

Hinchliffe Mill,
Holmfirth, HD9 2NX

Construction Environmental Management Plan
(CEMP: Biodiversity)

November 2025

Report reference	1507e
Revision	1
Prepared by	Toby Fisher CEnv MCIEEM
Approved by	Andrew Westgarth CEnv MCIEEM
Issue date	Rev 1. 20 th November 2025

This report is valid for a period of 12 months from the earliest issue date.

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1 Introduction and Background

1.1.1.1 This document presents a Construction Environment Management (CEMP: Biodiversity) in relation to the following consented development:

- Application Number: 2021/62/90800/W (Kirklees Council).
- Date of Decision: 20 August 2025.
- Proposal: Redevelopment And Change of Use of Former Mill Site to Form 19 Residential Units
- At: Hinchliffe Mill, Water Street, Holmbridge, Holmfirth, HD9 2NX.

1.1.1.2 This CEMP (Biodiversity) has been prepared in relation to Condition 30 which states:

- *“30) Development (including demolition, ground works, vegetation clearance) shall not commence until a Construction Environmental Management Plan: Biodiversity (CEMP: Biodiversity) has been submitted to and approved in writing by the Local Planning Authority. The CEMP: Biodiversity shall include:*
 - a) Details of minimisation of vegetation removal, including how the removal of trees, woodland and scrub shall be minimised as far as practicable by minimising working areas;*
 - b) A Schedule 9 Invasive Weed Management Plan to prevent the illegal spread of Variegated Yellow Archangel within and beyond the site;*
 - c) A risk assessment of potentially damaging construction activities that refers to the most up-to-date site specific survey information and specifically to nesting birds, badgers and invasive plant species;*
 - d) Identification of “biodiversity protection zones”, where appropriate;*
 - e) Practical measures (both physical measures and sensitive working practices) to avoid or reduce impacts during construction (may be provided as a set of method statements);*
 - f) The location and timing of sensitive works to avoid harm to biodiversity features;*
 - g) The times during construction when specialist ecologists need to be present on site to oversee works, where appropriate;*
 - h) Details of responsible persons and lines of communication; and*
 - i) Details of the use of protective fences, exclusion barriers and warning signs, where appropriate.*

The approved CEMP: Biodiversity shall be adhered to and implemented throughout the construction period strictly in accordance with the approved details, unless otherwise agreed in writing by the Local Planning Authority.”

1.2 Aims

1.2.1.1 The aims of this CEMP (Biodiversity) are to present the above listed information in order to ensure the protection of existing biodiversity features and to ensure compliance with wildlife legal protection.

1.3 Personnel

1.3.1.1 This CEMP (Biodiversity) has been prepared by Toby Fisher MCIEEM CEnv; a suitably qualified ecologist with over 20 years' experience of ecological consultancy in the UK.

1.4 Reference Documents

1.4.1.1 This document should be read in conjunction with the following document. Where relevant, key information in the below document is summarised in this document for ease of reference.

- Quants Environmental Ltd. Hinchliffe Mill, Holmfirth, HD9 2NX. Ecological Impact Assessment. Ref 1504c, Rev 2, 24/08/2022.

1.4.1.2 A Landscape Ecological Design Strategy (LEDS) is presented separately.

Figure 1. Site Location



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2 Ecological Baseline

2.1 Sources of Baseline Information

2.1.1.1 Baseline information is taken from the following document:

- Quants Environmental Ltd. Hinchliffe Mill, Holmfirth, HD9 2NX. Ecological Impact Assessment. Ref 1504c, Rev 2, 24/08/2022.

2.2 Internationally / Nationally Protected Sites

2.2.1.1 Rake Dike SSSI (Site of Special Scientific Interest) is a geological SSSI located approximately 1.91 km south-west of the site.

