

Ecological Impact Assessment (EcIA)

July 2026

Site Name Gomersal	Location Former Gomersal First School, Oxford Road, Gomersal, BD19 4JS
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FINAL

Document History

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1. EXECUTIVE SUMMARY

- 1.1. This Ecological Impact Assessment (EclA) has been prepared to assess the potential ecological effects of the proposed redevelopment of the site at Gomersal, West Yorkshire, and to identify any mitigation and enhancement measures required to ensure compliance with relevant wildlife legislation and planning policy.
- 1.2. The proposed development comprises the redevelopment of the site to provide a care home, together with associated access, parking and landscaping. The site comprises predominantly modified grassland, mixed scrub, broadleaved woodland, scattered trees and areas of hardstanding.
- 1.3. The desk study identified one designated site within 2 km of the site, Oakwell Park Local Wildlife Site, together with the adjoining Kirklees Wildlife Habitat Network. The proposed development is not anticipated to adversely affect these features. Building 2 was assessed as offering Low bat roost suitability. In accordance with current bat survey guidance, where all identified potential roost features have been fully inspected and no evidence of bats is identified, further surveys are not considered necessary. A single Potential Roost Feature was identified within Tree 11. Suitable nesting habitat for breeding birds is present within Building 2, trees and scrub. Woodland and scrub habitats were identified as being of greatest ecological value within the site and are proposed to be retained and enhanced.
- 1.4. The assessment identified no significant adverse residual effects following the implementation of the recommended mitigation measures. These include a pre-felling aerial inspection of Tree 11, protection of retained habitats during construction, sensitive lighting design, Reasonable Avoidance Measures for protected and notable fauna, phased vegetation clearance where appropriate, and the implementation of an Invasive Species Management Plan to control Himalayan balsam.
- 1.5. In addition to mitigation, the proposed development incorporates a range of biodiversity enhancement measures, including the enhancement of retained woodland, grassland and scrub habitats, native planting, and the installation of integrated bat and swift bricks. The created and enhanced habitats will be managed and monitored through a Habitat Management and Monitoring Plan (HMMP) to support the long-term delivery of Biodiversity Net Gain.
- 1.6. Subject to the implementation of the recommendations contained within this report, the proposed development is not anticipated to result in any significant adverse ecological effects. The proposals are considered to accord with relevant wildlife legislation and national and local planning policy and are expected to deliver a long-term enhancement in the biodiversity value of the site.

2. INTRODUCTION

- 2.1. The author of this report was Esme Sudall, an ecological consultant with Root3 Associates. Esme has a BSc (Hons) and MSc in Ecology and is a qualifying member of CIEEM.
- 2.2. This report was commissioned by Angela Swift Developments.
- 2.3. The site comprises land formerly associated with Gomersal First School and is located within the town of Gomersal, West Yorkshire. The site extends approximately one hectare. The site is bordered immediately to the north and east by buildings associated with the former school. The surrounding landscape is predominantly suburban in character, with Oxford Road located to the west, residential development and a graveyard to the north, and grassland fields to the east and south. Habitats present within the site include modified grassland, individual trees, mixed and bramble scrub, mixed deciduous woodland and areas of developed land.
- 2.4. Please refer to the site location plan in the Figure section of this report.
- 2.5. The purpose of this report is to address the following:
- To identify and evaluate the ecological features present within the site and address the likely effects of the proposed development upon these features.
 - To identify measures to avoid, minimise or mitigate adverse ecological effects and ensure compliance with relevant nature conservation legislation and planning policy.
 - To identify the mechanisms by which recommended mitigation measures can be secured and implemented.
 - To assess the significance of any residual ecological effects following the implementation of mitigation measures.
 - To identify opportunities for biodiversity enhancement associated with the proposed development.
 - To identify any requirements for ecological monitoring during or following construction, where appropriate.

3. PLANNING POLICY, LEGISLATION AND GUIDANCE

3.1. The proposed development has been assessed against the relevant national, regional and local planning policies relating to nature conservation. The key policies and legislation are summarised below. Scheme specific planning policy and legislation relevant to this assessment are provided in Appendix A.

- The Environment Act 2021¹;
- The Conservation of Habitats & Species Regulations 2017 (as amended)²;
- The Wildlife and Countryside Act 1981 (as amended)³;
- The EC Habitats Directive (Directive 92/43/EEC)⁴ as translated into UK law by the Conservation of Habitat and Species Regulation 2017 (as amended);
- The Natural Environment and Rural Communities Act (NERC) 2006⁵;
- The Protection of Badgers Act 1992⁶;
- The Hedgerow Regulations Act 1997⁷.

3.2. The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England. Policy N2 highlights the aim to improve biodiversity and contribute to nature recovery, strengthen ecological networks and conserve and enhance natural features.

3.3. Kirklees Local Plan (2019)

3.3.1. Policy LP30 seeks to protect and enhance biodiversity and geodiversity within Kirklees, including internationally, nationally and locally designated sites, Habitats and Species of Principal Importance, and the Kirklees Wildlife Habitat Network. Development proposals are expected to avoid significant harm to biodiversity through the application of the mitigation hierarchy and incorporate biodiversity enhancement measures where appropriate.

3.4. Kirklees Biodiversity Action Plan

3.4.1. The Kirklees Biodiversity Action Plan (BAP) identifies Habitats and Species of Principal Importance occurring within the district and sets out objectives for their conservation, enhancement and restoration. The proposed development has sought to retain habitats of greatest ecological value, enhance retained habitats and incorporate biodiversity enhancement measures in accordance with the objectives of the BAP.

3.5. West Yorkshire Local Nature Recovery Strategy

¹ <https://www.legislation.gov.uk/ukpga/2021/30/contents/enacted>

² HMSO. The Conservation of Habitats and Species Regulations 2017

³ HMSO. The Wildlife and Countryside Act 1981 (as amended).

⁴ EC (1992) Council Directive 92/43/EEC on the Conservation of natural habitats and of wild fauna and flora (The EC Habitats Directive).

⁵ HMSO. (2006), Natural Environment and Rural Communities Act.

⁶ HMSO. The Protection of Badgers Act 1992 (as amended).

⁷ HMSO. The Hedgerow Regulations Act 1997

3.5.1. The West Yorkshire LNRS was formally adopted in March 2026 and is now the current strategic document for nature recovery across Kirklees. It identifies priority habitats, ecological networks and opportunities for habitat creation and enhancement, and local planning authorities must have regard to it when exercising relevant functions under the Environment Act 2021.

4. METHODOLOGY

4.1. Scope of Assessment

4.1.1. The scope of this Ecological Impact Assessment has been informed by the findings of the desk study and field survey. The assessment considers the likely effects of the proposed development on ecological features within the site and the surrounding area.

4.1.2. The zone of influence is defined as the area over which ecological features may be affected by the proposed development, both directly and indirectly. For this assessment, the zone of influence extends beyond the site boundary where ecological connectivity exist, such as adjacent habitats, designated sites, protected species and notable habitats.

