Ostara Ecological Services

Ecological Appraisal

Executive Summary

Ostara Ecological Services were commissioned by Bernard Taylor Partnership Ltd to undertake an Ecological Appraisal and Biodiversity Net Gain (BNG) Assessment of land off Dowker Street, Milnsbridge. This comprised an online desk study, Phase 1 Habitat Survey and an ecological scoping survey which assessed the potential of the site to support species of conservation concern or other species which could present a constraint to the development of the site. The proposals include the removal of opportunistic vegetation on site to facilitate the construction of residential buildings with associated hardstanding and landscaping.

The ecological assessment highlights several key considerations for the proposed development site:

- ★ No impacts to designated sites are anticipated due to the small-scale development and distance from known sites. The site is not within any SSSI Impact Risk Zones.
- ★ Existing habitats are of low botanical value and limited species diversity, primarily supporting opportunistic fauna rather than plants. No protected or Priority plant species were recorded. Construction best practice measures should be followed to minimise pollution.
- ★ The site comprises low-value *Buddleia sp* scrub, rubble, and urban debris. Post-development habitats include urban trees, modified grassland, vegetated gardens, and ornamental hedgerows. A minor net loss in area habitats (–0.15 units; –21.21%); hedgerows (+0.02 units; 0%) with the underground culvert unchanged (0 units; 0%). Overall, the site is unlikely to achieve net gain, and off-site biodiversity offsetting for habitat and watercourse units will be required. A Landscape and Ecological Management Plan (LEMP) is recommended to secure habitat management and maximise biodiversity benefits.
- ★ Bats: Trees have negligible roosting potential. Low-quality foraging/commuting habitat will be retained or enhanced; a low-impact lighting strategy is recommended.
- ★ Reptiles: Unlikely to be present. Debris piles should be dismantled by hand, avoiding hibernation periods. Any fauna encountered should be left undisturbed or handled only by a suitably qualified ecologist (SQE).
- ★ Nesting Birds: Clearance outside March–August (inclusive) is preferred. If works occur in season, an SQE must check for active nests and retain appropriate buffers.
- ★ Hedgehogs and small mammals: Precautionary measures, including ramps, mammal ladders, and safe storage of hazardous materials, should be implemented to minimise harm.
- ★ Native tree and shrub planting is recommended. Bat and bird boxes should be installed on buildings, and hedgehog *Erinaceus europaeus* highways incorporated into garden fencing. Residents should be provided guidance on wildlife features to support ongoing conservation.

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- ★ The site is of low ecological value. With precautionary measures, sensitive construction, and proposed enhancements, the development will protect wildlife, provide lasting ecological benefits, and comply with statutory BNG requirements (with off-site offsetting for net gain).

Introduction

Site name	Dowker Street, Milnsbridge
Purpose of report	To undertake an initial assessment of the potential ecological impact of the proposals, an online desk study, Phase 1 Habitat Survey and protected species assessment were carried out. This is termed as a Preliminary Ecological Appraisal Report (PEAR) in accordance with CIEEM (2017).This assessment is considered 'preliminary' until any required protected species, habitat or invasive species surveys are completed, and the results incorporated into a final Ecological Appraisal or Low Impact Ecological Impact Assessment (EcIA) which supports the planning application. This report does not form part of a wider discipline Environmental Impact Assessment (EIA) or Environmental Statement (ES), nor does it confer the need for any such documentation. The report will also provide an overview of the Biodiversity Net Gain Good Practice Principles (Baker, Hoskin & Butterworth, 2019) and legislation and planning policy.
Aim(s)	★ Undertake a desk-based review of designated sites and records of protected species and other species that could present a constraint; ★ Assess the habitats present on site; ★ Assess the site for potential to support protected species or other species that could present a constraint, and make appropriate recommendations for further survey work if necessary; ★ Calculate BNG baseline and proposal enhancement/creation to achieve net gain on site, where feasible; ★ Provide outline options for mitigation measures as appropriate; and ★ Make recommendations for appropriate biodiversity enhancements in line with national and local planning policy.

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Introduction

Proposals	Development of c.38 residential buildings with associated infrastructure and soft landscaping.
Background information	Ostara Ecological Services LTD undertook a baseline survey in April 2023. Which concluded "*The site was approximately c.0.5ha in size and comprises 0.21ha of dense (inaccessible Buddleia scrub and saplings), 0.31ha of hard standing with chipped vegetation and scattered scrub. Remaining building foundations were present on the southern aspect, while on the northern aspect a rubble / brick pile wall had been created.* *Nesting birds were noted on site to the north within the dense scrub.* *No significant impacts upon designated sites are anticipated. The site does not meet the criteria for Sites of Special Scientific Interest (SSSI) Impact Risk Zones (IRZs).* *Outline recommendations include:* ★ *Due to the presence of nesting birds, limited lighting on site and dense vegetation, a Construction and Environmental Management Plan (CEMP) should be conditioned and produced. The CEMP will detail protection measures, and pre/during clearance ecology checks for protected species.* ★ *Lighting Strategy to avoid impacts to foraging and commuting species.* ★ *The site is considered suitable for small mammals such as hedgehogs Erinaceus europaeus, reptiles and nesting birds. The risk of injury to these species should be minimised during any works on site. Precautionary Methods of Works during construction are required and detailed within the report.* ★ *BNG results in a 73% net gain, which satisfies the trading rules.* ★ *Enhancements are easily achievable within the development where the incorporation of native planting, bat, bird and hedgehog nesting boxes are recommended. Inclusion of hedgehog highways and residential information of artificial boxes and hedgehogs are also recommended."* Due to the lapse of time an updated survey and matric was undertaken, as detailed in this report.
Location	Land at Dowker Street, Quarmby, Milnsbridge, Kirklees, West Yorkshire, England, HD3. Ordnance Survey Grid Reference SE 11615 16068.

