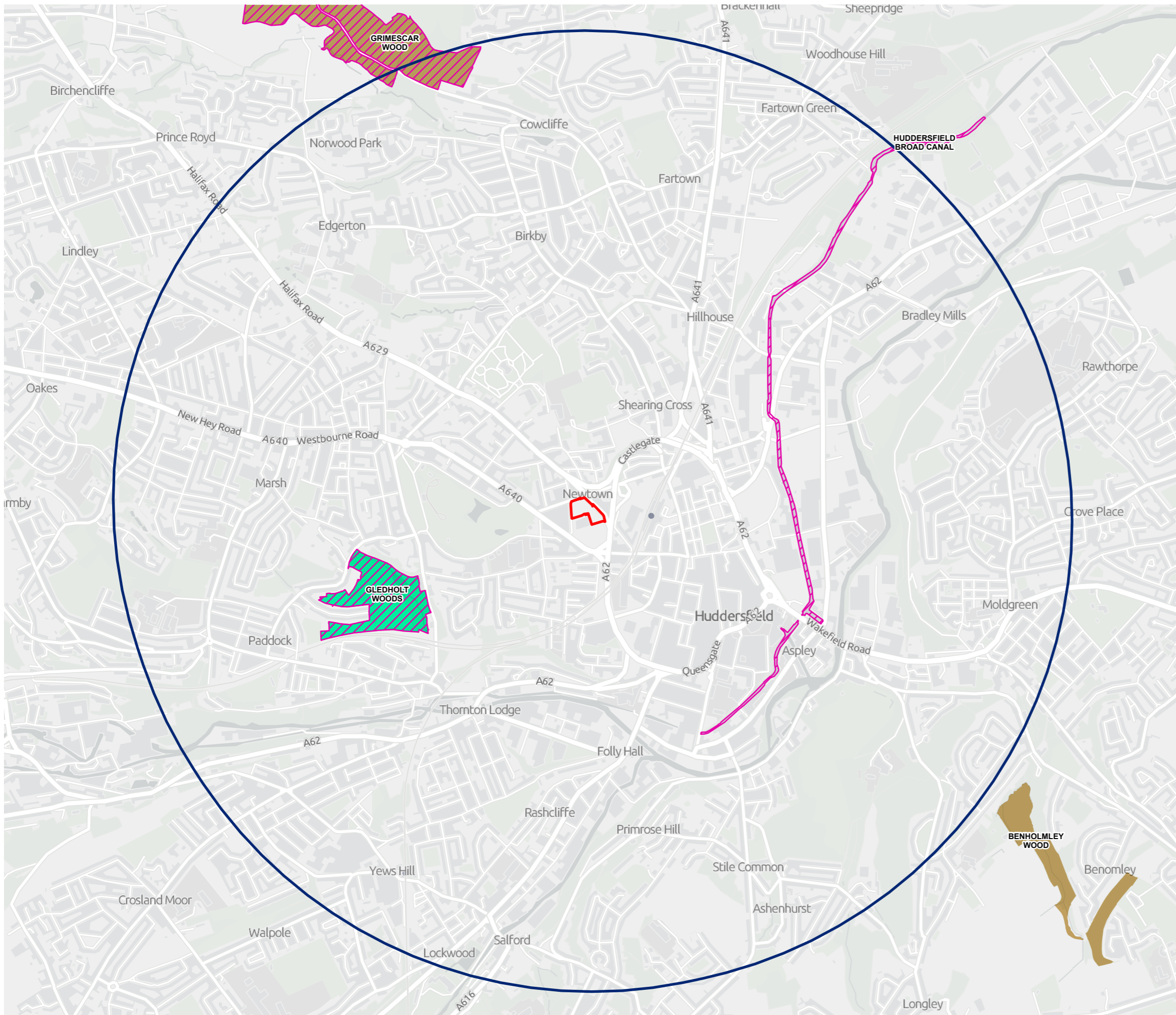
Maxar, Microsoft






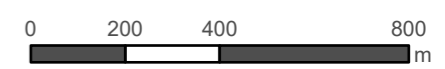
- Site Boundary (0.926Ha)
- Baseline Habitats**
- g4 - Modified grassland (0.039Ha)
- h3h - Mixed scrub (0.007Ha)
- u1b - Developed land; sealed surface (0.403Ha)
- u1f - Sparsely vegetated land (0.022Ha)
- u1c - Unvegetated, unsealed surface (0.455Ha)
- h2b - Non-native and ornamental hedgerow (0.014km)
- u1e - Built linear feature (0.071km)
- w33 - Line of trees (0.026km)
- Urban Trees (6 No.)