4.1.3. Accordingly, the assessment considers the following ecological features:

- Designated sites
- Habitats
- Protected and notable species

4.1.4. No consultation with statutory consultees was undertaken to inform the scope of this assessment.

4.2. Desk Study

4.2.1. An initial desk study was carried out in April 2026 to identify existing records of sites of nature conservation interest and of protected or notable species within 2 km of the centre of the site (Grid reference: SE 20878 26363).

4.2.2. To ensure that the information reported in this desk study is current, only data from surveys conducted within the last fifteen years have been considered. It should be noted that desk studies do not provide an exhaustive list of all ecological information for an area and thus cannot be relied upon as the sole source of information for the study area in question. The absence of records does not necessarily indicate that a species is not present in an area. Nonetheless, desk studies are very useful when combined with field-based surveys to identify features of nature conservation interest that might be associated with a site.

4.2.3. A search of the Multi-Agency Geographical Information for the Countryside (MAGIC⁸) website was undertaken to determine the following:

- The boundaries of statutory designated sites of nature conservation interest; and
- The locations of historic European Protected Species (EPS) licences granted by Natural England.
- The location of waterbodies within the zone of influence.

4.2.4. A search of OS Maps to determine the presence of waterbodies within 500 m of the site boundaries.

4.2.5. The West Yorkshire Ecology Service (WYES) was contacted in April 2026 to request the following information for locations within a 2 km radius of the site:

- Protected and notable species records; and
- The boundaries of statutory and non-statutory designated sites of nature conservation interest.

4.2.6. The West Yorkshire Bat Group (WYBG) were contacted in April 2026 to request bat records within a 2 km radius of the site.

4.2.7. A search of the Kirklees Planning Portal was undertaken to identify any planning applications within the zone of influence.

4.3. Phase I Habitat Survey

4.3.1. A habitat survey was conducted by an ecologist⁹ on the 21st April 2026. Weather conditions during the assessment were fair, with 2 oktas of cloud cover, no precipitation and 15°C.

4.3.2. The site walkover survey was conducted in accordance with the standard UK HAB Methodology¹⁰ and followed the principles of CIEEM's Guidelines for Ecological Appraisal¹¹ and CIEEM's Guidelines for Ecological Impact Assessment in the UK and Ireland¹².

4.3.3. A UKHABs Plan of the site is provided in Figure 7 of this report. Standard methodology has been used.

⁸ <https://magic.defra.gov.uk>

⁹ Esme Sudall BSc (Hons) MSc

¹⁰ UKHabs. The UK Habitat Classification. Version 2.0. <https://www.ukhab.org/ukhab-documentation/>

¹¹ CIEEM. 2017. Guidelines for Ecological Appraisal. <https://cieem.net/wp-content/uploads/2019/02/Guidelines-for-Preliminary-Ecological-Appraisal-Jan2018-1.pdf>

¹² CIEEM. 2018. <https://cieem.net/wp-content/uploads/2018/08/ECIA-Guidelines-2018-Terrestrial-Freshwater-Coastal-and-Marine-V1.1Update.pdf>

4.3.4. Condition assessments were undertaken using the Statutory biodiversity metric condition assessments¹³.

4.4. Protected Species Assessment

4.4.1. A search for signs of protected and notable species of fauna was undertaken during the site walkover. This included the potential presence of species based on habitat availability, alongside field signs of species. The searches included:

- Search for field signs of and habitat suitability for bats.
- Assessment of water bodies on site and within 500 m of the site boundary and terrestrial habitats suitable for notable amphibians.
- Search for field signs of and habitat suitability for reptiles.
- Search for field signs of badger, including setts, mammal paths, hair, snuffle holes and latrines to indicate activity.
- Search of watercourses for evidence of water vole, white-claw crayfish, and otter, and an assessment of habitat suitability.
- Assessment of habitat suitability to support notable birds and reporting any sightings during the walkover.
- Assessment of the sites suitability to support notable invertebrates and flora.
- Searched for invasive non-native species.

4.5. Preliminary Roost Assessment

4.5.1. A Preliminary Roost Assessment (PRA) was undertaken by Esme Sudall (BSc honours MSc) and Robert Bell (MCIEEM; Bat Survey Class Licence WML-A34-Level 4, 2016-25236-CLS-CLS; Barn Owl Licence CL29, 00070), on the 21st April 2026.

4.5.2. The following activities were carried out during the PRA in compliance with relevant bat survey guidelines¹⁴:

- A brief assessment of on-site habitats and those within 300 m of the site boundary, and their suitability for supporting bat species.
- A comprehensive inspection of all areas of the buildings, internally and externally, was undertaken to identify structural features suitable for roosting bats. Particular attention was given to crevices and gaps within walls and lintels, gaps between beams

¹³ DEFRA. 2026. <https://www.gov.uk/government/publications/statutory-biodiversity-metric-tools-and-guides/full-publication-update-history>

¹⁴ Collins, J. (ed.) (2023) Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th edition). The Bat Conservation Trust, London.

and joists, and the presence of bat evidence such as droppings on walls, floors and other surfaces, or insect remains beneath beams, alongside other relevant indicators. All signs indicative of bat roost presence, including live or dead bats, droppings, feeding remains, scratch marks and staining were recorded.

- An assessment of the building's bat roost potential – negligible, low, moderate, high or confirmed roost.

4.5.3. The following equipment was used or at hand during the survey:

- Torch
- Binoculars
- Endoscope
- Ladders
- Drone

4.5.4. Ground Level Tree Assessment

4.5.4.1. A ground level tree assessment (GLTA) was undertaken by Esme Sudall (BSc honours MSc) and Robert Bell (MCIEEM; Bat Survey Class Licence WML-A34-Level 4, 2016-25236-CLS-CLS; Barn Owl Licence CL29, 00070), on the 21st April 2026.

4.5.4.2. The following activities were carried out during the GLTA in compliance with relevant bat survey guidelines¹⁵:

- A systematic inspection of each tree using binoculars to identify the presence of PRFs such as splits, cracks, lifted bark, and knot holes in the trees.
- Further inspection of any features using a Clulite torch to assess their suitability for supporting roosting bats.
- Assessment of any PRFs presence of PRFs in a tree using *NONE*, *FAR*, *PRF* criteria, as outlined in Figure 2.
- Any PRFs identified were then assessed for the potential suitability using *PRF-I* and *PRF-M*, as outlined in Figure 3.

¹⁵ Collins, J. (ed.) (2023) Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th edition). The Bat Conservation Trust, London.

Figure 2: Guidelines for assessing suitability of trees for roosting bats (Sourced from: Collins, 2023).

Table 4.2. Guidelines for assessing the suitability of trees on proposed development sites for bats, to be applied using professional judgement.	
Suitability	Description
NONE	Either no PRFs in the tree or highly unlikely to be any
FAR	Further assessment required to establish if PRFs are present in the tree
PRF	A tree with at least one PRF present

Figure 3: Guidelines for categorising potential suitability of PRFs in trees (Sourced from: Collins, 2023).