Ostara Ecological Services

Introduction

Map



(screen shot from: https://gridreferencefinder.com/ on 31.03.2023)

Zone of Influence

The term Zone of Influence is used to describe the geographic extent of potential impacts of a proposed development. The Zone of Influence is determined by the nature of the development and also in relation to designated sites, habitats or species which might be affected by the proposals. For this site the Zone of Influence is considered to be the site boundary only due to the residential and commercial developments surrounding the site boundary.

Ostara Ecological Services

Methodology

Desk Study

Ecological records within a 2 km radius of the site were obtained and analysed using available online datasets only, specifically the MAGIC Defra database. The search was restricted to records of protected and notable species from the last ten years, together with information on sites of nature conservation interest within the 2 km study area.

The review included statutory sites designated for their ecological importance, as listed on the MAGIC database, namely:

- ★ Sites of Special Scientific Interest (SSSIs)
- ★ Special Areas of Conservation (SACs)
- ★ Special Protection Areas (SPAs)
- ★ Ramsar Sites (Wetlands of International Importance)
- ★ National Nature Reserves (NNRs)
- ★ Local Nature Reserves (LNRs)

Non-statutory sites, including Local Wildlife Sites (LWSs), Sites of Importance for Nature Conservation (SINCs), Regionally Important Geological/Geomorphological Sites (RIGS), and other locally identified conservation sites, were also identified through available online resources where possible.

A 1:25,000 Ordnance Survey map was reviewed to identify nearby features such as ponds, watercourses, or green corridors that could provide habitat or ecological connectivity to surrounding areas. Natural England's bat and Great Crested Newt *Triturus cristatus* European Protected Species Licence (EPSL) return data were also searched via the MAGIC website.

When determining whether a site falls within a GCN risk zone, the methodology often includes the review of spatial risk maps provided by systems such as NatureSpace Partnership or Natural England's district-level licensing schemes. These maps categorise areas into risk zones (e.g., Green, Amber, Red) based on habitat suitability and the likelihood of GCN presence.

All data were collated and analysed to provide an overview of the ecological context of the site.

Habitat Survey

A Phase 1 Habitat Survey was undertaken following the standard Joint Nature Conservation Committee (JNCC) Phase 1 methodology, alongside the UK Habitat Classification (UKHab) system, to identify and map habitats relevant to the site for Biodiversity Net Gain (BNG) assessment. Habitat types were described and assessed for their general ecological value. A detailed species list was compiled for each habitat, allowing vegetation to be grouped into areas of similar community types, with reference to National Vegetation Classification (NVC) communities where appropriate. Species identification followed the Botanical Society of Britain and Ireland (BSBI) Checklist. The Phase 1 and NVC information was then cross-referenced with UKHab to assign the most appropriate habitat codes, ensuring compatibility with the Statutory Biodiversity Metric.

Methodology

Metric Principles	The statutory Biodiversity Metric User Guide (Defra, 2024[1]) was consulted to provide guidance on the application of the statutory Biodiversity Metric calculator.
Biodiversity Units	The Biodiversity Metric tool was used to calculate changes in biodiversity units and the overall percentage of gain or loss, and should be read in conjunction with this report. Pre-development baseline habitats were quantified using measurements from the baseline habitat plan, as detailed within this document. Post-development habitats and areas were calculated based on the proposed site layout plan provided by the client at the time of this assessment.
Condition Assessment	Each habitat was assigned a condition using the statutory Biodiversity Metric condition assessment spreadsheet. Habitat parcels were assessed individually; however, where multiple habitats scored the same condition, their areas were combined within the Biodiversity Metric tool (e.g., all areas of hard standing and buildings).
Strategic Significance	The strategic significance of the habitats was assessed by determining if the habitats are identified within published plans, strategies or policies which are relevant to the habitats location.
Trading Rules	The biodiversity metric tool sets minimum habitat creation and enhancement requirements to compensate for specific habitat losses (up to the point of no net loss). These requirements are based on habitat type and distinctiveness.
Protected Species Assessment	A protected species scoping survey was carried out in conjunction with the Phase 1 Habitat survey. The site was assessed for its suitability to support protected species, in particular bats, birds, great crested newt, otters *Lutra lutra,* reptiles, badgers *Meles meles,* and other species of conservation importance that could pose a planning constraint.
Impact Assessment	The ecological impact assessment is based on the standard best practice methodology provided by the Guidelines for Ecological impact Assessment (CIEEM, 2018). The assessment identifies important sites, habitats, species and other ecological features that are of conservation value based on factors such as legal protection, statutory or local site designations such as Sites of Special Scientific Interest (SSSI) or Local Wildlife Sites (LWS) or inclusion on Red Data Book Lists or Local Biodiversity Action Plans. The importance of an ecological feature is considered within a defined geographical context. The following frame of reference is used, or adapted to suit local circumstances: ★ International and European

