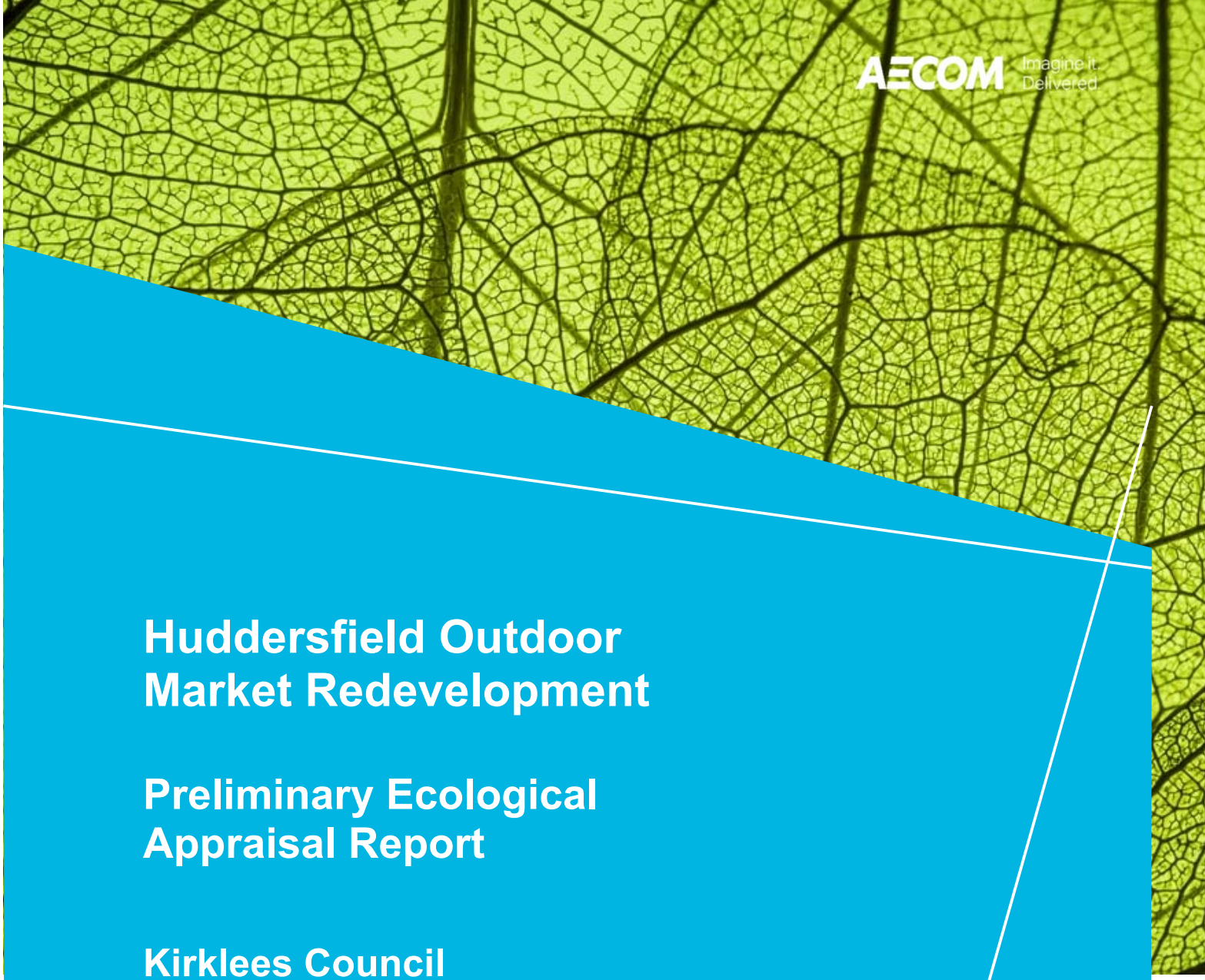

Huddersfield Outdoor Market Redevelopment

Preliminary Ecological Appraisal Report

Kirklees Council

Project Number: 60613541

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Quality Information

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Executive Summary

AECOM Limited was instructed by Kirklees Council to carry out a Preliminary Ecological Appraisal (PEA) of Huddersfield Outdoor Market. The Huddersfield Outdoor Market Site includes a car park, public roads and a working outdoor market. It is proposed that the Site is redeveloped as part of a Town Centre Masterplan for Huddersfield being developed by Kirklees Council.

The proposed redevelopment at the Site is for a combined indoor and outdoor market, located in the vicinity of the existing outdoor market. The exact details and layout are currently not confirmed but potential options include remodelling, refurbishing and/or extending the existing open market to Northumberland Street and the surrounding area.

The PEA was commissioned to identify whether there are known or potential ecological receptors (nature conservation designations, and protected and notable habitats and species) that may constrain or influence the design and implementation of the redevelopment of the Site.

A desk study to collate existing records of protected sites and species, and a Phase 1 habitat survey was undertaken by AECOM in December 2019. The information gained from the desk study and Phase 1 habitat survey has been used to determine the likely ecological value of the Site, the potential for protected, notable and invasive species to be present and to direct any more specific survey work which may need to be carried out prior to the submission of a future planning application.

The Site comprises hard-standing and buildings.

Two buildings within the Site have low bat roost suitability. Prior to demolition or works to these structures it will be necessary to undertake a dusk emergence or dawn re-entry survey to determine whether these buildings support roosting bats. This survey must be undertaken between May and August inclusive. Should the presence of roosting bats be recorded, additional surveys would be required to determine species of bats and type of roost.

In addition, the buildings may provide habitat for nesting birds, no dedicated surveys are required, however it is recommended that removal of this habitat should be undertaken outside of the period March to August inclusive when bird species are likely to be breeding. If this is not possible, the buildings will be checked for active nests by a suitably qualified ecologist/ornithologist no more than 24 hours prior to clearance. If active nests are found, they must be retained and remain undisturbed until an ecologist has confirmed that the young have fledged. Note that some species, such as feral pigeon (*Columba livia domestica*) may nest in buildings all year-round and advice from an ecologist should be followed if nesting birds are present.

The constraints outlined here will need to be reassessed when the exact nature and layout of the proposed redevelopment are known, or if there are any significant changes in the use or management of the land that would affect the habitats and species. If a planning application is made one year or more after a PEA (e.g. after January 2021) it is advisable to review and update the survey data.

