

Proposed Huddersfield Pharmaceutical Unit, School Street West, Huddersfield HD3 3ET

PRELIMINARY ECOLOGICAL APPRAISAL

December 2025

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Document Control

Survey Type:	Surveyors ¹	Survey Date(s)
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Reporting	Personnel	Date
Author	Victoria Burrows B.Sc. (Hons) M.Sc. CEnv MCIEEM Principal Ecologist	18 th November 2025
Signature(s)	Redacted	
Checked	Rebecca Bayley B.Sc. (Hons) Graduate Ecologist	16 th December 2025
Revised and issued	Victoria Burrows	16 th December 2025
Report issued to	Milieu Landscape Design Ltd	
Version Number	P01	
¹ Licence reference numbers		
Bats		
Victoria Burrows, Natural England Class Survey Licence (bats, Level 2) Registration Number 2015-10390-CLS-CLS		

SUMMARY

Introduction and Scope

- i. This preliminary ecological appraisal (PEA) has been prepared for the site of a proposed Huddersfield Pharmaceutical Unit, off School Street West, Huddersfield HD3 3ET.
- ii. This report presents the results of a desktop study and data search, an extended Phase 1 Habitat Survey and assessment and the results of the survey and assessment for relevant protected species carried out in October 2025. The survey was carried out by a licensed, qualified and experienced ecologist and is in accordance with recognised survey guidelines. Reference is also made to the separate *Bat Emergence Survey Report* (JCA Limited, 2024) prepared for the building at the site.

Results of Survey and Assessment

- iii. The 0.6542 hectares (ha) site lies to the east of School Street West and comprises the footprint of the former, now partially demolished, Acre Mill and associated hardstanding. Buildings 17 and 18 of the former mill lie within the site boundary. The majority of the remainder of the site is characterised by hardstanding which is devoid of vegetation or colonised by sparse ruderal herbs and self-seeded saplings of Goat Willow and Silver Birch that do not attain a 10% cover. Three self-seeded trees (T1 to T3) lie on the margins of the site. Other habitats within the site comprise an area of sparsely vegetated land along the eastern margin of Building 17 and two areas of colonising vegetation that has developed into a closed sward and, as such, are classed as other neutral grassland.
- iv. In consideration of the distances, and the absence of any direct habitat and hydrological connectivity between the site and any statutory and non-statutory designated sites for nature conservation in the wider area, it is considered that the redevelopment proposals will have no direct or indirect effect on any designated sites for nature conservation or their features of special interest.
- v. No Priority Habitat, semi-natural or irreplaceable habitats will be affected by the proposals. Wall Cotoneaster, an invasive plant species listed on Schedule 9 of the *Wildlife and Countryside Act 1981* (as amended), was detected at the site and further guidance is provided in **Section 5.4**.
- vi. No evidence of a bat roost has been found at the site. Based on observations made on site in October 2025 and in consideration of guidance in *Advice Note on the Lifespan of Ecological Reports and Surveys* (CIEEM, April 2019), it is confirmed that the bat survey (JCA Limited, 2024) remains valid to inform a planning application. No further surveys for roosting bats are required to comply with relevant survey guidelines or to inform a planning application. If works have not commenced by the start of the next bat active season (i.e. by May / June 2026) then an updated survey of the buildings will be required to ensure these survey findings remain valid to inform the works.
- vii. To secure the landscape planting proposals the works at the site will involve the removal of the pole-mounted boxes; it is recommended that suitable bat boxes are reinstated in the proposed areas of other neutral grassland / wildflower grassland near the northern site margin. Further information is provided in **Section 5.4** and **5.5**.
- viii. Mandatory measures to be applied to ensure the protection of nesting birds during and prior to the site preparation works are described at **Section 5.4** and recommendations for the provision of opportunities for conservation targets such as house sparrow (a Priority Species) are outlined at **Section 5.5**.

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- ix. Appropriate and proportionate survey effort and / or assessment, in accordance with standard survey guidelines has been applied to discount adverse effects on other relevant protected species. No further surveys for other protected species are necessary to inform a planning application.

Recommendations and Conclusion

- x. It is concluded that the proposals at School Street West, Huddersfield can be achieved in accordance with wildlife legislation, planning policy, Natural England guidance and best practice.
- xi. The recommendations in **Section 5.0** outline the mandatory measures and additional actions to be applied to ensure compliance with wildlife legislation, the National Planning Policy Framework (NPPF) and best practice. The mitigation hierarchy has been applied and, in the presence of mandatory actions and best practice measures described in **Section 5.0**, adverse effects on designated sites for nature conservation, ecologically valuable habitats and protected species are reasonably discounted.
- xii. Enhancement measures that aim to maximise the benefits for biodiversity as part of the proposals and comply with the NPPF and *Biodiversity Net Gain: Good Practice Principles for Development* (CIEEM, 2016) are outlined in **Section 5.0** and the separate *Assessment of Biodiversity Net Gain* (report reference HPU-AFL-ZZ-EX-RP-OE-941002-BNG-S3-P01).

1.0 INTRODUCTION

1.1 Background and Rationale

- 1.1.1 ERAP (Consultant Ecologists) Ltd was commissioned to carry out a preliminary ecological appraisal (PEA) at the site of a proposed Huddersfield Pharmaceutical Unit, off School Street West, Huddersfield HD3 3ET (hereafter the 'site'). The Ordnance Survey (OS) grid reference at the centre of the site is SE 11841 17681. An aerial image of the site and its surrounding habitats is appended at **Figure 1** (source image: ESRI World Imagery).
- 1.1.2 The assessment was requested to inform a planning application proposing the redevelopment of the site to a Pharmaceutical Unit at the Huddersfield Infirmary with associated car parking and landscape planting.
- 1.1.3 This report supplements a *Bat Emergence Survey Report* (JCA Limited, 2024) prepared for the building at the site. Reference is made to the *Bat Emergence Survey Report* (hereafter the 'bat survey report') in this PEA.

1.2 Scope of Works

- 1.2.1 The scope of ecological works undertaken in October 2025 comprised:
 - a. A desktop study and data search for known ecological information at the site and the local area;
 - b. An Extended Phase 1 Habitat Survey and assessment, and assessment of the habitats present at the site using the UK Habitats Classification;
 - c. Assessment of the ecological value of the habitats within the site with the use of the National Vegetation Classification (NVC) and the Ratcliffe criteria, as presented in *A Nature Conservation Review* (Ratcliffe, 1977);
 - d. Survey and assessment of all habitats for relevant statutorily protected species¹ and other wildlife including badger (*Meles meles*), barn owl (*Tyto alba*), bird species, and reptiles;
 - e. A daytime bat walkover survey for bats, which has comprised a ground level tree assessment and an inspection of the pole mounted timber bat boxes at the north-western corner of the site;
 - f. The identification of any potential ecological constraints on the proposals and the specification of the scope of mitigation and ecological enhancement required in accordance with wildlife legislation, planning policy guidance and other relevant guidance; and
 - g. The identification of any further surveys or precautionary actions that may be required to inform the progression of the site through the planning process or prior to the commencement of site preparation and construction activities.

¹ In accordance with *Government Circular: Biodiversity and Geological Conservation – Statutory Obligations and Their Impact on the Planning System* (Office of the Deputy Prime Minister, 2005) developers should not be required to undertake surveys for protected species unless there is reasonable likelihood of the species being present and affected by the development. In this instance (for example) there are no water bodies or water courses within or adjacent to the site; there has been no requirement to consider water vole (*Arvicola amphibius*) or otter (*Lutra lutra*) as part of this assessment.

2.0 METHOD OF SURVEY

2.1 Desktop Study and Data Search

2.1.1 The following sources of information and ecological records were consulted:

- a. MAGiC Maps: A web-based interactive map which brings together geographic information on key environmental schemes and designations, including details of statutory nature conservation sites;
- b. Ancient Tree Inventory (Woodland Trust, 2025): An online database of ancient and veteran trees;
- c. West Yorkshire Local Nature Recovery Strategy (LNRS); and
- d. West Yorkshire Ecological Record (WYER);

2.1.2 Information as presented in the *Arboricultural Constraints Appraisal in Relation to Proposed Pharmaceutical Manufacturing Unit at Huddersfield Hospital, Acre Street, Lindley, Huddersfield, West Yorkshire HD3 3DZ* (Bowland Tree Consultancy Ltd, 2025)² was consulted (report reference HPU-AFL-ZZ-EX-RP-OE-942001 - Tree Constraints Report-S3-P02).

2.2 Vegetation and Habitats

2.2.1 A Phase 1 Habitat Survey of the site was carried out by Victoria Burrows on 14th October 2025. The weather conditions were dry and overcast with a light air (Beaufort scale 1) and an air temperature of 14°C.

2.2.2 A habitat and vegetation map was prepared for the site and the immediate surrounding area and is appended at **Figure 2**. The mapping is based on the Joint Nature Conservation Committee Phase 1 Habitat Survey methodology (JNCC, 2010) with minor adjustments to illustrate and examine the habitats with greater precision.