[1] https://assets.publishing.service.gov.uk/media/669e45fba3c2a28abb50d426/The_Statutory_Biodiversity_Metric_-_User_Guide

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- ★ National (England)
- ★ Regional (West Yorkshire)
- ★ County (Kirklees)
- ★ District (Milnsbridge)
- ★ Local (Quarmby)
- ★ Below Local Level: Site Level Only.

Consideration of impacts at all scales is important, and essential if objectives for no net loss of biodiversity and maintenance of healthy ecosystems are to be achieved. In identifying impacts, the review considers the Client's Site proposals and any subsequent recommendations made are proportionate / appropriate to the site and have considered the Mitigation Hierarchy as identified below:

- ★ Avoid: Provide advice on how the development may proceed by avoiding impacts to any species or sites by either consideration of site design or identification of an alternative option.
- ★ Mitigate: Where avoidance cannot be implemented mitigation proposals are put forward to minimise impacts to species or sites as a result of the proposals. Mitigation put forward is proportionate to the site.
- ★ Compensate: Where avoidance cannot be achieved any mitigation strategy will consider the requirements for site compensatory measures.
- ★ Enhance: The assessment refers to planning policy guidance (e.g. NPPF) to relate the ecological value of the site and identify appropriate and proportionate ecological enhancement in line with both national and local policy.

Effects are considered significant at the range of scales from international to local. A significant effect is an effect that is sufficiently important to require assessment and reporting so that the ecological consequences of the project are understood. In broad terms, significant effects encompass impacts on structure and function of defined sites, habitats or ecosystems and the conservation status of habitats and species (including extent, abundance and distribution).

Surveyors

The surveys and assessments have been overseen, led and verified by full members of CIEEM who are bound by its code of professional conduct. All surveys and assessments have been undertaken with reference to the recommendations given in British Standard BS 42020, and as stated within specialist guidance, as appropriate, and are referenced separately. On site surveys was originally undertaken in 2023 by:

Ceridwyn Adkins BSc (Hons) who has been an ecologist for 18 years, and who also holds Natural England Licences for bats and great crested newts (Level 2).

Updated survey undertaken in 2025 by:

Ashley Powell MSc who has been an ornithologist and field ecologist for 20 years working on behalf of numerous organisations such as RSPB and Natural England.

Methodology

The report and calculator have been reviewed by:

Joanna Graham BSc (Hons), MCIEEM who has been an ecologist for 14 years, and who also holds Natural England Licences for bats, hazel dormice, *Muscardinus avellanarius* and great crested newts (Level 2).

Due to the sensitive nature of the licence numbers, these can be supplied separately and should not be available in the public domain.

Survey Date(s) & Weather

The survey was undertaken on 5th April 2023. 8/8 CC, 9 degrees Celsius, survey started with rain and stopped shortly after.

The updated survey was undertaken on 25th October 2025. 6/8cc 11 degrees Celsius, survey started with rain and stopped shortly after.

Limitations

Desk Study Records

The absence of records from desk study sources, including statutory and non-statutory designated sites, cannot be taken as evidence of the absence of any particular species. Often, gaps in records reflect under-recording within the search area rather than true absence. As such, the experience and professional judgement of the ecologist, combined with consideration of additional factors such as the presence or absence of suitable supporting habitat, is used to infer the likely presence or absence of species.

A biological records data search has not been undertaken for this assessment. However, given the location of the site, the habitats present, and the assessed suitability of the site for protected or notable species, it is not anticipated that the purchase of biological records data would significantly alter the conclusions or recommendations of this report.

Phase 1 Survey & Building assessment

Dense vegetation was present along the northern aspect which restricted access. Urban debris in the form of broken glass, cut vegetation, brick and rubble piles along with numerous appliances and sofas were present.

Ecological surveys are limited by factors that affect the presence of plants and animals such as time of year, weather, migration patterns and behaviour. The surveys were undertaken in October and therefore represent a valid sample of ecological evidence present during that season. The report is not designed, nor is it required to present a complete inventory of flora and fauna or NVC surveys. The survey team comprised suitably qualified ecologist(s) with good plant identification skills, these ecologists were not skilled in bryophyte or fungal identification; therefore, these elements were not included within the Phase 1 Habitat Survey. Consequently, a complete list of plants and animals resulting from the ecological surveys undertaken at the Site have not been produced, however, the absence of evidence of any particular species should not be taken as conclusive proof that the species is not present or that it will not be