Project Details	WIE21403-125: TRU: Fitzwilliam Street
Figure Title	Figure 2: Baseline Habitats
Figure Ref	21403125-WAT-XX-XX-GS-N-750002_P02
Date	June 2025
File Location	WIE21403-125\GIS\21403125-WAT-XX-XX-GS-N-75



-  Site Boundary
-  2km Study Area
-  Ancient Replanted Woodland
-  Local Nature Reserves (LNRs)
-  Local Wildlife Sites (LWSs)



Project Details	WIE21403-125: TRU: Fitzwilliam Street
Figure Title	Figure 3: Designated Sites
Figure Ref	21403125-WAT-XX-XX-GS-N-750003_P02
Date	June 2025
File Location	WIE21403-125\9_GIS\21403125-WAT-XX-XX-GS-N-75

Contains OS data © Crown Copyright and database right 2025  
Contains data from OS Zoomstack

# APPENDICES

## APPENDIX A. LEGISLATION AND RELEVANT PLANNING POLICY

### National Planning Policy

#### National Planning Policy Framework, 2024

The National Planning Policy Framework (NPPF) was published in 2012 and last updated December 2024<sup>43</sup>. Section 15 (outlined below) of the NPPF, ‘Conserving and Enhancing the Natural Environment’, is of relevance to this report. No significant changes to Section 15 are noted between the 2021<sup>44</sup> and 2024 update. The Government Circular 06/200545 - Biodiversity and Geological Conservation: Statutory Obligations and Their Impact within the Planning System, remains valid and is still referenced within the NPPF.

Of particular significance with respect to biodiversity in the NPPF revision, is the amendment to para 175(d) of the NPPF 2019 (now para 180(d) of the NPPF 2021), which now requires opportunities to incorporate biodiversity improvements in and around Proposed Development, rather than simply making it optional. This demonstrates further steps taken by the government towards achieving the 25 Year Environment Plan (2018). Otherwise, there have been no further changes to the wording of “Conserving and enhancing the natural environment” Chapter of the NPPF.

The NPPF encourages the planning system to contribute to and enhance the natural and local environment. This should be achieved by:

- “Protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);
- recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;
- maintaining the character of the undeveloped coast, while improving public access to it where appropriate;
- minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures and incorporating features which support priority or threatened species such as swifts, bats and hedgehogs;
- preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and
- Remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate”.

The NPPF also stipulates that Local Planning Authorities (LPAs), when determining planning applications, should apply the following principles:

“If significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;

- development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed

<sup>43</sup> [National Planning Policy Framework - GOV.UK](#)

<sup>44</sup> Ministry of Housing, Communities and Local Government (2021): National Planning Policy Framework

<sup>45</sup> Department of Communities and Local Government (2005): Circular 06/05: Biodiversity and Geological Conservation – Statutory Obligations and their Impact within the Planning System.

clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;

- development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists; and *development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to incorporate biodiversity improvements in and around developments should be encouraged, especially where this can secure measurable net gains for biodiversity.*"

### National Planning Practice Guidance, 2024

The Government's National Planning Practice Guidance<sup>46</sup> (NPPG) is intended to provide guidance to local planning authorities and developers on the implementation of the planning policies set out within the NPPF. The guidance of most relevance to ecology and biodiversity is the Natural Environment Chapter, which explains key issues in implementing policy to protect biodiversity, including local requirements. In addition, to the biodiversity net gain guidance<sup>47</sup> which requires development to have a positive impact ('net gain') on biodiversity by delivering at least a 10% increase in biodiversity value relative to the pre-development biodiversity value of the onsite habitat.

