

Northern Dyers, Meltham, Huddersfield



Ecological Impact Assessment (EclA)

Report Ref. ER-8319-06

17/03/2026

SDC Enterprise Ltd.

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Summary

The Site is primarily occupied by low distinctiveness habitats -buildings, hardstanding, a culverted watercourse length, and grassland. A small section of un-culverted watercourse is also present on-Site, classed as a high distinctiveness habitat and of greater ecological value despite being only short in length.

Bat, riparian mammal and crayfish eDNA surveys have been carried out. A small number of common bat species were recorded on-Site but do not appear to have any reliance upon it. Other surveyed species were not recorded and as such impacts are not anticipated.

Mitigation to be agreed by standard conditions of planning will be able to address most of the significant effects resulting from the development. There will be some residual impacts resulting from:

- Habitat loss from the Site and the lag-time between loss and re-creation on or off-Site. This will result in a short term, reversible negative impacts.
- Disturbance resulting from clearance and construction will result in a short term, reversible negative impact acting on wildlife but only at a Site scale.
- The watercourse will be retained. Provided impacts such as pollution from site run-off during works via suitable CEMP and long-term impacts such as light pollution are avoided via sensitive lighting plan, and given the watercourse is already channelised significant impacts would not be expected.

The scheme is expected to result in a net loss for biodiversity on-Site, however biodiversity off-setting will be used to ensure that a minor positive impact (10% gain), acting in the long-term on all identified receptors can be achieved in this respect.

Introduction

1. Brooks Ecological Ltd was commissioned by SDC Enterprise Ltd. to carry out an Ecological Impact Assessment (EclA) for their proposed development Northern Dyers, Meltham, Huddersfield (SE108111).
2. The British Standard BS:42020 recommends that a proportional assessment of ecological impacts should be made - such that decision making relating to the NPPF 'mitigation hierarchy', the planning balance', and the use of conditions is suitably informed.
3. The purpose of the EclA report is to use the information gathered, alongside the proposals for the Site, to:
 - identify any significant effects associated with the proposed development,
 - set out any mitigation (including monitoring) required to address these effects, and to ensure compliance with legislation and policy,
 - identify suitable enhancement,
 - identify measures required to secure mitigation and enhancement,
 - identify and assess any residual effects and their legal, policy and development management consequences.
4. This report adapts the format set out in the Chartered Institute for Ecology and Environmental Management (CIEEM) guidelines for Ecological Report Writing (December 2017).