2.2.3 On site habitat mapping was assisted via use of GPS technology, using the *HPU-AFL-ZZ-ZZ-DR-A-001002 - Location Plan and Boundary of Works-S5-P05* drawing as a base plan. This plan was provided to ERAP (Consultant Ecologists) Ltd without spatial referencing; the plan has been inputted into QGIS and an affine transformation was completed to ensure it is accurate in accordance with *ESRI World Imagery*.

2.2.4 The plant species within the site boundary were determined with estimates of the distribution, ground cover, abundance and constancy of individual species. The estimation of abundance was based on the DAFOR system, where D = Dominant, A = Abundant, F = Frequent, O = Occasional and R = Rare, this being a widely used and accepted system employed by ecological surveyors. The terms L = Locally and V = Very were additionally used to describe the plant species distributions with greater precision.

2.2.5 Stands of vegetation and habitats were described and evaluated using the National Vegetation Classification (NVC). The NVC provides a systematic and comprehensive analysis of British vegetation and is a reliable framework for nature conservation and land-use planning.

2.2.6 Habitats within the site were assessed in accordance with *The UK Habitat Classification Version 2.0* (UKHab Ltd, 2023). The UK Habitat Classification, or 'UKHab' has been designed to function at two scales of minimum mappable unit (MMU): fine scale (25m² or 5 metres length) and large scale (400m² or 20 metres

² Hereafter the 'Tree Report'

length). It has been considered for the purposes of this survey that the fine scale of 25m² or 5 metres length MMU is appropriate.

- 2.2.7 Searches were made for uncommon, rare and statutorily protected plant species, those species listed as protected in the *Wildlife and Countryside Act 1981* (as amended) and species which are indicators of important and uncommon plant communities. Plant nomenclature follows *New Flora of the British Isles 3rd Edition* (Stace, 2010).
- 2.2.8 Searches were carried out for the presence of invasive species, including those listed on Schedule 9 of the *Wildlife and Countryside Act 1981* (as amended), including Japanese Knotweed (*Fallopia japonica*), Indian Balsam (*Impatiens glandulifera*) and Giant Hogweed (*Heracleum mantegazzianum*).

2.3 Animal Life

Badger

- 2.3.1 The survey area for badger covered the site (as annotated on **Figure 1**) and extended to accessible land within a radius of 50 metres from the site boundary. Private gardens / land were excluded from the survey and these areas were viewed from the site margins.
- 2.3.2 The survey was conducted in accordance with guidance presented within *Badgers and Development* (Natural England, 2007) and *Badgers: advice for making planning decisions* (Natural England, 2022).
- 2.3.3 The following signs of badger activity were searched for:
 - a. Setts entrances, e.g. entrances that are normally 25 to 35cm in diameter and shaped like a 'D' on its side;
 - b. Large spoil heaps outside sett entrances;
 - c. Bedding outside sett entrances;
 - d. Badger footprints;
 - e. Badger paths;
 - f. Latrines;
 - g. Badger hairs on fences or bushes;
 - h. Scratching posts; and
 - i. Signs of digging for food.
- 2.3.4 Habitats within and surrounding the site were assessed in terms of their suitability for use by foraging and sheltering badger in accordance with their known habitat preferences as detailed in current guidance and *Badger* (Roper, 2010).

Bat Species

Habitat Assessment for Commuting / Foraging Bats

- 2.3.5 Habitats within and adjacent to the site were assessed for their value and suitability for commuting and foraging bats in accordance with Table 4.1 of *Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th edn)* (Collins, J. (ed), 2023). Reference has been made to the categories, descriptions and examples presented in **Table 2.1**.

Table 2.1: Consideration of Suitability of Foraging and Commuting Habitat for Bats

Suitability	Potential Flight Paths and Foraging Habitats
None	No habitat features on site likely to be used by any commuting or foraging bats at any time of the year (i.e. no habitats that provide continuous lines of shade / protection for flight-lines, or generate/shelter insect populations available to foraging bats).
Negligible ^a	No obvious habitat features on site likely to be used as flight-paths or by foraging bats; however, a small element of uncertainty remains in order to account for non-standard bat behaviour.
Low	Habitat that could be used by small numbers of bats as flight-paths such as a gappy hedgerow or unvegetated stream, but isolated, i.e. not very well connected to the surrounding landscape by other habitat. Suitable, but isolated habitat that could be used by small numbers of foraging bats such as a lone tree (not in a parkland situation) or a patch of scrub.
Moderate	Continuous habitat connected to the wider landscape that could be used by bats for flight-paths such as lines of trees and scrub or linked back gardens. Habitat that is connected to the wider landscape that could be used by bats for foraging such as trees, scrub, grassland or water.
High	Continuous, high-quality habitat that is well connected to the wider landscape that is likely to be used regularly by bats for flight-paths such as river valleys, streams, hedgerows, lines of trees and woodland edge. High-quality habitat that is well connected to the wider landscape that is likely to be used regularly by foraging bats such as broadleaved woodland, tree-lined watercourses and grazed parkland. Site is close to and connected to known roosts.
^a Negligible is defined as 'so small or unimportant as to be not worth considering, insignificant'. This category may be used where there are places that a bat could roost or forage (due to one attribute) but it is unlikely that they actually would (due to another attribute).	

Daytime Bat Walkover Survey

Ground Level Tree Assessment

- 2.3.6 A ground level tree assessment was conducted to assess the trees within the site for their suitability for use by roosting bats, and to inform whether further surveys or precautionary measures were required.
- 2.3.7 Trees were assessed from the ground using binoculars and a high-powered torch. Each tree was searched for the presence of the following features:
- Woodpecker holes, rot holes, hazard beams, other vertical or horizontal cracks or splits in stems and branches, partially decayed platey bark, knot holes, man-made holes, tear-outs, cankers in which cavities have developed, other hollows or cavities, including butt-rots, double-leaders forming compression forks with included bark, gaps between overlapping stems or branches, partially detached Ivy (Hedera helix) with stem diameters in excess of 50mm and bat, bird or dormouse (Muscardinus avellanarius) boxes.*
- 2.3.8 Terms used to describe any features present follow (where possible) those outlined and described in *Bat Tree Habitat Key, 2nd Edition* (Andrews, H (ed), 2013) and *Bat Roosts in Trees: A Guide to Identification and Assessment for Tree-care and Ecology Professionals* (BTHK, 2018).
- 2.3.9 Trees have been assessed and described using the categories presented at Tables 4.2 and 6.2 of *Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th edn)*, (Collins, J. (ed), 2023), as presented in **Table 2.2**.

Table 2.2: Definition of Terms and Suitability Categories Used in Tree Survey for Roosting Bats

Terms and Suitability Categories	Description
PRF	Potential Roost Feature.
None	Either no PRFs in the tree(s) or highly unlikely to be any.
FAR	Further Assessment Required to establish if PRFs are present in the tree.
PRF-I	PRF is only suitable for individual bats or very small numbers of bats either due to size or lack of suitable surrounding habitats.
PRF-M	PRF is suitable for multiple bats and may therefore be used by a maternity colony.

2.3.10 The requirement for further presence / absence surveys at each tree was then considered.

Inspection of Bat Boxes

2.3.11 The bat boxes mounted on four poles in the north-eastern corner of the site were inspected and searched for roosting bats by Victoria Burrows, Natural England Class Survey Licence (bats, Level 2) Registration Number 2015-10390-CLS-CLS on 14th October 2025. The surveyor's qualifications and experience meet the criteria as defined in *Technical Guidance Series Competencies for Species Survey: Bats* (CIEEM, 2013).

Equipment

2.3.12 A list of equipment used is detailed in **Table 2.3**.

Table 2.3: Survey Equipment used during Daytime Bat Survey

Ladders
LED Lenser P14 torch
Canon Ixus digital camera
8x20 binoculars
Ridgid Micro Inspection Camera Borescope CA-300

Bird Species

2.3.13 Bird species observed and heard during the survey were recorded.

2.3.14 Habitats throughout the site and in the immediate surrounding area were assessed for their value to roosting, feeding and nesting birds, as indicated by the amount of shelter, feeding value, woody vegetation structure and species diversity of tree and shrub species in the site.

Great Crested Newt and Other Amphibian Species

Desktop Search for Ponds

2.3.15 In accordance with *Great crested newts: advice for making planning decisions* (Natural England, 2022) all ponds within an unobstructed 500 metres of a site should be considered for their suitability to support breeding great crested newt and other amphibian species.

2.3.16 The search of habitats in the wider area up to a distance of 500 metres from the site boundary revealed the presence of two ponds, as detailed in **Table 2.4**.

Table 2.4: Ponds within 500 metres of the Site

Pond Reference	OS Grid Reference	Distance from Site Boundary	Location (refer to Figure 1)
1	SE 12013 17632	104 metres	To the south-east within the car park of the wider hospital site
2	SE 11700 17884	166 metres	In a parkland to the north-west

Consideration of Requirement for Further Survey

2.3.17 The requirement for further survey at each pond was then assessed using the following criteria:

- Presence of dispersal barriers to great crested newt movements between ponds and the site, as detected during the walkover survey;
- Distance of ponds from the site, and the potential influence of the proposed development of the site on any populations of great crested newt (if present at ponds), using the Natural England rapid risk assessment tool.