### Natural Environment and Rural Communities Act 2006

The majority of former Priority national (English) BAP habitats and species are now those listed as Habitats of Principal Importance (HoPI) and Species of Principal Importance (SoPI) in England under Section 41 (S41) of the NERC Act 2006. For the purpose of this report, habitats and species listed under S41 of the NERC Act are referred to as having superseded the UK BAP. All public bodies have a legal obligation or 'biodiversity duty' under Section 40 of the NERC Act 2006 to conserve biodiversity by having particular regard to those species and habitats listed under S41.

### Local Planning Policy

#### Kirklees Biodiversity Action Plan (Kirklees BAP)

Kirklees Council has selected biodiversity opportunity zones and wildlife habitat network which have been selected as part of their Habitats and Species of Principal Importance occurring within each Zone shown in the below maps and table<sup>48</sup>. A Kirklees SoPI has been created as part of the Kirklees Biodiversity Action Plan, which outlines the local species of importance<sup>49</sup>. The local species list focuses on; the species showing declines between 25-50% within Kirklees; Species for which Kirklees holds a significant part of the West Yorkshire Population, Species scarce within Kirklees but more common elsewhere; Sites important for scarce (notable/Red Data Book (RDB) status) invertebrate species in Kirklees; and specially protected species occurring within Kirklees.

<sup>46</sup> Department for Communities and Local Government. (2024). *National Planning Practice Guidance*. Available at: <https://www.gov.uk/government/collections/planning-practice-guidance#full-publication-update-history>.

<sup>47</sup> Department for Communities and Local Government. (2024). *National Planning Practice Guidance*. Available at: <https://www.gov.uk/guidance/biodiversity-net-gain>.

<sup>48</sup> Kirklees Council (2015). *Kirklees Local Plan*. Available at: <https://www.kirklees.gov.uk/beta/planning-policy/pdf/supportingDocuments/methodologyTechnicalPapers/DLP-Environmental-Designations-Technical-Paper.pdf>

<sup>49</sup> Kirklees Council (2007). *Kirklees Species of Principal Importance*. Available at: <https://www.kirklees.gov.uk/beta/delivering-services/pdf/biodiversity-species.pdf>

## UK Habitats of Principal Importance relevant to Kirklees UK Habitats of Principal Importance relevant to Kirklees<sup>50</sup>

Kirklees HoPI	Key geographical areas in Kirklees (biodiversity opportunity map category)
Arable Field Margins	Pennine Foothills
Hedgerows	Pennine Foothills
Lowland Mixed Deciduous Woodland	Valley Slopes and Pennine Foothills
Open Mosaic Habitats on Previously Developed	Land Urban Areas – included in Scrub Habitat Action Plan
Ponds	Relevant to occurrence of protected species (white-clawed crayfish, great-crested newt, water vole, <i>L. natans</i> ).
Reedbeds	Floodplain – included in Riverine Corridors Habitat Action Plan
Rivers	Floodplain – included in Riverine Corridors Habitat Action Plan.
Wet Woodland	Floodplain: also, component of Lowland Mixed Deciduous Woodland and Upland Oak Woodland
Woodland Wood-Pasture & Parkland	Pennine Foothills and Valley Slopes

### Notes

\*Upland and Lowland Meadows have been combined as in current Kirklees plan.

\*\*Upland Mixed Ashwood's in this area are a component of Upland Oak Woodland where lime rich substrates are present.

### Scrub Habitat Action Plan

#### General objectives

- Manage scrubland habitat for those species to which it is most suited, and which occur in the vicinity of the site.
- Maintain and develop links to other areas important for wildlife, for example, hedges, woodland, heath and flowering grasslands.

#### Important features to maintain and develop:

- An open structure with scattered shrubs or groups of shrubs. The density of shrub cover may vary greatly from almost open grassland to something approaching a woodland edge habitat.
- A variety of shrub species of differing heights, which produce flowers and berries.
- Flowering grassland: this may vary from rank growth on richer soils to more open species-rich vegetation on poorer soils.
- Wet or damp areas with associated wildflowers, grasses and sometimes reeds.
- Derelict built structures which might be important nesting or roosting habitats.
- Links to other habitats.