Ecological Impact Assessment (EclA) Checklist



EclA Criteria (to ensure decisions are based on adequate information in accordance with Clauses 6.2 and 8.1 of BS42020:2013)		Yes No n/a	Paragraph reference number(s)
Pre-appl/ scope	1. Where pre-application advice has been received from the Local Planning Authority and/or an NGO and/or statutory body (e.g. NE DAS, NRW DAS), it has been fully accounted for in the EclA		
	2. The scope, structure and content of the EclA is in accordance with published good practice ^{ii, iii and iv}		
Surveys, Sites, Species and Habitats	3. Adequate ^v and up-to-date ^{vi} : a. Desk study has been undertaken ^{vi} b. Phase 1 habitat survey (or equivalent) has been undertaken ^{vi} c. Phase 2 ecology surveys have been undertaken (where necessary) ^{vi}		
	4. All statutory and non-statutory sites likely to be significantly affected are clearly and correctly identified		
	5. All protected or priority species and priority habitats ^{vii} likely to be significantly affected are clearly and correctly identified, and adequate surveys have been undertaken to inform the baseline		
	6. Any invasive non-native plant species present are clearly and correctly identified		
Impacts and Effects	7. Where a separate PEA Report states that Phase 2 ecology surveys are required, these have been undertaken in full and results submitted with the application (or lack of such surveys is justified)		
	8. The assessment is based on clearly defined development proposals along with relevant drawings/plans (and any plans used are the same version number as those submitted with the application) or		
	9. The residual ecological effects are considered to be not significant at any geographical scale irrespective of the detailed development proposals, and the assessment is based on a worst-case-scenario		
	10. The report describes and assesses all likely significant ecological effects (including cumulative effects) clearly stating the geographical scale of significance (where relevant)		
Mitigation, Compensation and Enhancement	11. The mitigation hierarchy has been clearly followed ^{viii}		
	12. The report: a. Clearly identifies the proposed mitigation and compensation measures, and explains how these will adequately address all likely significant adverse effects b. Includes, where necessary, proposals for post-construction monitoring c. Recommends how proposed measures may be secured through planning conditions/obligations and/or necessary licences		
	13. A summary table of proposed mitigation and compensation measures has been provided		
	14. The need for any mitigation licences required in relation to protected species is clearly identified		
	15. Proposals to deliver ecological enhancement/Biodiversity Net Gain have been provided		
Competence/Good Practice	16. Limitations ^{ix} of the ecological work have been correctly identified and the implications explained		
	17. All relevant key timing issues (e.g. site vegetation clearance or roof removal) that may constrain or adversely affect the proposed timing of development have been identified		
	18. All ecological work and surveys accord with published good practice methods and guidelines OR deviation from such guidelines is made clear and fully justified, and the implications for subsequent conclusions and recommendations made explicit in the report ^x		
	19. All ecologists and surveyors hold appropriate species licences (where relevant) and/or have all necessary competencies to carry out the work undertaken		
Conclusions	20. The report clearly identifies where the proposed development complies with relevant legislation and policy, highlighting any possible non-compliance issues, and highlighting circumstances where a conclusion cannot be drawn as it requires an assessment of non-ecological issues (such as socio-economic ones)		
	21. The report provides a clear summary of losses and gains for biodiversity, and a justified conclusion of an overall net gain for biodiversity		
	22. Justifiable conclusions ^{xi} based on sound professional judgement ^{xii} have been drawn as to the significance of effects on any designated site, protected or priority habitat/species or other ecological feature, and a justified scale of significance has been stated		

Method

Scope of Assessment

5. The application site 'the Site' encompasses an established factory with associated access areas and some surrounding habitats including a small section of field, currently unmanaged grassland.
6. 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.
7. Thorough survey of the Site has been carried out by Brooks Ecological.
8. Ecological surveys and reports informing this assessment comprise of the following:
 - Preliminary Ecological Appraisal - Brooks Ecological report reference; ER-8319-01
 - Biodiversity Net Gain Baseline - Brooks Ecological report ER-8319-02A
 - Bat Emergence Report - Brooks Ecological report ER-8319-03
 - River Condition Assessment - Brooks Ecological report ER-8319-04
 - Riparian Mammal Survey - Brooks Ecological report ER-8319-05
 - White Clawed Crayfish eDNA - Brooks Ecological report SI-8319-01

Field Survey

9. Full details of the methodologies used and the results obtained are contained in the relevant documents referenced above. Unless stated otherwise these followed the relevant survey guidelines referenced in reports.

Desk Study

10. A full desk study including consideration of local biological records, aerial photographs, local designations, and planning guidance has been carried out by Brooks Ecological.

Figure 1 Site area assessed (red line).



Assessment Method

11. In assessing the significance of effects, we refer to Section 5 of CIEEM (2018) - that a 'significant effect' is an effect that either supports or undermines biodiversity conservation objectives for 'important ecological features' or for biodiversity in general. In relation to ecological features, we consider the following factors in combination, including;
 - the feature's value on an ascending scale, from Site to international value,
 - the Site's position in the local landscape,
 - its current management, and
 - its size, rarity, or threats to its integrity
12. There are several 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 Habitats of Principal Importance, or presents any opportunities in this respect.
13. The assessment considers the development proposals set out below, from which the potential impacts can be summarised as:
 - Vegetation and habitat removal
 - Disturbance, pollution, or interference arising from the Site's construction
 - Disturbance, pollution, or interference arising from the Site's operation
14. This report deals with any significant effects potentially arising from these impacts. It looks at how the mitigation hierarchy can be applied to any effects and the implications of any residual significant effects.