Table 6.2. Guidelines for categorising the potential suitability of PRFs on a proposed development site for bats, to be applied using professional judgement.	
Suitability	Description
PRF-I	PRF is only suitable for individual bats or very small numbers of bats either due to size or lack of suitable surrounding habitats.
PRF-M	PRF is suitable for multiple bats and may therefore be used by a maternity colony.

4.5.5. Limitations

- 4.5.5.1. Despite best efforts, the species list produced during the habitat survey was not a comprehensive representation of all species present on site, as no investigation can ensure the complete characterisation of the natural environment. This survey does not constitute a full botanical survey. Plant species may be under-recorded, unidentifiable or not visible including factors including the time of year the survey was conducted or grassland cutting regimes.
- 4.5.5.2. The protected species assessment offers an initial evaluation of the probability of protected species being present on site. This evaluation is based on the suitability of habitat, known species distribution in the local area (informed by the data search), and any direct evidence found within the survey area.

4.5.6. Proportionality

- 4.5.6.1. Root3 Associates Ltd provide recommendations in line with the British Standard for Biodiversity (BS42020). Within BS42020, proportionality is encouraged for both ecologists and Local Authority Decision Makers and Consultees. Please refer to the below extract from Section 5.5 of BS42020.

“The work involved in preparing and implementing all ecological surveys, impact assessments and measures for avoidance, mitigation, compensation and enhancement should be proportionate to the predicted degree of risk to biodiversity and to the nature and scale of the proposed development. Consequently, the decision-maker should only request supporting information and conservation measures that are relevant, necessary and material to the application in question. Similarly, the decision-maker and their consultees should ensure that any comments and advice made over an application are also proportionate.

NOTE 1 This approach is enshrined in Government planning guidance, for example, paragraph 193 of the National Planning Policy Framework for England [41].

NOTE 2 The desk studies and field surveys undertaken to provide a preliminary ecological appraisal (PEA) might in some cases be all that is necessary.”

4.5.7. Assessment

4.5.7.1. This Ecological Impact Assessment has been prepared in accordance with the Guidelines for Ecological Impact Assessment in UK and Ireland (CIEEM, 2024).

4.5.7.2. Significance

4.5.7.2.1. Ecological features are those considered to be of sufficient ecological importance that they could be affected by the proposed development. Their importance is determined with reference to various factors such as habitat quality, extent, rarity, connectivity, conservation status and the presence of notable or protected species.

4.5.7.3. Geographical Context

4.5.7.3.1. The importance of each ecological feature has been considered within an appropriate geological context. For the purposes of this assessment, ecological features have been evaluated at one or more of the following levels:

- International (European)
- National (United Kingdom)
- Regional (Yorkshire and the Humber)
- County (West Yorkshire)
- District (Kirklees)
- Local (Gomersal)

4.5.7.4. The assessment considers the likely effects of the proposed development during the construction and operational phases. Where applicable, mitigation and enhancement measures have been recommended, and the significance of residual effects has been assessed following their implementation.

5. BASELINE ECOLOGICAL CONDITIONS

5.1. Designated Sites

5.1.1. The desk study identified one designated site within 2 km of the site. This is summarised in Table 1.

Table 1: Summary of relevant designated sites.

Site Name	Level of Designation	Location relative to site	Reasons for Designation
Oakwell Park	Local Wildlife Site	440 m northeast	Comprises a mosaic of broadleaved woodland, species-rich grassland and restored colliery habitats, supporting a diverse range of flora and fauna of local ecological importance.

5.1.2. The eastern boundary of the site adjoins the Kirklees Wildlife Habitat Network. Although the site itself does not fall within the network, the woodland in the eastern corner of the site will be retained and enhanced as part of the proposals, maintaining habitat connectivity and supporting the function of the wider wildlife network.

5.2. Habitats

5.2.1. On-Site Habitats

Modified grassland (g4):

5.2.1.1. The majority of the site comprises a tussocky grassland field, previously used as a recreational sport field by the school. Species recorded included perennial ryegrass *Lolium perenne*, meadow foxtail *Alopecurus pratensis*, cock's-foot *Dactylis glomerata*, with frequent hairy bittercress *Cardamine hirsuta*, creeping thistle *Cirsium arvense*, broad leaved dock *Rumex obtusifolius*, cleavers *Galium aparine*, dandelion *Taraxacum officinale* agg., and white clover *Trifolium repens*.

5.2.1.2. In the north-western portion of the grassland, occasional bluebell *Hyacinthoides non-scripta*, meadow vetchling *Lathyrus pratensis* and herb robert *Geranium robertianum* were noted. Within the southern portion of the grassland, bramble scrub *Rubus fruticosus* agg., was noted to be encroaching into the sward. In the western section of the grassland, the proportion of ruderal species increased significantly, with common nettle *Urtica dioica*, creeping thistle *Cirsium arvense* and bramble recorded (Photograph 1). There was no evidence of current management.

Bramble scrub (h3d):

5.2.1.3. Dense bands of bramble scrub are present along the northern and southern parts of the site. In the southern part of the site, the scrub extends westwards, connecting with the developed land surrounding the outbuilding (Photograph 2). There was no evidence of current management.

Other Woodland – Mixed – Mainly Broadleaved (w1h5):

5.2.1.4. An area of woodland was present within the eastern corner of the site, extending northwards along the eastern boundary. The woodland comprised a mixed stand of broadleaved and coniferous trees, with broadleaved species forming approximately 70% of the canopy composition. Woodland structure was variable, with a moderately developed shrub layer (Photograph 3).

5.2.1.5. Recorded tree species included silver birch *Betula pendula*, field maple *Acer campestre*, hawthorn *Crataegus monogyna*, sycamore *Acer pseudoplatanus*, Scots pine *Pinus sylvestris*, ash *Fraxinus excelsior*, wild cherry *Prunus avium* and Austrian pine *Pinus nigra*. The woodland represented a mixed secondary woodland habitat.

5.2.1.6. The ground flora was dominated by bramble *Rubus fruticosus* agg., cleavers *Galium aparine* and common nettle *Urtica dioica*, with occasional wild garlic *Allium ursinum* and ivy-leaved speedwell *Veronica hederifolia* also recorded. Localised stands of Himalayan balsam *Impatiens glandulifera* were recorded within the woodland, primarily along the eastern boundary, appearing to spread into the site from adjacent land beyond the site boundary (Photograph 4). There was no evidence of current management.

Individual trees:

5.2.1.7. A number of mature individual trees are scattered across the site, predominantly allocated along site boundaries. Species include field maple *Acer campestre*, goat willow *Salix caprea*, wild cherry *Prunus avium*, sycamore *Acer pseudoplatanus*, ash *Fraxinus excelsior*, and hawthorn *Crataegus monogyna* (Photographs 5 to 7). There was no evidence of current management.