### Environmental Improvement Plan 2023

<sup>50</sup> Kirklees Council (2007). Kirklees Habitats of Principal Importance. Available at: <https://www.kirklees.gov.uk/beta/delivering-services/pdf/biodiversity-habitats.pdf>

In 2023, following the proceedings 15 (COP15) a quarter-of-a century of action to help the natural world regain and retain good health was developed, which on a five-year cycle will be renewed to ensure the commitments align with the current law in the Environment Act 2021. This plan was named the 25Year Environmental Plan (25YEP). Ten goals were set out for the 25YEP, which include the following:

Goal 1: Thriving plants and wildlife;

Goal 2: Clean air;

Goal 3: Clean and plentiful water;

Goal 4: Managing exposure to chemicals and pesticides;

Goal 5: Maximise our resources, minimise our waste;

Goal 6: Using resources from nature sustainably;

Goal 7: Mitigating and adapting to climate change;

Goal 8: Reduced risk of harm from environmental hazards;

Goal 9: Enhancing biosecurity;

Goal 10: Enhanced beauty, heritage, and engagement with the natural environment.

### BS 42020: 2013 Biodiversity: Code of Practice for Planning and Development

This British Standard sets out to assist those concerned with ecological issues as they arise through the planning process in matters relating to permitted development and activities involved in the management of land outside the scope of land use planning, which could have site-specific ecological implications.

The standard has been produced with input from a number of organisations including the Chartered Institute of Ecology and Environmental Management (CIEEM) and the Association of Local Government Ecologists (ALGE) and provides:

- Guidance on how to produce clear and concise ecological information to accompany planning applications;
- recommendations on professional ethics, conduct, competence and judgement to give confidence that proposals for biodiversity conservation, and consequent decisions/actions taken, are sound and appropriate; and
- direction on effective decision-making in biodiversity management a framework to demonstrate how biodiversity has been managed during the development process to minimize impact.

## Legislation

Specific habitats and species receive legal protection in England under various pieces of legislation, including:

- The Conservation of Habitats and Species Regulations 2017 (as amended)<sup>51</sup>;
- The Wildlife and Countryside Act (WCA) 1981 (as amended)<sup>52</sup>;
- The Natural Environment and Rural Communities Act 2006<sup>53</sup>;
- The Hedgerow Regulations 1997<sup>54</sup>;
- The Protection of Badgers Act 1992<sup>55</sup>;
- Wild Mammals (Protection) Act 1996<sup>56</sup>
- Environment Act 2021<sup>57</sup>, and
- Natural Environment and Rural Communities Act 2006<sup>58</sup>

Further details of legislation in respect of legally protected and notable flora and fauna of relevance to the Site are provided below;

### Bats

In summary, all UK bat species are protected by the Conservation of Habitats and Species Regulations 2017 (as amended) and by the WCA 1981 (as amended). Taken together it is an offence to deliberately, intentionally or recklessly:

- Kill, injure or capture a bat;
- Disturb bats in such a way as to be likely significant to affect
  - (i) the ability of any significant group of bats to survive, breed, or rear / nurture their young; or
  - (ii) the local distribution of that species;
- Damage or destroy any breeding or resting place used by bats; or
- Obstruct access to any place used by bats for shelter or protection and disturbing bats while occupying such as place.

### Badger

Badgers (*Meles meles*) are protected under the Protection of Badgers Act 1992 (as amended) which makes it an offence to:

- Wilfully kill, injure, take, possess or cruelly ill-treat a badger, or to attempt to do so;
- Intentionally or recklessly damage, destroy or obstruct access to a badger sett; and,
- Disturb a badger when it is occupying a sett.

These provisions have implications for construction or preparation works undertaken in the vicinity of an active sett and may be confounded by distance from the sett entrance. Any works resulting in ground penetration, vibration or noise near an identified badger sett entrance/s have the potential to disturb badgers and advice should be sought from a suitably experienced ecologist under such circumstances. If disturbance to an active sett is probable, then a licence may need to be obtained from Natural England before any works commence.