1. Introduction

AECOM was instructed by Kirklees Council to carry out a Preliminary Ecological Appraisal (PEA) of Huddersfield Outdoor Market and surrounding roads; Brook Street, Northumberland Street, Byram Street and Lord Street, Huddersfield, West Yorkshire and a car park located off Lord Street (Ordnance Survey Grid Reference SE 14520 17000), hereafter referred to as the 'Site' and shown on Figure 1, **Appendix A**.

The Site is surrounded by the A62 link road. Huddersfield Train Station is located to the west of the Site.

It is proposed that the Site is redeveloped as part of a Town Centre Masterplan for Huddersfield currently under development by Kirklees Council. The proposed redevelopment at the Site is for a combined indoor and outdoor market, located in the vicinity of the existing outdoor market, with options including remodelling, refurbishing and/or extending the existing open market to Northumberland Street and the surrounding area. The proposed works are referred to as Huddersfield Outdoor Market Redevelopment.

At the time of preparing this report the layout and full details of the proposed redevelopment were unknown. As such, this report provides general guidance on the potential ecological constraints and potential mitigation needs within the Site only. The recommendations and guidance presented within this PEA will need to be reviewed when the exact layout and nature of the proposed redevelopment is known.

This PEA was commissioned to identify whether there are known or potential ecological features (nature conservation designations, and protected and notable habitats and species) that may constrain or influence the design and implementation of a future proposed development. The approach applied when undertaking this PEA accords with the *Guidelines for Preliminary Ecological Appraisal* (CIEEM, 2017). The PEA addresses relevant wildlife legislation and planning policy as summarised in Section 2 of this report; and is consistent with the requirements of *British Standard 42020:2013 Biodiversity: Code of Practice for Planning and Development*.

In order to deliver the PEA, a desk study and extended Phase 1 habitat survey were undertaken by appropriately experienced AECOM ecologists to identify ecological features within the Site and, where accessible the wider potential zone of influence. Additional details are provided in Section 3: Methods.

The purpose of the PEA was to:

- Identify and categorise all habitats present within the Site and any areas immediately outside of the survey area boundary where there may be potential for direct or indirect effects (the "zone of influence");
- carry out an appraisal of the potential of the habitats recorded to support protected or notable species of fauna and flora;
- provide high-level advice on any potential ecological constraints and opportunities in the zone of influence that should be addressed in any future planning applications for the Site, including the identification (where known/relevant) of any requirements for follow-up habitat and species surveys and/or requirements for avoidance, ecological mitigation or compensation of the potential ecological impacts of the proposed redevelopment;
- provide high-level recommendations on potential options for enhancements to the biodiversity and ecosystem services; and
- provide a map showing the location of the identified ecological receptors of relevance.

This report provides a high-level appraisal of the ecological risks associated with the Site and identifies the scope of further work that would be required to support a future planning application (if applicable). High level recommendations are made on potential options for the avoidance, mitigation or compensation of the potential impacts of the proposed redevelopment (where known) on the identified ecological features.

2. Wildlife Legislation and Planning Policy

2.1 Wildlife Legislation

The following wildlife legislation is potentially relevant to the Site:

- The Conservation of Habitats and Species Regulations 2017 (as amended);
- Wildlife and Countryside Act 1981 (as amended);
- Countryside and Rights of Way (CRoW) Act 2000; and
- Natural Environment and Rural Communities (NERC) Act 2006.

The above legislation has been considered when planning and undertaking this PEA using the methods described in Section 3 when identifying potential constraints to a future proposed redevelopment, and when making recommendations for further survey and mitigation, as discussed in Section 5.

Further information on the requirements of the above legislation is provided as **Appendix B**.

2.2 National Planning Policy

The National Planning Policy Framework (NPPF) was first published on 27th March 2012. This was replaced by the revised NPPF, published in February 2019, which sets out the Government's planning policies for England and how these are expected to be applied.

Promoting a strong theme of sustainable development, the Framework aims to strengthen local decision making and reinforce the importance of up-to-date plans. Core aims of the NPPF include:

- The Presumption in favour of Sustainable Development;
- Delivering Sustainable Development – Building a strong competitive economy and ensuring the vitality of town centres;
- Promoting sustainable transport;
- Meeting the challenge of climate change, flooding and coastal change;
- Conserving and enhancing the natural environment; and
- Conserving and enhancing the historic environment.

The NPPF states the commitment of the UK Government to minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity. It specifies the obligations that the Local Authorities and the UK Government have regarding statutory designated sites and protected species under UK and international legislation and how this is to be delivered in the planning system. Protected or notable habitats and species can be a material consideration in planning decisions and may therefore make some sites unsuitable for particular types of development, or if development is permitted, mitigation measures may be required to avoid or minimise impacts on certain habitats and species, or where impact is unavoidable, compensation may be required.

Section 15, paragraphs 170-177 of the NPPF includes provision for measurable net gain and creating/maintaining coherent ecological networks. Please note that these paragraphs are also material considerations when making planning decisions, whether plans or specific development projects and applications.

Further information on the relevant parts of the NPPF is provided as **Appendix B**.

2.3 Local Planning Policy

Relevant local planning policies for the Site are detailed in the Kirklees Local Plan. This plan was adopted on 27 February 2019 and is now the statutory development plan for Kirklees and has superseded the Kirklees Unitary Development Plan. The Plan covers the period 2013 – 2031 and the relevant local policy is summarised within Table 1 below. For the precise wording of the policy please refer back to the source document.

These planning policies have been considered when assessing potential ecological constraints identified by the desk study and field surveys; and, when assessing requirements for further survey, design options and ecological mitigation, as described in Section 5.

Table 1: Summary of local planning policy

Document	Planning Policy	Purpose
Kirklees Local Plan	Policy LP30 Biodiversity and Geodiversity	Opportunities will be taken to protect and enhance biodiversity and geodiversity within Kirklees, including the range of international, national and locally designated wildlife and geological sites, Habitats and Species of Principal Importance and the Kirklees Wildlife Habitat Network.

2.4 Kirklees Biodiversity Action Plan (BAP)

The Kirklees Biodiversity Action Plan (BAP) focuses on the local habitats and species of principal importance (also known as priority habitats and species). These are the species and habitats taken from the UK National Biodiversity Action Plan that occur in Kirklees or those that are of sub-regional importance. UK habitats of Principal Importance which are relevant to Kirklees include:

- hedgerows;
- ponds; and
- rivers.

UK species of Principal Importance which are relevant to Kirklees include:

- common starling *(Sturnus vulgaris)*;
- house sparrow *(Passer domesticus)*; and
- bats.

2.5 Biodiversity Net Gain

The NPPF requires that planning decisions should follow the principles of the mitigation hierarchy and provide net gain for biodiversity.

