

Land off Huddersfield Road, Meltham



Preliminary Ecological Appraisal Report

Report Ref. ER-8319-01

23/07/2025

SDC Enterprise Ltd

Report reference	ER-8319-01 - Preliminary Ecological Appraisal Report
Author	Josh Birchall BSc (Hons), MCIEEM Principal Ecologist
Technical Review	Rob Weston BSc (Hons) MSc MCIEEM Associate
QA	Carly Lucas BSc (Hons) Graduate Ecologist
Authorised	Josh Birchall BSc (Hons), MCIEEM Principal Ecologist
Date	23/07/2025
Report duration	In accordance with CIEEM (2019), unless otherwise stated the findings of this report remain valid for a period of 18 months. After this period advice should be sought on the scope of any updating work required.



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Unit A, 1 Station Road, Guiseley, Leeds, LS20 8BX
Phone: 01943 884451
01943 879129
www.brooks-ecological.co.uk
Registered in England Number 5351418

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Summary

This report is produced to inform SDC Enterprise Ltd of potential ecological constraints associated with their proposed development site and the need for further reporting or output to support a planning application.

This report is based on a desk study of designated wildlife sites and records of protected or notable species, and an extended Phase 1 Habitat Survey carried out in March 2025.

Key Findings

The Site is primarily comprised of industrial buildings with associated access areas of low ecological value. An area of grassland is found to the south where the extension is proposed whilst a culverted watercourse section runs along the northern boundary.

Biodiversity Net Gain

Details on measurement of the Site's biodiversity and the implications of complying with the requirement to provide a net gain for biodiversity are provided in our separate report ER-8319-02.

Further surveys

Further surveys for roosting bats, crayfish, otter and watercourse MORPH survey (to inform BNG assessment) are recommended.

Introduction

1. Brooks Ecological Ltd was commissioned by SDC Enterprise Ltd to carry out a Preliminary Ecological Appraisal (PEA) of land at Land off Huddersfield Road, Meltham, grid ref. SE108111. The survey includes land within the red line boundary shown in Figure 1, opposite.
2. This report is produced with reference to British Standard BS:42020 'Biodiversity Code of Practice for Planning and Development' and the CIEEM (2017) Guidelines for Preliminary Ecological Appraisal.

Purpose of a PEA

3. A PEA is an *initial assessment* of the baseline for a proposed development site and establishes whether the Site is likely to be constrained by ecology, and whether more information is needed to identify the ecological baseline.
4. The subsequent Preliminary Ecological Appraisal Report (PEAR) is intended to give guidance to a developer and assist with the early stages of project planning and design. Where a site is not complex or constrained, and no additional ecological input is necessary, the PEAR may be sufficient and suitable to support a planning application.
5. Biodiversity Accounting metrics are used separately to quantify the value of a Site in Biodiversity Units, which helps in the later stage of assessing the ecological impacts of the proposed development. This process is set out separately in the Biodiversity Gain Report which accompanies this PEAR.

Proposals/Reason for PEA

6. The PEA has been commissioned to inform proposals to redevelop the Site for industrial use.

The Site

7. The application site 'the Site' comprises industrial buildings, unmanaged grassland and culverted watercourse, the Site area has been measured using GIS against the provided red line boundary as 0.52Ha. The Site incorporates a small area of blue line, around an existing building which will be retained during works.

Figure 1 The Site (red line boundary).



Desk Study

Landscape

8. The Site is located on the eastern periphery of the small mill town of Meltham. There are further industrial Sites to the east and south, whilst to the west are suburban areas of Meltham. To the north more open, primarily pastoral farmland is present.
9. The wider area is typical of Kirklees with a mix of shallow valleys supporting woodland rides in the steepest areas and pastoral fields, interspersed with other small mill towns such as Honley c. 2.8km east.
10. The underlying geology of the Rossendale formation may influence soil material content supporting freely draining slightly acid loamy soils. However, much of the soils are likely to have been influenced by the previous developed nature of much of the Site.

Wildlife Corridors

11. Meltham Dike flows through the Site although culverted in parts and interrupted by development, it may still act as a wildlife corridor for various species, particularly downstream of the Site.
12. Various woodlands locally will likely act as stepping stones for wildlife.

Figure 2 Analysis of wildlife corridors and structured habitat visible on mapping in relation to the Site.



Designations

13. The assessment uses a 2km area of search around the Site for records of protected and notable species and locally or nationally designated wildlife sites.

Statutory Designations

14. A search has been made to identify any nationally designated sites within a 2km radius of the Site, or internationally designated sites within a 10km radius. The results are shown in the below table.

Table 1 Statutory Designated Sites.

Site Name	Distance from Site	Designation	Summary Interest
South Pennine Moors (Phase 1)	2.6km SW	Special Protection Areas (SPA)/ Special Areas of Conservation (SAC)/ Dark Peak (SSSI)	Provides critical breeding habitats for merlin and golden plover and Annex 1 Habitats: European dry heat, blanket bogs and old sessile oak woods with Blechnum.
South Pennine Moors (Phase 2)	6.10km NW	Special Protection Areas (SPA)/ Special Areas of Conservation (SAC)	Provides critical breeding habitats for merlin and golden plover and contains Annex 1 Habitats: European dry heat, blanket bogs and old sessile oak woods with Blechnum.

15. The Site does not support similar or supporting habitats and is separated by an expanse of urban development and large areas of open countryside. Direct and indirect impacts on this Site because of this development are unlikely.

SSSI Impact Risk Zones (IRZs)

16. The Site lies within the IRZ for the south Pennine moors SSSI but does not fall into any of the highlighted categories which require the LPA to consult with Natural England in relation to potential impacts.

Non-Statutory Designations

17. There are 5 Local Wildlife Sites in the search area. Of these Folly Dolly Falls is the closest c. 120m north of the Site. Despite its proximity to the Site and links via watercourse Folly Dolly Falls is upstream of the Site and given the already culverted nature of the watercourse on Site provided some standard precautions related to preventing pollution/ run-off from the Site can be followed impacts would not be expected.
18. Direct and indirect impacts on all remaining sites because of this development are unlikely due to the Site's separation and distance.

Nature Improvement Area

19. The Site is not within any Nature Improvement Area.

Wildlife Habitat Network

20. Though the map supplied is unclear the Kirklees Wildlife Habitat Network (KWHN) appears in very close proximity to the Site. As such the watercourse section has been included as 'strategically located' within the metric.