Mixed scrub (h3h):

5.2.1.8. A linear strip of mixed scrub lines the southern boundary, comprising hazel *Corylus avellana*, sycamore *Acer pseudoplatanus* and hawthorn *Crataegus monogyna*. Scattered self-seeded mixed scrub was also recorded towards the northwestern site boundary, comprising field maple *Acer campestre* and goat willow *Salix caprea*. On occasion, these species had self-seeded northeasterly interspersing into the grassland (Photograph 8). There was no evidence of current management.

Urban; Ruderal or ephemeral (u, 81):

5.2.1.9. The western part of the site includes developed land associated with the former driveway and playground. This area has been colonised by ruderal and ephemeral vegetation. Species recorded included common nettle *Urtica dioica*, dandelion *Taraxacum officinale*, hairy bittercress *Cardamine hirsuta*, rosebay willowherb *Chamerion angustifolium*, herb robert *Geranium robertianum* and mosses. Frequent *Buddleja* *Buddleja davidii* was also recorded particularly around the base of Building 2 (Photograph 9). There was no evidence of current management.

Buildings (u1b5):

5.2.1.10. Two buildings are located within the site boundary, comprising a temporary classroom building (Building 2) (Photo 10) and a gas services structure (Building 1). The temporary classroom lies partially within the application red line boundary, with the southern section falling within the proposed development area. However, the entirety of Building 2 was surveyed for completeness. Two additional buildings, comprising a former main school building and an associated outbuilding, are located outside of the application boundary and were not included within this assessment. There was no evidence of current management.

Developed land; sealed surface (u1b):

5.2.1.11. Developed land includes tarmac areas such as the access road and an area to the north of the site comprising a former hard surfaced play area with extensive moss cover and sparse ruderal vegetation. There was no evidence of current management.

5.2.2. Adjacent Habitats

5.2.2.1. To the north of the site lies a church and associated graveyard comprising areas of grassland, mature trees and developed land. To the northeast is a residential property with an associated garden and areas of hardstanding. The eastern boundary adjoins a parcel of broadleaved woodland, beyond which lies arable pasture that also extends around the southern site boundary. Oxford Road forms the western boundary of the site. The woodland adjoining the eastern site boundary forms part of the Kirklees Wildlife Habitat Network.

5.3. Species

Bats

5.3.1. WYES returned 93 records of bats within the search area of the following species; *pipistrellus pygmaeus*, *pipistrellus pipistrellus*, *Nyctalus noctula*, *Nyctalus leisleri*, *myotis brandtii*, *Plecotus auritus*.

5.3.2. WYBG returned 8 records of *pipistrellus* bat species within the search area.

Preliminary Roost Assessment

5.3.3. There are two buildings present within the red line application boundary. Building 1 (B1) is a gas services building located on the western boundary, adjacent to Oxford Road. Building 2 (B2) is a single-storey derelict building formally used as a classroom, located on the southern boundary. Only the southern portion of this building is located within the red line boundary, although the entirety of this building was surveyed. Please refer to the building plan in the Figures section at the end of this report.

Building 1: Gas Services Structure

5.3.4. Building 1 is a gas services building constructed from prefabricated metal panel walls mounted on a concrete base slab, beneath a flat mono-pitched roof. External elevations were flush and well-sealed, with a metal access door, ventilation grills and service conduits. No lifted panels, gaps, crevices or other potential roost features to support roosting bats were identified in the external inspection.

5.3.5. An internal inspection was not undertaken due to the nature and operational use of the structure.

Plate 1: Building 1; Gas services building.



Building 2: External Inspection

5.3.6. Building 2 comprised a single storey, mid-to late-20th century timber framed outbuilding clad externally with vertical timber boarding beneath a flat shed-felt covered roof. The structure incorporated timber fascia boards and double-glazed, timber framed windows. Sections of external cladding were weathered, and in places where cladding has been lost or detached, breathable felt had been used as a temporary repair. Buddleja was noted sprouting from the base of the building in multiple locations.

5.3.7. Windows were present around the north, east and western elevations. Along the eastern elevation of the building, the majority of which had been smashed and subsequently boarded over using wooden boards.

5.3.8. Potential roost features identified during the external inspection included a gap behind fascia board on the north, west and south elevations, however, the space beneath was well sealed. In addition, damage to the soffit box on the eastern elevation was noted, although this feature was fully inspected and did not provide access into the building. Timber boarding over the windows also created narrow crevices between the glass and boards, however, these features were fully inspected. No evidence of current or historic bat roosting was identified within any of the identified PRFs.

Plate 2: *Northeastern corner of B2.*



Plate 3: *Eastern elevation of B2.*



Plate 4: Gap behind fascia board on N, W and S elevations of B2, but well-sealed.



Plate 5: Wooden window boards of eastern elevation of B2.



Plate 6: Internal view of wooden window boards on eastern elevation of B2.



Plate 7: Damaged soffit on eastern elevation of B2.



Building 2: Internal Inspection

- 5.3.9. Internally, B2 comprised two large classroom spaces with two smaller rooms located on the western side of the building. The structure showed evidence of informal access since becoming disused and contained scattered debris throughout. A small loft hatch was present, providing access to a shallow roof void, providing access into a shallow roof void above the ceiling.
- 5.3.10. The entire building was inspected internally. No evidence of roosting bats was identified within the building, including live or dead bats, droppings, feeding remains, scratch marks or staining.

Plate 8: Inside of B2.



Plate 9: Loft hatch in western room of B2.



PRA Summary

5.3.11. In accordance with best practice guidance¹⁶, Building 1 was assessed as offering Negligible bat roost suitability due to the absence of suitable roost features. Building 2 was assessed as offering Low suitability due to the presence of several minor potential roost features. However, all identified features were fully inspected and no evidence of current or historic bat use was identified. Accordingly, bat roost potential in buildings is considered negligible.

Ground Level Tree Assessment

5.3.12. The ground level tree assessment included the inspection of all individual trees on site, including those within boundary scrub habitat and the eastern woodland area.

5.3.13. There are two individual trees to be lost as a result of the proposed development, Tree 10 and Tree 11 (Tree numbers in reference to Tree Survey and Constraints Report, doc ref: 13172TCRv1). These trees are highlighted on Figure 5 at the end of this report.

5.3.14. Tree 11 (T11) comprised a mature sycamore *Acer pseudoplatanus* of 730 mm diameter (dbh) and height of 15 m. An inspection of this tree highlighted the presence of one knot hole, facing south, just off the main stem, at a height of c.8 m.

5.3.15. In accordance with the aforementioned guidance¹⁷ and methodology, the knot hole constituted a potential roost feature, providing limited potential roosting space for bats. The feature was inspected using a Clulite torch, which confirmed it to be shallow in depth, with suitability limited to supporting an individual bat or very small number of bats. Accordingly, the feature was classified as a Potential Roost Feature – Individual (PRF-I).