Limitations

	present in the future. Whilst the majority of the site was examined at the macro scale, many species will have been overlooked at the micro level because it is not the purpose of a phase 1 habitat survey to classify all taxa occurring in the site. The list of invasive plant species included on Schedule 9 of the Wildlife and Countryside Act 1981 (as amended) is extensive and these plants are found in a range of different habitats, including aquatic habitats. The ecology surveys checked, in particular, for the presence of Japanese knotweed *Reynoutria japonica syn. Fallopia japonica*, giant hogweed *Heracleum mantegazzianum*, Himalayan balsam *Impatiens glandulifera* and *Cotoneaster* species. However, there may be other invasive plant species present within the Site which were not recorded, but it is considered that this survey is sufficient to identify any significant constraints posed by invasive plants.
Calculator	Defra are making ongoing updates to the Biodiversity Statutory calculator tool and intend to make improvements to the metric over time. Accordingly, the calculations made in this assessment may require updates to align with any future changes to the metric and best practice standards. Where habitats to be created on site are not accounted for in the UKHab, assumptions have been made as to which categories in the tool best represent those habitats (UKHab Ltd., v2,2023).
Metric	The metric details 'ha' should be to two/three decimal places, which therefore could remove habitats from the calculation. The habitat mapping uses a MMU tailored to small sites to improve accuracy. This approach aligns with standard defaults (25m²) and is limited by the precision of baseline OS data and seasonal habitat variations.
Plans	While mapped areas may appear visually exaggerated for illustrative clarity, all area calculations have been carried out with precision. Existing habitat areas have been cross-referenced with recent aerial imagery and on-site ground-truthing to ensure accuracy. Proposed habitat areas have been carefully aligned with the submitted landscape plans and further verified against aerial imagery. As such, all habitat areas, both existing and proposed, are as accurate as reasonably possible based on the best available data at the time of assessment. This approach ensures consistency with the statutory Biodiversity Metric and provides a robust foundation for calculating net gain outcomes.
Mapping software	The habitat mapping for this site was completed to UKHab Level 3. As such, the mapping is accurate to Level 3 classification and may not always align with the Level 4 codes presented within the Biodiversity Net Gain (BNG) metric calculator. Where discrepancies occur, the BNG Excel document should be considered the definitive source for habitat coding in the context of metric calculations.

Limitations

Valid	The results and recommendations within this report are valid for up to two years from the date of survey, assuming there are no significant changes to the Site or its immediate surroundings.

Desk Study Results (2km)

Statutory Protected Sites	★ Gledholt Woods LNR- 1.3km east ★ SSSI Impact Risk Zones: No criteria that matches the IRZ
Non-Statutory Protected Sites	The site is centrally located within the Milnsbridge Conservation Area, which states "*When considering whether to grant planning permission for development affecting a listed building and its setting special regard should be had to preserving the building or its setting. The site is also located within the Milnsbridge Conservation Area. It is therefore necessary to pay special attention to the desirability of preserving or enhancing the character or appearance of the surroundings when considering whether to grant planning permission or listed building consent for development or works within them*". The site lies within close proximity (500m north east) to the Kirklees Wildlife Habitat Network (KWHN).
Granted Licence(s)	★ 2014-1010-EPS-MIT for destruction and damage of a resting place for C-PIP[2] 2014-2015. Located 1 km south east ★ EPSM2009-1162 for destruction of a resting place for C-PIP 2009-2011. Located 1.53 km north ★ EPSM 2012-5292 for destruction of a resting place for C-PIP 2013-2014. Located 1.55 km north ★ The site lies within the bat alert zone[3].

[2] Common pipistrelle *Pipistrellus pipistrellus*

[3] "bat alert zone" concept is essentially a spatial screening layer. It flags areas where based on historic records, modelling, habitat context (woodland, water, connectivity) there is a heightened probability of bat roosts or bat activity.

Baseline Field Survey Results				
Confirmed Presence CP Potentially Present PP Unlikely Presence UP No Possibility NP	Code	Consider Further	Risk to Project (H/M/L/N)[4]	Reason/Notes (e.g. field signs present or desk study revealed presence in area and/or suitable habitat present)
Habitats				The majority of habitats on site were generally of limited botanical interest and poor species diversity. The majority of the site was either hard standing with scattered Buddleia scrub and urban debris or dense Buddleia vegetation with restricted access. Ash *Fraxinus excelsior,* willow *Salix sp,* sycamore *Acer pseudoplatanus* saplings were present only. No trees were present.
Biological Important Hedgerow	NP	N	N	None present
S41 (only) Habitats[5]	NP	N	N	None present.
Trees on, or within 15m of site	NP	N	N	None present.
Protected Plants (WCA Sch.8[6], CHSR Sch.5[7])	NP	N	N	None present.
Invasive Plants[8]	NP	N	N	None present.
Great Crested Newts	NP	N	N	No ponds on site or within 250m of the site.
Bats	UP	N	N	None of the saplings on site were considered suitable to support roosting bats with no obvious features noted. The southern and eastern boundary had street lighting present, the surrounding residential and commercial properties offered suitable roosting features for bats. The site was considered to offer low potential for foraging and commuting bats.