2.2.1.2 There is one site within 2 km of the site which is comprehensively designated as a SSSI/SAC/SPA¹. The site is located approximately 1.93 km south of the site and is designated as follows:

- Dark Peak SSSI
- South Pennine Moors SAC
- Peak District Moors (South Pennine Moors Phase 1) SPA.

2.3 Locally Designated Sites

2.3.1.1 WYES confirmed the presence of five Local Wildlife Sites (LWS) within 2 km of the site:

- Malkin House Wood LWS approximately 260 metres north-east of the site.
- Carr Green Meadows Holmbridge LWS approximately 570 metres north-west of the site.
- Yateholme Reservoirs and Plantations LWS approximately 695 metres south-west of the site.
- Digley Reservoir / Marsden Clough LWS approximately 725 metres south-west of the site.
- New Laithe Fields Holmbridge LWS approximately 850 metres north-west of the site.

2.4 Other Non-Statutory Designations

2.4.1.1 WYES confirmed the presence of several areas of Kirklees Wildlife Habitat Network (KWHN) within 2 km of the site; the mill pond within the site and the River Holme along the northern edge of the site are included within the KWHN.

2.4.1.2 WYES confirmed that there are no areas of woodland listed on the West Yorkshire Ancient Woodland Inventory within 2 km of the site.

2.5 Habitats

2.5.1.1 The following habitat types are present at the site:

2.5.2 Bare Ground, Hard Standing and Walls

2.5.2.1 The bare ground, hard standing and walls at the site are largely devoid of vegetation except for sparse vegetation comprising species such as silver birch *Betula pendula*, Yorkshire fog *Holcus lanatus*, red fescue *Festuca rubra*, red valerian *Centranthus ruber*, groundsel *Senecio vulgaris*, creeping bent *Agrostis stolonifera*, creeping buttercup *Ranunculus repens*, false oat-grass *Arrhenatherum elatius*, ribwort plantain *Plantago lanceolata*, spear thistle *Cirsium vulgare*, smooth sow-thistle *Sonchus oleraceus*, foxglove *Digitalis purpureum*, hart's-tongue fern *Asplenium scolopendrium*, common nettle *Urtica dioica*, sycamore *Acer pseudoplatanus*, ivy-leaved toadflax *Cymbalaria muralis* and creeping thistle *Cirsium arvense*.

¹ SSSI = Site of Special Scientific Interest; SAC = Special Area of Conservation; SPA = Special Protection Area.

2.5.3 Ephemeral / Short Perennial

- 2.5.3.1 Ephemeral / short perennial vegetation has become established on former bare ground in the eastern part of the site. Species present include common bent *Agrostis capillaris*, red fescue, spear thistle, broad-leaved dock *Rumex obtusifolius*, Yorkshire fog, butterfly bush *Buddleja davidii*, tufted hair-grass *Deschampsia cespitosa*, common ragwort *Senecio jacobaea*, silver birch, ribwort plantain, greater willowherb *Epilobium hirsutum*, rosebay willowherb *Chamerion angustifolium* and bramble *Rubus fruticosus* agg.

2.5.4 Semi-improved Grassland

- 2.5.4.1 Semi-improved grassland at the site is unmown and supports species including cock's-foot, Yorkshire fog, yarrow *Achillea millefolium*, tufted hair-grass, red clover *Trifolium pratense*, creeping buttercup, common bent, ribwort plantain, creeping thistle, common ragwort, soft rush, grey willow, bramble, foxglove, creeping bent, soft rush *Juncus effusus*, common mouse-ear *Cerastium fontanum* and white clover with toad rush *Juncus bufonius* present in waterlogged areas.

2.5.5 Broad-Leaved Trees and Semi-Natural Woodland

- 2.5.5.1 Broad-leaved trees and semi-natural woodland is dominated by sycamore and goat willow *Salix caprea* with occasional ash *Fraxinus excelsior* and alder *Alnus glutinosa*. Where the trees form a closed canopy, the ground flora and shrub layer includes bramble, common nettle, male fern, cock's-foot, dog rose *Rosa canina*, opposite-leaved golden saxifrage *Chrysosplenium oppositifolium*, hogweed *Heracleum sphondylium*, tufted hair-grass, holly *Ilex aquifolium*, creeping buttercup and honeysuckle *Lonicera periclymenum*. Within the woodland in the southern part of the site (Target Note 1, Figure 3), a channel of flowing water upto approximately 30cm wide and 2-3cm deep flowed through the woodland.

