

**Consultation Response from KC,
Ecology Unit**
2026/91224 Land east of Woods Mount, Marsden, Huddersfield, HD7 6LB
Formation of earthworks and minor drainage
Date Responded: 29/06/2026
Responding Officer: Z. Hanshaw
Responding Ref: 2606/79

Good afternoon,

I have reviewed the Preliminary Ecological Appraisal (PEA) (ArbTech, August 2024) and I am not satisfied with the information provided.

Firstly, The Chartered Institute of Ecologists and Environmental Managers (CIEEM) Advice Note on the Lifespan of Ecological Reports and Surveys states that for reports between 18 months and 3 years old “A professional ecologist will need to undertake a site visit and may also need to update desk study information (effectively updating the Preliminary Ecological Appraisal) and then review the validity of the report, based on the factors listed below. Some or all of the other ecological surveys may need to be updated. The professional ecologist will need to issue a clear statement, with appropriate justification, on:

- The validity of the report;
- Which, if any, of the surveys need to be updated; and
- The appropriate scope, timing and methods for the update survey(s).

The likelihood of surveys needing to be updated increases with time”.

As the report is nearly 2 years old, it will need to be updated in line with this CIEEM guidance.

The PEA also identifies that further bird surveys, and lichen surveys may be required dependent on the proposals. I understand that the development is not proposing to permanently remove habitat, but that some temporary destruction will be required to facilitate the works. I would therefore recommend that as part of the update to the PEA the ecologist is provided with detailed plans of the proposals to enable assessment of the impacts. Any surveys identified as necessary in the updated report should be undertaken and the results provided to the LPA prior to determination.

The submitted PEA identifies that further vegetation surveys will be required for this site. The site is adjacent to an area Priority Habitat- Upland Heath, and there is Priority Habitat- Deciduous Woodland and Upland Heath on the site. The report further states that the heathland within the development site could meet the criteria for the Annex 1 habitat- European Dry Heath. The PEA recommends that further phase 2 vegetation surveys are undertaken to identify the National Vegetation Community (NVC) of the site and quantify the importance of these habitats. The PEA also identifies that further fungi survey is required. These should be submitted alongside the updated report.

I would also recommend that soil information is provided. The habitats onsite can often form on peat soils, and the drainage of these should not be permitted. Clarification on the presence of peat soil should be provided.

Finally, further Biodiversity Net Gain information should be submitted with this proposal. If >25m² of habitat is to be impacted during the construction, or if any priority habitat is to be removed, then this development will be required to demonstrate Biodiversity Net Gain under the current legislation.