[4]: **High:** Further surveys required prior to the commencement of works / **Medium:** Precautionary measures and/or further surveys may be required, particularly if the recommended avoidance or mitigation measures cannot be implemented /**Low:** A low risk to the project. No further surveys are deemed to be required unless the scope of works differ to those anticipated and described above /**Negligible:** Negligible foreseeable risk to the project.

[5] Section 41 (S41) of the Natural Environment and Rural Communities (NERC) Act 2006 published lists of habitats and species of principal importance for biodiversity conservation in England (succeeded the UK Biodiversity Action Plan (BAP).

[6] Wildlife & Countryside Act 1981 (as amended)

[7] Conservation of Habitats and Species (Amendment) Regulations 2019

[8] Wildlife & Countryside Act 1981 (as amended) Schedule .9, Injurious weeds (Weeds Act 1959)

Baseline Field Survey Results

Confirmed Presence CP Potentially Present PP Unlikely Presence UP No Possibility NP	Code	Consider Further	Risk to Project (H/M/L/N)[4]	Reason/Notes (e.g. field signs present or desk study revealed presence in area and/or suitable habitat present)
Badgers	NP	N	N	No setts, evidence of pathways were noted on site, therefore badgers are considered absent from the site and not discussed further in this report.
Reptiles	PP	N	L	The terrestrial habitats on site although were considered to be suitable for reptiles, with small areas of rubble and scrub providing suitable refuge and hibernation sites, the urban context of the site and debris present reduces the likelihood of reptiles being present.
Riparian species	NP	N	N	No suitable habitats present on site.
Nesting Birds	CP	N	M	Suitable habitat within the tree saplings and pigeons *Columba livia* and blackbirds *Turdus merula* were noted nesting on site.
Other Species	PP	N	L	The habitats on Site and in the wider landscape were suitable for hedgehogs which is UK BAP Priority Biodiversity Species.

BNG Results

Habitat Strategic Significance	The site lies within the Milnsbridge Conservation Area and close to the KWHN. However, the on-site habitats are of limited ecological value and poor botanical diversity, being dominated by hardstanding, urban debris, and dense stands of Buddleia with scattered saplings of ash, willow and sycamore. There are no mature trees or semi-natural habitats of note. Although proximity to the KWHN slightly elevates the site's contextual importance, the habitats themselves make minimal contribution to ecological connectivity or biodiversity at a strategic scale. Therefore, the site's habitats are considered to have Low Strategic Significance.
Baseline Habitat Summary	Baseline habitats were assessed and mapped in accordance with the Statutory Biodiversity Metric (2025). The site comprises disturbed urban land featuring self-established Buddleia scrub on rubble and compacted surfaces. No trees of ecological or arboricultural merit are present, and no priority habitat is affected. Habitat distinctiveness values reflect predominantly non-native / artificial substrates.

BNG Results

Culvert

The culvert remains entirely subsurface and will not be altered or disturbed by the proposed development. No habitat or ecological function is associated with the culvert, and it is not accessible to wildlife.

For the purposes of the Statutory Biodiversity Metric the culvert is therefore assigned baseline and post-development habitat values of zero.

Baseline Habitat Impacts

Habitat	Notes	ha
Urban – Developed land; sealed surface	Hardstanding and compacted urban surfaces	0.1523
Urban – Vacant or derelict land	Rubble and urban debris with sparse early succession vegetation	0.1483
Urban – Introduced shrub	Dense Buddleia scrub with occasional saplings	0.2171
Urban – Built linear features	Remnant linear structures of negligible ecological value	0.001219
Culvert	Underground not accessible	0.1km

Condition Assessment

Refer to Habitat Condition Sheet for further details.

Post-Development Habitat Summary

The Table below provides a summary of the developments proposed habitats, proposed target conditions and how these conditions will be feasible/ achieved.

Habitat	Notes	ha
Urban Developed Land; Sealed Surface	Buildings and hardstanding associated with completed development	0.33171

BNG Results

Grassland – Modified grassland	A22 Hard wearing low maintenance amenity grassland mix	0.11206
Urban – Urban tree (individual trees)	19 small / poor trees to be included within the proposals.	0.0774
Urban – Vegetated garden	Mixed ornamental and native planting	0.07395
Culvert	Underground not accessible	0.1

No hedgerows are currently present on site. Baseline hedgerow biodiversity units are therefore recorded as 0 in the Statutory Metric. The proposed development includes three sections of ornamental hedgerow planting, totalling 0.0185 km. These hedgerow habitats are newly created and therefore add measurable hedgerow units to the post-development biodiversity value. As there is no existing hedgerow baseline, the baseline remains zero units and the new hedgerow planting contributes entirely to net gain.

An existing underground culvert is present within the site boundary. In line with Environment Agency advice as part of the 2023 application, the culvert has been included in the BNG assessment.