2.5.6 Scrub

- 2.5.6.1 Scrub is abundant at the site and is generally dominated by grey willow *Salix cinerea*. Additional woody species present include bramble, ash, butterfly bush, silver birch and sycamore.

2.5.7 Open Water (Flowing)

- 2.5.7.1 The River Holme flows west to east along the site's northern boundary. At the time of the survey, the water was fast flowing with boulders and stones present and the channel held water approximately 6 metres wide and upto 50 cm deep. Species present at the margins include bramble, greater woodrush *Luzula sylvatica*, common nettle, greater willowherb, grey willow, sycamore, soft rush, rosebay willowherb, holly and pendulous sedge *Carex pendula*.

2.5.8 Open Water (Still)

- 2.5.8.1 The mill pond within the site extends to approximately 2400 square metres (part of this open water area is covered with scrub). No submerged vegetation was observed at the time of the survey. Species present at the margins include grey willow, soft rush, goat willow, hawthorn, purple loosestrife *Lythrum salicaria* and tufted hair-grass.

2.6 Invasive Weeds

- 2.6.1.1 One invasive weed listed on Schedule 9 of the Wildlife and Countryside Act 1981 (as amended) (Sch 9 WCA) was recorded at the site: a small area of variegated yellow archangel *Lamiastrum galeobdolon* subsp. *argentatum* is present to the south of the mill pond. The previous survey² identified small areas of Japanese knotweed *Fallopia japonica*, Himalayan balsam *Impatiens glandulifera* and cotoneaster *Cotoneaster horizontalis* within the site and it is possible that an update

² Whitcher Wildlife Ltd. (2020). Hinchcliffe Mill, Holmfirth. OS Ref: Se 12721 07089. Extended Phase I Habitat Survey. Ref No: 200829. Date: 21st August 2020

survey during May-September would identify the continued presence of these Schedule 9 species within the site.

2.7 Great Crested Newt

- 2.7.1.1 The on-site mill pond was subject to an eDNA survey Great Crested Newts in 2021. The result was negative and it is considered that GCN are likely absent from the site. Common Toads are known to breed in the mill pond on the site.

2.8 Birds

- 2.8.1.1 During breeding bird surveys conducted at the site in Spring 2021, a total of 35 bird species were recorded including five species listed on Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006 as Species of Principal Importance for the conservation of biodiversity in England³: bullfinch, dunnoek, house sparrow, song thrush and starling. Of these, bullfinch (1 pair), dunnoek (3-4 pairs) and song thrush (2 pairs) probably bred within the site. House sparrow and starling appear to nest in houses outside the site boundaries.
- 2.8.1.2 Five species which are Red listed as Birds of Conservation Concern⁴ (BoCC) were recorded: grey wagtail, house sparrow, mistle thrush, song thrush and starling. Of these, grey wagtail (1 pair) and song thrush (2 pairs) possible/probably bred within the site. Five Amber list species were recorded: bullfinch, dunnoek, dipper, mallard and willow warbler.
- 2.8.1.3 Overall, the site supports a typical mix of farmland, woodland, wetland and urban fringe species. No species listed on Schedule 1 of the Wildlife and Countryside Act 1981 (as amended) such as kingfisher or barn owl were recorded.
- 2.8.1.4 No species listed as Qualifying Features for Peak District Moors (South Pennine Moors Phase 1) SPA (merlin; European golden plover; short-eared owl) were recorded within or adjacent to the site during the surveys.