<sup>51</sup> HMSO (2017) 'The Conservation of Habitats and Species Regulations 2017 (as amended)'

<sup>52</sup> HMSO (1981) 'Wildlife and Countryside Act 1981 (as amended)'

<sup>53</sup> ODPM (2006) 'Natural Environment and Rural Communities Act (2006)'

<sup>54</sup> ODPM (1997) 'The Hedgerow Regulations'

<sup>55</sup> ODPM (1992) 'The Protection of Badgers Act'

<sup>56</sup> HMSO. (1996). Wild Mammals (Protection) Act.

<sup>57</sup> HMSO (2021). 'Environment Act'

<sup>58</sup> HMSO (2006). Natural Environment and Rural Communities Act 2006

## Birds

The level of protection afforded to birds under the law varies from species to species. A few game and pest species may lawfully be hunted and killed, usually under licence, whilst the rarest species are listed on Schedule 1 of the WCA 1981 and are protected by special penalties for offences.

All of the native bird species of Britain are additionally covered by the European Union (EU) Directive on the Conservation of Wild Birds 2009<sup>59</sup> ('The Birds Directive'). The Birds Directive applies to all wild birds, their eggs, nests and habitats, and provides for the protection, management and control of all species of birds naturally occurring within each member state of the European Union. It requires the UK to take measures to ensure the preservation of sufficient diversity of habitats to maintain populations of all wild birds at ecologically and scientifically sustainable levels. The requirements of the Birds Directive are implemented in the UK primarily through the WCA 1981 (as amended) and Conservation of Habitats and Species Regulations 2017.

Statutory protection is given to all nesting birds in the UK under the WCA 1981 (as amended), which makes it an offence to intentionally kill, injure or take any wild bird, take, damage or destroy its nest whilst in use or being built, or take or destroy its eggs. In addition to this, for species listed on Schedule 1 of the WCA 1981 (as amended), it is an offence to intentionally or recklessly disturb birds while they are nest building, or at or near a nest with eggs or young, or to disturb the dependent young of such a bird.

In addition to statutory protection, the bird species of Britain are also subject to various conservation designations intended to indicate their rarity, population status and conservation priority. These do not have statutory force but may be instrumental in determining local, regional and national planning and development policy. The main categories of designation comprise the British Trust for Ornithology (BTO) 'Species Alert' lists, the Royal Society for the Protection of Birds (RSPB) 'Birds of Conservation Concern' lists and species listed under Section 41 of the NERC Act 2006 and local Biodiversity Action Plans (BAPs).

The BTO Conservation Alert System lists of 'Birds of Conservation Concern' include a 'Red List' for birds of high conservation concern and an 'Amber List' for birds of medium conservation concern. Red List species are those that are globally threatened, and Amber List species are those with an unfavourable conservation status in Europe, according to the International Union for Conservation of Nature (IUCN) criteria<sup>60</sup>. An updated list of 'Red' and 'Amber List' species was published in 2015 (Eaton et al., 2015)<sup>61</sup>.

## Great Crested Newt

In summary, great crested newt, their eggs, breeding sites and resting places are protected by the Conservation of Habitats and Species Regulations 2017 (as amended) and by the WCA 1981 (as amended). Taken together it is an offence to:

- capturing, killing, disturbing or injuring great crested newts deliberately.
- damaging or destroying a breeding or resting place.
- obstructing access to their resting or sheltering places (deliberately or recklessly).
- possessing, selling, controlling or transporting live or dead newts, or parts of them.
- taking great crested newt eggs.

<sup>59</sup> Directive 2009/147/EC of the European Parliament and of the Council of 30 November 2009 on the conservation of wild birds

<sup>60</sup> IUCN (2000): 'The revised Categories and Criteria (IUCN Red List Categories and Criteria version 3.1)'.

<sup>61</sup> Eaton et al (2015): 'Birds of Conservation Concern 4: the population status of birds in the United Kingdom, Channel Islands and Isle of Man'. *British Birds* 108, 708–746.

## Invertebrates

The majority of invertebrate species are not legally protected. However, a total of seventy-two terrestrial and aquatic invertebrate species are protected under the WCA 1981 (as amended). Certain species of invertebrate are also protected under the Conservation of Species and Habitats Regulations 2017 (as amended).