Granted EPSM Licences

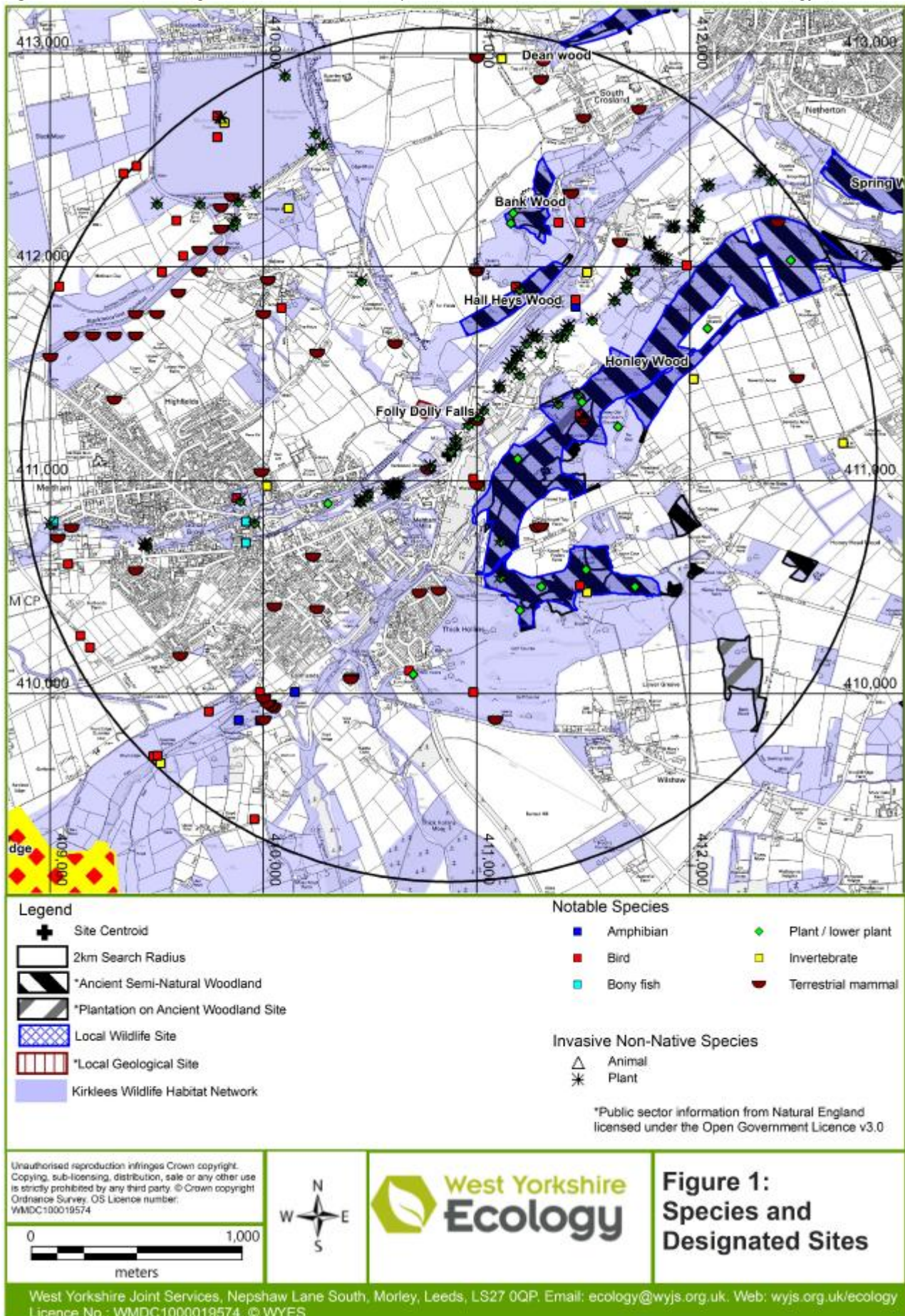
21. There are no granted European Protected Species Mitigation (EPSM) licences shown within 1km of the Site.

Mapped Ancient Woodland and Trees

22. There is no mapped ancient woodland (AW) or Plantation on an Ancient Woodland Site (PAWS) within 15m of The Site, the nearest being AW at Greasy Slack Wood just over 230m to the east.
23. No records of Ancient Trees have been returned.

Mapped Priority Habitat

24. Deciduous woodland is the nearest mapped priority habitat c. 90m downstream of the Site and c.70m upstream. However, provided some standard precautions are put in place to protect the watercourse from site run-off and/or pollution during construction impacts would not be expected.

Figure 3 Records of designated sites and notable species within 2km of the Site; West Yorkshire Ecology.

Survey

25. The survey was carried out during March 2025¹ and followed the principles of Extended Phase 1 Habitat Survey methodology (JNCC, 2010).
26. Although out of the main growing season, the nature of habitats present here, and the expertise and training of the surveyor meant that it was still possible to confidently classify the type and condition of habitats present on this Site.
27. Enough time was afforded the surveyor to carry out the survey. The survey was not constrained by poor weather.
28. Whilst the majority of the Site was accessible, at least 10% of the Site was inaccessible due to dense vegetation and due to much of the watercourse being within a culvert, which could not be closely inspected. This could have concealed invasive species or protected species evidence.

Habitat Appraisal

29. The Site's habitats are described in order on the following pages. In line with the requirement to provide information on Biodiversity Net Gain (BNG), habitats are named in accordance with the UK Habitats classification system. We have used the UK Habitats v2.01 guidance in identifying habitats. Habitat descriptions are divided into the 'distinctiveness' categories used in the calculations presented in the Biodiversity Gain Assessment, with more weight being afforded the more distinctive/important habitats.
30. Generally, the following apply to each tier of distinctiveness, although some authorities might highlight some lower distinctiveness habitats as having a higher importance locally. Where relevant we have highlighted these.

Very Low Distinctiveness Habitats

31. Habitats of little or no habitat value, i.e., lacking any significant native vegetation, but could still provide supporting habitat for protected or notable fauna such as birds or bats. In the context of BNG, their areas are included in calculations, but mitigation or compensation is not required.

Low Distinctiveness Habitats

32. Habitats which are ubiquitous, often which have been created or modified intentionally. They tend to lack diversity of species and structure. They are unlikely to support notable flora but could still provide supporting habitat for protected or notable fauna. In the context of BNG, they are included in calculations, but

compensation/mitigation needs only to provide habitat of similar or higher distinctiveness.

Medium Distinctiveness Habitats

33. Habitats which are common but provide a higher level of structural and species diversity. Though unlikely to support more notable assemblages, species of interest could be present here and they are more likely to be important supporting habitat to fauna. In the context of BNG, mitigation needs to provide habitat of the same broad habitat type, or that of higher distinctiveness.

High Distinctiveness Habitats

34. Habitats which are more natural and contain more important assemblages of plants and potentially species which are rare in their own right. They will provide good habitat for fauna. These habitats are likely to be targeted as conservation priorities and will be the subject of additional policy guidance or legislation. In the context of BNG, whilst mitigation or compensation for loss or damage is possible, provision of more of the same type of habitat would be required, which (with a few exceptions) is likely to be difficult.

Very High Distinctiveness Habitats

35. These are the UK's rarest/best habitats. They will be present in very particular locations and a range of rare or important plant and animal species will depend on the particular conditions they provide. These habitats will be the subject of restrictive policy guidance or legislation. Whilst the BNG metric does not preclude mitigation or compensation in respect of these habitats, creation of the same habitat type would be required, and this would range between very difficult/expensive and impossible.

Irreplaceable Habitats

36. These are habitats of high biodiversity value, which are so difficult to recreate that it would be impossible to achieve the requirement to increase biodiversity on top of no net loss. These habitats have significant protection in the NPPF; any impacts from development require a strong justification and will flag as unacceptable in the Biodiversity Metric. Bespoke compensation for any loss of these habitats must be agreed with the LPA.

Condition Assessment

37. Our condition assessment for each habitat described references where available the criteria set out in DEFRA (2024) Statutory Biodiversity Metric Condition Assessments. A completed version of this spreadsheet is provided digitally with the Biodiversity Gain Report which accompanies this report.

¹ This Report has been prepared during July 2025 following a visit to the Site in March 2025, and our findings are based on the conditions of the Site that were reasonably visible and accessible at that date. We accept no liability for any areas that were not

reasonably visible or accessible, nor for any subsequent alteration, variation, or deviation from the Site conditions which affect the conclusions set out in this report.

Habitats of Low/Very Low Distinctiveness

Figure 4 Approximate location and extent of these habitats.