Dispersal Barriers

2.3.18 Pond 2 is separated from the site by existing built development including the boundary wall at Union Street (at the northern site boundary); these features are regarded as a significant barrier to the dispersal of amphibian species between Pond 2 and the site and no further consideration of Pond 2 is required.

Consideration of Distance of Ponds from Site and Relative Size of Site

2.3.19 Pond 1 (**Photo 12**) lies over 100 metres from the site boundary. The Natural England Rapid Risk Assessment tool from *GCN Method Statement WML-A14-2 (Version April 2020)* (Natural England, 2020) has been completed to inform the requirement for further surveys, and is presented in **Table 2.5**.

2.3.20 The tool has been completed based on the distance of the pond from the site and the area of the development site that supports habitat suitable for use by sheltering amphibian species (0.0948 hectares, of the site is vegetated (i.e. not buildings or unvegetated hardstanding). The rapid risk assessment tool assumes that great crested newt are present.

Table 2.5: Rapid Risk Assessment Result

Component	Likely Effect	Notional Offence Probability Score
Great crested newt breeding pond(s)	No effect	0
Land within 100m of any breeding pond(s)	No effect	0
Land 100-250m from any breeding pond(s)	0.01 - 0.1 ha lost or damaged	0.01
Land >250m from any breeding pond(s)	No effect	0
Individual great crested newts	No effect	0
Maximum:		0.01
Rapid risk assessment result:	GREEN: OFFENCE HIGHLY UNLIKELY	

2.3.21 The rapid risk assessment result of "Green: offence highly unlikely" indicates that the development activities are of such a type, scale and location that it is highly unlikely any offence would be committed should the development proceed. In addition, Pond 1 was created between 2011 and 2016 to presumably compensate for the loss of the two former mill lodges in this area. Great crested newt were not identified as an ecological consideration during the former works at the site / wider hospital site. There are no other

ponds with connectivity to the site which would act as a potential source of a great crested newt population. The presence of great crested newt is reasonably discounted and no further survey is required.

- 2.3.22 In accordance with best practice, and given the proximity of Pond 1 to the site, **Section 5.4** of this report outlines reasonable avoidance measures for the protection of other amphibian species.

Reptile Species

- 2.3.23 The site and its surroundings were assessed in terms of their suitability for use by reptile species using the important characteristics for reptiles outlined in the draft document *Reptile Mitigation Guidelines* (Natural England, 2011), and the *Reptile Habitat Management Handbook* (Edgar, et al., 2010). These habitat characteristics are outlined in **Table 2.6**.

Table 2.6: Important Habitat Characteristics for Reptiles

1. Location (in relation to species range)	7. Connectivity to nearby good quality habitat
2. Vegetation Structure	8. Prey abundance
3. Insolation	9. Refuge opportunity
4. Aspect	10. Hibernation habitat potential
5. Topography	11. Disturbance regime
6. Surface geology	12. Egg-laying site potential

Other Wildlife

- 2.3.24 Evidence of other wildlife, including Priority Species, observed whilst on site, but for which specific surveys were not made, was recorded and has been included in this report where it is considered of relevance to the planning application.
- 2.3.25 Habitats have been assessed for their suitability for Priority Species identified in the data search results where this is considered relevant to the application.

2.4 Survey and Reporting Limitations

- 2.4.1 All areas of the site were accessible and the survey was completed under suitable conditions. No survey limitations on the intended scope of survey were experienced.
- 2.4.2 It was evident during the site survey that trees T1 and T3 had been recently felled. It is understood that the works were carried out to facilitate the repair of the stone wall along School Street West. The trees have been clear felled from the base (refer to **Photos 9 and 10**) and in consideration of the information collated at the felled trees on site and that presented in the Tree Report it has been possible to accurately determine the baseline condition of these trees and to assess their suitability for use by roosting bats.
- 2.4.3 All measurements within this report are approximate only, and have been either estimated whilst on site or calculated using mapping software (QGIS) or internet-based mapping services such as MAGiC Maps and Google Earth.

2.5 Evaluation Methods

- 2.5.1 The habitats, vegetation and animal life were evaluated with reference to standard nature conservation criteria as described in *A Nature Conservation Review* (Ratcliffe, 1977). These are size (extent), diversity,

naturalness, rarity, fragility, typicality, recorded history, position in an ecological or geographical unit, potential value and intrinsic appeal.

- 2.5.2 Habitats have been assessed to determine whether they meet those described in *UK Biodiversity Action Plan: Priority Habitat Descriptions* (Maddock, A (ed), 2008); these lists are used to help draw up the statutory lists of Priority Habitats, as required under Section 41 of the *Natural Environment and Rural Communities (NERC) Act 2006*. Where suitable, the ecological value of the habitats present has been assessed using the terms outlined in *Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine* (CIEEM, 2018). Each habitat and individual trees have been assessed to determine whether they are ‘irreplaceable habitat’, defined in *National Planning Policy Framework* (Ministry of Housing, Communities & Local Government, 2024)³ as ‘Habitats which would be technically very difficult (or take a very significant time) to restore, recreate or replace once destroyed, taking into account their age, uniqueness, species diversity or rarity. They include ancient woodland, ancient and veteran trees, blanket bog, limestone pavement, sand dunes, salt marsh and lowland fen’. The further detail presented in *The Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024* (GOV.UK, 2024) has also been referred to.
- 2.5.3 Government advice on wildlife, as set out in the NPPF and associated government circulars has been taken into consideration. Legislation relating to protected species, such as those listed under Schedules 1, 5, 6 and 8 of the *Wildlife and Countryside Act 1981* (as amended) and *The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019*, is referenced where applicable, and any impacts to protected species are evaluated in accordance with current guidance.
- 2.5.4 The presence of any Priority Species, as listed under Section 41 of the *Natural Environment and Rural Communities (NERC) Act 2006* is noted, and habitats are assessed in terms of their suitability and value for these species.

3.0 SURVEY RESULTS

3.1 Desktop Study and Data Search

Statutory Designated Sites for Nature Conservation and SSSI Impact Risk Zones

- 3.1.1 The site and adjoining land have no statutory designation for nature conservation.
- 3.1.2 The site lies within a Site of Special Scientific Interest (SSSI) Impact Risk Zone for the overlapping South Pennine Moors Phase 2 Special Protection Area (SPA) and the South Penning Moors Special Area of Conservation (SAC) and SSSI located 7.95 kilometres to the south-west of the site and designated for its woodland, heathland and blanket bog habitat and its breeding bird assemblage.
- 3.1.3 A site of geological importance known as Elland Bypass Cutting SSSI is located 2.4 kilometres to the north.
- 3.1.4 The SSSI Impact Risk Zone requires the Local Planning Authority to consult with Natural England on likely risks from the following development categories (Natural England, 2025):
- Infrastructure:** Airports, helipads and other aviation proposals.
 - Minerals, Oil and Gas:** Oil and gas exploration / extraction.

³Hereafter the NPPF

- c. **Air Pollution:** Livestock & poultry units with a floorspace greater than 500m², slurry lagoons greater than 4000m².
- d. **Combustion:** General combustion processes greater than 50MW energy input. Including: energy from waste incineration, other incineration, landfill gas generation plant, pyrolysis / gasification, anaerobic digestion, sewage treatment works, other incineration / combustion.

3.1.5 Based on the development proposals at the site the SSSI impact risk zone states:

'You do not need to consult Natural England on the proposed development at this location.

The Impact Risk Zones for Sites of Special Scientific Interest (SSSI IRZs) indicate that at the location selected, the proposed development is unlikely to have a harmful effect on terrestrial Sites of Special Scientific Interest (SSSIs) and the Special Areas of Conservation (SACs), Special Protection Areas (SPAs) or Ramsar sites that they underpin.

Therefore, you do not need to consult Natural England on the likely impacts of development on terrestrial SSSIs and the SACs, SPAs or Ramsar sites that they underpin.'

Non-statutory Designated Sites for Nature Conservation

3.1.6 The site and adjoining land have no non-statutory designation for nature conservation, called 'Local Wildlife Sites' or 'LWS' in West Yorkshire. Three LWS are located within a 2 kilometres radius from the centre of the site, and are summarised in **Table 3.1**.

Table 3.1: LWS Within a 2 Kilometres Radius from the Centre of the Site

LWS Name	Distance and Direction from the Site
Gledholt Woods	1.5 kilometres south-east
Grimescar Wood	1.75 kilometres north-east
Huddersfield Narrow Canal	1.8 kilometres to the south

3.1.7 The presence of the LWS is considered further at **Section 4.2**.

Local Nature Recovery Strategy

3.1.8 The West Yorkshire LNRS is in preparation at the time of writing.

Priority Habitats Inventory

3.1.9 The Priority Habitats Inventory⁴ was checked via MAGiC Maps. The northern area of the site is identified as 'Open Mosaic Habitat (draft)'; this is discussed further in **Section 4.3**. No other Priority Habitats are identified at the site by the inventory.