Biodiversity net gain requires developers to ensure habitats for wildlife are enhanced and left in a measurably better state than they were prior to development. Where a development has an impact on biodiversity it encourages developers to provide an increase in appropriate natural habitat and ecological features over and above that being affected, with the aim of halting the current loss of biodiversity through development and restoration of ecological networks.

The process is becoming more mainstream and will soon be a mandatory requirement for planning applications. In such cases, applicants must assess the type of habitat, and habitat condition before submitting plans and then demonstrate biodiversity will be improved.

In order for a development to achieve net gain it is important that the principles of the mitigation hierarchy are followed. This process involves first trying to avoid adverse impacts on biodiversity before finding ways to minimise or mitigate effects and as a last resort compensating for any residual impacts.

There are four sequential steps that must be taken throughout the lifecycle of a project:

- Avoidance - actions taken to avoid causing impacts to the environment prior to beginning development (for example, moving the development to a different location);
- Minimisation - measures taken to reduce the duration, intensity, extent and/or likelihood of the unavoidable environmental impacts caused by development (for example, adapting the development design to minimise impacts);
- Restoration or rehabilitation - actions taken to repair environmental degradation or damage following unavoidable impacts caused by development; and
- Offsets - Measures taken to compensate for any adverse environmental impacts caused by development which cannot be avoided, minimised and/or restored (e.g. including habitat creation to offset losses).

Biodiversity metrics provide a measure of overall Biodiversity Value based on habitat type, area, condition and distinctiveness. A metric is a tool that allows the value of a site to be measured pre- and post-development. The change in Biodiversity Units indicates either a net loss or net gain.

3. Methods

3.1 Desk Study

A desk study was carried out to identify nature conservation designations and protected and notable habitats and species potentially relevant to the Site.

A stratified approach was taken when defining the desk study area, based on the likely zone of influence of the Site on different ecological receptors; and, an understanding of the maximum distances typically considered by statutory consultees. Accordingly, the desk study identified any statutory nature conservation designations within 2 km of the Site boundary and local non-statutory nature designations, and protected and notable habitats and species within 1 km of the Site boundary.

The desk study was carried out using the data sources detailed in Table 2. Protected and notable habitats and species include those listed under Schedules 1, 5 and 8 of the WCA; Schedules 2 and 5 of the Habitats Regulations; species and habitats of principal importance for nature conservation in England listed under section 41 (s41) of the NERC Act; and other species that are Nationally Rare, Nationally Scarce or listed in national or local Red Data Lists and Biodiversity Action Plans.

Table 2: Desk study data sources

Data Source	Accessed	Data Obtained
Multi-Agency Geographic Information for the Countryside (MAGIC) website	December 2019	• Statutory designations within 2 km of the Site. • Ancient woodlands and notable habitats within 1 km of the Site. • Information on habitats and habitat connections (based on aerial photography) relevant to interpretation of planning policy and assessment of potential protected and notable species constraints. • European Protected Species Mitigation Licences (EPSML) for bats within 1 km of the Site.
West Yorkshire Ecology Service	December 2019	• Non-statutory designations within 1 km of the Site. • Protected and notable species records within 1 km of the Site (records for the last 10 years only).
Ordnance Survey 1:2500 Pathfinder maps and aerial photography	December 2019	• Information on habitats and habitat connections (based on aerial photography) relevant to interpretation of planning policy and assessment of potential protected and notable species constraints.
Kirklees Local Plan	December 2019	• Information on the local planning policies relevant to the Site.
Kirklees Biodiversity Action Plan (BAP)	December 2019	• General information on Local Biodiversity Action Plan Priority Habitats and Species.

3.2 Field Survey

The field survey comprised a Phase 1 habitat survey and an appraisal was made of the potential suitability of the habitats present to support protected and notable species. A preliminary bat roost appraisal was also undertaken.

3.2.1 Phase 1 Habitat Survey

A Phase 1 habitat survey was undertaken in accordance with the standard survey method (JNCC, 2010). Phase 1 habitat survey is a standard method of environmental audit. It involves categorising different habitat types and habitat features within a survey area. The information gained from the survey can be used to determine the likely ecological value of a site, and to direct any more specific survey work which may need to be carried out prior to the submission of a planning application. The standard Phase 1 habitat survey method can be "extended" to record target notes on protected, notable and invasive species.

The survey was undertaken on 12 December 2019 by suitably experienced AECOM ecologists who recorded and mapped all habitat types present within the Site boundary, along with any associated relevant ecological features observed. The survey area encompassed all safely accessible parts of the Site and adjacent habitats to a maximum distance of 50 metres, where access permission had been granted in advance of survey, or this land was visible from within the Site boundary or from public rights of way, or other publicly accessible areas.

Where relevant ecological features were present, target notes (Appendix C) were recorded and the position of these shown on the Phase 1 habitat map (Appendix A). Typical and notable plant species were recorded for different habitat types and reflect the conditions at the time of survey. This was not intended to be a detailed inventory of the plant species present in the Site, as this is not required for the purposes of Phase 1 habitat survey.

3.2.2 Appraisal of Potential Suitability of Habitats to Support Protected and Notable Species

An appraisal was made of the potential suitability of the habitats present within the Site to support protected and notable species of plants or animals. Field signs, habitat features with potential to support protected species and any sightings or auditory evidence were recorded when encountered, but no detailed surveys were carried out for any particular species.

A note was made of visible instances of invasive non-native plant species listed under Schedule 9 of the Wildlife and Countryside Act 1981 (as amended). Locations of plants or stands of any such invasive non-native plant species if found were recorded.

Section 5 of this report identifies further steps required to protect ecology, based on the results of the habitat survey. These steps should be completed prior to submission of a planning application as the results are likely to be material for determination of the planning application.

3.2.3 Preliminary Appraisal for Bats

An initial external inspection of any buildings within the Site was undertaken during the Phase 1 habitat survey on 12 December 2019 by an AECOM ecologist who holds a Natural England WML-18 (Level 2) bat survey class licence**.** This survey was conducted in line with the bat survey guidelines (Collins, 2016).

All external features of buildings within the Site, that may have suitability to be used by roosting bats, including the roof tiles, cracks and crevices within the brick work and missing mortar, were examined during the survey using binoculars and a high-powered torch.

Based on these inspections, each building was classified as having negligible, low, moderate, or high suitability to support roosting bats using the criteria set out in the bat survey guidelines (Collins, 2016) and within **Appendix D**.

No trees or other features that could support roosting bats were present on Site.