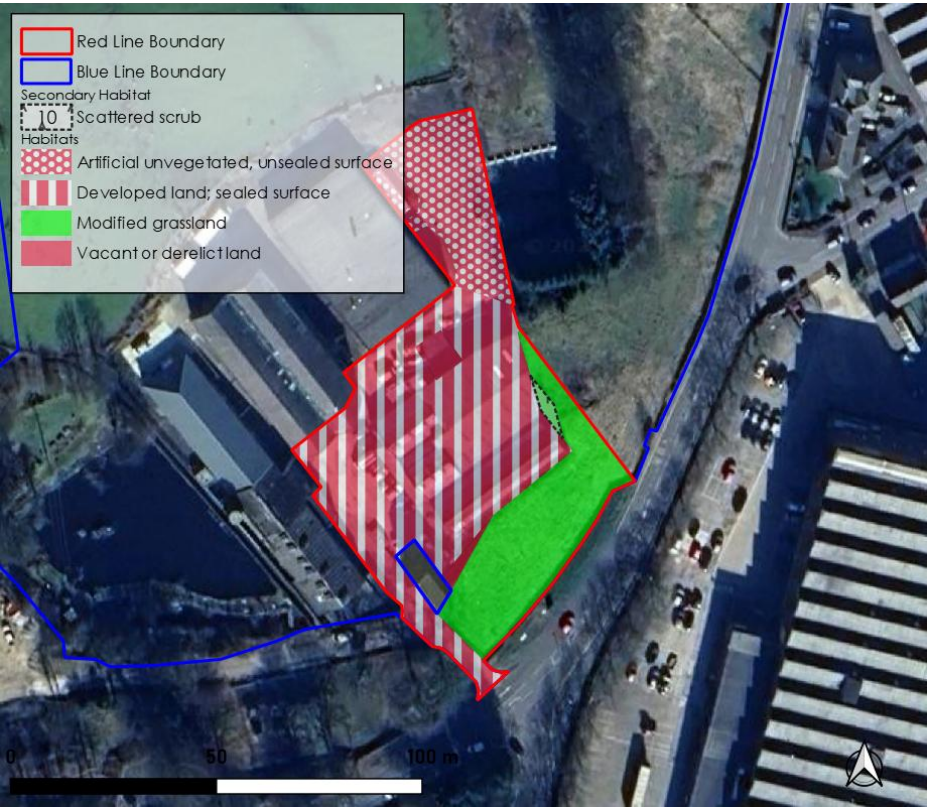


Table 2 Summary – Habitats of Low/Very Low Distinctiveness.

UK Habitats	Label Ref	Summary Description
Developed Land; Sealed surface	-	Well-sealed hardstanding associated with access road and buildings.
Artificial unvegetated; unsealed surface	-	Well-used gravel access yard, no notable vegetation cover.
Vacant/ derelict	-	Several unmanaged peripheral areas support a mix of locally common weeds and pioneer species such as; common mosses, herb Robert, scurvy grass, willowherbs, Himalayan balsam, bittercresses, dandelion, goosegrass, Yorkshire fog and annual meadow grass.
Modified Grassland	-	Rough/rank grassland dominated by coarse grasses such as cocksfoot and creeping bent, as well as lesser amounts of red fescue and Yorkshire fog, with evidence of former improvement in the presence of perennial ryegrass. Grasses and competitive species such as nettle and broad-leaved dock dominate the sward with other forbs limited in cover and variety to creeping buttercup, meadow buttercup, creeping thistle, hogweed, dandelion, Himalayan balsam and sorrel. An average of 4 species per m ² . Bramble is prevalent at peripheries and around old tree stumps.

Figure 5 Modified grassland



Watercourses

Figure 6 Approximate location and extent of these habitats.

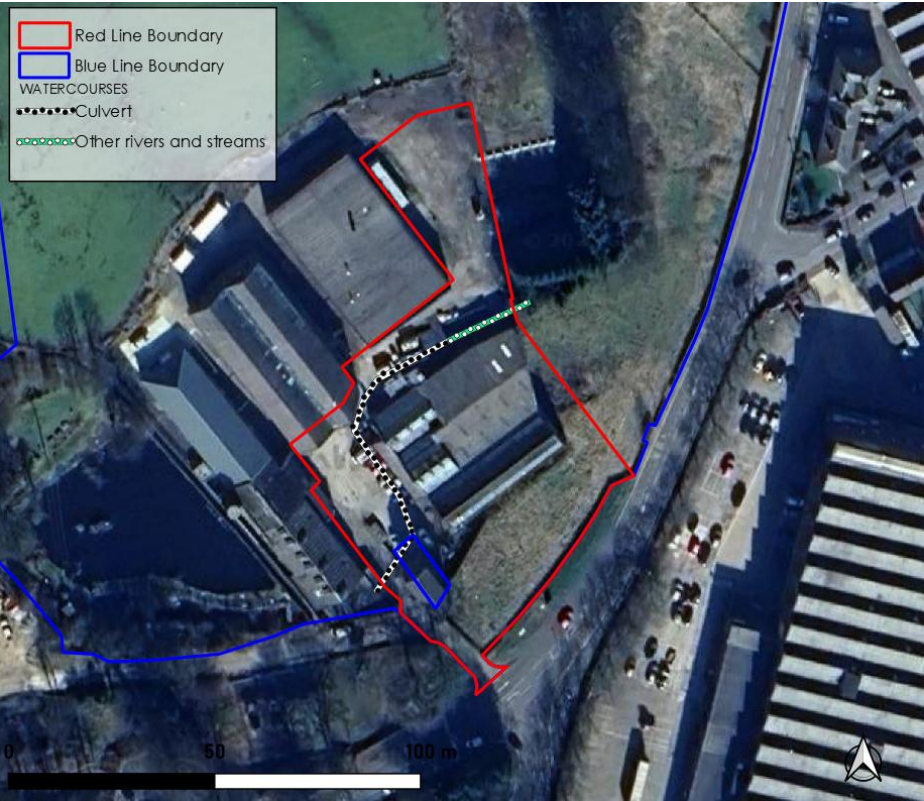


Table 3 Summary of watercourse habitats.

UK Habitats	Label Ref	Summary Description
Culvert	-	Culverted section of Meltham Dike. Stone built sides and metal/ concrete roof with occasional stone sections.
Other rivers and streams	-	Stream section with stone bed and low flow at the time of survey. Stone sides continue off-Site with the channel appearing to have been straightened. No notable aquatic vegetation cover at the time of survey but species noted growing on banks and exposed stones include; foxglove, pendulous sedge, opposite leaved golden saxifrage, harts tongue fern, maiden hair spleenwort and bramble. A small amount of the invasive Montbretia and Himalayan balsam was also noted. Japanese knotweed is noted growing in the stream banks immediately adjacent the site boundary.

Habitat Photos

Figure 7 Hardstanding areas above culvert.



Figure 8 Gravel access yard.



Figure 9 Vacant/ bare ground.



Figure 10 Bramble at grassland periphery.



Figure 11 Stream and bank with Japanese knotweed.



Figure 12 Grassland overview.



Faunal Appraisal

38. The following pages discuss only the groups and species that could be reasonably expected to be found on the type of habitats present on, or adjacent to, the Site.

Amphibians

Desk evidence

39. Only a single pond (pond 1) is shown on mapping within 250m, this being the former mill pond c. 30m off the western boundary.
40. No records of great crested newt have been returned. There is a single record of common frog with the closest being 0.94km away from the Site in 2012 and three records of smooth newt with the closest being 1.29km away from the Site in 2006.

Field Evidence

41. The Site mostly comprises limited value habitat for amphibians and its built-up nature may act as barrier to dispersal, alongside adjacent the roads.
42. Pond 1 represents poor value habitat for amphibians, particularly Great Crested newt (GCN) as it is used for angling and stocked with fish, as well as support of wildfowl. It is an old mill pond and as such supports artificially built-up sides in most areas furth limiting its suitability to support amphibians. Despite its proximity to the it is not well connected to due to the long intervening factory walls, road and culvert.

Summary Evaluation

43. The Site is considered highly unlikely to be of value to amphibians, especially GCN. The occasional passing presence of common amphibians is unlikely but cannot be ruled out.

Further Surveys and Recommendations

44. No further surveys or precautions are considered necessary.

Figure 13 Ponds mapped in relation to the Site.