Ancient Tree Inventory

3.1.10 No ancient or veteran trees are identified at the site by the inventory.

⁴ A spatial dataset that describes the geographic extent and location of Natural Environment and Rural Communities Act (2006) Section 41 habitats of principal importance.

Protected and Notable Species

3.1.11 Records of protected and notable species for a 2 kilometres radius from the centre of the site are summarised in **Table 3.2**.

Table 3.2: Records of Protected Species Within a 2 Kilometres Radius from the Centre of the Site

Taxon Group	Species Name and Designations ¹ and Notes
Amphibians	Common toad (<i>Bufo bufo</i>): WCAs5, PS & LBAP. 28 records. The closest record is 1780 metres to the west.
	Common frog (<i>Rana temporaria</i>): WCAs5 & LBAP. 16 records. The closest record is on the site.
	Palmate newt (<i>Lissotriton helveticus</i>): WCAs5. 2 records. The closest record is 1375 metres to the south-west.
Birds – Priority and LBAP Species	PS & LBAP: Skylark (<i>Alauda arvensis</i>), tree pipit (<i>Anthus trivialis</i>), nightjar (<i>Caprimulgus europaeus</i>), cuckoo (<i>Cuculus canorus</i>), yellowhammer (<i>Emberiza citrinella</i>), reed bunting (<i>Emberiza schoeniclus</i>), yellow wagtail (<i>Motacilla flava flavissima</i>), spotted flycatcher (<i>Muscicapa striata</i>), house sparrow (<i>Passer domesticus</i>), tree sparrow (<i>Passer montanus</i>), grey partridge (<i>Perdix perdix</i>) and wood warbler (<i>Phylloscopus sibilatrix</i>). LBAP Only: Kestrel (<i>Falco tinnunculus</i>), swallow (<i>Hirundo rustica</i>), dunnoek (<i>Prunella modularis</i>), bullfinch (<i>Pyrrhula pyrrhula</i>), starling (<i>Sturnus vulgaris</i>), song thrush (<i>Turdus philomelos</i>) and swift (<i>Apus apus</i>).
Birds – WCAs1 Species	Brambling (<i>Fringilla montifringilla</i>): WCAs1. 1 record located 1280 metres to the north.
	Fieldfare (<i>Turdus pilaris</i>): WCAs1. 1 record located 1280 metres to the north.
	Hoopoe (<i>Upupa epops</i>): WCAs1. 2 records. The closest record is 1280 metres to the north.
	Kingfisher (<i>Alcedo atthis</i>): WCAs1. 1 record located 1785 metres to the south.
	Redwing (<i>Turdus iliacus</i>): WCAs1.1 record located 1280 metres to the north.
Bony Fish	Brown/sea trout (<i>Salmo trutta</i>): PS & LBAP. 3 records. The closest record is 1585 metres to the south.
Crustacean	White-clawed crayfish (<i>Austropotamobius pallipes</i>): WCAs5, PS & LBAP. 6 records. The closest record is 1630 metres to the south-east.
Reptile	Grass snake (<i>Natrix helvetica</i>): WCAs5 & PS. 1 record located 1215 metres to the south-east.
Terrestrial Mammals	Bats (Vespertilionidae): WCAs5. 13 records. The closest record is 195 metres to the north-west.
	Brown hare (<i>Lepus europaeus</i>): PS & LBAP. 1 record located 1800 metres to the south-east.
	Hedgehog (<i>Erinaceus europaeus</i>): PS & LBAP. 1 record located 1825 metres to the north-west.
	Brown long-eared bat (<i>Plecotus auritus</i>): EPS, WCAs5, PS & LBAP. 1 record located 74 metres to the south-east.
	Noctule bat (<i>Nyctalus noctula</i>): EPS, WCAs5, PS & LBAP. 11 records. The closest record is 260 metres to the east.
	Soprano pipistrelle (<i>Pipistrellus pygmaeus</i>): EPS, WCAs5, PS & LBAP. 2 records. The closest record is 1685 metres to the south-east.
	Daubenton's bat (<i>Myotis daubentonii</i>): EPS, WCAs5 & LBAP. 1 record located 1745 metres to the south.
	Leisler's bat (<i>Nyctalus leisleri</i>): EPS, WCAs5 & LBAP. 3 records. The closest record is 74 metres to the south-east.
	Pipistrelle (<i>Pipistrellus pipistrellus</i>): EPS, WCAs5 & LBAP. 57 records. The closest record is 74 metres to the south-east.
	Whiskered bat (<i>Myotis mystacinus</i>): EPS, WCAs5 & LBAP. 3 records. The closest record is 1525 metres to the north-west.

Taxon Group	Species Name and Designations ¹ and Notes
	Bat (Chiroptera): EPS & WCAs5. 1 record located 1665 metres to the south-west.
	Myotis bat species (<i>Myotis</i>): EPS & WCAs5. 2 records. The closest record is 1535 metres to the west.
	Nyctalus bat species (<i>Nyctalus</i>): EPS & WCAs5. 1 record located 1785 metres to the east.
	Pipistrelle bat species (<i>Pipistrellus</i>): EPS & WCAs5. 7 records. The closest record is 325 metres to the north.
¹ Key to Designation Codes: EPS = European Protected Species under The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019. WCAs1 = Species receives full protection under Schedule 1 of the Wildlife and Countryside Act 1981 (as amended). WCAs5 = Species receives full protection under Schedule 5 of the Wildlife and Countryside Act 1981 (as amended). PS = Priority Species listed under Section 41 of the NERC Act 2006. LBAP = Species listed on the West Yorkshire Biodiversity Action Plan.	

3.1.12 The presence of these protected and notable species within the wider area has been taken into account throughout this report.

3.2 Vegetation and Habitats

General Description

- 3.2.1 The 0.6542 hectares (ha) site lies to the east of School Street West and comprises the footprint of the former, now partially demolished, Acre Mill and associated hardstanding. Buildings 17 and 18 of the former mill lie within the site boundary. The majority of the remainder of the site is characterised by hardstanding which is devoid of vegetation or colonised by sparse ruderal herbs and self-seeded saplings of Goat Willow (*Salix caprea*) and Silver Birch (*Betula pendula*) that do not attain a 10% cover. Three self-seeded trees (T1 to T3) lie on the margins of the site.
- 3.2.2 Other habitats within the site comprise an area of sparsely vegetated land along the eastern margin of Building 17 and two areas of colonising vegetation that has developed into a closed sward and, as such, are classed as other neutral grassland.
- 3.2.3 The site boundaries are demarcated by a stone wall which extends parallel to School Street West at the western site boundary and by a tall brick wall, behind which lies Union Street at the northern site boundary. The southern site boundary cuts across the buildings and the eastern site boundary is undefined and extends over an area of hardstanding used for car parking by the hospital.
- 3.2.4 A Phase 1 Habitat Survey map is appended at **Figure 2**. Photographs are appended in **Section 8.1**.

Buildings and Hardstanding

- 3.2.5 Refer to **Photo 1**. Building 17 and 18 lie within the site. No vegetation is associated with the buildings. The buildings are described by the UKHab as u1b5 buildings.
- 3.2.6 Refer to **Photos 1 to 4**. The areas of the site classed as hardstanding do not support any significant assemblage or cover of plant species. Scattered plant species that have colonised the cracks between the concrete slabs of hardstanding comprise Creeping Bent (*Agrostis stolonifera*), Narrow-leaved Ragwort (*Senecio inaequidens*) and Yorkshire-fog (*Holcus lanatus*). A plant species list for the areas of hardstanding is appended at **Table 8.2**. The hardstanding is described by the UKHab as u1b6 other developed land with the secondary codes 81 ruderal or ephemeral.

Boundary Walls

- 3.2.7 Refer to **Photo 5** and **6**. The site side (eastern site) of the stone wall at the western site boundary is colonised by very locally abundant rupestral plants of Maidenhair Spleenwort (*Asplenium trichomanes*) and Red Valerian (*Centranthus ruber*).

Other Neutral Grassland

- 3.2.8 Two areas of neutral grassland lie within the site boundary. Due to the shallow and compacted soil conditions present it is likely that these areas were formerly areas of self-seeded ruderal vegetation that, over time and with the absence of management, has become a closed sward and, as such, is classified as grassland.

Other Neutral Grassland 1

- 3.2.9 Refer to **Photo 7**. Other neutral grassland 1 is located in the northern area of the site and is characterised by constant and abundant Cock's-foot (*Dactylis glomerata*) with constant and frequent Red Fescue (*Festuca rubra*). Yorkshire-fog and Black Medick (*Medicago lupulina*) are locally abundant, Creeping Bent is frequent and Pendulous Sedge (*Carex pendula*) and Zig-zag Clover (*Trifolium medium*) are locally frequent. Occasional plants of Dandelion (*Taraxacum officinale* agg.), Tufted Vetch (*Vicia cracca*) and Bush Vetch (*Vicia sepium*) were also recorded. A plant species list is appended at **Table 8.3**.
- 3.2.10 The grassland has affinities with the MG1 *Arrhenatherum elatius* community of the NVC (Rodwell, 1992), and is described by the UKHab as g3c other neutral grassland with the secondary code 82 vacant or derelict land.