Ecology Baseline

15. A summary of the points salient to this assessment are set out below, further detail is available in the referenced reports:

Designated Sites and Conservation Areas

16. Impacts on Statutory (International and National) designations or their interests have been ruled out at PEA Stage – a summary of this assessment is set out in table 1 below.

Table 1 Potentially relevant designations.

Site Name	Designation	Level	Located	Comments
South Pennine Moors (Phase 1)	Special Protection Areas (SPA)/ Special Areas of Conservation (SAC)/ Dark Peak (SSSI)	International, national	2.6km SW	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.
South Pennine Moors (Phase 2)	Special Protection Areas (SPA)/ Special Areas of Conservation (SAC)	International	6.10km NW	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.

Habitats

Figure 2 Site habitats



Potential future changes to the baseline

17. The Site's use and ecological baseline will likely be unchanged until the time of the proposed development.
18. Left unmanaged, the competitive and/ or ruderal vegetation will establish within the grassland, hardstanding, vacant ground and unsealed surfaces present until native scrub succeeds over most of the Site, eventually giving way to woodland. The watercourse and culvert would remain channelised for many years they may become blocked or otherwise eventual degrade altering the flow of the watercourse.
19. The table below sets out the habitats at this Site and their relevance in this assessment.

Table 2 Site Habitat Summary.

Habitat Feature	Notes	Valued at what scale
Developed Land; Sealed surface	Well-sealed hardstanding associated with access road and buildings.	None
Artificial unvegetated; unsealed surface	Well-used gravel access yard, no notable vegetation cover.	None
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.	Negligible
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 m2. Bramble is prevalent at peripheries and around old tree stumps.	Site
Culvert	Culverted section of Meltham Dike. Stone built sides and metal/ concrete roof with occasional stone sections.	Site
Other rivers and streams (Meltham Dike)	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.	Local

Species and Species Groups

20. Potential constraints relating to relevant groups were investigated through desk study and the surveys listed above. The PEA process and survey carried out have been able to scope out the likelihood of impacting on riparian mammals, bats, white clawed crayfish, invasive species and other protected or notable species generally. Ongoing precautions are recommended in relation to INNS. These precautions would be set out in the Site's CEMP Biodiversity which could be secured and approved through a standard condition of planning.
21. The highlighted species / groups below are of relevance to the Site and are referenced later in the assessment.

Table 3 Summary of relevant faunal / species issues.

Species/ Group (Feature)	Notes	Valued at what scale
Bats	No roosts were found during emergence surveys of the buildings and watercourse. General bat activity levels were also assessed during the emergence surveys though this was limited to small numbers of common and widespread species with only occasional foraging or commuting observed	Site Level
Water Vole	No evidence found during the dedicated surveys of the watercourse; potential habitat suitability is limited.	N/a
Otter	No evidence found during the dedicated surveys of the watercourse; potential habitat suitability is limited.	N/a
White Clawed Crayfish	No evidence found during the dedicated surveys of the watercourse.	N/a
Invasive non-native plant species (INNS)	Japanese Knotweed, Montbretia and Himalayan Balsam present within / adjacent watercourse in grassland.	Site Level

Description of the Proposed Development

22. The Site currently supports an industrial building and proposals are to demolish the existing and rebuild a larger industrial unit.
23. The Site is subject to a Planning Application for the following:
24. Full application for access and infrastructure works including extending the new factory on to grassland to the southeast as well as supporting access and infrastructure. The current culvert and watercourse elements on-Site will be retained in their current condition.
25. The plan opposite shows the layout associated with the full application element.

Figure 3 Site Layout (existing building footprint shown in red dotted line).



Impacts and Effects of Development

26. Figure 4 shows the sum extent of clearance works and impacts required to install infrastructure and create development platforms.
27. All terrestrial habitats are expected to be lost during development to achieve site levels and where hardstanding is already present this will likely be replaced.
28. Watercourses are retained in situ. These will need to be appropriately protected during development as detailed in a CEMP. No enhancements are currently planned for.
29. Habitat losses incurred during this phase would be mitigated and compensated for in the next phases.