¹⁶ ⁹ Collins, J. (ed.) (2023) Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th edition). The Bat Conservation Trust, London.

¹⁷ Collins, J. (ed.) (2023) Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th edition). The Bat Conservation Trust, London.

Plate 10: Tree 11 (T11) showing the identified PRF (circled in red).



5.3.16. Tree 10 (T10) comprised a Multistem goat willow *Salix caprea*, with stems of 530 mm, 470 mm and 320 mm diameter (dbh) and a height of 15 m. An inspection of this tree concluded there to be no potential roost features present. Accordingly, T2 was categorised as having *NONE* suitability, with no capacity to support roosting bats.

Plate 11: Tree 10 (T10) assessed as having no suitable features to support roosting bats.



5.3.17. All other individual trees and those within the woodland habitat parcel were absent of PRFs and considered to offer *NONE* suitability to support roosting bats.

Foraging Habitat

5.3.18. The site is expected to be of value to foraging bats, owing to the presence of mature trees, woodland and grassland offering suitable foraging resources. In addition, scrub vegetation along the northern and southern site boundaries is likely to function as linear commuting habitat, facilitating bat movement through the wider landscape. Transect surveys were not considered proportionate to the proposed development, as all key foraging habitats and linear commuting features, including the woodland and the majority of the grassland areas, are to be retained within the proposed development.

Badger

- 5.3.19. No records of badger *Meles meles* were returned by WYES within the search area, and the site lies outside the area identified as having increased probability of badger activity.
- 5.3.20. No fields signs of badger were identified during the survey. Specifically, no setts, latrines, footprints, well-worn paths, or foraging signs were recorded within the site.
- 5.3.21. The woodland and scrub habitat within the site were considered suboptimal for sett establishment due to predominantly flat topography and limited areas of suitable friable ground. Nevertheless, habitats within the site are likely to provide some value for commuting and opportunistic foraging badger.

Hedgehog

- 5.3.22. WYES returned 6 records of hedgehog *Erinaceus europaeus* within the search area.
- 5.3.23. Habitats within the site, including areas of grassland, scrub and woodland edge are considered suitable to support hedgehog. The site may provide opportunities for foraging, sheltering, and commuting within the wider suburban landscape.

Birds

- 5.3.24. WYES returned records of barn owl *Tyto alba*, tawny owl *Strix aluco*, and swift *Apus apus* within the search area.
- 5.3.25. Evidence of bird activity recorded during the survey included rook *Corvus frugilegus*, jay *Garrulus glandarius*, and wren *Troglodytes troglodytes*. Habitats within the site were considered likely to support a range of common and widespread breeding bird species associated with suburban and woodland edge environments.
- 5.3.26. Woodland, scrub, and scattered tree habitats within the site provide suitable nesting, sheltering and commuting opportunities for breeding birds, whilst areas of scrub and grassland offer foraging habitat.
- 5.3.27. The buildings within the site were considered to provide negligible suitability for nesting barn owl *Tyto alba* due to the absence of suitable access points. No evidence of current or historic bird nesting activity was recorded within Building B2 during the survey. Nevertheless, opportunistic nesting by common and widespread bird species cannot be ruled out, due to the presence of open windows in B2.
- 5.3.28. Habitats within the site were considered suboptimal for specialist ground-nesting bird species owing to the absence of extensive areas of undisturbed rough grassland,

heathland or other open habitats typically favoured by such species. However, areas of bramble scrub may provide opportunistic nesting habitat for common and widespread bird species.

Amphibians

5.3.29. WYES returned 3 records of great crested newt *Triturus cristatus*, 1 record of common frog *Rana temporaria* and 1 record of smooth newt *Lissotriton vulgaris* within the search area.

5.3.30. There are no waterbodies present within the site.

Off-site Waterbodies

5.3.31. OS Maps and MAGIC identified three waterbodies within 500 m of the site location. Please refer to the waterbody plan in Figure 6.

5.3.32. Waterbody 1 is located approximately 360 m northeast of the site boundary, within the grounds of a private residential property. The property was visited during the survey, and the resident advised that the pond has been infilled and has not functioned as a waterbody for several years. Accordingly, Waterbody 1 was discounted from further assessment.

5.3.33. Waterbody 2 is located approximately 130 m south of the site boundary. This water feature was dry at the time of the survey and appears to be part of Church Beck. The feature comprises two connected ponds linked by a culverted section of Church Beck. Waterbody 3 is located approximately 388 m to the southwest of the site boundary. This waterbody is an attenuation feature/swale located in a residential development.

5.3.34. Waterbody 2 and Waterbody 3 were evaluated using the Habitat Suitability Index (HSI) scoring system developed by Oldham et al (2000)¹⁸. The scoring system produces a value of habitat suitability calculated from scores achieved under a variety of categories which include location within the UK, pond area, permanence, water quality, percentage shade, presence of waterfowl, presence of fish, number of other ponds within 1 km (not obstructed by major roads), quality of surrounding vegetation and macrophyte cover. The HSI assessment results are summarised in Table 3.

5.3.35. Pond suitability is determined using the scale shown in Table 2.

¹⁸ Oldham, R.S., Keeble, J., Swan, MJS and Jeffcote, M (2000) Evaluating the suitability of habitat for great crested newt *Triturus cristatus*. Herpetological Journal 10 (4), 143-155 pp.

Table 2: HSI Scores as a measure of pond suitability (Oldham et al., 2000).

HSI Score	Pond Suitability
<0.5	Poor
0.5-0.59	Below average
0.6-0.69	Average
0.7-0.79	Good
>0.8	Excellent

Table 3: Outcomes of HSI assessments on Waterbodies 2 and 3.

Suitability Index	Factor	Waterbody 2		Waterbody 3	
		Notes	Score	Notes	Score
SI 1	Geographic location	Zone A	1	Zone A	1
SI 2	Pond area	100 m ²	0.2	250 m ²	0.45
SI 3	Permanence	Sometimes dries	0.5	Never dries	0.9
SI 4	Water quality	Poor - agricultural runoff and no evidence of submerged plants.	0.33	Moderate – aquatic vegetation present.	0.67
SI 5	Shade	100%	0.2	10%	1
SI 6	Waterfowl	Absent – no evidence	1	Absent – no evidence	1
SI 7	Fish	Absent – no evidence	1	Absent – no evidence	1
SI 8	Pond count	2 ponds.	0.5	4	0.9
SI 9	Terrestrial habitat	Good – within woodland	1	Moderate – disturbance due to location in POS.	0.67
SI 10	Macrophytes	Assumed 50%, however water absent at the time of the survey.	0.8	30%	0.6
Results		0.55 Below average		0.79 Good	

5.3.36. The HSI assessment indicated that Waterbody 2 offers below average suitability for great crested newt and is therefore considered unlikely to support a breeding population should the species be present within the local area. The HSI assessment of Waterbody 3 indicated that it offers good suitability for great crested newt. However, Waterbody 3 is located approximately 388 m from the site and is separated from it by Oxford Road and intervening developed land. In line with current guidance, great crested newt dispersal typically occurs where ponds are located within 250 m and with an absence of barriers to dispersal. Given the separation distance and presence of significant built infrastructure, the likelihood of great crested newts, if present, dispersing onto the site from Waterbody 3 is considered low.