Other Neutral Grassland 2

- 3.2.11 Refer to **Photo 8**. An area to the immediate north of Building 18 is colonised by ruderal herbs and grasses characterised by abundant Red Fescue and Black Medick and frequent Yorkshire-fog, Dandelion, Creeping Bent, Rough Meadow-grass (*Poa trivialis*), Common Bird's-foot-trefoil (*Lotus corniculatus*) and White Clover (*Trifolium repens*). Narrow-leaved Ragwort and Perennial Rye-grass (*Lolium perenne*) are locally frequent and Red Clover (*Trifolium pratense*), Orange Hawkweed (*Pilosella aurantiaca*), Smooth Tare (*Vicia tetrasperma*), Colt's-foot (*Tussilago farfara*), Purple Toadflax (*Linaria purpurea*) and Self-heal (*Prunella vulgaris*) are very locally frequent. A plant species list is appended at **Table 8.4**.
- 3.2.12 The grassland has affinities with the MG1 *Arrhenatherum elatius* community of the NVC (Rodwell, 1992), and is described by the UKHab as g3c other neutral grassland with the secondary code 82 vacant or derelict land.

Individual Trees

- 3.2.13 Refer to **Photos 9** and **10**. Trees are limited to three small trees (T1: Goat Willow, T2: Silver Birch and T3: Aspen (*Populus tremula*)). Trees T1 and T3 had been recently felled prior to the survey. It is understood that the works were carried out to facilitate the repair of the stone wall along School Street West.

Invasive Plant Species

- 3.2.14 No Japanese Knotweed is present at the site.

- 3.2.15 As illustrated on **Figure 2**, one plant of Wall Cotoneaster (*Cotoneaster horizontalis*) was detected at the site. This species is listed on Schedule 9 of the *Wildlife and Countryside Act 1981* (as amended); it is an offence to spread or cause its spread in the wild. This is considered further at **Section 4.3** below.

3.3 Animal Life

Badger

- 3.3.1 No signs of badger were detected within the site. The high cover of buildings and hardstanding that occupy the majority (85.5%) of the site and the shallow, compacted soil conditions elsewhere are not suitable for the attraction of badger for sett construction and foraging. The presence of badger is reasonably discounted.

Bat Species

Habitat Assessment for Commuting and Foraging Bats

- 3.3.2 The high cover of hardstanding and buildings (85.5% of the site area) and only a small area (0.0948 ha) of vegetation cover at the site and the isolation of the site within an area bordered by existing built development with artificial lighting is sub-optimal for the attraction of foraging and commuting bats. The site is assessed to conform to a 'low' suitability for use by foraging bats in accordance with Table 4.1 of *Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th edn)* (Collins, J. (ed), 2023) (reproduced at **Table 2.1** of this report).
- 3.3.3 The 'low' suitability assessment is confirmed by the results of the bat emergence surveys as reported in the bat survey report which describes the bat activity as 'a very low level of commuting and foraging bat activity' and only one species (common pipistrelle (*Pipistrellus pipistrellus*)) were recorded.

Roosting Bats: Buildings

- 3.3.4 As reported in the bat survey report. Building 17 (Building 1 in the bat survey report) was assessed to be of 'low' suitability for use by roosting bats. No bats were observed emerging from the surveyed building during the survey on 20th August 2024.

Daytime Survey: Pole Mounted Bat Boxes

- 3.3.5 Refer to **Photo 11**. Inspection of the pole-mounted bat boxes at the north-western margin of the site on 14th October 2025 did not detect any bats or droppings. Many of the boxes are damaged, open at the top and / or have water ingress which limits their suitability for use by roosting bats.

Ground Level Tree Assessment

- 3.3.6 No trees support any features suitable for use by roosting bats. All trees (T1 to T3) are assessed to conform to the suitability criteria for use by roosting bats of 'none'.

Bird Species

- 3.3.7 Birds detected in the site on 14th October 2025 are listed in

3.3.8 Table 3.3.

Table 3.3: Bird Species Detected on 14th October 2025

Scientific Name	Common Name	BOCC Status ¹
<i>Coloeus monedula</i>	Jackdaw	Green
<i>Columba livia domestica</i>	Feral pigeon	Green
<i>Erithacus rubecula</i>	Robin	Green
<i>Pica pica</i>	Magpie	Green

¹BOCC: Birds of Conservation Concern (Stanbury, et al., 2021).

- 3.3.9 The opportunities for use by nesting birds at the site are limited to the single trees (two of which have been recently felled) and to the buildings which may be used by nesting feral pigeon and possibly species such as house sparrow and starling (both Priority Species); this is considered further at **Section 4.4**, below.
- 3.3.10 Due to the enclosed urban conditions and the frequency of disturbance by the adjacent car park use of the site by ground nesting birds including species such as little ringed plover is reasonably discounted.

Reptiles

- 3.3.11 The site lies within an urban area and is surrounded by existing built development which creates a barrier to the dispersal of reptiles. The site is not adjacent nor linked to any areas of favourable habitat for reptile species. The presence of reptiles within the site is reasonably discounted.

4.0 EVALUATION AND ASSESSMENT

4.1 Introduction and Description of Proposals

- 4.1.1 This PEA has been requested to inform a planning application for redevelopment of the site to a Pharmaceutical Unit associated with the wider Huddersfield Infirmary with associated car parking and landscape planting. Building 18 will be retained and Building 17 will be removed and re-built.
- 4.1.2 Following an iterative process, the site proposals and associated landscape planting as shown on *Huddersfield Pharmaceutical Unit. Site GA drawing HPU-AFL-ZZ-EX-DR-L-901001 Site GA External Works S5 -P04* ((Milieu Landscape Design, 2025), hereafter the 'proposals', have been prepared to maximise the opportunities for biodiversity at the site and to satisfy the requirements of statutory biodiversity net gain.
- 4.1.3 **Section 4.2** provides an assessment of any impacts of the proposed development on the designated sites for nature conservation present in the wider area. The ecological value of habitats within the site is evaluated at **Section 4.3**, and protected and notable species are considered at **Section 4.4**.

4.2 Designated Sites for Nature Conservation

- 4.2.1 It is considered that the site is sufficiently small and distant from all designated sites for nature conservation that the proposed development will have no adverse direct or indirect effect upon them or their features of interest.

4.3 Vegetation and Habitats

- 4.3.1 The site contains only common and widespread plant species that are typical of the hardstanding and compacted soil conditions at the site. No rare plant species were detected and none of the habitats present are representative of semi-natural habitat or are an irreplaceable habitat⁵.
- 4.3.2 For completeness and in consideration of whether the vegetation in the proposed development site meets the criteria to be defined as Open Mosaic Habitat on Previously Development Land Priority Habitat the following documents were referred to:
- a. *UK Biodiversity Action Plan; Priority Habitat Descriptions Open Mosaic Habitat on Previously Developed Land* (Maddock, 2010);
 - b. *Definition and mapping of open mosaic habitats on previously developed land: Phase 1 Final Report*. (Riding, A., Critchley, N., Wilson, L. and Parker, J. , December 2009); and
 - c. The description of habitat u1a open mosaic habitat on previously developed land in *The UK Habitat Classification. Habitat Definitions Version 1.1* (Butcher, B., Carey, P., Edmonds, R., Norton, L. and Treweek, J., 2020).
- 4.3.3 The qualifying criteria are summarised and assessed in **Table 4.1**, below. To qualify the site must meet all criteria; the site only meets one criterion.

⁵ As defined at *The Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024*.

Table 4.1: Assessment of Site Habitats Against Criteria for Open Mosaic Habitat (OMH) on Previously Developed Land Priority Habitat

Criterion	Qualifying Criterion	Represented at Site	Criterion Met?
1	The area of open mosaic habitat is at least 0.25ha in size.	The area of the site which is not occupied by existing buildings and hardstanding that is devoid of vegetation is 0.0948ha; this is less than 0.25ha.	x
2	Known history of disturbance at the site or evidence that soil has been removed or severely modified by the previous use(s) of the site. Extraneous materials / substrates such as industrial spoil may have been added.	The area formerly supported buildings (as confirmed by examination of Google Earth) and has since been used as a car park / site compound. The area has a compacted gravel / hardcore surface and remnant floor tiles of the buildings remain present. There is no evidence that other extraneous materials or industrial spoil have been introduced to the area or are influencing the vegetation and plant species at the site.	x
3	The site contains some vegetation. This will comprise early successional communities consisting of stress-tolerant species. Early successional communities are composed of a) annuals, or b) mosses/liverworts, or c) lichens, or d) ruderals, or e) inundation species, or f) open grassland, or g) flower-rich grassland, or h) heathland.	Common and species-poor communities of ruderal herbs are present, however none of the plant species present are true calcicoles or calcifuges. No areas of orchid spikes or other true calcicoles that are indicative of alkaline substrates are present. The vegetation does not represent an example of the communities described under b, c, e, f, g or h. In consideration of 'a' (annuals) and 'd' (ruderals), the species composition in the site does not contain a typical assemblage of ruderal species that are influenced by the substrate. For example no Wild Carrot (<i>Daucus carota</i>), or Common Toadflax (<i>Linaria vulgaris</i>) was detected. In reference to Annex 1 of (Maddock, 2010), only 11 species (Common Mugwort, Common Mouse-ear, Autumn Hawkbit, Common Cat's-ear, Purple Toadflax, Black Medick, Ribwort Plantain, Zigzag Clover, Red Clover, Colt's-foot and Tufted Vetch) were detected in the area are represented on the list of plant species characteristic of OMH (Northern England).	✓
4	The site contains unvegetated, loose bare substrate and pools may be present.	This is not an accurate description of the site conditions.	x
5	The site shows spatial variation, forming a mosaic of one or more of the early successional communities a-h (in criterion 3) plus bare substrate within 0.25ha.	OMH generally establish on sites where there is a physical and chemical factor that is impeding successional development of the vegetation, this is not the case in the site. The shallow depth and compaction of the soil in local areas is influencing the rate (i.e. temporal) colonisation of local areas of the site by vegetation and not the physical and chemical nature of the substrate.	x