Figure 4 Development footprint in relation to phase 1.



Table 4 Lists the anticipated Impacts and Effects associated with the proposals.

Impacts during Site Clearance		Stage
1	Habitat will be removed from the Site by clearance and soil stripping using heavy machinery. This will take place in phases as set out in the above section.	<i>Clearance</i>

	Significant Effects - in the absence of mitigation	Acting on	Acting at scale (Maximum)
1a	Direct habitat loss. There will be a loss of habitat generally which will be managed through the Biodiversity Net Gain process - this is set out in the accompanying Biodiversity Net Gain Report Higher value habitats will be retained, development is focused on lower value habitat.	Meltham Dike	Local
		Culvert	Site
		INNS	Site
		Bats	Site
1b	Damage to retained and adjacent habitat such as by storage of clearance machinery or materials in these areas.	Meltham Dike	Local
		Culvert	Site
1c	Disturbance. The noise and activity at the Site will render it and areas immediately off-Site inhospitable to wildlife during this period. Wildlife is likely to be habituated to some level of noise associated with the adjacent road and industrial estate.	Bats	Site
1d	Pollution. There is a high potential for sediment or chemicals to be released from the Site, or into both open or culverted sections of the Meltham Dike.	Culvert	Site
		Meltham Dike	Local
1e	Potential effects on Protected Species. Precautions will be required to ensure that potential impacts on bats and nesting birds, and the spread of Invasive Non-Native Species (INNS) can be avoided.	Protected Species INNS	Criminal Offence

	Impacts during Construction	Stage
2	Construction activities Construction of new foundations, the building, drains, access and other associated infrastructure.	Construction

	Significant Effects - in the absence of mitigation	Acting on	Acting at scale (Maximum)
2a	Damage to retained habitat such as by storage of machinery or materials in these areas, or further earthworks. In the absence of a well-defined and enforceable 'No Works Area' area shown as retained on planning drawings could be damaged or destroyed by contractors working on-Site.	Culvert	Site
		Meltham Dike	Local
2b	Disturbance. The noise and activity at the Site will render it and areas immediately off-Site inhospitable to wildlife during this period. However, the Site supports an existing factory; wildlife in this area is therefore likely to be habituated to higher noise levels.	Bats	Site
2c	Pollution. Given the proximity of the watercourse and nature of proposals there is a high risk of sediment or chemicals to be released from the Site, or into retained habitat during this stage.	Culvert	Site
		Meltham Dike	Local

	Impacts during Construction	Stage
3	Landscaping activities will take place post construction. Biodiversity Off-setting will be enacted during this stage.	Construction

	Significant Effects - in the absence of mitigation	Acting on	Acting at scale (Maximum)
3a	Damage to retained habitat such as by storage of machinery or materials in these areas. Access will be required to retained areas to commence management and in itself could result in damage.	Culvert	Site
		Meltham Dike	Local
3b	Pollution. There is the potential for hazardous chemicals (i.e. herbicides, insecticides, fertilisers) to be used on retained habitats by landscape contractors. This could lead to increased mortality of retained vegetation on-Site or off-Site pollution events.	Culvert	Site
		Meltham Dike	Local
3c	Inappropriate habitat creation or management techniques could mean that the proposals fail to deliver on BNG commitments	Culvert	Site
		Meltham Dike	Local
		Modified grassland	Site

	Significant Effects - in the absence of mitigation	Acting on	Acting at scale (Maximum)
3d	Biodiversity Offsetting will be enacted - securing a 10% net gain in terms of habitat value. This is likely to take place within the same district.	All habitats and species	District

	Impacts during Operation	Stage
4	The Site will become used. The new factory building will come into use, including at night. Traffic and pedestrians will be regularly moving around the Site.	<i>Operation</i>