Invertebrates

5.3.37. WYES did not return any records of notable or protected invertebrate species within the search area.

5.3.38. Habitats within the site are likely to support common and widespread invertebrate species but are unlikely to support significant assemblages of notable species.

Reptiles

- 5.3.39. WYES returned no records of reptiles within the search area.
- 5.3.40. The site supports habitats with low to moderate suitability for common reptile species, including areas of tussocky grassland, unmanaged bramble scrub and woodland edge habitat along boundaries. These habitats may provide opportunities for sheltering, dispersal and limited basking for widespread reptile species such as common lizard *Zootoca vivipara* and slow worm *Anguis fragilis*.
- 5.3.41. However, suitability is constrained by the dominance of dense scrub and the limited extent of open basking and hibernation features. Accordingly, the likelihood of reptiles using the site, if present in the local area, is considered to be low.

Aquatic Species

- 5.3.42. No records of aquatic species, including water vole, otter and white-claw crayfish, were returned during the desk study.
- 5.3.43. OS Maps and Magic confirmed the presence of Church Beck, approximately 90 m south of the site. However, no watercourses, wet ditches, ponds or other suitable aquatic habitats were identified within or immediately adjacent to the site during the survey, and the site lacks direct hydrological connectivity with Church Beck. Accordingly, the site is considered to have negligible suitability for aquatic species and these species have therefore been scoped out of further assessment.

Invasive Non-Native Species (INNS)

- 5.3.44. WYES returned no records of INNS within the search area.
- 5.3.45. Seedlings of Himalayan Balsam *Impatiens glandulifera*, an invasive non-native species listed under Schedule 9 of the Wildlife and Countryside Act 1981 (as amended), was recorded growing in the woodland parcel on the eastern corner of the site, and within the bramble scrub habitat on the southern boundary. The plants were observed in the early stages of growth. A more extensive covering of this species was also observed in the field off-site beyond the eastern boundary.

6. DEVELOPMENT PROPOSALS

- 6.1. Development proposals are to create a new care home comprising 84 bedrooms with communal facilities. Parking will be provided at the main entrance and front of the development with landscaped gardens to the rear.
- 6.2. A detailed landscape plan has been prepared by PDP Ltd, setting out the proposed landscaping scheme for the site. The design has been informed by early ecological input, with the retention and enhancement of existing habitats prioritised throughout the design process. The site layout was amended where practicable to retain key ecological features, including individual trees. The landscape proposals seek to enhance the site's ecological value and landscape character through the incorporation of native woodland planting, enhancement of grassland to create species-rich swards, additional tree planting, and the delineation of sensitive habitat areas from public access to reduce disturbance and support their long-term establishment and management.

7. ASSESSMENT OF EFFECTS AND MITIGATION MEASURES

7.1. Designated sites

7.1.1. Potential Impacts

- 7.1.1.1. The desk study identified Oakwell Park, located approximately 440 m northeast of the site and designated at both statutory and non-statutory level. Given the distance and the absence of direct pathways for impact, including hydrological connectivity or continuous habitat corridors, it is considered highly unlikely that the proposed development would result in any adverse effects upon the integrity or ecological function of this designated site.

7.1.2. Mitigation Measures

- 7.1.2.1. No mitigation measures are considered necessary in regard to this designated site.

7.1.3. Significance of Residual Effects

- 7.1.3.1. It is considered highly unlikely the proposed development will result in any adverse effects upon Oakwell Park. Therefore, the residual effect is considered Not Significant.

7.2. Habitats

On-site Habitats

7.2.1. Potential Impacts

7.2.1.1. The proposed development will result in the permanent loss of areas of species-poor grassland and scrub habitat. Whilst these habitats provide foraging and sheltering opportunities for a range of common fauna, they are of relatively low ecological value due to their limited botanical diversity and extent. There is also potential for accidental damage to retained habitats during construction, including woodland, retained trees and scrub, through vegetation clearance, material storage, soil compaction or pollution incidents.

7.2.2. Mitigation and Enhancement Measures

7.2.2.1. The proposed development has sought to retain habitats of greatest ecological value, including the eastern woodland and southern scrub, maintaining habitat connectivity within the site and with the wider landscape. A detailed landscape scheme has been developed which includes the enhancement of retained grassland to species-rich grassland, enhancement and creation of native scrub, woodland enhancement, and the planting of native trees and shrubs. Native species appropriate to the local landscape character should be used throughout the scheme to maximise biodiversity benefits. During construction, retained habitats should be protected through the implementation of appropriate tree protection measures and a Construction Environmental Management Plan (CEMP), including pollution prevention measures. The creation of a Habitat Management and Monitoring Plan (HMMP) will detail enhancement measures for habitats within the site.

7.2.3. Significance of Residual Effects

7.2.3.1. Although the proposed development will result in the loss of areas of species-poor grassland and scrub, these losses will be compensated through the retention and enhancement of higher-value habitats and the creation of species-rich planting across the site. Consequently, the proposed development is expected to deliver an overall enhancement in habitat quality and ecological connectivity. The residual effect on on-site habitats is therefore considered beneficial but not significant.

Off-site Habitats

7.2.4. Potential Impacts

7.2.4.1. The habitats adjacent to the site, including the churchyard to the north, residential gardens to the northeast, arable pasture to the east and south, and Oxford Road to the west, are not anticipated to be adversely affected by the proposed development. The churchyard and residential gardens are separated from the development by existing boundary walls and function as habitat for common and widespread species. Similarly, the arable pasture land is of limited ecological value and is considered highly unlikely to be subject to any adverse effects as a result of the proposed development.

7.2.4.2. The woodland immediately adjoining the eastern site boundary forms part of the Kirklees Wildlife Habitat Network. During construction, there is potential for indirect effects on this habitat through accidental encroachment, dust generation, pollution incidents and root damage if construction activities are not appropriately controlled.

7.2.5. Mitigation Measures

7.2.5.1. The proposed development has been designed to retain the woodland along the eastern site boundary, maintaining habitat connectivity with the wider Wildlife Habitat Network. Retained trees and woodland should be protected throughout construction in accordance with BS5837:2012. Construction activities should be confined to the development footprint, with protective fencing installed around retained habitats prior to works commencing. Pollution prevention measures should be implemented in accordance with a Construction Environmental Management Plan (CEMP) to avoid impacts on adjacent habitats.