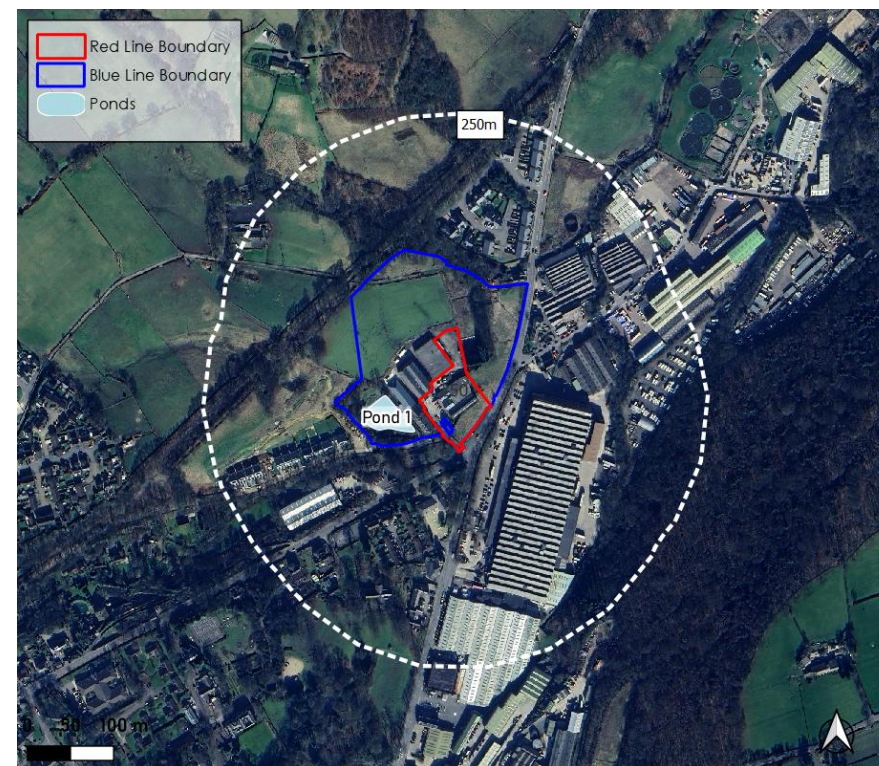


Figure 14 Pond 1 overview.



Bats

Desk evidence

45. There are 19 records with roosts present. The closest being 0.53km away in 2011.

Field Evidence (Roosting)

46. There is one main factory building and some smaller outbuildings, these are described below. A retained building in the blue line is also encircled in the Site. The culvert is also described below.
47. There are no trees on Site.

Table 4 Bat Roost Suitability Assessment.

Ref	Notes	Suitability
Building 1	Factory building, with brick and stone built solid walls, the building mostly has an asbestos roof with supporting metal frame, though a small slate section is also present. Stone walls have a stone capping at the wall tops whilst brick walls support verge guards. There are several cracks and areas of missing mortar in the stone walls, particularly the east which could facilitate roosting in these areas. There is a lifted asbestos verge guard on the eastern elevation which could support roosting by low numbers of crevice dwelling bats. There are metal gutters with narrow gaps behind on some elevations, which could also facilitate roosting or access to bats but is a poor feature due to the thermal properties of metal.	Low
Building 2 (enclosed by the Site)	Recently refurbished and retained with the scope of works. The roof appears new.	Negligible
Culvert	The culvert was not fully accessed and difficult to fully evaluate, it is around 1.5m high and up to c. 5m wide. A metal framed and stone tile roof is present at least in parts, where access to roosting between tiles could take place. Stone built walls also support many suitable cracks, though the low height may limit roosting potential.	Moderate
Portacabins/caravans	Well-sealed temporary units.	Negligible

Field Evidence (foraging and commuting)

48. Urban areas of the Site are unlikely to be of value to bats; however, the watercourse is likely to be attractive to bats for both foraging and commuting purposes.

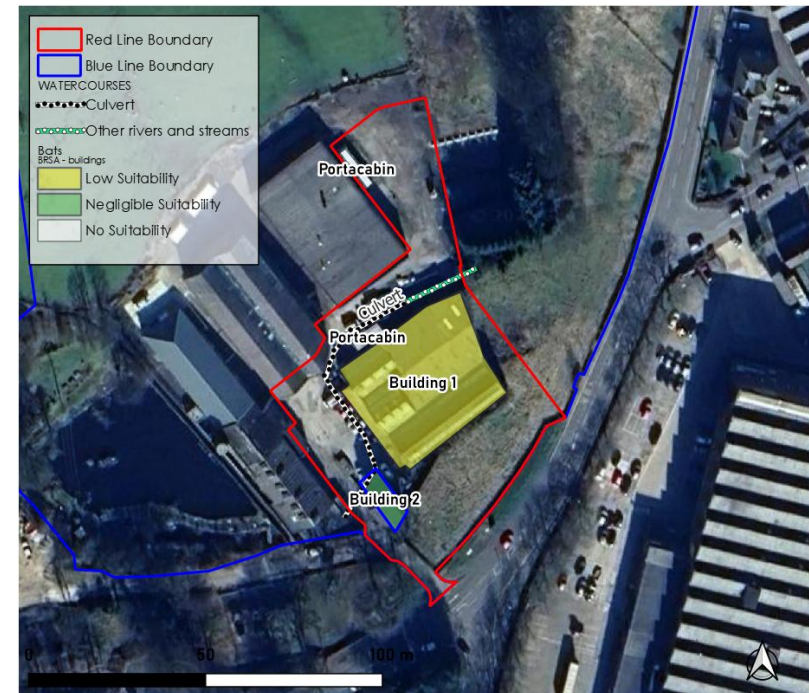
Summary Evaluation

49. The Site has the potential to support roosting bats as well as bat activity associated with the watercourse.

Further Surveys and Recommendations

50. Further emergence surveys are recommended to assess the status of roosting bats; such surveys can also provide information on how well used the watercourse is for bat activity.

Figure 15 Building plan.



Bat Roost Suitability Assessment

Building 1 and culvert end



Stone tiles and metal frame



Culvert walls



Slate roof section



Exposed verges at eastern elevation



Gaps in verges at east



Gaps in stonework



Panel roof



Overview of building 1



Building 2 overview



Inside of building 1 roof



Portacabin



Birds

Desk Evidence

51. The bird records returned include a number of common species.
52. Referencing the local Biodiversity Action Plan (BAP), corn bunting, grey partridge, house sparrow, tree sparrow, yellowhammer, skylark, lapwing, curlew, reed bunting, snipe, redshank, ring ouzel and red grouse are most relevant with the closest being house sparrow, tree sparrow and yellowhammer at 0.18km, 0.65km and 0.85km away from the Site respectively. All other birds in relation to the BAP are over 1.42km away from the Site.

Field Evidence

53. The Site is primarily built-up areas which are unlikely to be of value to most bird species. No declining urban bird species such as house sparrow or starling were observed.

Summary Evaluation

54. Based on its size and habitats the Site will not be important to local bird populations

Further Surveys and Recommendations

55. No further surveys are considered necessary to demonstrate current baseline in respect of birds.

Badgers

Desk evidence

56. There are no badger records within 200m of the Site. The nearest sett record is 445m from the Site.

Field Evidence

57. The Site provisions poor habitat for badger and no evidence was noted.

Summary Evaluation

58. Badger setts are unlikely to be present at the Site as affected by the proposals.

Further Surveys and Recommendations

59. Given that absence cannot be demonstrated at this stage a precautionary pre-works check for setts is recommended - co-ordinated with Site clearance.

Hedgehogs (NERC Act 2006/Local BAP)

Desk evidence

60. No hedgehog records returned for the area.

Field Evidence

61. No evidence of hedgehogs was found on site.

Summary Evaluation

62. The Site supports poor habitat for this species and although occasional passing presence cannot be ruled out, this species is unlikely to be in anyway reliant upon the Site.

Further Surveys and Recommendations

63. No further surveys are considered necessary however measures to allow them to pass through the Site could be considered.

Riparian Mammals

Desk evidence

64. 14 water vole records returned for the area with the closest being 1.45km away from the Site in 1999.
65. 4 otter records returned for the area with the closest being 0.112km away from the Site in 2006.
66. Brooks Ecological have previously surveyed the watercourse in 2018 with no evidence of otter noted.