2.9 Bats

- 2.9.1.1 Previous surveys undertaken at the site⁵ identified two common pipistrelle bats entering and leaving from the eaves in the north-west corner of the mill building on 24th June 2010. During a dusk emergence survey on 15th September 2010, two common pipistrelle bats were seen to emerge from two separate locations behind the gutter at the south-west corner of the building³. On 6th September 2017, bat droppings were found scattered on the first floor of the mill building and this was attributed to bats foraging within the building. The previous report⁵ states that during a dusk emergence survey on 6th September 2017, 3x common pipistrelle bats emerged from the eaves of the mill building; one at the south-east corner of the building; two from above the fifth window on the west side; one from the eaves at the southern end (it is noted that this totals 4 bats; not 3). On 6th September 2017, a high level of common pipistrelle foraging activity was recorded around the mill building (including bats flying in and out through the mill windows) and Daubenton's bats were recorded foraging along the river. During a dawn survey on 22nd September 2017, no bats were seen to enter or exit the mill building. During a daytime inspection survey on 17th August 2020, no evidence of bats was observed within the building or on the exterior⁵. During a dusk emergence survey on 17th August 2020⁵, a high level of common pipistrelle foraging activity was observed, particularly around the mill itself; two common pipistrelle bats emerged from the south-west corner of the mill (one emerged from the eaves

³ Species / Habitats listed on Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006 as Species of Principal Importance for the conservation of biodiversity in England.

⁴ Amber / Red List as defined in: Eaton, M.A., N.J. Aebischer, A.F. Brown, R.D. Hearn, L. Lock, A.J. Musgrove, D.G. Noble, D.A. Stroud & R.D. Gregory. 2015. Birds of Conservation Concern 4: the population status of birds in the United Kingdom, Channel Islands and the Isle of Man. British Birds 108: 708-746.

⁵ Whitcher Wildlife Ltd. (2020). Hinchcliffe Mill, Holmfirth. OS Ref: Se 12721 07089. Extended Phase I Habitat Survey. Ref No: 200829. Date: 21st August 2020.

between the 3rd and 4th windows on the western side of the mill and one possibly emerged from the north-west corner of the mill).

- 2.9.1.2 During the survey on 7th January 2021, no evidence of bats was identified at the site. The mill building remains as previously described, i.e. a large derelict two/three storey stone building (approx 50 x 17 metres) with a hipped-gable roof covered with stone-slates and lined with a lath-and-plaster lining. There are multiple direct flight paths to the interior of the building via broken windows and open doorways. There are multiple potential bat roost features within the roof structure, e.g. gaps at the eaves and gaps beneath roof stone-slates. The masonry is generally well-sealed otherwise, although there a small number of potential bat roost features within areas of external masonry and in gaps over doorways etc.
- 2.9.1.3 The mill building is considered to be a confirmed bat roost, with a maximum of 4x common pipistrelle bats having been recorded roosting in the building in 2017.
- 2.9.1.4 The walls alongside the River Holme and along the south side of the mill pond provide potential bat roost features. The walls elsewhere at the site appear to be unsuitable for roosting bats due to the absence of suitable roost features. The bridge over the River Holme to the north of the mill building could also support bat roosts, although it was not possible to safely inspect the underside of the bridge on 7th January 2021 due to health and safety considerations.

2.10 Otter and Water Vole

- 2.10.1.1 Despite specific searches and static video camera surveys, no evidence of otter or water vole was observed within or adjacent to the site.

2.11 Other Fauna

- 2.11.1.1 No evidence of Badger or Hedgehog has been recorded at the site. Hedgehog could potentially occur at the site and there is potential for Badger to colonise the site and excavate a new sett.