3.3 Desk Study and Field Survey Limitations

The aim of a desk study is to help characterise the baseline context of a proposed development and provide valuable background information that would not be captured by a single site survey alone. Information obtained during the course of a desk study is dependent upon people and organisations having made and submitted records for the area of interest. As such, a lack of records for a particular habitat or species does not necessarily mean that the habitats or species do not occur in the study area. Likewise, the presence of records for particular habitats and species does not automatically mean that these still occur within the area of interest or are relevant in the context of the proposed development.

Where habitat boundaries coincide with physical boundaries recorded on OS maps the resolution is as determined by the scale of mapping. Elsewhere, habitat mapping is as estimated in the field and/or recorded by hand-held GPS. Where areas of habitat are given they are approximate and should be verified by measurement on site where required for design or construction. While indicative locations of trees are recorded this does not replace requirements for detailed specialist arboricultural survey to *British Standard 5837:2012 Trees in Relation to Design, Demolition and Construction*.

The optimum time for undertaking a Phase 1 habitat survey is between May and September when flowering plants are at their most visible. This survey was undertaken in December 2019. As such, some plants that are characteristic of certain habitats may not have been visible or could only be identified to genus rather than species level. However, due to the nature of the habitats present within the survey area, it is considered that the timing of the survey did not prevent habitats from being accurately categorised and assessed for their potential nature conservation value.

4. Results

4.1 Nature Conservation Designations

4.1.1 Statutory Designations

Gledholt Woods Local Nature Reserve (LNR) is located approximately 1.2 km south-west of the Site boundary. Gledholt or 'TP Woods' LNR contains an area of mature woodland and rough meadow. The woodlands support an unusual range of fungi for a site so close to a town centre. White clawed crayfish (*Austropotamobius pallipes*) have been found in the pond at this LNR.

4.1.2 Non-Statutory Designations

Table 3 details the non-statutory nature conservation designations located within 1 km of the Site, identified by the desk study, based on the method given in Section 3 of this report.

Table 3: Sites with Non-Statutory Designations for Nature Conservation

Designation	Reason(s) for Designation	Relationship to the Site
Huddersfield Narrow Canal LWS	Designated for its standing open water and value for appreciation of nature due to the canal and its tow path providing excellent opportunities for people both on the water and on the bank to see a wide variety of wildlife. Species recorded at the site include kingfisher (*Alcedines* sp.), great willowherb (*Epilobium hirsutum)*, water horsetail (*Equisetum fluviatile*), marsh horsetail (*Equisetum palustre)*, great manna grass (*Glyceria maxima*) and purple loosestrife (*Lythrum salicaria).*	Approximately 625 m south-east at its closest point
Sir John Ramsden Canal LWS	Designated for its standing open water and is within 500 m of another standing water LWS. Plants include fool's-water-cress (*Apium nodiflorum)*, meadowsweet (*Filipendula ulmaria*), pond weed (*Potamogeton)* and water star-wort (*Callitriche sp*.) Also designated for its value for appreciation of nature.	Approximately 330 m east at its closest point

4.2 Habitats

4.2.1 Phase 1 Habitat Types

The habitats recorded, their extent and distribution are detailed in Table 4 and shown in **Appendix A**. The areas are approximate only. The associated target notes are provided in **Appendix C**.

Table 4: Habitats present within the Site

Habitat Area	Metres squared (m²)	% of Site area
Hard-standing	5,281	68%
Buildings	2,471	32%

The habitats are described in greater detail below.

Hard-Standing
The majority of the Site is comprised of hard-standing in the form of pavements and public roads which surrounds the buildings on Site. A small operational car park is located off Lord Street in the north-eastern part of the Site.

Buildings
The central part of the Site contains two buildings. The largest building (Target Note 1) is a working outdoor market comprised of metal framework and glass/plastic panels. The building has a multiple pitched metal and glass roof canopy and open frontages on the northern, eastern and western aspects. These aspects have metal shutters fitted and have extended metal and glass canopies. The southern aspect is joined to a smaller building.

The smaller building (Target Note 2) is used as a café and the Market Office along with other associated facilities and is located in the southern section of the Site, adjacent to the outdoor market. This building is single-storey and comprised of stone with a pitched slate roof and metal drain pipes. Extraction units, roof lights and metal and stone chimneys are present along the roof with lead flashing present around the edge of the roof lights and the base of the chimneys. On the southern aspect, metal shutters are used to cover some of the doorways and the glass windows are covered by security bars. All doors on the eastern aspect have metal shutters attached, this section of the building is used as public conveniences. On some aspects, metal and stone ventilation grills are present within the building's stonework. The western aspect is a gable end with three glazed windows. The northern aspect is joined to the larger building.

4.3 Protected and Notable Species

Table 5 provides a summary of potentially relevant species identified through a combination of desk study and field survey. The table summarises the conservation status of each species and provides comment on the likelihood of presence.

Where species are identified in Table 5 as likely or possible, they are likely to represent legal constraints or may be material to determination of a planning application. Further surveys will or may be required to determine presence or probable absence. Requirements for further survey are identified in Section 5 of this report.

There are no ponds within the Site, or within 250 m of the Site boundary, and therefore no potential for great crested newt or other amphibians to be present. No other habitats potentially suitable for protected species are present (other than those considered in Table 5 below) due to the habitats present on Site. None of the other desk study records received in respect of protected species are therefore relevant.

Table 5: Protected and notable species relevant or potentially relevant to the Site

Species	Legally Protected Species?	Species of Principal Importance?	Other Notable Species?	Present on Site?	Present / Potentially Present in Wider Zone of Influence?	Supporting Comments
Bats	✓	✓	x	?	✓	Existing records of pipistrelle bat species (*Pipistrellus sp.)*, noctule (*Nyctalus noctula)*, Daubenton's bat *(Myotis daubentonii),* and noctule bat *(Nyctalus leisleri)* were identified within 1 km of the Site, the majority of these were activity records. One record was in relation to a pipistrelle species roost located approximately 850 m to the south-east. Two European Protected Species Mitigation Licences (EPSMLs) for bats have been granted within 1 km of the Site boundary; one was granted for 2014 in relation to common pipistrelle *(Pipistrellus pipistrellus),* located approximately 560 m south-east of the Site boundary. Another licence was granted between 2011 and 2013 for common pipistrelle and is located approximately 850 m south-east of the Site boundary. Both licences are for resting places only. Bats are listed on the Kirklees BAP. There are two buildings (Target Notes B1 and B2) with bat roost suitability. The other habitats present within the Site provide limited foraging and commuting habitats for bats, and these habitats lack connectivity and are surrounded by hard-standing/buildings associated with Huddersfield City Centre.
Breeding birds	✓	✓	✓	✓	✓	The desk study identified existing records of bird species including swift (*Apus apus*), grey wagtail (*Motacilla cinerea)* and mallard *(Anas platyrhynchos)* within 1 km of the Site. The nearest bird record to the Site boundary was of a grey wagtail recorded in 2015 located approximately 350 m south east of the Site boundary. Two records of peregrine falcon (*Falco peregrinus*), a Schedule 1 listed bird (WCA, 1981), were recorded in 2015 (approximately 135 m south-east of the Site boundary) and 2016 (approximately 700 m east of the Site boundary). Birds including swift, goldfinch, grey wagtail and peregrine falcon are listed on Kirklees BAP. Although limited, habitats present within the Site have potential to support common nesting bird species.