Field Evidence

67. The Site supports suitable habitat for Otter but is less well suited to water vole due to the large stone wall banks. No evidence of either species was noted during the survey.

Summary Evaluation

68. Given the poor suitability of habitat a likely absence of water vole from the Site can be concluded.
69. The stream is considered suitable to support otter foraging and to a lesser extent halting activity.

Further Surveys and Recommendations

70. Otter are a highly mobile species utilising long sections of watercourse and as such the presence of Otter could have changed since previous survey in 2018. Further Otter survey is recommended in support of a planning application.

Reptiles

Desk evidence

71. No reptile records returned for the area.

Field Evidence

72. The Site provides some marginal basking and cover habitat for grass snake associated with the watercourse, though no field evidence was found.
73. The Site offers very poor habitat for other reptiles.

Summary Evaluation

74. The habitat is poor for reptiles, including grass snake, and they are assessed as likely absent from the Site.

Further Surveys and Recommendations

75. No further surveys or precautions are considered necessary.

White Clawed Crayfish

Desk evidence

76. No records of white clawed crayfish or other non native species have been returned for the area.
77. Brooks Ecological carried out surveys in 2018, though no crayfish were found.

Field Evidence

78. No evidence of crayfish was noted during the survey. The Site provides some suitable habitat with a stoney bed and gaps in the stone banks suitable for use by crayfish.

Summary Evaluation

79. The Site has the potential to support crayfish and given the time elapsed since any survey was carried out the status of white clawed or invasive species locally could have changed.

Further Surveys and Recommendations

80. Further updating survey is recommended to ascertain the status of crayfish. This could be carried out in the form of eDNA sampling.

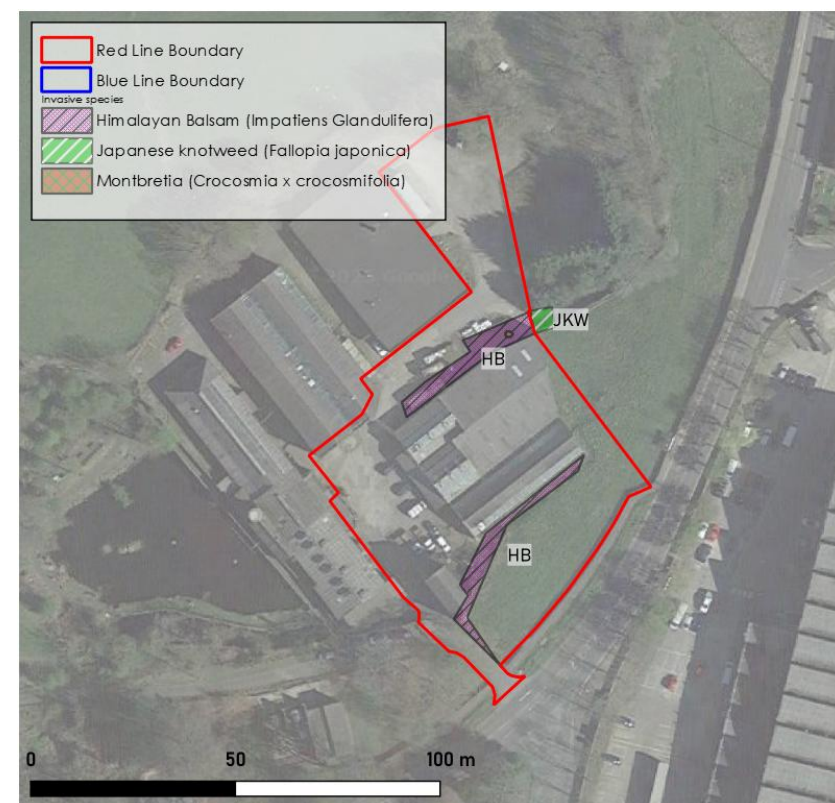
Invasive Non-Native Species (INNS)

81. INNS are species listed on Schedule 9 of the Wildlife and Countryside Act (1981), for which it is an offence to cause or allow it to grow in the wild.
82. The following INNS were noted during survey²:
- Japanese Knotweed
 - Himalayan Balsam
 - Montbretia (within the stream bed)

Survey constraints

83. This survey is constrained by the presence of areas that were inaccessible due to walls, fencing and the culvert along the watercourse.
84. Although no INNS have been identified in this preliminary survey, it is not always possible to conclude absence from preliminary survey alone due to factors such as season, accessibility, third-party attempts to hide evidence, or undisclosed treatment programmes. For this reason, this report should not be relied upon as definitive evidence of absence of INNS.
85. This site presents a small risk of supporting undetected INNS based on the following factors:
- Areas of site inaccessible to survey
 - Potential for recent earthworks or management which may have obscured viable material
 - Proximity to nearby potential sources of infection
 - Potential for tipping of material
86. Should further assurances be needed in relations to INNS, a dedicated Invasive Weed Survey should be commissioned.

Figure 15 Approximate INNS locations.



² Whilst our ecologists are trained in the identification of invasive species, this report is not a dedicated invasive species survey. Detectability of invasive plant species can be affected by several factors, and conclusive determination status, or extent, is not

possible through preliminary survey alone. As the presence of invasive species can generate significant costs to development, the client may wish to instruct a dedicated invasive species survey prior to entering into contracts.

Ecological Constraints

Habitat Value

87. The usual approach to development is to minimise any net loss of biodiversity towards a gain in biodiversity value where this is possible on-Site. Our separate report on Biodiversity Gain sets out the position of the Site in terms of measured biodiversity.
88. Irrespective of the Biodiversity Gain process, development should still seek to retain what is best about the Site.
89. The plan opposite shows the Site in the context of mapped habitat distinctiveness (as assessed at the time of the survey*) with the aim of informing the design of any layout. It shows that there is a short watercourse section of higher distinctiveness which would need to be avoided by the proposals and that the Site is relatively uniform in terms of potential impact.
90. The watercourse is likely to act as constraint with enhancement being costly as well as off-site units. However, the culvert could likely be enhanced by reducing the length or removing the culverted section entirely. Further MORPH surveys should be carried out of the watercourse to full evaluate its baseline condition, given the channelised nature this has been assumed as 'poor' for now.
91. Other habitats do not impose any particular design constraints. Loss of habitat of this nature are not of the order which (outside of Biodiversity Net Gain) would require specific mitigation or compensation as they are common locally.
92. INNS have been identified on Site and an appropriate management plan will be required to facilitate bring them under control.

**This represents our assessment of the habitat type and condition at the time of survey. This may change if the*

survey was carried out in sub-optimal season or growing conditions. Where this is the case, we will recommend updating surveys during the optimal season.

Faunal constraints

93. Further surveys for roosting bats, riparian mammals and crayfish have been recommended.

Figure 17 Habitat distinctiveness.