3 Risk Assessment of Potentially Damaging Activities

Table 1. Risk Assessment of Potentially Damaging Activities

Activity	Risk	Summary of Actions to Minimise Risks
Works affecting Cross Mill building, walls, trees.	Impacts on bat roosts (maximum of 4no. Common Pipistrelle bats recorded roosting in Cross Mill building in 2017)	Pre-works checking surveys for bats (see Section 4.2 below). Obtain derogation licence from Natural England. Sensitive timing to minimise impacts on bats as per conditions of any granted licence. Direct ecological supervision of works, e.g. supervised roof strip. Pre-install bat boxes on retained trees.
Works affecting Cross Mill building, trees, woodland, scrub and walls.	Damage/ destruction of active bird nests.	No works to building or removal of vegetation between 1 st March and 31 st August unless area declared clear of active bird nests by SQE ⁶ less than 48 hours before start of works.
Ground works in vicinity of Invasive Weeds	Spread of invasive weeds listed on Schedule 9 of Wildlife and Countryside Act as amended) within and beyond the site.	Variegated Yellow Archangel <i>Lamium galeobdolon argentatum</i> will be removed. Site will be monitored for growth of Himalayan Balsam / Japanese Knotweed / Wall Cotoneaster prior to the start of ground works and at regular intervals during the growing season. Control measures will be implemented for any invasive weeds found to be present.
Ground works affecting scrub, woodland	Impacts on Hedgehog	Ecological Toolbox Talk to be provided by SQE prior to start of ground works.
Vegetation clearance	Impacts on retained habitats	Minimisation of vegetation removal. Biodiversity Protection Zones. Ecological Toolbox Talk to be provided by SQE⁶ prior to start of ground works and periodic checks by SQE during construction phase.
Ground works	Impacts on Badger	Pre-works checking surveys for Badger.

⁶ SQE = Suitably Qualified Ecologist.

4 Pre-Start Ecological Surveys

4.1 *Nesting Bird Checking Surveys*

- 4.1.1.1 No works affecting Cross Mill building, trees, woodland, scrub or walls will take place within the main bird nesting period (1st March – 30th August) unless a SQE has confirmed that no active nests are present, no more than 48 hours prior to such works. Where clearance works will extend over a longer period, the checks will be repeated by the SQE as necessary. In the event any active nests are identified, the SQE will implement an appropriate buffer zone (the size of the buffer zone will depend on the species involved, stage of nesting and nature of construction activities proposed) into which no works will progress until the SQE confirms that the nest is no longer active. A nest is classed as active when it contains eggs or chicks and whilst being built.

4.2 *Bats*

- 4.2.1.1 As detailed in Section 2.9 above, the Cross Mill building is considered to be a confirmed bat roost, with a maximum of 4x common pipistrelle bats having been recorded roosting in the building in 2017.
- 4.2.1.2 Given the time elapsed since the previous bat surveys, full update bat surveys will be undertaken during the optimal summer survey period (May to August) in 2026 in accordance with the following scope:
1. Internal and external inspections of all built structures affected by the proposals (Cross Mill building plus any walls affected by the proposals) to search for evidence of bats (e.g. droppings) and potential bat roost features.
 2. Update assessment of any trees affected by the proposals.
 3. Dusk emergence bat surveys of Cross Mill building plus any other features identified by Items 1 and 2. Surveys will be undertaken in accordance with current good practice guidelines⁷ and will involve two to three dusk emergence surveys between May and August spaced at least 3 weeks apart and with sufficient numbers of surveyors to cover all potential roost features.
- 4.2.1.3 No works affecting potential bat roost features will commence until the above surveys have been completed. Where necessary, the appropriate derogation licence from Natural England will be obtained prior to the start of works (see Section 5 below).

4.3 *Invasive Weeds*

4.3.1 *Variegated Yellow Archangel*

- 4.3.1.1 Prior to the start of ground works, a SQE will undertake a site visit with the Site Manager to confirm the location of Variegated Yellow Archangel. An exclusion zone will be demarcated around Variegated Yellow Archangel until this species has been removed (see Section 5).