Biodiversity Net Gain Results

The Statutory Biodiversity Metric (2025) calculation indicates the following net change in biodiversity units for the proposed development:

Habitat Type	Units change	% change	Notes
Habitat	-0.15	-21.21	Loss due to removal of non-native Buddleia and conversion to hard surfaces; low-value habitats
Hedgerow	0.2	N/A	Newly created ornamental hedgerows contribute additional units
Watercourse	0	0	Culvert remains untouched; included per EA request but does not contribute units

BNG Results

FINAL RESULTS		
Total net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	*Area habitat units*	-0.15
	Hedgerow units	0.02
	Watercourse units	0.00
Total net % change (Including all on-site & off-site habitat retention, creation & enhancement)	*Area habitat units*	-21.21%
	Hedgerow units	N/A
	Watercourse units	0.00%
Trading rules satisfied?		No - Check Trading Summaries ▲

Discussion and Recommendations

Desk Study	No impacts to designated sites are anticipated due to the small scale development proposed and distance of the proposed development from such sites (where known).
Habitat Survey	The majority of habitats on site were generally of limited botanical interest and poor species diversity. The value of habitats was largely noted in their potential to support a range of protected / Priority faunal species rather than for their botanical value. No protected or Priority plant species were observed and all plant species encountered were common, widespread and characteristic of the common habitat types they represent. No impacts to any notable habitats are anticipated due to the small scale and distance of the proposed development from such habitats. Best practice measures to minimise the possibility of pollution must be implemented during construction.
BNG	The proposed development results in the removal of low value habitats comprising self-established Buddleia shrub, compacted rubble, and urban debris, which were previously recorded in 2023. Since that time, the Statutory Biodiversity Metric has been updated four times, and under the 2025 version, the pre-development habitats are recognised as having very low ecological value. The current post-development scheme introduces a combination of urban trees, modified grassland, vegetated garden areas, and ornamental hedgerows. While there is a minor net loss in area habitats (–0.15 units; –21.21%), this is largely attributable to the conversion of non-native shrub, which contribute little ecological value. The newly planted hedgerows (+0.02 units) provide a measurable biodiversity uplift, and the underground culvert remains unaltered with zero net effect. Overall, the changes in metric calculation since 2023 mean that the small net loss is considered negligible in ecological terms. However, due to the low ecological value of the site and the habitats present, it is unlikely that the development will achieve an overall biodiversity net gain on-site. Therefore, off-site biodiversity offsetting will be required for area habitats and watercourses to ensure compliance. Given the low ecological

Discussion and Recommendations

value of the existing and proposed habitats, it is recommended that a Landscape and Ecological Management Plan (LEMP) is implemented rather than a Habitat Management and Monitoring Plan (HMMP). The LEMP will ensure that new vegetation, hedgerows, and grassland areas are appropriately managed to maintain habitat condition and deliver the maximum achievable biodiversity benefit over the long term.

Daytime Bat Assessment

Due to the age and structure of the tree saplings, these have been assessed as having "negligible" potential to support roosting bats. The site did provide suitable foraging and commuting resources for bats. The proposals will result in the loss of minor on-site vegetation, with retention of boundaries and new landscaping proposed throughout. In assessing the site against criteria in best practice guidelines (Collins J., 2023) the site was considered to offer low quality foraging and commuting habitat for bats. On this basis, a development would be of low risk to bat species foraging and commuting. Given the small size of the site and surrounding habitats and existing lighting, it is considered disproportionate to undertake bat activity surveys to assess the use of the vegetation on site by bats.

Additional lighting could affect foraging and commuting animals. As a result, it is recommended that construction works are to be undertaken in daylight hours only with no night hours work permitted. If additional lighting is required, a sensitive lighting strategy should be implemented on site and follow the guidance set out in Bats and Lighting in the UK (BCT and ILP, 2018).

A low impact lighting strategy will be adopted for the site during and post-development, which will include the following measures:

- ★ Use narrow spectrum light sources to lower the range of species affected by lighting.
- ★ Use light sources that emit minimal ultraviolet light.
- ★ Avoid white and blue wavelengths of the light spectrum to reduce insect attraction and where white light sources are required in order to manage the blue shortwave length content they should be of a warm / neutral colour temperature <4,200 kelvin.
- ★ Not use bare bulbs and any light pointing upwards. The spread of light will be kept in line with or below the horizontal.

Light spill will be reduced via the use of low-level lighting used in conjunction with hoods, cowls, louvres and shields. Lights will also be directional to ensure that light is directed to the intended areas only. External lighting will be on PIR sensors that are sensitive to large objects only (so that they are not triggered by passing bats) and will be set to the shortest time duration to reduce the amount of time the lights are on. Wall lights and security lights will be 'dimmable' and set to the lowest light intensity settings. There are several products on the market that allow the control of the light intensity and the duration that the lights are on. All lighting on the developed site will make use of the most up to date technology available.