- 4.3.4 In terms of each habitat's importance in a geographical context⁶, the habitats at the site are of 'site' value only. The proposals and requirement to satisfy statutory biodiversity net gain (BNG) provide an opportunity to enhance the habitat structural diversity, and the habitat connectivity function and value of the site for use by nesting birds and foraging bats within the context of the urban area by landscape planting as described in **Sections 5.3** and **5.5**.
- 4.3.5 Wall Cotoneaster, an invasive plant species listed on Schedule 9 of the *Wildlife and Countryside Act 1981* (as amended), was detected at the site. It is an offence to spread or to cause the spread of this species in the wild and further guidance is provided in **Section 5.4**.

4.4 Protected Species and Other Wildlife

Bat Species

- 4.4.1 No evidence of a bat roost has been detected at the site. The scope of bat surveys carried out at the site remains valid to inform a planning application.
- 4.4.2 To secure the landscape planting proposals the works at the site will involve the removal of the pole-mounted boxes; it is recommended that these are reinstated in the proposed areas of other neutral grassland / wildflower grassland near the northern site margin. Further information is provided in **Section 5.4** and **5.5**.
- 4.4.3 Inappropriate use of artificial lighting at the site may have an adverse effect on use of the local area by foraging bats and other wildlife. Guidance to avoid a significant impact on foraging and commuting bats in the long-term are described at **Section 5.3**.

Bird Species

- 4.4.4 Likely use of the buildings by nesting feral pigeon was detected. Mandatory measures to be applied to ensure the protection of nesting birds during and prior to the site preparation works are described at **Section 5.4** and recommendations for the provision of opportunities for conservation targets such as house sparrow (a Priority Species) are outlined at **Section 5.5**.

Other Animal Life

- 4.4.5 Appropriate and proportionate survey effort and / or assessment, in accordance with standard survey guidelines has been applied to discount adverse effects on other relevant protected species. No further surveys for other protected species are necessary to inform a planning application.

5.0 RECOMMENDATIONS AND ECOLOGICAL ENHANCEMENT

5.1 Introduction

- 5.1.1 The recommendations described below are appropriate and proportionate to the scale of the development proposals, the likely impacts of the proposals and aim to ensure that the proposals are

⁶ Using the terms presented at Section 4.7 of *Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine* (CIEEM, 2018), i.e. International and European, National, Regional, Local Authority-wide area, River Basin District, Estuarine system / Coastal cell or Local. The term 'site' value is additionally used to highlight ecological features considered to be of importance in the context of the wider site habitats, but which are of negligible value in the context of the local area.

implemented in accordance with the mitigation hierarchy, relevant wildlife legislation, Natural England guidance, the principles of the National Planning Policy Framework (NPPF) (Ministry of Housing, Communities & Local Government, 2024), local planning policy and best practice.

- 5.1.2 The recommendations aim to ensure compliance with Chapter 15, paragraph 193(d) of the NPPF which states:

‘opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate’.

5.2 Bat Survey Validity

- 5.2.1 As detailed in **Section 3.3** of this report and in the bat survey report, the presence of roosting bats at the site is reasonably discounted. Based on observations made on site in October 2025 and in consideration of guidance in *Advice Note on the Lifespan of Ecological Reports and Surveys* (CIEEM, April 2019) it is confirmed that the bat survey (JCA Limited, 2024) remains valid to inform a planning application. No further surveys for roosting bats are required to comply with relevant survey guidelines or to inform a planning application.
- 5.2.2 Bats are mobile and it is recognised that the validity of a presence / absence survey for bat species is typically considered to be no more than 18 months. If works have not commenced by the start of the next bat active season (i.e. by May / June 2026) then an updated survey of the buildings will be required to ensure these survey findings remain valid to inform the works.

5.3 Recommendations in Relation to Site Layout and Design Specifications

Retention and Protection of Existing Habitats

- 5.3.1 It is considered the proposals are in accordance with the mitigation hierarchy. The proposals have sought to retain the only remaining tree at the site (T1: Silver Birch) and secure the planting of compensatory habitats of introduced shrubs, other neutral grassland and new trees as part of the site design and landscape proposals.
- 5.3.2 Implementation of the recommendations at **Section 5.5** would further enhance the opportunities at the site for biodiversity, complement the retained habitats and secure biodiversity net gain (refer to the separate *Assessment of Biodiversity Net Gain* report (reference HPU-AFL-ZZ-EX-RP-OE-941002 - BNG - S3-P01).

Lighting

- 5.3.3 Paragraph 198(c) in Chapter 15 (conserving and enhancing the natural environment) of the NPPF states that development should:
- ‘limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.’*
- 5.3.4 Although the bat survey report detected ‘a very low level of commuting and foraging bat activity’ common pipistrelle bat activity was detected and, in the presence of the proposed landscape planting and habitat creation, the suitability of the site for use by foraging bats is likely to increase. It is therefore

recommended, in accordance with best practice, that any external lighting scheme at the redeveloped site must involve the use of appropriate products and screening, where necessary, to ensure no excessive artificial lighting shines beyond the site boundaries or over any new landscape planting, as lighting overspill may deter use by wildlife such as foraging bats.

5.3.5 The lighting scheme will be designed with reference to current guidance, namely:

- a. *Guidance Note 08/23: Bats and Artificial Lighting at Night* (Institution of Lighting Professionals & Bat Conservation Trust, 2023); and
- b. *Bats and lighting: Overview of current evidence and mitigation guidance* (Stone, 2014).

5.4 Protection of Existing Features During Construction and Construction Environment Management Plan (CEMP) for Biodiversity

Introduction

5.4.1 To inform the site preparation and construction activities it is recommended that a CEMP for Biodiversity is prepared and implemented. The CEMP for Biodiversity will describe the following actions / measures:

Tree Protection

5.4.2 During the construction phase, temporary protective demarcation fencing should be used to protect the tree (T1) to be retained and fencing must be used to demarcate the construction zone. The fencing must extend outside the canopy of the retained tree and must remain in position until the end of the construction phase.

5.4.3 The fencing will be in accordance with BS5837:2012 *Trees in Relation to Design, Demolition and Construction: Recommendations* (BSI, 2012).

Building Works and Bats

5.4.4 If building demolition works have not commenced by the start of the next bat activity survey season (i.e. May / June 2026) then it is recommended that an updated licensed bat survey is completed to ensure the current assessment remains valid to inform the works.

5.4.5 It is recommended that immediately prior to removal a licensed bat surveyor carries out an updated inspection of the pole-mounted bat boxes to search for bats. If a bat is present the licensed surveyor will provide appropriate guidance.

5.4.6 If at any point during the works a bat is found or suspected when the licensed surveyor is not on site, all works in the area must stop immediately and ERAP (Consultant Ecologists) Ltd or the Bat Conservation Trust must be contacted for guidance.

Protection of Nesting Birds

5.4.7 All wild birds are protected under the *Wildlife and Countryside Act 1981* (as amended) while they are breeding. Any works such as building demolition and vegetation clearance that will affect habitats suitable for use by nesting birds must be scheduled to commence outside the bird nesting season. Commencement of works in the nesting season must be informed by a pre-works nesting bird survey, carried out by a suitably experienced ecologist. The bird breeding season typically extends between March to August inclusive.

- 5.4.8 If breeding birds are detected the ecologist will issue guidance in relation to the protection of the nesting birds in conjunction with the scheduled works. This may involve cordoning off an area of the site until the young birds have fledged.

Reasonable Avoidance Measures Method Statement for the Protection of Wildlife

- 5.4.9 During the site preparation works and construction operations it is essential that the following best practice and Reasonable Avoidance Measures Method Statement (RAMMS) are applied for the protection of wildlife:
- a. All site personnel must be made aware of this RAMMS and best practice guidance;
 - b. During works all arising waste must be either removed from the area or placed in a skip to avoid the accumulation of materials that may create suitable habitat and shelter for terrestrial mammals;
 - c. During construction, bricks etc. must ideally be stored on pallets or raised from the ground in another suitable manner in order that no suitable habitat for hedgehog / other wildlife is created;
 - d. Trenches or holes must be fitted with a means of escape (such as ramped edge or a sloping plank of timber). This will ensure that any inquisitive animals do not become trapped;
 - e. Deep trenches / excavations must not be left open overnight. Any open excavations (e.g. foundations / footings / service trenches etc) will be covered with plywood sheeting (or similar) at the end of each working day;
 - f. Any pipes must be stored with caps on (to prevent animal entry);
 - g. No fires must be lit at the site; and
 - h. The use of chemicals (such as fertilisers and herbicides) harmful to wildlife should be avoided wherever possible.