4.3.2 *Other Invasive Weeds*

- 4.3.2.1 Prior to the start of ground works, a SQE will undertake an update checking survey for invasive weeds during the optimal period of April to September. Any evidence of such species will be recorded and mapped.
- 4.3.2.2 In England, Himalayan Balsam typically dies back completely during the Winter and new seedlings emerge in March. Prior to the start of ground works, a SQE will undertake a site visit to search for Himalayan Balsam. If any Himalayan Balsam is found, the SQE will destroy these plants using appropriate measures, e.g. crushing and/or uprooting depending on their growth-stage. As detailed

⁷ Collins, J. (ed.) (2023) Bat surveys for Professional Ecologists: Good Practice Guidelines (4th edition). The Bat Conservation Trust, London.

in Section 5 below, further checking surveys will be required during the growing season to check for regrowth / new seedlings.

4.4 Hedgehog

- 4.4.1.1 Immediately prior to the start of ground works, a SQE will provide an Ecological Toolbox Talk to include measures to protect Hedgehog. Where appropriate, the SQE will undertake checking surveys for Hedgehog, e.g. dismantling piles of leaves / brash. If a Hedgehog is found, the SQE will carefully move the animal to a suitable nearby area of retained habitat, e.g. retained woodland.

4.5 Badger

- 4.5.1.1 3-6 months prior to the start of ground works, a SQE will undertake an update checking survey for evidence of Badger such as setts. If an active sett is found to be present, it may be necessary to obtain a Badger Licence from Natural England to permit otherwise illegal activities such as closing-down a sett or disturbance of Badgers using a sett. If other evidence of Badgers is found (e.g. paths), the SQE will implement appropriate measures, e.g. periodic checking surveys and safe storage of materials.

4.6 Biodiversity Protection Zones / Vegetation Clearance

- 4.6.1.1 Prior to the start of ground works, a SQE will undertake a site visit with the Site Manager to confirm the location and extent of all habitats to be retained. Where appropriate, exclusion zones will be demarcated around such areas using Tree Protection Fencing (TPF) or Heras-type fencing (see Section 5 below).

5 Measures to Avoid / Reduce Impacts

5.1.1.1 This section sets out details of measures and sensitive working practices to avoid or reduce impacts during construction, including action to be taken if any protected species are found during construction works.

5.2 *Nesting Birds*

5.2.1.1 See Section 4.1 above.

5.3 *Bats*

5.3.1.1 As per Section 4.2 above, update bat surveys will be undertaken during the optimal summer survey period (May to August) in 2026.

5.3.1.2 No works affecting potential bat roost features will commence until the above surveys have been completed. Where necessary, the appropriate derogation licence from Natural England will be obtained prior to the start of works. The conditions of any such granted licence will be strictly adhered to. It is envisaged that the licensed Method Statement will comprise the following (subject to the findings of update surveys and the licensing decision of Natural England):

- Bat Toolbox Talk prior to the start of works.
- Pre-install bat boxes on retained trees to receive any bats found.
- Potential seasonal restrictions (depending on the findings of update surveys, seasonal restrictions on certain activities may be necessary).
- Direct ecological supervision of certain activities (e.g. roof stripping, pointing).
- Potential use of bat exclusion devices (e.g. if it is not possible to retain roost sites in gaps within masonry).

5.4 *Variegated Yellow Archangel*

5.4.1.1 Prior to the start of ground works, a SQE will undertake a site visit with the Site Manager to confirm the location of Variegated Yellow Archangel. No ground works will take place within 2 metres of the above-ground parts of Variegated Yellow Archangel unless either supervised by a SQE or if the works are directly involved with the removal of this species.

5.4.1.2 To eradicate Variegated Yellow Archangel from the site, all above-ground and below-ground parts of each plant will be removed using hand tools under the direct supervision of a SQE. The material (roots, stems, seeds and soil which may contain viable material) will be excavated and buried in a suitable location. A receptor hole will be excavated to receive the material which will be buried at least 2 metres below ground level.