	Significant Effects - in the absence of mitigation	Acting on	Acting at scale (Maximum)
4a	Damage to retained and created habitat such as by inappropriate use, littering, release of invasive species.	New and retained habitats	Local
4b	Disturbance. Noise, lighting and increased human activity at the Site will be present of a lower order and will likely be tolerable to species habituated to the previous factory. Construction activities will have already caused displacement to a certain level, likely to be above disturbance during operation.	Bats	Site
4c	In the absence of correct management retained and created habitats will not provide the necessary biodiversity units committed to through the BNG process, which already does not meet 10%.	New and retained habitats	Local

30. Achieving the required Biodiversity Net Gain position will ensure that effects relating to habitat loss are addressed - both in respect of the habitats identified as valued features, and also the lower value habitats which would previously have been scoped out of Impact Assessments. Our impact assessment therefore only highlights where habitats place a particular constraint on the protection of, or delivery of habitats on-Site; or on off-set agreements.
31. Planning permission for the Site would be anticipated to be subject to standard conditions requiring the production of the following documents (for each phase):
- BS:42020 Biodiversity Management Plan (BMP)
Would specify the provision of faunal habitat features (such as bird and bat boxes) and the creation of new habitats (grassland and urban habitats).
 - Statutory Habitat Management and Monitoring Plan (HMMP)
Would specify the creation and on-going management of any 'significant' habitats in the developed Site over a 30-year period. This plan would also specify the monitoring of habitats. Each phased application, after phase 1 would be subject to its own HMMP secured by standard condition.
 - BS:42020 Construction Environmental Management Plan (CEMP: Biodiversity)
Here this would set out the precautions necessary in relation to risks from the construction phase primarily to significant retained habitats and local habitats which could be important or sensitive to activities on the Site, i.e. Meltham Dike.
 - INNS Management Plan
A dedicated INNS management plan is recommended to facilitate the long term control of INNS in the watercourse and surrounding areas.
 - Lighting Plan
This would protect habitats within the Site (retained or created) which could be valuable to sensitive nocturnal wildlife from unnecessary illumination. Here this would comprise of the Site boundaries and watercourse areas.

Table 5 Lists the mitigation put in place to address the effects identified in table 4.

Mitigation during Site Clearance		Stage
1	Habitat will be removed from the Site by cleared using heavy machinery.	<i>Clearance</i>

	Significant Effects - in the absence of mitigation	Mitigation / Compensation	Residual Magnitude
1a	Direct habitat loss.	The HMMP will detail the creation and management of new habitats, ensuring on-Site habitats (such as the watercourse) meet their target habitat types and condition scores, as set out in the proposals' Biodiversity Metric. The BMP will also detail the provision of faunal features, such as bird nesting and bat roosting boxes, and refugia for hedgehogs, amphibians and invertebrates. The CEMP will detail the 'No Works Area' and suitable protection fencing so any on-Site habitat to be retained or enhanced can be suitably protected through development. Off-setting for BNG purposes will need to target the creation of new watercourse units and likely some low distinctiveness units to accommodate the loss of grassland. The off-Site creation of a mix of these habitats would be managed in the longer term providing a potential gain for these species, when set against the loss of an unmanaged / unsecured habitat mix which is likely to be lost in the near future here to natural succession. However it must be acknowledged that securing just the right mix of habitats, in the right location would be reliant on the off-setting opportunities available. There will be a lag time between loss of habitat and creation on-Site / offsetting due to the nature of the proposals - this is seen as resulting in a negative impact of the relevant receptors here.	Minor Negative
1b	Damage to retained habitat such as by storage of clearance machinery or materials in these areas.	The CEMP will detail the installation of suitable barrier fencing (including silt protection fencing and any others as deemed necessary by the construction teams CEMP) and around any retained or protected habitat - the 'No Works Area'.	Neutral
1c	Disturbance. The noise and activity at the Site will render it, and areas immediately off-Site, inhospitable to wildlife during this period.	The main contractors CEMP will detail time limits to work on-Site and the installation of screened fencing to limit visual disturbance of sensitive habitat. Some level of disturbance is unavoidable.	Negative
1d	Pollution. There is the potential for sediment or chemicals to be	The CEMP will detail the installation of suitable barrier fencing (including silt protection fencing and any others as deemed necessary by the construction teams CEMP) and around any retained or protected habitat - the 'No	Neutral