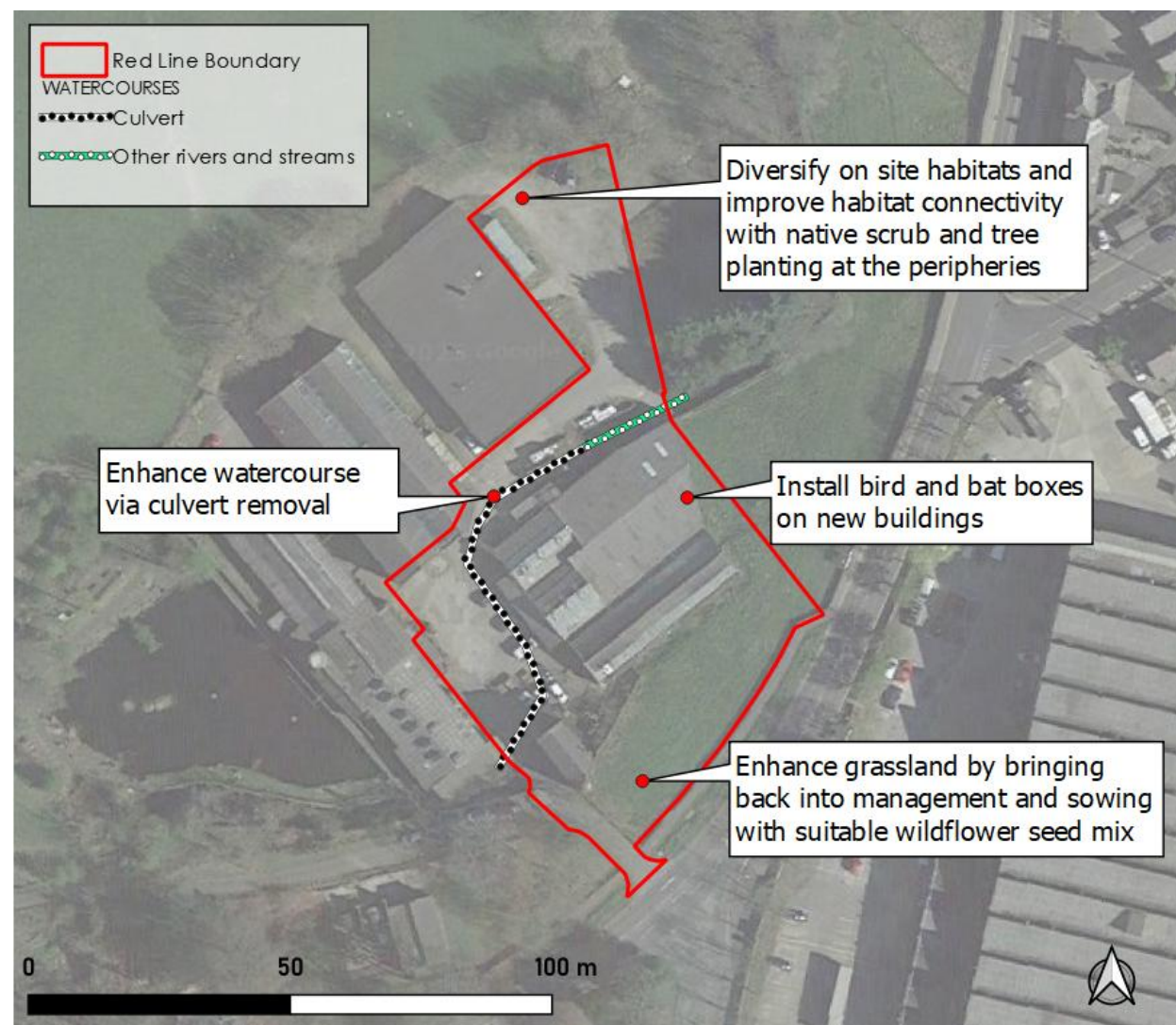
Ecological Opportunities

94. Ecological opportunities at the Site relate to:

- Potential to improve the watercourse by reducing the length or removing culverted sections.
- Potential to improve grassland areas by bringing closer in line with traditional meadow management practices and sowing a suitable wildflower seed mix.
- Installing roosting or nesting features on new buildings.
- Improved habitat diversity and connectivity with diverse native tree and/or scrub planting around peripheral areas or adjacent the watercourse.

95. A Biodiversity Management Plan would be useful in defining these enhancements and can be secured by standard condition.

Figure 16 Ecological Opportunities.



Conclusions and Recommendations

Planning considerations		
Recommendation	Rationale	When
R1 Additional Surveys		
R1.1	Bat roosting	May-August
R1.2	Riparian Mammals (Otter)	Spring/ Autumn
R1.3	White clawed crayfish eDNA	March - October
R1.4	MORPH survey to fully assess watercourse condition	Anytime
R2 Produce a layout which minimises loss of biodiversity	Engage with the Constraints and Opportunities set out above, involve your ecologist in designs at an early stage. The proposals will need to consider the NPPF hierarchy of Avoid–Mitigate–Compensate in minimising any loss of biodiversity. Biodiversity Net Gain (BNG) policy mandates a minimum 10% Net Gain in Biodiversity Units, and the LPA may request additional gains. Your layout may need to change to accommodate your findings from R1 surveys.	During the design process
R3 Design	Make sure your design team follows ecological advice to and make sure there are no design conflicts. <u>Produce a habitat retention plan at an early stage</u> which can be used to inform BNG and maximise scores. A habitat retention plan should identify areas which can be excluded from any impacts of clearance and construction. In producing a plan you should consider the need to provide (amongst other things) Site compounds, to store and move materials, to install drainage, flood storage, access and services, all with suitable easements. <u>Decide on the extent of red-line vs blue/black-line land.</u> Minimising the extent of your red line can limit exposure to BNG, but can also leave you needing separate legal agreements to use off-Site land for BNG delivery. Work out at an early stage what is right for your project. Your planning consultant should be able to help with this decision.	During the design process
R4 Biodiversity Net Gain (BNG)	Carry out a BNG Assessment using the Statutory Biodiversity Metric Calculation Tool and accompanying Condition sheets produced by Defra. It is important that the baseline survey is undertaken during the appropriate season for the habitat type being assessed, so as to ensure the accuracy of habitat mapping and calculating condition scores. Where an initial survey is undertaken at a sub-optimal time of year, it is recommended that updating surveys be carried out during the optimal season for that habitat, prior to the BNG assessment being finalised. Failure to do this could mean that the final Biodiversity score calculated for a project is incorrect, which could then impact on any financial contribution that has been budgeted for to address Biodiversity Offsetting.	During the design process. Baseline survey to be completed during the appropriate season.
R5 Produce a Biodiversity Management Plan	To specify in detail how the development will cater for biodiversity on-Site and to show how habitats incorporated will be managed.	Delivery report Suitable for planning condition
R6 Produce a CEMP (Biodiversity)	To show how the site will be built without affecting surrounding habitats and minimising risk of affecting protected or notable fauna. The CEMP will detail the following protection measures: • Location of Biodiversity Protection zones or fences • Pre- or during- clearance ecology checks for protected species. • Protected/notable species method statements where licensing is not needed. • Nesting bird management	Delivery report Suitable for planning condition

Other considerations (managing legal or financial risks)		
Issue	Rationale	When
R7 INNS Management Plan	This provides a formal INNS Survey and sets out management prescriptions and timings in detail. It can provide security for the Main Contractor and assurance for future Site operators/purchasers/owners.	Best initiated at an early stage (INNS Survey would ideally be complete April - October)

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Appendix 1 Habitats and Ecological Features



Appendix 2 List of species recorded

Annual meadow grass	<i>Poa annua</i>
Bittercresses	<i>Cardamine spp.</i>
Brachythecium	<i>Brachythecium rutabulum</i>
Bramble	<i>Rubus fruticosus</i>
Buddleia	<i>Buddleia davidii</i>
Burdock	<i>Arctium sp.</i>
Cock's-foot	<i>Dactylis glomerata</i>
Coltsfoot	<i>Tussilago farfara</i>
Common moss	<i>Rhytidiadelphus squarrosus</i>
Common mouse-ear	<i>Cerastium fontanum</i>
Common ragwort	<i>Jacobaea vulgaris</i>
Common sorrel	<i>Rumex acetosa</i>
Creeping bent	<i>Agrostis stolonifera</i>
Creeping buttercup	<i>Ranunculus repens</i>
Creeping thistle	<i>Cirsium arvense</i>
Dandelion	<i>Taraxacum officinale agg.</i>
Danish scurvygrass	<i>Cochlearia danica</i>
False oat grass	<i>Arrhenatherum elatius</i>
Groundsel	<i>Senecio vulgaris</i>
Hart's tongue fern	<i>Asplenium scolopendrium</i>
Himalayan balsam	<i>Impatiens glandulifera</i>
Hogweed	<i>Heracleum sphondylium</i>
Japanese knotweed	<i>Reynoutria japonica</i>
Male fern	<i>Dryopteris filix-mas</i>
Meadow buttercup	<i>Ranunculus acris</i>
Montbretia	<i>Monbretia × Crocosmia</i>
Nettle	<i>Urtica dioica</i>
Nipplewort	<i>Lapsana communis</i>
Perennial rye grass	<i>Lolium perenne</i>
Perennial sow thistle	<i>Sonchus arvensis</i>
Pointed spear moss	<i>Calliergonella cuspidata</i>