Species	Legally Protected Species?	Species of Principal Importance?	Other Notable Species?	Present on Site?	Present / Potentially Present in Wider Zone of Influence?	Supporting Comments
Schedule 9 invasive non-native plant species	x	x	✓	x	✓	The desk study returned records of invasive non-native plant species including Japanese knotweed *(Reynoutria japonica),* giant hogweed *(Heracleum mantegazzianum)* and Himalayan balsam *(Impatiens glandulifera)* within 1 km of the Site boundary. The nearest record of Schedule 9 invasive non-native plant species is located approximately 570 m from the Site boundary. No invasive non-native plant species were observed as being present within the Site and are not considered further in this report.

Key to symbols: ✓ = yes, x = no,? = possibly, see Supporting Comments for further rationale.

Species present on site are those for which recent direct observation or field signs confirmed presence. Species which are possibly present are those for which there is potentially suitable habitat based on the results of the Phase 1 Habitat survey, or this combined with desk study records.

Legally protected species are those listed under Schedules 1, 5 and 8 of the Wildlife and Countryside Act 1981 (as amended); and, Schedules 2 and 4 of The Conservation of Habitat & Species Regulations 2017 (as amended).

Species of Principal Importance as those listed under Section 41 of the NERC Act. Planning Authorities have a legal duty under Section 40 of the same Act to consider such species when determining planning applications.

Other notable species include native species of conservation concern listed in the LBAP (except species that are also of Principal Importance), those that are Nationally Rare, Scarce or Red Data List, and non-native controlled weed species listed under Schedule 9 of the Wildlife and Countryside Act 1981 (as amended).

4.3.1 Preliminary Bat Roost Appraisal

Following the preliminary bat roost appraisal survey within the Site; two buildings (Target Notes B1 and B2) have suitability to support roosting bats. Further details on each building are contained within Table 6 below and photographs are provided within **Appendix C**.

Table 6: Initial assessment of buildings with suitability to support roosting bats

Target Note	Description	Potential roost features	Bat Roost Suitability
1	A large building used as an outdoor market comprised of metal framework and glass/plastic panes. The building has a multiple pitched metal and glass roof canopy and open frontages on the northern, eastern and western aspects. These aspects have metal shutters fitted and have extended metal and glass canopies. The southern aspect is joined to a smaller building.	• High, pitched canopy roof with slate tiles.	Low
2	A café and Market Office along with other associated facilities. Single-storey and comprised of stone with a slate roof and metal drain pipes. Extraction units, roof lights and metal and stone chimneys are present along the roof. Lead flashing is present around the base of the stone chimney stacks. Metal shutters are used to cover some of the building entrances and some of the glass windows are covered by security bars. On some aspects metal and stone ventilation grills are present within the building's stonework.	• Missing mortar from stonework on gable on western aspect. • Lead flashing, ridge tiles and slates on roof.	Low

5. Identification of Ecological Constraints and Recommendations

5.1 Approach to the Identification of Ecological Constraints

Relevant ecological receptors that may represent constraints to the proposed redevelopment are identified in Section 4 of this report.

The NPPF and local planning policy (summarised in Section 2 of this report) specify requirements for the protection of features of importance for biodiversity. Planning policy is a material consideration when determining planning applications.

Compliance with planning policy requires that the proposed development considers and engages the following mitigation hierarchy where there is potential for impacts on relevant ecological features:

1. Avoid features where possible;
2. Minimise impact by design, method of working or other measures (mitigation) e.g. by enhancing existing features; and
3. Compensate for significant residual impacts, e.g. by providing suitable habitats elsewhere (whether in the control of Kirklees Council or otherwise legally enforceable through planning condition or Section 106 agreement).

This hierarchy requires the highest level to be applied where possible. Only where this cannot reasonably be adopted should lower levels be considered. The rationale for the proposed mitigation and/or compensation should be provided with planning applications, including sufficient detail to show that these measures are feasible and would be provided.

The likelihood of the relevant ecological receptors constraining the proposed redevelopment has been assessed with reference to the scale described in Table 7. The higher the importance of the ecological receptor for the conservation of biodiversity at national and local scales, the more likely it is to be a material consideration during determination of the planning application for the proposed redevelopment.

Table 7: Scale of Constraint to Development

Likelihood	Definition
High	An actual or potential constraint that is subject to relevant legal protection and is likely to be a material consideration in determining the planning application (e.g. statutory nature conservation designations and European/nationally protected species). Further survey likely to be required (as detailed in this report) to support a planning application.
Medium	An actual or potential constraint that is covered by national or local planning policy and, depending on the level of the potential impact as a result of the proposed development, may be a material consideration in determining the planning application. Further survey may be required (as detailed in this report) to support a planning application.
Low	Unlikely to be a constraint to development or require further survey prior to submission of a planning application. Mitigation is likely to be covered under Construction Environmental Management Plan (CEMP) or precautionary working method statement (e.g. generic requirements for the management of nesting bird risks).

5.2 Biodiversity Net Gain

A Biodiversity Net Gain (BNG) assessment may be required as part of the redevelopment of the Site. Should a BNG assessment be required, detailed designs are necessary for a BNG assessment, so this cannot be carried out at this stage as the exact layout of the proposed redevelopment of the outdoor market has not been determined.

The results of the metric calculation can be used to inform the requirements for on-site mitigation and any off-site compensation that may be needed to achieve the target of net gain in biodiversity.

The assessment is an iterative process and can be applied during the design evolution process to guide the requirements for mitigation and compensation, in terms of the type and extent of habitats to be recreated or restored (in other words, improve habitat condition) to ensure the Site results in net gain.

5.3 Constraints and Requirements for Further Survey: Designations

Based on available information, one statutory designation; Gledholt Woods LNR and two non-statutory designations; Huddersfield Narrow Canal LWS and Sir John Ramsden Canal LWS are not considered to be relevant to the proposed redevelopment. This is due to the distance from the Site to these designated sites and lack of potential impact pathways between the proposed redevelopment and the designated sites.