Biosecurity and Invasive Plant Species

- 5.4.10 It is an offence under the *Wildlife and Countryside Act 1981* (as amended) to cause the spread of Wall Cotoneaster in the wild. It is recommended that the plants of Wall Cotoneaster are identified and removed and buried on site as part of the works.
- 5.4.11 To minimise the risk of introduction of invasive species to the site and the spread of invasive species around the site and into the adjacent habitats, all machinery / plant to be brought to the site must be clean. Wheels / tracks of machinery / plant must have been pressure washed before use at the site. No excessive remnant soil or plant material from other sites must be present on the machinery / plant or in the tyre treads as this may increase the risk of spread of non-native and invasive plant species e.g. Japanese Knotweed (*Fallopia japonica*), Indian Balsam (*Impatiens glandulifera*) and Giant Hogweed (*Heracleum mantegazzianum*).

5.5 Habitat Reinstatement / Creation and Landscape Planting

Reinstatement of Bat Boxes

- 5.5.1 To replicate the pole-mounted bat boxes to be removed by the proposal it is recommended that bat boxes are installed on either suitable elevations of the buildings, the retaining wall at the northern margin of the site or on replacement poles within the areas of other neutral grassland and tree planting.

- 5.5.2 Suitable bat boxes are the Schwegler 1FF, Greenwood Ecohabitat's single or double cavity boxes and Schwegler 1FD, see **Insert 1**.



Insert 1: Schwegler 1FF, Greenwood Ecohabitat's single cavity and Schwegler 1FD bat boxes

Provisions for Nesting House Sparrow

- 5.5.3 House sparrows are associated with suburban areas. Monitoring suggests a severe decline in the UK house sparrow population, estimated as dropping by 71 per cent between 1977 and 2008 with large falls in both rural and urban populations (RSPB, 2023).
- 5.5.4 The installation of house sparrow terrace nest boxes is recommended at the buildings or the retaining wall at the northern site boundary. The boxes will not be positioned over windows or doorways where droppings may become a nuisance.
- 5.5.5 Suitable bird boxes are available from the NHBS (www.nhbs.com) or Wild Care (www.wildcare.co.uk). ERAP (Consultant Ecologists) Ltd will advise on the siting of bird boxes, as needed. An example of a suitable house sparrow bird box is given below at **Insert 2**.



Insert 2: Schwegler 1SP House Sparrow Nesting Terrace

Landscape Planting

- 5.5.6 In accordance with ecological guidance the landscape proposals as detailed on *Huddersfield Pharmaceutical Unit. Site GA drawing HPU-AFL-ZZ-EX-DR-L-901001 Site GA External Works S5 -P04* (Milieu Landscape Design, 2025) specify the creation of the following habitats:
- A new hedgerow at the eastern site boundary to provide opportunities for nesting birds and to create habitat connectivity;

- b. Creation (and appropriate management) of other neutral grassland / wildflower grassland for the attraction of invertebrates;
- c. Tree planting to create stepping stones for the movement of mobile wildlife; and
- d. More formal areas of ornamental planting that include a variety of species with a broad flowering period to provide opportunities for feeding invertebrates.

5.6 Long-term Habitat Management

- 5.6.1 A Long-term Habitat Management Plan will be required to secure the appropriate management and maintenance of the habitats at the site in accordance with the separate *Assessment of Biodiversity Net Gain*.

6.0 CONCLUSION

- 6.1 It is concluded that the proposals at School Street West, Huddersfield can be achieved in accordance with wildlife legislation, planning policy, Natural England guidance and best practice.
- 6.2 The recommendations in **Section 5.0** outline the mandatory measures and additional actions to be applied to ensure compliance with wildlife legislation, the National Planning Policy Framework (NPPF) and best practice. The mitigation hierarchy has been applied and, in the presence of mandatory actions and best practice measures described in **Section 5.0**, adverse effects on designated sites for nature conservation, ecologically valuable habitats and protected species are reasonably discounted.
- 6.3 Enhancement measures that aim to maximise the benefits for biodiversity as part of the proposals and comply with the NPPF and *Biodiversity Net Gain: Good Practice Principles for Development* (CIEEM, 2016) are outlined in **Section 5.0** and the separate *Assessment of Biodiversity Net Gain* (report reference HPU-AFL-ZZ-EX-RP-OE-941002 - BNG - S3-P01).

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8.0 APPENDIX 1: TABLES AND FIGURES

8.1 Photographs

Table 8.1: Photographs



Photo 1: Buildings 18 and 17 and hardstanding



Photo 2: Hardstanding



Photo 3: Hardstanding and scattered self-seeded saplings at north-western corner of the site



Photo 4: Hardstanding and sparse ruderal herbs



Photo 5: Rupestral herbs along stone wall at western site boundary



Photo 6: Tall brick wall at northern site boundary



Photo 7: Other neutral grassland 1



Photo 8: Other neutral grassland 2



Photo 9: T1 (Silver Birch)

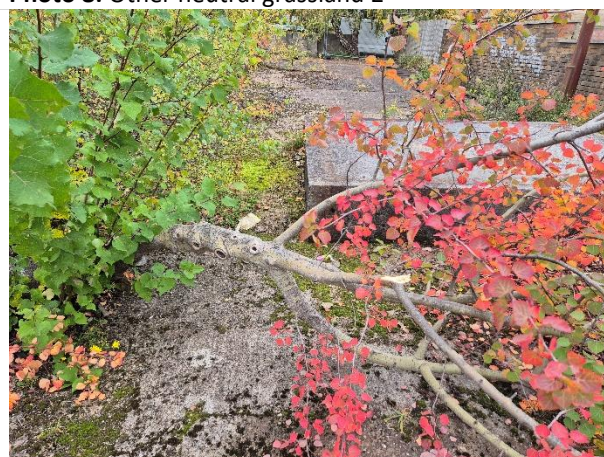


Photo 10: T3 (Aspen). Felled prior to survey to facilitate wall repair works at School Street West



Photo 11: Pole-mounted bat boxes at western site boundary



Photo 12: Pond 1 (off-site)

8.2 Plant Species Lists

Table 8.2: Plant Species List for Sparse Ruderal Herbs at the Hardstanding

Scientific Name	Common Name	DAFOR ¹	Cover
<i>Acer pseudoplatanus</i>	Sycamore	R	<1%
<i>Agrostis stolonifera</i>	Creeping Bent	VLA	<1%
<i>Betula pendula</i>	Silver Birch	R	<1%
<i>Buddleja davidii</i>	Butterfly-bush	O	<1%
<i>Carex pendula</i>	Pendulous Sedge	R	<1%
<i>Centranthus ruber</i>	Red Valerian	F	1%
<i>Cerastium fontanum</i>	Common Mouse-ear	VLF	<1%
<i>Chamerion angustifolium</i>	Rosebay Willowherb	R	<1%
<i>Cirsium vulgare</i>	Spear Thistle	R	<1%
<i>Conyza canadensis</i>	Canadian Fleabane	O	<1%
<i>Dactylis glomerata</i>	Cock's-foot	LF	<1%
<i>Dryopteris filix-mas</i>	Male-fern	R	<1%
<i>Festuca rubra</i>	Red Fescue	F	2%
<i>Fraxinus excelsior</i>	Ash	R	<1%
<i>Geranium robertianum</i>	Herb-Robert	VLA	<1%
<i>Holcus lanatus</i>	Yorkshire-fog	LF	<1%
<i>Hypochaeris radicata</i>	Cat's-ear	O	<1%
<i>Leontodon autumnalis</i>	Autumn Hawkbit	O	<1%
<i>Linaria purpurea</i>	Purple Toadflax	VLF	<1%
<i>Malva neglecta</i>	Common Mallow	R	<1%
<i>Medicago lupulina</i>	Black Medick	ULA	<1%
<i>Pilosella officinarum</i>	Mouse-ear Hawkweed	VLA	<1%
<i>Plantago lanceolata</i>	Ribwort Plantain	VLA	<1%
<i>Populus alba</i>	Poplar	R	<1%
<i>Rosa canina</i>	Dog-rose	R	<1%
<i>Rumex obtusifolius</i>	Broad-leaved Dock	R	<1%
<i>Salix caprea</i>	Goat Willow	R	<1%
<i>Sedum anglicum</i>	Stone Crop	VLF	<1%
<i>Senecio inaequidens</i>	Narrow-leaved Ragwort	F	1%
<i>Taraxacum officinale</i> agg.	Dandelion	O	<1%
<i>Trifolium repens</i>	White Clover	VLA	<1%
<i>Tripleurospermum inodorum</i>	Scentless Mayweed	VLF	<1%
<i>Tussilago farfara</i>	Colt's-foot	VLF	<1%
<i>Urtica dioica</i>	Common Nettle	VLA	<1%
¹ Key to DAFOR: D=Dominant, A=Abundant, F=Frequent, O=Occasional, R=Rare, V=Very, L=Local and *denotes a constant species			