Procumbent pearlwort	<i>Sagina procumbens</i>
Rat's tail/ greater plantain	<i>Plantago major</i>
White clover	<i>Trifolium repens</i>
Willowherb	<i>Epilobium sp.</i>
Yorkshire fog	<i>Holcus lanatus</i>

Appendix 3 Explanatory Notes and Resources Used

Site Context

Aerial photographs published on commonly used websites were studied to place the site in its wider context and to look for ecological features that would not be evident on the ground during the walkover survey. This approach can be very useful in determining if a site is potentially a key part of a wider wildlife corridor or an important node of habitat in an otherwise ecologically poor landscape. It can also identify potentially important faunal habitat (in particular ponds) which could have a bearing on the ecology of the application site. Ponds may sometimes not be apparent on aerial photographs so we also refer to close detailed maps that identify all ponds issues and drains.

Designated Sites

A search of the MAGIC (Multi-Agency Geographic Information for the Countryside) website was undertaken. The MAGIC site is a Geographical Information System that contains all statutory (e.g. Sites of Special Scientific Interest [SSSIs]) as well as many non-statutory listed habitats (e.g. ancient woodlands and grassland inventory sites). It is a valuable tool when considering the relationship of a potential development site with nearby important habitats. In addition, information from the local record holders was referred to on locally designated sites.

Functional linkage with off-Site habitats

When assessing these we consider whether the Site could be functionally linked to them, considering links such as:

- Hydrological links – is the Site upstream downstream, or could ground water issues affect it?
- Physical links – is the site in close proximity and could it be directly or indirectly affected by construction and operational effects? Conversely it may be that despite proximity major barriers separate the two.
- Recreational links – do footpaths and roads make it likely that increased recreational pressure could be felt?
- Habitat links – is the site part of a network of similar habitat types in the wider area? These could be joined by linear corridors or could simply be 'stepping stones' of habitat of similar form or function.

Method

Phase 1 habitat survey methodology (JNCC, 2010). This involves walking the site, mapping and describing different habitats (for example: woodland, grassland, scrub). The survey method was "Extended" in that evidence of fauna and faunal habitat was also recorded (for example droppings, tracks or specialist habitat such as ponds for breeding amphibians). This modified approach to the Phase 1 survey is in accordance with the approach recommended by the Guidelines for Baseline Ecological Assessment (IEA, 1995) and Guidelines for Preliminary Ecological Appraisal (CIEEM 2017).

Faunal Appraisal

This section first looks at the types of habitat found on Site or within the sphere of influence of potential development, then considers whether these could support protected, scarce, or NERC Act 2006 Section 41 species (referred to collectively as 'notable species').

Records of notable species supplied from a 2km area of search by West Yorkshire Ecology are used to inform this appraisal.

We discuss further only notable species or groups which could be a potential constraint due to the presence of suitable habitat and their presence (or potential presence) in the wider area. We screen out and do not present accounts of notable species or groups which do not meet these criteria – in some cases it may be necessary to explain this reasoning.

Consideration is given to the Local Biodiversity Action Plan (LBAP), which for this site is the 'Kirklees Biodiversity Action Plan'.

Species/group	Habitat
Floating water plantain	Semi-natural pasture
Great crested newt	Lowland and upland meadows
Marsh helleborine	Lowland dry acid grassland
Northern wood ant	Blanket bog
Twite	Upland heathland
Water vole	Upland flushes
White clawed crayfish	Lowland heathland
	Upland oak woodland
	Lowland deciduous and other woodlands
	Upland mixed ashwoods
	Wet woodland
	Arable field margins
	Hedgerows
	Rivers, riverine corridors and associated habitats
	Reedbeds
	Scrub and habitat mosaics on previously developed land

Bats

Bat roosting potential is classified according to the following criteria set out below, taken from the Bat Conservation Trust Good Practice Guidelines (2023).

Bat Roosting Suitability of Buildings

Suitability	Criteria
<i>None</i>	No habitat features on site likely to be used by any roosting bats at any time of the year (i.e. a complete absence of crevices/suitable shelter at all ground/underground levels).
<i>Negligible</i>	No obvious habitat features on site likely to be used by roosting bats; however, a small element of uncertainty remains as bats can use small and apparently unsuitable features on occasion.
<i>Low</i>	A structure with one or more potential roost sites that could be used by individual bats opportunistically at any time of the year. However, these potential roost sites do not provide enough space, shelter, protection, appropriate conditions and/or suitable surrounding habitat to be used on a regular basis or by larger numbers of bats (i.e. unlikely to be suitable for maternity and not a classic cool/stable hibernation site, but could be used by individual hibernating bats).
<i>Moderate</i>	A structure with one or more potential roost sites that could be used by bats due to their size, shelter, protection, conditions and surrounding habitat but unlikely to support a roost of high conservation status (with respect to roost type only, such as maternity and hibernation - the categorisation described in this table is made irrespective of species conservation status, which is established after presence is confirmed).
<i>High</i>	A structure with one or more potential roost sites that are obviously suitable for use by larger numbers of bats on a more regular basis and potentially for longer periods of time due to their size, shelter, protection, conditions and surrounding habitat. These structures have the potential to support high conservation status roosts, e.g. maternity or classic cool/stable hibernation site.

Bat Roosting Suitability of Trees

Suitability	Criteria
<i>None</i>	Either no PRFs in the tree, or highly unlikely to be any.
<i>FAR</i>	Further assessment required to establish if PRFs are present within the tree.
<i>PRF-I</i>	Potential roost feature suitable to support individual or low numbers of bats
<i>PRF-M</i>	Potential roost feature suitable to support multiple bats and possibly be used by a maternity colony

Evaluation

In evaluating the Site, the ecologist will take into account a number of factors in combination, such as:

- the baseline presented above,
- the Site's position in the local landscape,
- its current management and
- its size, rarity or threats to its integrity.

There are a number of tools available to aid this consideration, including established frameworks such as Ratcliffe Criteria or concepts such as Favourable Conservation Status. Also of help is reference to Biodiversity Action Plans in the form of the Local BAP and Section 41 of the NERC Act (2006) to determine if the Site supports any Priority habitats or presents any opportunities in this respect.

The assessment of impacts considers the generic development proposals from which potential effects include:

- Vegetation and habitat removal
- Direct effects on significant faunal groups or protected species
- Effects on adjacent habitats or species such as disturbance, pollution and severance
- Operation effects on wildlife such as noise and light disturbance

Appendix 4 Bat Activity Survey Rationale

The Bat Conservation Trust Guidelines (BCTG) (Collins 2023) is now widely accepted as providing a basis and rationale for scoping and conducting bat surveys. It is acknowledged that the guidelines provide a wealth of background and are a very useful tool in standardising approaches to survey, it is also felt that an over reliance on some of the guidelines within this document can result in the provision of complicated surveys where they have significant consequences for the cost, or timescale of a large project, but could never deliver positives for bat conservation.

Taking the BCTG document as a whole, Chapter 2 helps the reader understand whether or not surveys are required, and that in the context of planning and development survey is required in relation to ensure;

- the avoidance of legal offences, and;
- the provision of a sufficient level of information – such that will allow the Local Planning Authority to make an informed decision on the proposals and their potential impacts on the Favourable Conservation Status (FCS) of bats.

Attendance at seminars presented by, and discussions with, those involved in production of the BCTG document has emphasised the point that it is within the remit of the consultant ecologist to make a decision on the necessity and scope of surveys – they will use the guidelines in doing so but are not in any way bound by them: this is reflected in Section 1.1 of the guidelines –

‘The Guidelines do not aim to either override or replace knowledge and experience. It is accepted that departures from the guidelines (e.g. either decreasing or increasing the number of surveys carried out or using alternative methods) are often appropriate. However, in this scenario an ecologist should provide documentary evidence of (a) their expertise in making this judgement and (b) the ecological rationale behind the judgement.’