	Significant Effects - in the absence of mitigation	Mitigation / Compensation	Residual Magnitude
	released from the Site, or into retained habitat during this stage.	Works Area'. The main contractors CEMP will detail bunded compounds which will be used for storage of machinery and materials.	
1e	Potential effects on Protected Species. Precautions will be required to ensure / demonstrate that the spread of Non-Native Species (INNS) can be avoided.	An INNS management plan will detail management and precautions related to INNS during clearance.	Avoided entirely

	Mitigation during Construction	Stage
2	Construction activities will likely take place over a c.1-2 year period. Construction of roads and sewers will be followed by footings and then above ground construction of buildings.	<i>Construction</i>

	Significant Effects - in the absence of mitigation	Mitigation / Compensation	Residual Magnitude
2a	Damage to retained habitat such as by storage of machinery or materials in these areas.	The CEMP will detail the installation of suitable barrier fencing (including silt protection fencing and any others as deemed necessary by the construction teams CEMP) and around any retained or protected habitat - the 'No Works Area'. The main contractors CEMP will detail bunded compounds which will be used for storage of machinery and materials.	Neutral
2b	Disturbance. The noise and activity at the Site will render it, and areas immediately off-Site, inhospitable to wildlife during this period.	The main contractors CEMP will detail time limits to work on-Site and the installation of screened fencing to limit visual disturbance of sensitive habitat. However, some level of disturbance is unavoidable but after the clearance phase identified above this will act on a decreasing amount of habitat.	Minor Negative
2c	Pollution. There is the potential for sediment or chemicals to be released from the Site, or into retained habitat during this stage.	The CEMP will detail the installation of suitable barrier fencing (including silt protection fencing and any others as deemed necessary by the construction teams CEMP) and around any retained or protected habitat - the 'No Works Area'. The main contractors CEMP will detail bunded compounds which will be used for storage of machinery and materials.	Neutral

	Mitigation during Construction	Stage
3	Landscaping activities will take place period during the construction period and will, be phased around completion of roads and units. Biodiversity Off-setting will be enacted during this stage.	<i>Construction</i>

	Significant Effects - in the absence of mitigation	Mitigation / Compensation	Residual Magnitude
3a	Damage to retained habitat such as by storage of machinery or materials in these areas. Access will be required to retained areas to commence management, and in itself could result in damage.	The CEMP will detail the installation of suitable barrier fencing (including silt protection fencing and any others as deemed necessary by the construction teams CEMP) and around any retained or protected habitat - the 'No Works Area'. The main contractors CEMP will detail bunded compounds which will be used for storage of machinery and materials.	Neutral

3b	Pollution There is the potential for hazardous chemicals (i.e. herbicides, insecticides, fertilisers) to be used on retained habitats by landscape contractors. This could lead to increased mortality of retained vegetation, or make it harder for retained habitats to be enhanced in line with the BNG Metric.	The HMMP / BMP will specify preparation, and establishment works for all new and retained habitats covered by the BNG Metric. This will detail where hazardous chemicals can and cannot be used.	Neutral
3c	Inappropriate habitat creation or management techniques could mean that the proposals fail to deliver on BNG commitments	The HMMP / BMP will specify preparation, and establishment works for all new and retained habitats covered by the BNG Metric.	Neutral
3d	Biodiversity Offsetting will be enacted - securing a 10% net gain in terms of habitat value. This is likely to take place within the same district.	Secured through the land-owner's HMMP, Developer's Biodiversity Gain Plan and the securing legal agreement - Conservation Covenant or S106.	Minor Positive