Table 8.3: Plant Species List for Other Neutral Grassland 1

Scientific Name	Common Name	DAFOR ¹	Cover
<i>Agrostis stolonifera</i>	Creeping Bent	F	5%
<i>Alopecurus pratensis</i>	Meadow Foxtail	VLA	<1%
<i>Artemisia vulgaris</i>	Mugwort	R	<1%
<i>Carex pendula</i>	Pendulous Sedge	LF	1%
<i>Centranthus ruber</i>	Red Valerian	VLA	<1%
<i>Dactylis glomerata</i>	Cock's-foot	A*	80%
<i>Festuca rubra</i>	Red Fescue	F*	10%
<i>Holcus lanatus</i>	Yorkshire-fog	LA	5%
<i>Lotus corniculatus</i>	Common Bird's-foot-trefoil	VLA	<1%
<i>Medicago lupulina</i>	Black Medick	LA	2%
<i>Plantago lanceolata</i>	Ribwort Plantain	O	<1%
<i>Rumex obtusifolius</i>	Broad-leaved Dock	O	<1%
<i>Taraxacum officinale</i> agg.	Dandelion	O	<1%
<i>Trifolium medium</i>	Zigzag Clover	LF	1%
<i>Vicia cracca</i>	Tufted Vetch	O	<1%
<i>Vicia sativa</i>	Common Vetch	O	<1%
<i>Vicia sepium</i>	Bush Vetch	O	<1%
¹ Key to DAFOR: D=Dominant, A=Abundant, F=Frequent, O=Occasional, R=Rare, V=Very, L=Local and *denotes a constant species			

Table 8.4: Plant Species List for Other Neutral Grassland 2

Scientific Name	Common Name	DAFOR ¹	Cover
<i>Agrostis capillaris</i>	Common Bent	F	5%
<i>Alchemilla vulgaris</i>	Lady's Mantle	R	<1%
<i>Buddleja davidii</i>	Butterfly-bush	O	<1%
<i>Carex pendula</i>	Pendulous Sedge	O	<1%
<i>Chamerion angustifolium</i>	Rosebay Willowherb	VLF	<1%
<i>Cirsium arvense</i>	Creeping Thistle	O	<1%
<i>Cotoneaster horizontalis</i>	Wall Cotoneaster	R	<1%
<i>Dactylis glomerata</i>	Cock's-foot	VLF	5%
<i>Dipsacus fullonum</i>	Teasel	R	<1%
<i>Festuca rubra</i>	Red Fescue	A	20%
<i>Geranium molle</i>	Dove's-foot Crane's-bill	R	<1%
<i>Holcus lanatus</i>	Yorkshire-fog	F	10%
<i>Hypericum androsaemum</i>	Tutsan	R	<1%
<i>Hypochaeris radicata</i>	Cat's-ear	O	<1%
<i>Jacobaea vulgaris</i>	Common Ragwort	O	<1%
<i>Linaria purpurea</i>	Purple Toadflax	VLF	<1%
<i>Lolium perenne</i>	Perennial Rye-grass	LF	2%
<i>Lotus corniculatus</i>	Common Bird's-foot-trefoil	F	5%
<i>Malva neglecta</i>	Common Mallow	O	<1%
<i>Medicago lupulina</i>	Black Medick	A	15%
<i>Origanum vulgare</i>	Oregano	R	<1%
<i>Pilosella aurantiaca</i>	Orange Hawkweed	VLF	<1%
<i>Plantago lanceolata</i>	Ribwort Plantain	O	<1%
<i>Poa trivialis</i>	Rough Meadow-grass	F	5%
<i>Prunella vulgaris</i>	Selfheal	VLF	<1%
<i>Ranunculus repens</i>	Creeping Buttercup	R	<1%
<i>Rubus fruticosus</i> agg.	Bramble	R	<1%
<i>Rumex obtusifolius</i>	Broad-leaved Dock	O	<1%
<i>Salix caprea</i>	Goat Willow	LA	1%
<i>Salix fragilis</i>	Crack-willow	R	<1%
<i>Senecio inaequidens</i>	Narrow-leaved Ragwort	LF	1%
<i>Taraxacum officinale</i> agg.	Dandelion	F	5%
<i>Trifolium medium</i>	Zigzag Clover	VLA	1%
<i>Trifolium pratense</i>	Red Clover	VLF	<1%
<i>Trifolium repens</i>	White Clover	F	5%
<i>Tussilago farfara</i>	Colt's-foot	VLF	<1%
<i>Vicia sativa</i>	Common Vetch	O	<1%
<i>Vicia tetrasperma</i>	Smooth Tare	VLF	<1%

¹Key to DAFOR: D=Dominant, A=Abundant, F=Frequent, O=Occasional, R=Rare, V=Very, L=Local and *denotes a constant species

8.3 Figures

Figure 1: Aerial Image of the Site Showing Ponds within 500 metres

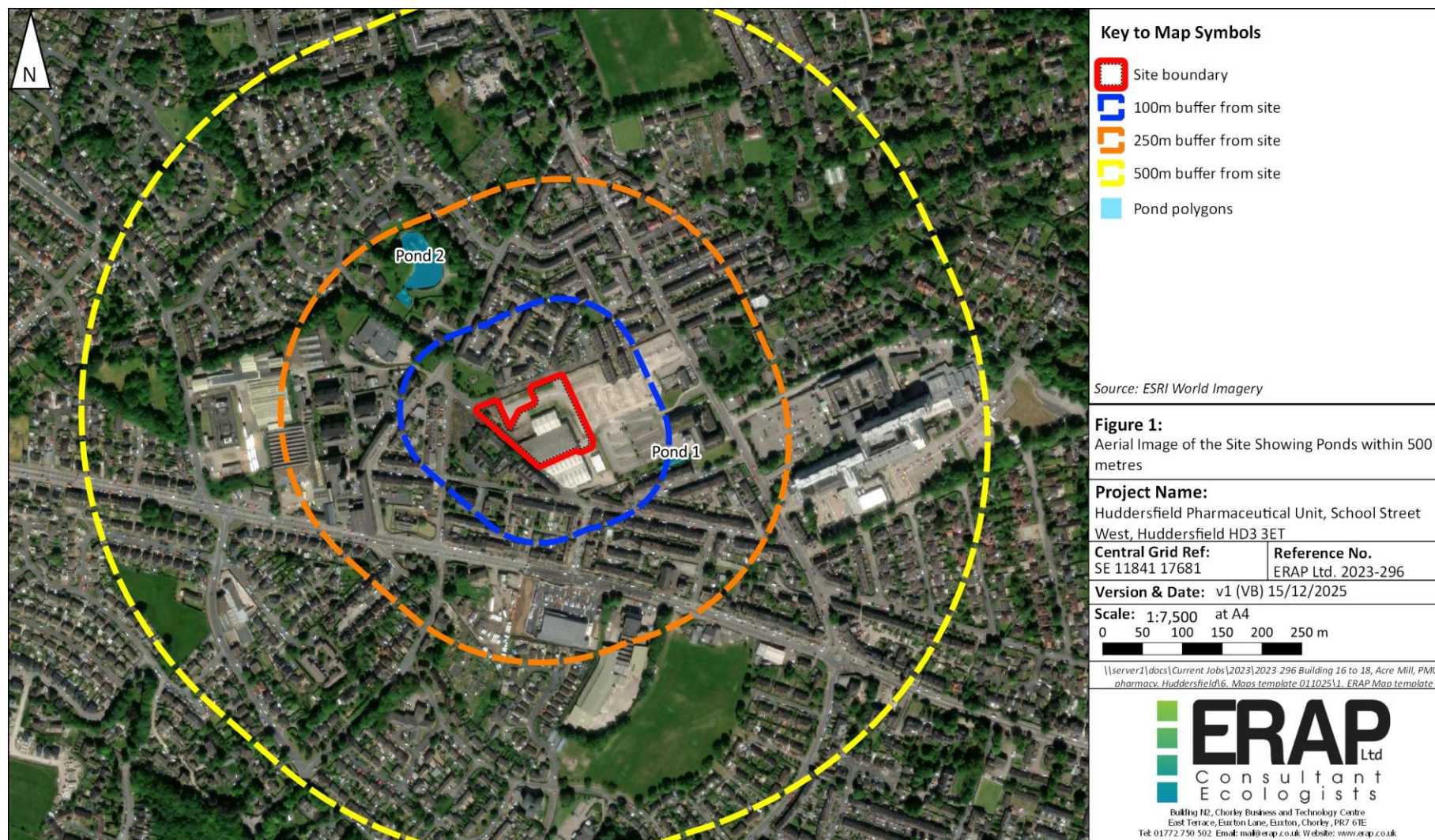


Figure 2: Phase 1 Habitat Survey