Such decisions require a consideration of the potential of the project to impact on bat habitat, alongside analysis of the value of habitat on and around the site and of local records and the likelihood that bats might occur in significant numbers. Our reports aim to present information on how we have arrived at our decision on the Site, what assumptions we have based this on, and where further survey is recommended we indicate what the objective of this survey should be and how best this would be achieved.

The Site is small and despite the presence of the stream it is considered emergence surveys are adequate to assess bats use of the Site, making additional survey disproportionate.

This assessment has been made by Joshua Birchall BSc (Hons) MCIEEM. Josh has over 10 years of professional bat survey experience, is a member of the South Lancashire Bat Group and is also registered to use the Class Survey Licence WML CL17 (Level 1).

Appendix 5 Wildlife Legislation, Policy and Guidance

This is not an exhaustive list but sets out briefly the relevance of Legislation, Policy and Guidance in terms of planning applications and this assessment.

Legislation

Council Directive 92/43/EEC on the Conservation of natural habitats and of wild fauna and flora (EC Habitats Directive).

Provides framework at an international (EU) level for the consideration/protection of European Protected Species (EPS), and habitats through the designation of sites.

Council Directive 79/409/EEC on the Conservation of wild birds (EC Birds Directive) and The Ramsar Convention on Wetlands of International Importance (1971)

Provides framework at an international (EU) level for the consideration/protection of important bird populations and the sites on which they are dependant.

The Conservation of Habitats and Species Regulations (2010)

This transposes the EC Habitats Directive into UK law and provides the basis on which all EPS are protected and impacts on them can be licensed in the UK.

The Wildlife and Countryside Act (1981) as amended

This provides the basis on which UK species are legally protected or restricted and confers protection on Sites of Special Scientific Interest SSSIs. It contains annexes of plants and animals which are legally protected as well as those which are considered to be invasive or harmful. It provides the basis on which impacts on such species can be licensed in the UK and provides controls on work on or near SSSIs.

The Countryside and Rights of Way Act 2000 (CRoW)

Provides a statutory basis for nature conservation, strengthens the protection of SSSIs and UK protected species and requires the consideration of habitats and species listed on the UK and Local Biodiversity Action Plans (UKBAP/LBAP).

Natural Environment and Rural Communities Act 2006 (NERC)

Sets out the responsibilities of Local Authorities in conserving biodiversity. Section 41 of the Act requires the publishing of lists of habitats and species which are "of principal importance for the purpose of conserving biodiversity". At present these largely reflect those making up the UKBAP lists.

Hedgerows Regulations (1997)

Define and provide protection for Important Hedgerows.

Protection of Badgers Act (1992)

Protects badgers from persecution, this includes excavation/development in the proximity of setts.

Protected Sites

Statutory EU/International Protected Sites

Special Areas of Conservation (SACs); and Special Protection Areas (SPAs) and Ramsar Sites contain examples of some of the most important natural ecosystems in Europe. Work on or near these sites is strictly protected and Local Authorities will be expected to carry out 'Appropriate Assessment' of development in proximity of them. In this case there is often an increased burden on the developer in relation to provision of information and assessment.

Statutory UK Protected Sites

Local Nature Reserves (LNRs); National Nature Reserves (NNRs); Sites of Special Scientific Interest (SSSIs) all receive strict protection under UK legislation. Work in or in proximity to these sites would be restricted with any needing to be agreed with Natural England. Natural England now provide guidance on the nature of development which could impact on SSSIs through Impact Risk Zones.

Locally Protected Sites

Local Authorities have a variety of protected wildlife sites designated at a local or regional level. These are gradually being brought under the banner of Local Wildlife Sites (LWS) but at present a plethora of different designations exist – all subject to local policy.

Protected Species

European Protected Species

A number of species (most relevantly bats, great crested newts [GCN], and otters) receive strict protection from killing, injury and disturbance under The Conservation of Habitats and Species Regulations (2010). Protection is also conferred on the habitats on which they rely such as roost space in the case of bats and ponds and fields etc. in the case of GCN.

UK Protected Species

A number of species (including bats, GCN, water vole and white clawed crayfish) are strictly protected under The Wildlife and Countryside Act (1981) as amended, from killing, injury, disturbance and damage or destruction of their resting places etc. Certain species (such as reptiles) and some birds (such as barn owl) receive partial protection e.g. at certain times of the year or from certain activities only. All

nesting bird species are protected from damage or destruction of their nests – whilst active.

Invasive species

Schedule 9 of the Wildlife and Countryside Act (1981) as amended.

Lists these species and makes it an offence to cause or allow their spread in the wild. This often has impacts on development and planning in relation to the presence of invasive plant species such as: Himalayan balsam (*Impatiens glandulifera*), Japanese knotweed (*Reynoutria japonica*), and giant hogweed (*Heracleum mantegazzianum*).

Planning Policy/GuidanceThe National Planning Policy Framework (NPPF)

The National Planning Policy Framework was updated in December 2024. The most relevant paragraphs from the NPPF are set out below.

The approach to assessing the natural environment is now embedded within the definition of what 'sustainable development' is and this falls under one of three objectives of the planning system – the 'environmental objective' applying in this case. Paragraph 8c (P8c) of the NPPF states that sustainable development should "protect and enhance our natural, built and historic environment", including "improving biodiversity". P10 sets out the Framework's presumption in favour of sustainable development.

Section 11 of the NPPF details making effective use of land. The Framework states that planning policies and decisions should take "opportunities to achieve net environmental gains – such as developments that would enable new habitat creation" and should "recognise that some undeveloped land can perform many functions, such as for wildlife" (P125).

Section 15 details conserving and enhancing the natural environment; policies and decisions should be "protecting and enhancing valued landscape [and] sites of biodiversity [...] value", "recognise the intrinsic character and beauty of the countryside" and contribute to conserving and enhancing the natural environment and reducing pollution (P187). Allocations of land for development should, "allocate land with the least environmental or amenity value, where consistent with other policies in this Framework" and "take a strategic approach to maintaining and enhancing networks of habitats" (P188).

The Framework sets out ways to minimise the impacts on biodiversity through plans which "identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity" and promote the "conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity" (P192).

It is made clear in P193 that local planning authorities should apply a set of principles when determining planning applications. Planning permission should be refused "if significant harm to biodiversity resulting from development cannot be avoided [...], adequately mitigated, or, as a last resort, compensated for". Development should not normally be permitted where an adverse effect on a SSSI

is likely, and "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".

UK Biodiversity Indicators 2023: update to Biodiversity 2020: A Strategy for England's Wildlife and Ecosystem Services

The UK Biodiversity Indicators 2023 provide updates to the indicators set out in Biodiversity 2020 including new species abundance targets as set out in the Environment Act 2021. Biodiversity 2020 builds on the Natural Environment White Paper (June 2011) – Setting out the current UK Government's approach to nature conservation. It promotes a more coherent and inclusive approach to conservation and the valuing in economic and social terms of economic resources.

The strategy promotes initiatives such as Biodiversity Offsetting, Nature Improvement Areas and a focus on well-connected natural networks and introduces the concept of securing a 'no net loss' situation with regard to UKBAP/Section 41 habitats and species.

ODPM circular 06/05 (2005) Biodiversity and Geological Conservation – Statutory Obligations and Their Impact Within the Planning System

Provides guidance to Local Authorities on their obligations to biodiversity – particularly in relation to assessing planning applications and ensuring the adequacy of information.

BSI (2013) British Standards Institute BS 42020:2013 Biodiversity – Code of Practice for Planning and Development

Provides a standard for the biodiversity assessment and development industries and decision makers such as Local Planning Authorities to work to.