Reptiles

The presence of reptiles on site is considered unlikely due to the highly urban context, although debris piles and scrub provide marginal habitat. The site is not considered a core area for

Discussion and Recommendations

	reptiles locally, and any reptiles present are expected only on a transient basis. Further formal surveys are not considered necessary or proportionate given the low likelihood of presence. As a precaution, any debris piles should be dismantled by hand tools only, where it is safe to do so. In the extremely unlikely event that a reptile or other fauna is encountered during works, it should be allowed to move away unharmed at its own pace. Only a trained ecologist should handle any wildlife directly. If multiple reptiles are encountered, works should cease, and the methodology should be re-evaluated. To minimise risk to hibernating reptiles, removal of rubble piles should not be undertaken during the winter (November to February) hibernation period and should avoid temperatures above 11°C, when reptiles may be active. These precautionary measures will reduce the negligible risk to reptiles during the proposed works.
Nesting Birds	The tree saplings and shrub habitats on site provide suitable nesting habitat for birds. During surveys, pigeons and blackbirds were observed nesting within the site. Given the small-scale nature of the proposed development, it is considered disproportionate to undertake further detailed surveys. All nesting birds are protected under the Wildlife and Countryside Act 1981 (as amended). Where possible, vegetation that provides nesting habitat should be cleared outside of the nesting bird season (March to August inclusive). If any clearance is required during the nesting season, a nesting bird check must be conducted by a Suitably Qualified Ecologist (SQE) within 24 hours prior to the works to confirm the absence of active nests. If active nests are discovered during inspections, a suitable buffer of retained vegetation should be maintained around the nest, of appropriate size for the species, and the nest monitored until it is no longer active or all chicks have fledged. Clearance of vegetation within the buffer may only proceed once the SQE confirms that the nest is no longer active.
Other(s)	Given the suitability of scattered scrub and overgrown vegetation on Site, it is considered that hedgehogs could use the Site for foraging. Whilst this species is not legally protected, they are a material condensation during planning and efforts should be made to minimise the risk of injury or effects on the local population status. In order to minimise the risk of harm to other animals passing through the Site it is recommended that preventative measures are in place during construction. These precautions are: ★ Mammal ladders (such as a plank) or earth ramps to be placed in any open excavations at the end of each day; ★ Cap off any open pipes at the end of each day; ★ Cover any open holes, or install mammal ladders or earth ramps in any open excavations at the end of each day to prevent animals from becoming trapped; ★ Keep all fuel and other harmful substances in a locked area;

Discussion and Recommendations

- ★ Ensure any spillages are treated with spill kits; and
- ★ Night work should be avoided where possible, and any flood lighting should face away from the Site boundaries.

Ecological Enhancements

The National Planning Policy Framework and local development plan requires ecological enhancement of sites subject to development proposals to the extent that they provide a net biodiversity gain. Where new landscape planting is proposed species such as oak *Quercus robur*, silver birch *Betula pendula*, rowan *Sorbus aucuparia* and whitebeam *Sorbus aria* would make attractive additions to the Site. In particular rowan will provide a valuable source of berries late into the winter months and provide an important food source for native and migratory bird species. Ash and elm should currently be avoided due to the prevalence of 'Ash dieback' and 'Dutch elm disease', as stocks of these species cannot be guaranteed to be free from these afflictions. The use of native species in tree planting is also encouraged as these can harbour a high diversity of invertebrates. Other suggested planting of benefit to invertebrates includes:

- ★ Willow *Salix sp*.;
- ★ Cherry *Prunus sp,;*
- ★ Hazel *Corylus avellana*; and
- ★ Birch.

Good horticultural practice should be utilised, including the use of peat-free composts, mulches and soil conditioners, native plants and avoidance of the use of invasive species listed on Schedule 9 of the Wildlife and Countryside Act 1981 (as amended).

Additional enhancements that could easily be met within the development scope include the incorporation of bat and bird nest boxes and hedgehog highways. Boxes could be placed either on new buildings within the Site boundaries.

In-cavity bat boxes located on buildings could be incorporated into the structure of the properties as they are built. These boxes would consist of Ibstock Enclosed Bat Box 'C' which is positioned at least 3 metres from the ground, facing either south, south-west or south-east (for additional warmth) and close to good foraging habitat.

The installation of a minimum of two bird boxes will provide additional nesting habitat for birds.

New boxes to be installed are Blackbird FSC Nest Box or suitable alternative.

Garden habitats will provide preferred habitats for foraging hedgehog to facilitate the movement of hedgehogs through the site post-construction, 'hedgehog highways' will be provided within all new lengths of garden (and where feasible boundary). A 13cm x 13cm hole is recommended which is too small for most pets and can be delivered by raising a fence panel per garden,

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Ecological Enhancements

installing hedgehog friendly fencing, removing a brick at the bottom of a wall or cutting a hole in fencing/walls.

It is recommended the new residents are provided with educational resources on bat and bird boxes and hedgehog conservation and how they too can get involved, especially where hedgehogs are sick or injured, targeting properties with the highways installed, but available for all residents.