Approximately 400 species of invertebrates are also priority adopted as Species of Principal Importance under Section 41 of the NERC Act (2006).

Many British invertebrate species have also been assigned codes associated to their rarity and threat status including by the International Union for the Conservation of Nature (IUCN). Taxa listed as Critically Endangered, Endangered or Vulnerable are defined as Threatened (Red List) species. As such, the consideration of invertebrates on a site to accompany a planning application should consider species of conservation interest (i.e. Species of Principal Importance and Local BAP, National Rare/Red data book species, Nationally Scarce species) as well as value of the whole invertebrate community).

## Protected and other Notable Flora

Wild plants listed in Schedule 8 of the Wildlife and Countryside Act 1981 (as amended) receive special protection. It is an offence to intentionally pick, uproot or destroy such a plant or to possess, sell or exchange them. Even non-vascular plants - which have no roots - are protected against removal from the substrate on which they are growing. The Schedule is reviewed every five years. It currently includes vascular plants (including flowering plants, ferns and horsetails), bryophytes (including mosses and liverworts), charophytes (stoneworts), lichens and fungi<sup>62</sup>.

## Invasive Non-native Plant Species

In accordance with those species listed on Schedule 9 of the WCA 1981 (as amended) it is an offence to:

- Plant in the wild (or release seeds);
- Allow their spread into the wild

## Reptiles

All native British reptiles are protected in accordance with the WCA 1981 (as amended). There are two levels of protection afforded to reptiles through the WCA 1981 (as amended); these result from different parts of the Act applying to the different species.

In summary, common species of reptile such as common lizard *Zootoca vivipara*, slow worm *Anguis fragilis*, grass snake *Natrix natrix* and adder *Vipera berus* are partially protected under the WCA 1981 (as amended); this prohibits the intentional killing and injuring and trade (i.e. sale, barter, exchange, transporting for sale and advertising to sell or to buy).

## Environment Act 2021 and Mandatory Biodiversity Net Gain

The Environment Bill was given Royal Assent in November 2021 and is now the Environment Act 2021. The Act includes a target to halt the decline of nature by 2030 and to strengthen the existing biodiversity duty through the introduction of a mandatory requirement to achieve at least 10% biodiversity net gain (BNG) for most new developments in England, subject to some exemptions. These requirements commenced on 12th February 2024. The BNG requirement is framed as a pre-commencement condition and that BNG information will need to be provided by the applicant as part of the planning application submission. Pertinent to this site one exemption includes:

Developments below the threshold

A development that does not impact a priority habitat and impacts less than<sup>63</sup>:

<sup>62</sup> Natural England (2014) Wild plants: dangerous, invasive and protected species. Available at: <https://www.gov.uk/guidance/wild-plants-dangerous-invasive-and-protected-species#specially-protected-plants>

<sup>63</sup> Other exemptions can be found on the Government Website [Biodiversity net gain: exempt developments - GOV.UK](#)



## Ecological Impact Assessment (EcIA)

- 25 square metres (5m by 5m) of on-site habitat
- 5 metres of on-site linear habitats such as hedgerows

The act is supported by secondary legislation comprising six statutory instruments:

- i. The Biodiversity Gain (Town and Country Planning) (Consequential Amendments) Regulations 2024;
- ii. The Biodiversity Gain Site Register (Financial Penalties and Fees) Regulations 2024;
- iii. The Biodiversity Gain Requirements (Exemptions) Regulations 2024;
- iv. The Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024;
- v. The Biodiversity Gain (Town and Country Planning) (Modifications and Amendments) (England) Regulations 2024; and,
- vi. The Biodiversity Gain Site Register Regulations 2024.

**Appendix B: Potential Roosting Features**

Tree	Description and Evaluation	Photograph
T3	Horse Chestnut with flaking bark suitable for bat roosting	
T4	Horse Chestnut with snapped branch	

Network Rail  
Waterloo General Offices  
London  
SE1 8SW  
[www.networkrail.co.uk](http://www.networkrail.co.uk)