7.2.6. Significance of Residual Effects

7.2.6.1. Subject to the implementation of the aforementioned mitigation measures, no significant adverse effects on the adjoining woodland or Kirklees Wildlife Habitat Network are anticipated. The residual effect is therefore considered Not Significant.

7.3. Species

Bats

7.3.1. Potential Impacts

7.3.1.1. Building 2 was assessed as offering Low bat roost suitability. In accordance with current bat survey guidance¹⁹, where all identified potential roost features have been fully inspected and no evidence of bats is identified, further surveys are not considered necessary. The identified features within Building 2 were inspected to a sufficient level to satisfy these criteria and, therefore, no further bat surveys are recommended prior to the proposed works.

7.3.1.2. A ground-level tree assessment identified a small knot hole within Tree 11, considered to offer limited potential to support a single bat or small number of roosting bats (Potential Roost Feature – Individual). The proposed removal of this tree therefore presents a low risk of disturbing or injuring a roosting bat if appropriate precautionary measures are not implemented.

7.3.1.3. Retained woodland, trees and scrub provide suitable commuting and foraging habitat for bats. During construction and operation, potential indirect impacts include disturbance from construction activities and the introduction of artificial lighting, which could reduce the suitability of these habitats, particularly for light-sensitive species such as brown long-eared bat *Plecotus auritus*.

7.3.2. Mitigation Measures

7.3.2.1. No further pre-application bat surveys are considered necessary. Prior to the felling of Tree 11, the identified Potential Roost Feature should be subject to an aerial inspection by a suitably licensed bat ecologist immediately before works commence. Should evidence of bats be identified during the inspection, works must cease and appropriate mitigation agreed with the ecologist.

7.3.2.2. External lighting should be designed in accordance with the principles of the Bat Conservation Trust and Institution of Lighting Professionals Guidance Note 08/23, ensuring that retained woodland, trees and other vegetated boundaries remain unlit and continue to function as dark commuting corridors.

7.3.2.3. To provide biodiversity enhancement, a minimum of two integrated bat bricks should be incorporated into suitable dwellings. These should be installed on upper elevations at least 4–5 m above ground level in accordance with current best practice.

¹⁹ Collins, J. (ed). (2023) Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th edition). The Bat Conservation Trust, London.

7.3.3. Significance of Residual Effects

7.3.3.1. Subject to implementation of the above mitigation measures, no significant adverse effects on bats are anticipated during either the construction or operational phases of the development. The incorporation of integrated bat roost features will provide additional roosting opportunities within the completed development. Overall, the residual effect on bats is considered Not Significant.

Badger

7.3.4. Potential Impacts

7.3.4.1. No evidence of badger activity, including setts, latrines, footpaths or foraging signs, was identified during the survey. The site is therefore considered unlikely to support badgers. However, the habitats present, including woodland and scrub, may provide occasional foraging habitat for commuting badgers. During construction there is the low risk of injury to badgers through open excavations, pipework, or unsuitable storage of materials, should individual badgers enter the site.

7.3.5. Mitigation Measures

7.3.5.1. A precautionary approach should be adopted during construction through adherence to the following Reasonable Avoidance Measure:

- All excavations, trenches or holes left overnight should be covered or fitted with a suitable means of escape (e.g., timber ramp) to prevent badgers becoming trapped.
- Any open pipework with a diameter greater than 150 mm should be capped at the end of each day.
- Appropriate storage of materials to ensure badgers do not use them as temporary refuge or become trapped inside.

7.3.6. Significance of Residual Effects

7.3.6.1. Given the absence of evidence of badgers within the site and the implementation of the aforementioned Reasonable Avoidance Measures, no significant effects on badger are anticipated. The residual effect is therefore considered Not Significant.

Hedgehog

7.3.7. Potential Impacts

7.3.7.1. The habitats present within the site, including woodland, scrub and grassland, provide suitable foraging and commuting habitat for hedgehogs. Although no evidence of hedgehogs was identified during the survey, there is potential for individuals to be present within vegetation or to move through the site during construction. Potential impacts include injury or mortality during vegetation clearance and groundworks, or entrapment within excavations, trenches or stored materials.

7.3.8. Mitigation Measures

7.3.8.1. To minimise the risk of harm to hedgehogs during construction, the following Reasonable Avoidance Measures should be implemented:

- Noisy equipment and generators turned off when not in use, particularly at nighttime.
- A pre-commencement check of any trenches/pits each morning to check for hedgehogs.
- A pre-commencement check / hand search of any vegetation before clearance.
- All excavations and trenches should have a means of escape, such as a timber plank.
- Appropriate storage of materials to ensure hedgehogs do not use them as temporary refuge or become trapped inside.

7.3.8.2. Additionally, gaps measuring 13 x 13 cm should be incorporated into boundary fencing to maintain habitat connectivity for hedgehogs.

7.3.9. Significance of Residual Effects

7.3.9.1. Subject to adherence to the aforementioned Reasonable Avoidance Measures, the proposed development is not anticipated to result in significant adverse effects on hedgehogs. The residual effect is therefore considered Not Significant.

Birds

7.3.10. Potential Impacts

7.3.10.1. Building 2, together with the trees and areas of bramble scrub within the site, provide suitable nesting habitat for breeding birds. Vegetation clearance, tree works and demolition of Building 2 have the potential to result in the disturbance of nesting birds and harm to nesting birds if undertaken during the main bird breeding season (March to August inclusive).

7.3.11. Mitigation Measures

7.3.11.1. Where practicable, vegetation clearance, tree works and any works affecting Building 2 should be undertaken outside the main breeding bird season (March to August

inclusive). Where this is not possible, a nesting bird check should be undertaken by a suitably qualified ecologist no more than 48 hours prior to the commencement of works. Should any active nests be identified, an appropriate exclusion zone should be established around the nest and works within the affected area delayed until the young have fledged and the nest is no longer in use.

7.3.12. Enhancement Measures

7.3.12.1. To provide additional nesting opportunities for birds, it is recommended that integrated swift *Apus apus* bricks are incorporated into the proposed building. Swift bricks should be installed on north- or east-facing elevations at a height of at least 5 m above ground level, with a clear flight path to the entrance.

7.3.13. Significance of Residual Effects

7.3.13.1. Subject to the implementation of the above mitigation measures, the proposed development is not expected to result in significant adverse effects on breeding birds. The provision of integrated swift bricks will provide a biodiversity enhancement through the creation of additional nesting opportunities for this Species of Principal Importance. Overall, the residual effect is considered Not Significant.

Amphibians

7.3.14. Potential Impacts

7.3.14.1. The site does not contain any ponds or other waterbodies capable of supporting breeding amphibians. Although records of great crested newt *Triturus cristatus*, common frog *Rana temporaria* and smooth newt *Lissotriton vulgaris* were returned during the desk study, the site itself provides limited suitability for amphibians. The nearest waterbody offering suitable breeding habitat for great crested newts is located approximately 388 m from the site and is separated by Oxford Road and intervening urban development, presenting significant barriers to dispersal. Accordingly, the proposed development is considered unlikely to impact amphibian populations.