5.5 *Other Invasive Weeds*

5.5.1.1 As per Section 4.3, prior to the start of ground works, an update checking survey for invasive weeds will be undertaken during April to September. Any evidence of such species will be recorded and mapped.

5.5.1.2 Himalayan Balsam is an annual species and its location can change year-to-year; therefore, update survey will be required to determine its current location at any given time. The growing season is typically March to October; with viable seed set from around mid-July onwards.

5.5.1.3 Prior to the start of ground works, a SQE will undertake a site visit to search for Himalayan Balsam. If any Himalayan Balsam is found, the SQE will destroy these plants using appropriate measures, e.g. crushing and/or uprooting depending on their growth-stage. Further checking surveys will be conducted by the SQE during the growing season and before viable seed can be set (March to 15th July) to check for regrowth / new seedlings. The SQE will destroy Himalayan Balsam as required.

- 5.5.1.4 If evidence of other Invasive Weeds (e.g. Japanese Knotweed / Wall Cotoneaster) is found, appropriate control measures will be implemented, i.e. herbicide treatment for Japanese Knotweed / removal and deep burial for Wall Cotoneaster.

5.6 Hedgehog

- 5.6.1.1 See Section 4.5 above.

5.7 Biodiversity Protection Zones / Minimisation of Vegetation Removal

- 5.7.1.1 Figure 2 below shows Biodiversity Protection Zones and vegetation that is to be retained. Prior to the start of ground works, a SQE will undertake a site visit with the Site Manager to confirm the location of the Biodiversity Protection Zones and the extent of all habitats to be retained. Where appropriate, exclusion zones will be demarcated around such areas using Tree Protection Fencing (TPF) or Heras-type fencing. No work will be permitted within Biodiversity Protection Zones, unless supervised by the ECoW.

5.8 Use of Protective Fences, Exclusion Barriers and Warning Signs

- 5.8.1.1 As shown in the Tree Protection Plan (TPP) of the Arboricultural Method Statement⁸, Tree Protection Fencing (TPF) will be installed as per Figure 2, Section 6 of BS5837:2012 (Trees in relation to design, demolition and Construction – Recommendations)⁹ to protect retained trees and woodland.
- 5.8.1.2 The location of Biodiversity Protection Zones are shown in Figure 2 below. No work will be permitted within these areas, unless supervised by the ECoW.
- 5.8.1.3 Signs will be attached to the TPF/ Heras-type fencing stating “*Biodiversity Protection Zone: No Unauthorised Entry*”.

5.9 Actions if Protected Species are Found

- 5.9.1.1 If protected species or suspected evidence of protected species / invasive weeds are found (e.g. active bird nests, Hedgehog, Badger setts, Himalayan Balsam) work must stop immediately and advice sought from the SQE.
- 5.9.1.2 The SQE will advise as to whether further surveys / mitigation / avoidance / licensing is required in order to ensure legal compliance. All work would thereafter proceed in accordance with the advice of the SQE and in accordance with the conditions of any granted licence.

⁸ Woodsage. (2025). Hinchliffe Mill. Tree Protection Plan. November 2025.

⁹ British Standards Institution (BSI) BS 5837:2012. Trees in relation to design, demolition and construction – Recommendations. Published by BSI Standards Limited 2012. ISBN 978 0 58069917 7.