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Legislation

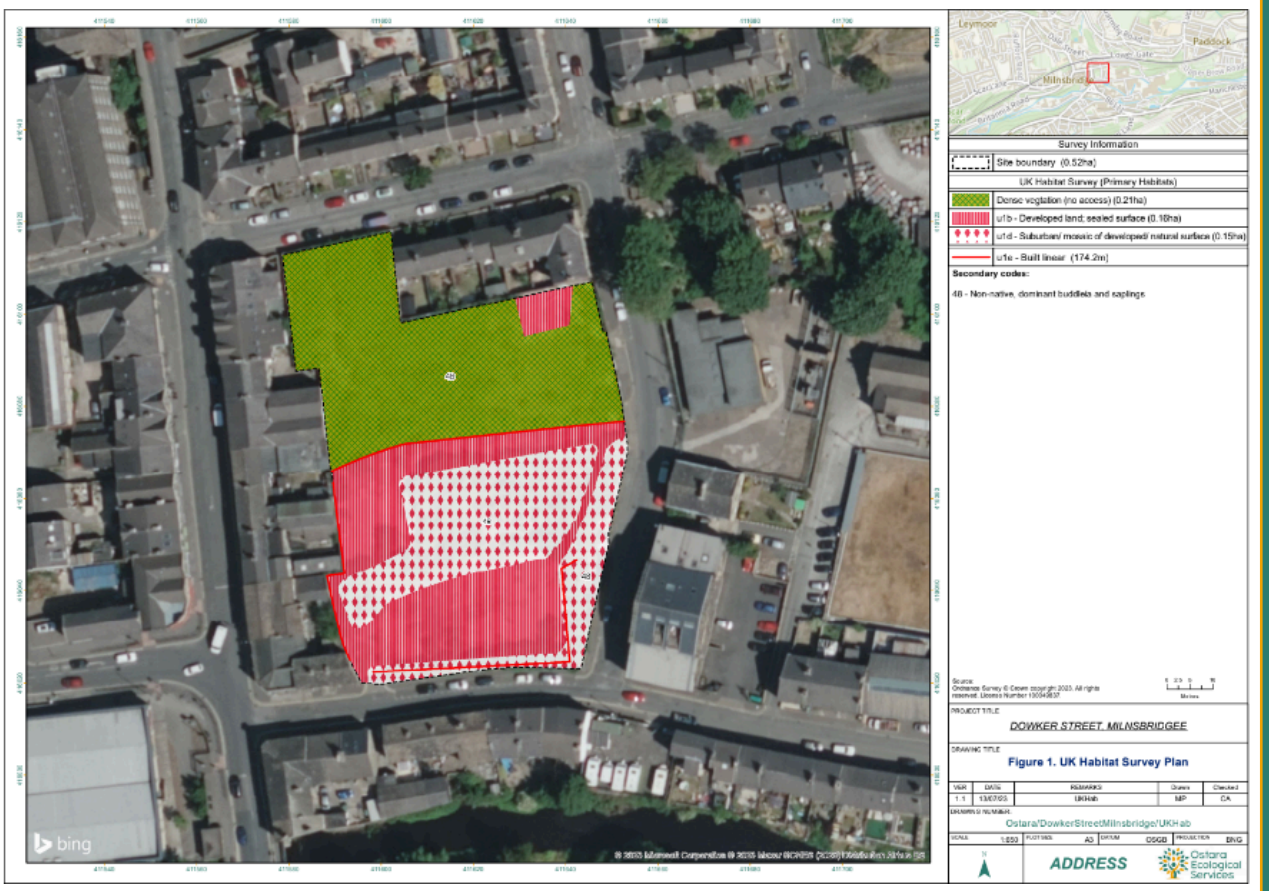
Relevant legislation, policy guidance and both Local and National Biodiversity Action Plans (BAPs) are referred to throughout this report where appropriate. Their context and application is explained in the relevant sections of this report.

The relevant articles of legislation are:

- The National Planning Policy Framework (NPPF, 2021);
- ODPM Circular 06/2005 (retained as Technical Guidance on NPPF 2019);
- Local planning policies;
- The Conservation of Habitats and Species (amendment) (EU Exit) Regulations 2019;
- The Wildlife and Countryside Act 1981 (as amended);
- The Protection of Badgers Act 1992;
- The Countryside and Rights of Way Act 2000;
- The Hedgerow Regulations 1997;
- The Natural Environment and Rural Communities Act 2006;
- Local Biodiversity Action Plan for Kirklees.

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Existing Plan



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Proposed Plan



Phase 1 Plant list

Not a comprehensive list, but species noted[9]:

- ★ *Fraxinus excelsior (R) sapling*
- ★ *Salix sp (O) sapling*
- ★ *Acer sp (A) sapling*
- ★ *Sambucus nigra (O) sapling*
- ★ *Rubus fruticosus* agg. (O)
- ★ *Rumex sp(O)*
- ★ *Cirsium sp (O)*
- ★ *Buddleja (D)*
- ★ *Tussilago farfara (F)*
- ★ *Fragus sp (O) sapling*
- ★ *Betula sp (F) sapling*
- ★ *Galium aparine (O)*
- ★ *Geranium robertianum (O)*
- ★ *Lolium perenne ())*
- ★ *Taraxacum sp (O)*
- ★ *Epilobium (O)*
- ★ *Urtica dioica (O)*
- ★ *Poa sp (O)*

[9] DAFOR: D - Dominant; A - Abundant, F - Frequent, O - Occasional, and R - Rare

Photographs



Hard standing with scattered scrub



Urban debris and brick wall



Dense vegetation and hard standing



Dense vegetation and rubble pile wall

Photographs



Open area of hardstanding to the north



Dense vegetation