5.4 Constraints and Requirements for Further Survey: Habitats

The hard-standing and buildings present within the Site are considered to be of no ecological value and the loss of this habitat would not require specific habitat mitigation.

5.5 Constraints and Requirements for Further Survey: Species

Bats

All species of bats are fully protected under the Wildlife and Countryside Act 1981 (as amended) and the Conservation of Habitats and Species Regulations 2017 (as amended). Under this legislation it is illegal to:

- intentionally or recklessly kill, injure or capture a bat;
- intentionally or recklessly disturb a bat when it is occupying a roost; and
- intentionally or recklessly damage, destroy or obstruct access to a bat roost.

The two buildings within the Site have low suitability to support roosting bats, it will therefore be necessary to determine whether these support roosting bats prior to undertaking any works which would affect these buildings, i.e. demolition or repair/renovation works. One dusk emergence or one dawn re-entry survey should be undertaken between May and August in line with the current best practice guidelines (Collins, 2016)

Licences to permit otherwise illegal activities relating to bats and their roost sites can be issued for specific purposes and by specific licensing authorities in each country, in this case Natural England. These are called European Protected Species (EPS) or 'mitigation' licences and are issued under the Habitat Regulations. It is an offence not to comply with the terms and conditions of an EPS licence.

If an impact is predicted on any roosts confirmed on Site, then appropriate mitigation will be required as part of a Natural England EPS licence. Robust survey data will also be essential to support the EPS licence application.

Breeding Birds

All species of bird are protected under Section 2 of the Wildlife and Countryside Act 1981 (as amended).

This legislation makes it an offence to intentionally:

- kill, injure or take any wild bird;
- take, damage or destroy the nest of any wild bird while that nest is in use or being built; or
- take, destroy an egg of any wild bird.

Due to the limited suitable habitat on the Site, no dedicated breeding bird surveys are required. However, clearance of the Site to facilitate development works during the bird breeding season carries a risk of an offence under the Wildlife and Countryside Act 1981 (as amended).

To ensure compliance with legislation protecting nesting birds, removal of any habitats (e.g. trees, scrub and buildings) that might be used by nesting birds should ideally be carried out outside the nesting season (generally taken to be March to August inclusive). If the disturbance of this habitat cannot be avoided by design, then the proposed redevelopment should be undertaken outside of the period March to August inclusive when bird species are likely to be breeding. If this is not possible, then an appropriately experienced ecologist should check the areas for nests immediately prior to removal. If nests are found, they must be retained and remain undisturbed until an ecologist has confirmed that the young have fledged. Note that some species (such as feral pigeon) may nest in buildings all year-round and advice from an ecologist should be followed if nesting birds are present.

Table 8: Summary Appraisal of Features of Ecological Constraints and Recommended Further Action and Surveys

Receptor	Scale of Constraint	Further Requirements, Including Potential Mitigation Requirements and Surveys	Driver	When is Action Likely to be Required		
				To Inform Design	Before Planning Application	Pre-construction Onwards
Bats	Medium	Bat dusk emergence /dawn re-entry survey May to August using bat detection equipment. (Collins, 2016) to determine use of the Site by roosting bats to inform mitigation requirements. Protection of bat roosts or mitigation for loss of roosts (where confirmed on Site).	The Habitats Regulations. WCA 1981 (as amended). LBAP	✓	✓	✓
Breeding birds	Low	Clearance works should avoid March-August inclusive. If this is not possible, the buildings will be checked for active nests by a suitably qualified ecologist/ornithologist no more than 24 hours prior to clearance.	Wildlife and Countryside Act, 1981 (as amended).			✓

5.6 Opportunities for Ecological Enhancement

At the time of preparing this report the nature and layout of the proposed redevelopment was unknown, however, there could be potential opportunities to enhance the Site for biodiversity to reflect its location within the wider surrounds, and to satisfy the requirements of the NPPF.

Potential opportunities for biodiversity enhancement have been identified as follows and can be refined as and when the nature and layout of the proposed redevelopment has been determined.

- Provision of bird and bat boxes; and
- Vegetated roofs/walls.

6. Conclusions

At the time of preparing this report the full details and layout of the proposed redevelopment was unknown. This report provides general guidance on the potential ecological constraints associated with the Site and potential mitigation requirements.

Subject to further survey and assessment, potential constraints have been identified relating to bats and birds. The two buildings on Site offer potential bat roosting habitat and a further survey, as outlined above have been recommended to determine the value of these habitats to inform any future planning application. If roosting bats are recorded, then further surveys will be required.

There is potential for nesting birds to be present on Site, however the need for additional ecological surveys for birds isn't required provided that the above mitigation is implemented in relation to nesting birds.

The Site will need to be reassessed if there is a significant change to the type or scale of development proposed, or if there are any significant changes in the use or management of the land. If a planning application is made one year or more after a PEA (January 2021) it is advisable to review and update the survey data.

7. References

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Joint Nature Conservation Committee (2010) *Handbook for phase 1 habitat survey – a technique for environmental audit*. Joint Nature Conservation Committee, Peterborough

Kirklees Biodiversity Strategy https://www.kirklees.gov.uk/beta/delivering-services/pdf/biodiversity-strategy.pdf

Kirklees Habitats of Principal Importance https://www.kirklees.gov.uk/beta/delivering-services/pdf/biodiversity-habitats.pdf

Kirklees Local Plan strategy and policies https://www.kirklees.gov.uk/beta/planning-policy/local-plan.aspx

Kirklees Species of Principal Importance https://www.kirklees.gov.uk/beta/delivering-services/pdf/biodiversity-species.pdf

MAGIC website: https://magic.defra.gov.uk/

Appendix A Phase 1 Habitat Plan

File Name:Z:\UK\UKMCR5\Jobs\PR-440374_Queensgate_Quarter\900_CAD_GIS\GIS\02_Maps\Outdoor Market - Phase 1 Plan.mxd

THIS DRAWING IS TO BE USED ONLY FOR THE PURPOSE OF ISSUE THAT IT WAS ISSUED FOR AND IS SUBJECT TO AMENDMENT

Legend

- Target Note
- Site Boundary
- J3.6 - Buildings
- J5 - Hardstanding

Purpose of Issue
FOR INFORMATION

Client
KIRKLEES COUNCIL

Project Title
OUTDOOR MARKET

Drawing Title
PHASE 1 HABITAT PLAN

Drawn	Checked	Approved	Date
EC	AR	AD	30/01/2020

AECOM Internal Project No.	Scale @ A3
60613541	1:750

AECOM

Royal Court, Basil Close, Chesterfield. S41 7SL
http://www.aecom.com/

Drawing Number
FIGURE 1

Rev
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Appendix B Legislation and Planning Policy