	Mitigation during Operation	Stage
4	The Site will become occupied. The factory will come into usage and traffic and articulated vehicles will access the Site regularly. Pedestrian access across the Site will increase. Retained and created habitat will be managed by the Site Management Company.	<i>Operation</i>

	Significant Effects - in the absence of mitigation	Mitigation/Compensation	Residual Magnitude
4a	Damage to retained and created habitat such as by inappropriate use, littering, spreading of invasive species.	The design of the building will incorporate suitable waste disposal, managed access to habitats and INNS will be subject management.	Neutral
4b	Disturbance. Noise, lighting and increased human activity at the Site will be present of a lower order and will likely be tolerable to species habituated to previous factory conditions. The additional disturbance caused may cause displacement, but construction activities will have already caused displacement to a certain level, likely to be above disturbance during operation.	New nesting (for birds) and roosting (for bats) will be proposed in suitable places away from disturbance.	Neutral
4c	In the absence of correct management , retained and created habitats will not provide the necessary biodiversity units committed to through the BNG process.	The BMP/HMMP will provide full details of habitats to be created and their suitable management suitable management The BMP will include monitoring so that evidence can be provided, or remedial action can put in place as required.	Neutral

Timing Issues

32. Standard constraints will apply to nesting birds and vegetation clearance.

Cumulative Effects

33. The proposals are likely to act cumulatively in combination with the following local applications:
34. Only two recent applications have been returned within the same postcode of the current site: 2026/90459 an application to erect a new electricity sub-station and 2024/91661 an application to fell dead and dangerous trees to the west of the Site. Other applications are older from pre-2020.
35. The above applications are not of a scale or nature which is likely to result in cumulative impacts upon local ecology in relation to site development.

Offsite Measures or Compensation

36. A baseline BNG assessment has been undertaken (Brooks Ecological report ER-8319-02A) though proposals are not currently at a stage where a post development assessment can be finalised. However, based on the high-level assessment and the nature of the proposals it is anticipated that some offsetting will be required to offset habitat areas lost and achieve a 10% gain. Retained habitats such as the watercourse will also require a 10% gain to be achieved, likely through offsetting as despite retention no current enhancements are proposed.
37. Biodiversity Offsetting will be required for the scheme to demonstrate a 10% net gain in Habitat Units and Trading Rules will need to be taken into account. Discussions are underway as to a means of securing a local off-set for the requisite units.

Enhancement

38. Opportunities will be detailed in the Habitat Management and Monitoring Plan (HMMP) and the Biodiversity Management Plan (BMP) documents, to be produced as a standard condition of planning.

Monitoring

39. The CEMP document will detail the role of an Ecological Clerk of Works (ECOW) in overseeing protection measures.
40. The BMP and HMMP documents will identify any management specific monitoring which might be required in respect of habitat enhancement proposed. The LPA will require regular Monitoring Reports for the Site, to demonstrate that on-site habitats are meeting the condition scores targeted.

Policy and Legislation

41. Given the implementation of the mitigation set out above, it is anticipated that the proposals will comply with the relevant policy and legislation relating to wildlife and ecology.

Conclusion

42. Mitigation to be agreed by standard conditions of planning will be able to address most of the significant effects resulting from the development. There will be some residual impacts resulting from:
 - Habitat loss (of a mix of grassland and low value urban habitats) from the Site and the lag-time between loss and re-creation on or off-Site. This will result in a short term, reversible negative impact on bats at a Site level.
 - Disturbance resulting from clearance and construction will result in a short term, reversible negative impact acting on bats at a Site scale.
 - Retention of the watercourse will require adequate protection during site development, as will be detailed in a CEMP to avoid direct negative impacts. Additional protection from indirect impacts from lighting can be detailed in a lighting plan. Adequate protection should allow the impacts above the existing baseline of the watercourse to be avoided.
43. The scheme is expected to result in a net loss for biodiversity on-site. Biodiversity off-setting will be required to ensure that a minor positive impact (10% gain), acting in the long-term on all identified receptors can be achieved in this respect.

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