6 Timing and Location of Sensitive Works

Activity	Location	Timing	Notes
Nesting Bird Check	Potential bird nesting areas (Cross Mill building, trees, woodland, scrub and walls)	1 st March to 31 st August	No dismantling works or vegetation removal will take place during this period unless area declared clear of active bird nests by SQE no more than 48 hours before such works.
Bats	Cross Mill building, trees, walls	Prior to start of works affecting building, trees, walls	Update bat surveys (May-Aug) as per Section 4.2 above. Obtain derogation licence from Natural England as required. Thereafter, works to proceed as per instructions from SQE and in accordance with Natural England licence where appropriate.
Biodiversity Protection Zones	See Figure 2 below	Prior to the start of ground works	SQE will undertake a site visit with the Site Manager to confirm the location of Biodiversity Protection Zones and the extent of all habitats to be retained. Where appropriate, exclusion zones will be demarcated around such areas using Tree Protection Fencing (TPF) or Heras-type fencing.
Removal of Variegated Yellow Archangel	Small area south of mill pond	Prior to the start of ground works	SQE to confirm the location and exclusion zone. All parts of this species to be removed using hand tools and buried in a suitable location.
Other Invasive Weeds	TBC subject to survey	Prior to the start of ground works. Also periodic checks during April to July.	SQE to undertake update checking survey during growing-season and before seed-set). If other Invasive Weeds found, control measures will be implemented.
Install Bat Boxes on Trees	See LEDS	Prior to the start of works affecting Cross Mill building	4x bat boxes to be attached to retained trees ¹⁰ .
Hedgehog	Full site area	Immediately prior to the start of ground works	SQE will provide an Ecological Toolbox Talk to include measures to protect Hedgehog. Where appropriate, the SQE will undertake checking surveys for Hedgehog, e.g. dismantling piles of leaves / brash.
Badger	Full site area	3-6 months prior to the start of ground works	Update checking survey by SQE. If an active sett is found to be present, SQE to advise on requirement for Badger Licence to ensure legal compliance.

¹⁰ As detailed separately in Landscape Ecological Design Strategy (LEDS), further 4x bat boxes to be attached to Cross Mill building.

7 Persons Responsible

7.1 Overall Responsibility

- 7.1.1.1 Holroyd Homes (The Studio, Rear Of 14 Park Drive, Huddersfield, HD1 4EB) will be responsible for implementing the works detailed in this CEMP: Biodiversity.

7.2 Role of Suitably Qualified Ecologist (SQE)

- 7.2.1.1 The SQE will be responsible for advising the site personnel of their legal responsibilities and ensuring that the measures to avoid / reduce impacts are delivered effectively. The SQE will undertake checking surveys for protected species including nesting birds and will advise on timings of sensitive works and on any unforeseen circumstances that may arise. The SQE will be responsible for informing the Site Manager if any actions are required such as avoiding disturbance to protected species.

7.3 Lines of Communication

- 7.3.1.1 It is essential that there is clear and effective communication between the SQE and Site Manager.
- 7.3.1.2 The SQE reserves the right to stop works and involve the appropriate authorities if necessary.

7.4 Times when a Suitably Qualified Ecologist must be Present

- 7.4.1.1 The SQE (or a representative of the SQE) must be present for any of the following activities:
- 3 to 6 months prior to the start of ground works (to check for evidence of Badger).
 - Immediately prior to the start of ground works (to identify: Habitats to be Retained / Protective Fencing / Invasive Weeds / Hedgehog).
 - To supervise the removal of Variegated Yellow Archangel / other Invasive Weeds.
 - Periodic checks for, and removal of, Invasive Weeds including regrowth / new seedlings.
 - No more than 48 hours before any ground works affecting potential bird nesting areas (buildings, trees, woodland, scrub, walls) during the main bird nesting period (1st March to 31st August).
 - If evidence of protected/notable species is identified at any stage.
 - Bats: To undertake update bat surveys during May – August to inform licence application.
 - Bats: To directly supervise works to Cross Mill building as per the conditions of a derogation licence¹¹ for bats.

¹¹ Derogation licence to be either a European Protected Species Mitigation (EPSM) licence or a Class Licence.

Figure 2. CEMP Biodiversity Drawing



Habitats to be Retained (Biodiversity Protection Zones)

- | | | |
|--|-------------------------------|--------------------------------------|
| Protective Fencing (Biodiversity Protection Zones) | Other woodland; broadleaved | Red Line Boundary |
| Mixed scrub | Ponds (Non- Priority Habitat) | Variegated Yellow Archangel location |