The Conservation of Habitats and Species Regulations 2017 (as amended)

The original Regulations transposed the EU Directive on Natural Habitats, and Wild Fauna and Flora 9/43/EEC) into domestic legislation. Amendments in 2007 and 2009 addressed a number of gaps and inconsistencies in the original legislation and provided a greater legal certainty and clarity in a number of areas. In April 2010 the Regulations were brought up to date to consolidate changes made since 1994. The Regulations afford a high level of protection to a variety of species that are considered important at a European scale. The Regulations identify European Protected Species and various habitats of importance within the European Union, with important sites for these habitats/species or both being designated as special Areas of Conservation (SAC). Any proposed development that may have a significant effect on a SAC or Special Protection Area (SPA) should be assessed in relation to the site's 'conservation objectives', i.e. the reasons for which the Site is designated.

The new Regulations simplified the species protection regime to better reflect the Habitats Directive, providing a clear legal basis for surveillance and monitoring of European Protected Species (EPS). The Regulations also amended the WCA, updating Schedules 5 and 8 to consider provisions made by the Habitat Regulations 1994 in relation to the protection of EPS. They also offered further clarification to Part 4 of Section 9 considering "reckless" offences on wild animals, which was previously amended by the CROW Act 2000.

In 2012, the Regulations were further amended to place new duties on public bodies to take measures to preserve, maintain and re-establish habitat for wild birds. They were also amended to ensure certain provision of the Habitats Directive and the Birds Directive were transposed clearly and Section 15 was amended to make clear that Local Nature Reserves can be designated for re-establishing bird habitat

Please note that These Regulations (cited as the Conservation of Habitats and Species and Planning (Various Amendments) (England and Wales) Regulations 2018) came into force on 28th December 2018. They amend the Conservation of Habitats and Species Regulations 2017, the Neighbourhood Planning (General) Regulations 2012, the Town and Country Planning (Permission in Principle) Order 2017 and the Town and Country Planning (Brownfield Land Register) Regulations 2017.

Regulation 2 amends the Conservation of Habitats and Species Regulations 2017 ("the Habitats Regulations") applicable to special development orders, local development orders, neighbourhood development orders, simplified planning zones, enterprise zones and the conversion of footpaths into cycle tracks to incorporate the habitats assessments provisions in regulation 63 of the Habitats Regulations. With the exception of the conversion of footpaths into cycle tracks, this regulation also incorporates regulations 65 and 66 for the review of existing decisions and consents.

Regulation 2 also amends the Habitats Regulations to allow for the application of regulation 63 to applications for permission in principle.

Regulation 3 amends the Neighbourhood Planning (General) Regulations 2012 to change the prescribed condition relating to habitats for the purpose of examination of neighbourhood development plans to require that a neighbourhood development plan complies with the provisions applicable to land use plans in Chapter 8 of Part 6 of the Habitats Regulations.

Regulation 4 amends the Town and Country Planning (Permission in Principle) Order 2017 to change the definition of habitats development (for which a local planning authority may not grant permission in principle) to incorporate the habitats assessment process under regulation 63 of the Habitats Regulations.

Regulation 5 amends the Town and Country Planning (Brownfield Land Register) Regulations 2017 to change the definition of habitats development (which a local planning authority may not enter onto Part 2 of the Brownfield Land Register) to incorporate the habitats assessment process under regulation 63 of the Habitats Regulations.

Wildlife and Countryside Act 1981 (as amended)

The Wildlife and Countryside Act 1981 is the major domestic legal instrument for wildlife protection in the UK, and is the primary means by which the following are implemented:

- The Convention on the Conservation of European Wildlife and Natural Habitats ('the Bern Convention'); and
- The Council Directive 79/409/EEC on the Conservation of Wild birds (the 'Bird Directive')

Wild Birds

The Act makes it an offence (with exception to species listed in Schedule 2) to intentionally:

- kill, injure, or take any wild bird,
- take, damage or destroy the nest of any wild bird while that nest is in use or being built (also [take, damage or destroy the nest of a wild bird included in Schedule ZA1] under the Natural Environment and Rural Communities Act 2006), or
- take or destroy an egg of any wild bird.

Special penalties are available for offences related to birds listed on Schedule 1, for which there are additional offences of disturbing these birds at their nests, or their dependent young. The Secretary of State may also designate Areas of Special Protection (subject to exceptions) to provide further protection to birds. The Act also prohibits certain methods of killing, injuring, or taking birds, restricts the sale and possession of captive bred birds, and sets standards for keeping birds in captivity.

Other Animals

The Act makes it an offence (subject to exceptions) to intentionally kill, injure or take any wild animal listed on Schedule 5, and prohibits interference with places used for shelter or protection, or intentionally disturbing animals occupying such places. The Act also prohibits certain methods of killing, injuring, or taking wild animals.

Flora, Fungi and Lichens

The Act makes it an offence (subject to exceptions) to intentionally) pick, uproot or destroy:

- any wild plant listed in Schedule 8, or
- unless an authorised person, to intentionally uproot any wild plant not included in Schedule 8,
- to sell, offer or expose for sale, or possess (for the purposes of trade), any live or dead wild plant included in Schedule 8, or any part of, or anything derived from, such a plant.

Non-native Species

The Act contains measures for preventing the establishment of non-native species which may be detrimental to native wildlife, prohibiting the release of animals and planting of plants listed in Schedule 9 in England and Wales. It also provides a mechanism making any of the above offences legal through the granting of licences by the appropriate authorities.

The Countryside and Rights of Way (CroW) Act, 2000

Part III of this Act deals specifically with wildlife protection and nature conservation in England and Wales. The CroW Act strengthened the safeguards afforded to SSSIs.

Natural Environment and Rural Communities (NERC) Act 2006

Section 41 of the NERC Act requires the listing of habitats and species that are considered to be of principle importance for the conservation of biodiversity in England, including habitats and species in England that have been identified as priorities within the UK Biodiversity Action Plan (UKBAP).

The NERC Act requires that the Section 41 list be used to guide decision-makers such as public bodies, including local and regional authorities, in implementing their duty under section 40 of the NERC Act 2006 'to have regard' to the conservation of biodiversity in England, when carrying out their normal functions.

The EU Invasive Alien Species Regulations 2014

The EU Invasive Alien Species Regulations sets out to address the problems concerned with invasive alien species (IASs) in order to protect native biodiversity and ecosystem services and minimize and mitigate the human health and/or economic impacts that IASs can have. It sets out rules to prevent and manage the introduction and spread of IASs in the EU through prevention, early detection and rapid eradication, and management.

National Planning Policy Framework

The NPPF came into being in March 2012 and was revised and updated in July 2018 and published in February 2019, relevant sections are as follows (although full details should be considered, which are found at https://www.gov.uk/government/publications/national-planning-policy-framework--2):

Section 15 of the NPPF relates specifically to "Conserving and Enhancing the Natural Environment".

Paragraph 170 states that "*Planning policies and decisions should contribute to and enhance the natural and local environment by:*

a) 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);

b) 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;

c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;

d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;

e) 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;

f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.."

Paragraph 171 states that Plans should: distinguish between the **hierarchy of international, national and locally designated sites**; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework; take a **strategic approach to maintaining and enhancing networks of habitats and green infrastructure**; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries

Paragraph 174 states that: *To protect and enhance biodiversity and geodiversity, plans should:*

a) Identify, map and safeguard components of local wildlife-rich habitats and wider **ecological networks**, including the hierarchy of international, national and locally designated sites of importance for biodiversity; **wildlife corridors and stepping stones** that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and

b) promote the **conservation, restoration and enhancement of priority habitats**, **ecological networks** and the protection and **recovery of priority species**; and identify and **pursue opportunities for securing measurable net gains for biodiversity**.

Paragraph 175 states: *When determining planning applications, local planning authorities should apply the following principles:*

a) 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;

b) **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 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;

c) **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

d) 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.

Paragraph 176 states: ***The following should be given the same protection as habitats sites****:* potential Special Protection Areas and possible Special Areas of Conservation;

a) listed or proposed Ramsar sites; and

b) sites identified, or required, as compensatory measures for adverse effects on habitats sites, potential Special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites.

Paragraph 177 states: **The presumption in favour of sustainable development does not apply where development requiring appropriate assessmen**t because of its potential impact on a habitats site is being planned or determined.

Appendix C Target Notes

Target Note	Description	Photograph
1	Large building located in the centre of the Site. Open frontage on the eastern aspect comprised of metal frames and glass panes offering potential for birds to enter the building.	
1	Multiple skylights are present throughout the multiple pitched glass and metal roofing. Metal bars above one of the shutters on the eastern aspect offer potential for bats to enter the building.	
2	Missing pointing within the stone work on the western aspect offering potential access for bats to roof void under eaves.	

2	Slates, ridge tiles and lead flashing offering potential for bats to enter the roof. Chimney stacks could offer nesting opportunities for birds.	

Appendix D Preliminary Bat Roost Appraisal Method

Table D1: Survey Methodology for Assessing the Potential Roost Features (PRFs) of Buildings

Buildings

Bats utilise many different features in buildings for places of shelter and roosting. Features that should be observed, noted and graded (in accordance with criteria in Table D2) during the external and internal survey of buildings includes:

External

- external features associated with each building are visually inspected for their suitability for use by roosting bats. Equipment includes close focusing binoculars and powerful spot-lamps are used to study the walls, eaves and roofs of the buildings. Inspection mirrors and endoscopes are used as required.
- bats are able to enter a roosting cavity through a small gaps at least 20mm wide. However, bats usually also require an area to land that is adjacent to the entrance hole and has a rough surface. Such features are looked for during the inspection.
- features include; gaps in ridge tiles (where mortar is missing) gaps under roof tiles or slates, lead flashing around chimney stacks and around dormer windows, gaps under the fascias and soffits, weatherboarding, missing mortar from joints in stone/ brickwork, roof valleys and hips.
- special attention should be paid to the areas directly below any potential access/ egress point in an attempt to identify any accumulation of bat droppings.
- no work involving multi-sectional ladders over 5 m in height should be undertaken as part of the external survey.

Internal

- the most effective method of determining the presence of bat activity within a building is by the presence of their droppings. Bats deposit droppings in both roost and social areas, but the use of such sites by bats can change due to prevailing weather conditions or the time of year.
- the internal inspection involves surveying all surfaces window ledges, rough wall surfaces, floors, cobwebs, cupboard tops and any relatively undisturbed surface.
- areas of particular interest (but not restricted to) are the tops of gable end walls, top of the ridge beam, hip and other roof beams, mortise joints, junction of roof beams, areas around chimney breasts, between roof tiles and felting.

Other features, such as accumulations of discarded wings of moths or butterflies are also recorded where present. Certain bat species are more likely than others to deal with prey items and leave evidence such as this, and so such features can help identify the species present. Similarly, the location of where droppings were recorded can provide an indication of both the species and the type of roost that is present.

Table D2: Criteria used to describe the level of suitability of a Potential Roost Feature (PRF) to support roosting bats.

Suitability / Risk	Description of Roosting Habitats
NEGLIGIBLE	Structure or tree with no or very limited roosting opportunities for bats. Feature may be isolated from foraging habitat.
LOW	Structure or tree one or more potential roost sites that could be used by individual bats opportunistically. However, these potential roost sites do not provide enough space, shelter, protection, appropriate conditions and/or suitable surrounding habitat to be used on a regular basis or by larger numbers of bats (i.e. unlikely to be suitable for maternity or hibernation). A tree of sufficient size and age to contain PRF(s) but with none seen from the ground or features seen with only very limited roosting potential with a limited number of roosting opportunities. Low proximity and connectivity to low or moderate quality foraging habitat.
MODERATE	Structure or tree 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 – the assessments in this table are made irrespective of species conservation status, which is established after presence is confirmed). Often will have some connectivity and proximity to moderate or high quality foraging habitat.
HIGH	A structure or tree 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 longer periods of time due to their size, shelter one or more species of bat. With good connectivity to high quality foraging habitat.
CONFIRMED ROOST	**Presence of bats or evidence of bats. Confirmation of roost status may require further Roost Classification Survey.**

Notes:

1. Collins, 2016 uses the terms negligible, low, moderate, etc. to assess habitat suitability for bats as per the levels of shown in the table above.
2. The **NEGLIGIBLE** category is used where a feature has been inspected and found not to contain any features of use to bats, and hence provides confirmation that a feature has been inspected or considered.
3. For building/structures PRFs assessed at **LOW to HIGH** Risk further surveys are likely to be required (in accordance with standard survey guidance to attempt to determine roost presence/absence).
4. **CONFIRMED ROOSTS** likely to require Roost Characterisation Surveys to inform planning/mitigation requirements.