7.3.15. Mitigation Measures

7.3.15.1. No specific mitigation measures are considered necessary for amphibians. As a precaution, any excavations left open overnight should be covered or provided with a suitable means of escape to prevent wildlife from becoming trapped.

7.3.16. Significance of Residual Effects

7.3.16.1. The proposed development is not expected to result in significant adverse effects on amphibians. The residual effect is therefore considered Not Significant.

Invertebrates

7.3.17. Potential Impacts

7.3.17.1. The habitats present within the site are considered likely to support common and widespread invertebrate species. The proposed development will result in the permanent loss of small areas of grassland and scrub, which provide foraging and sheltering habitat for invertebrates.

7.3.18. Mitigation and Enhancement Measures

7.3.18.1. The proposed landscaping scheme includes the enhancement of retained grassland to species-rich grassland, the creation and enhancement of scrub habitat, native tree and shrub planting, and the enhancement of retained woodland. These measures will increase the diversity of flowering plants, nectar sources and refuge habitats available to invertebrates. The implementation of an Invasive Species Management Plan to control Himalayan balsam will also facilitate the establishment of native vegetation, further improving habitat quality.

7.3.19. Significance of Residual Effects

7.3.19.1. Whilst the proposed development will result in the loss of a limited extent of habitat used by common and widespread invertebrate species, this will be offset through habitat creation and enhancement. Consequently, the proposed development is expected to provide an overall benefit for common invertebrate species, and the residual effect is considered beneficial but not significant.

Reptiles

7.3.20. Potential Impacts

7.3.20.1. The site comprises habitats of low to moderate suitability for common reptile species, including areas of tussocky grassland, bramble scrub and woodland edge habitat. Although no records of reptiles were returned during the desk study and the likelihood of reptiles using the site is considered to be low, there remains a small risk of injury or mortality to any individuals that may be present during vegetation clearance and groundworks.

7.3.21. Mitigation Measures

7.3.21.1. Although the likelihood of reptiles occurring on the site is considered low, vegetation clearance within suitable habitats should be undertaken using a phased approach. Vegetation cutting should be undertaken over 3 consecutive days. Firstly, vegetation should initially be strimmed to approximately 150 mm, reduced to 75 mm on the second day and finally 30 mm. This will allow any reptiles that may be present to disperse naturally into adjacent retained habitat before works proceed

7.3.22. Significance of Residual Effects

7.3.22.1. Subject to the implementation of phased vegetation clearance, the proposed development is not expected to result in significant adverse effects on reptiles. The residual effect is therefore considered Not Significant.

Aquatic Species

7.3.23. Potential Impacts

7.3.23.1. No watercourses, ponds or other suitable aquatic habitats are present within or immediately adjacent to the site. The nearest watercourse, Church Beck, is located approximately 90 m south of the site and is hydrologically disconnected from the development. Consequently, the proposed development is not expected to result in direct or indirect effects on aquatic species, including water vole, otter and white-clawed crayfish.

7.3.24. Mitigation Measures

7.3.24.1. No aquatic species-specific mitigation measures are considered necessary.

7.3.25. Significance of Residual Effects

7.3.25.1. The proposed development is not expected to result in any adverse effects on aquatic species. The residual effect is therefore considered Not Significant.

Invasive Non-native Species

7.3.26. Potential Impacts

7.3.26.1. Himalayan balsam *Impatiens glandulifera* was recorded within the eastern and southern parts of the site, indicating a localised but established population. Construction activities, particularly vegetation clearance, soil stripping and earthworks, have the potential to facilitate the spread of the species both within the site and to surrounding habitats through the movement of contaminated soil or plant material.

7.3.27. Mitigation Measures

7.3.27.1. Prior to the commencement of works, an Invasive Species Management Plan (ISMP) should be prepared by a suitably qualified specialist. The plan should detail appropriate measures for the treatment, control and eradication of Himalayan balsam, together with biosecurity procedures to prevent its spread during construction. Any movement of soil or vegetation from affected areas should be undertaken in accordance with the recommendations of the ISMP.

7.3.28. Significance of Residual Effects

7.3.28.1. Subject to the implementation of the Invasive Species Management Plan and associated biosecurity measures, no significant adverse effects are anticipated. The long-term management of Himalayan balsam is expected to provide a localised ecological benefit.

7.4. Cumulative Effects

7.4.1. A review of planning applications within the zone of influence did not identify any developments that, either alone or in combination with the proposed development, would be likely to give rise to significant cumulative ecological effects. The proposed development retains habitats of ecological value, incorporates habitat and biodiversity enhancements, and is not anticipated to adversely affect designated sites or protected species. Accordingly, significant cumulative ecological effects are not anticipated.

7.4.2. The significance of each ecological feature is summarised in Table 4.

Table 4: Summary of ecological features and significance of residual effects.

Ecological feature	Residual effect	Mitigation	Means by which mitigation can be secured
Designated sites	Not Significant	No specific mitigation required. Pollution prevention measures to be implemented during construction.	A Construction Environmental Management Plan (CEMP) to be produced.
On-site habitats	Beneficial but Not Significant	Woodland and scrub to be retained, native woodland planting, grassland enhancement, protection of retained habitats during construction.	Landscape Plan; CEMP
Off-site habitats	Not Significant	Protection of adjoining woodland, pollution prevention measures, tree protection fencing.	CEMP; Arboricultural Method Statement; Tree protection plan
Bats	Not Significant	Pre-felling aerial inspection of Tree 11; Sensitive lighting scheme Integrated bat roosting features	CEMP; Wildlife Enhancement Plan; Lighting Strategy
Badger	Not Significant	Reasonable Avoidance Measures	CEMP
Hedgehog	Not Significant	Reasonable Avoidance Measures	CEMP
Amphibians	Not Significance	Precautionary measures during construction	CEMP
Breeding birds	Not Significant	Timing of vegetation clearance to avoid main bird breeding season or pre-works nesting bird check; Integrated swift bricks	CEMP; Wildlife Enhancement Plan
Invasive non-native species	Beneficial but Not Significant	Invasive Species Management Plan; Biosecurity Measures	Invasive Species Management Plan
Invertebrates	Beneficial but Not Significant	Creation of species rich grassland, scrub and woodland enhancement	Landscape Plan; Habitat Management and Monitoring Plan (HMMP)
Reptiles	Not Significant	Phased vegetation clearance	CEMP
Aquatic Species	Not Significant	Pollution prevention measures	CEMP

8. ENHANCEMENT MEASURES

- 8.1. The proposed development incorporates a range of biodiversity enhancement measures designed to deliver long-term ecological benefits and increase the biodiversity value of the site. These measures have been informed by the findings of this Ecological Impact Assessment and seek to enhance habitat quality, strengthen ecological connectivity, and provide additional opportunities for protected and priority species.
- 8.2. The proposed landscape scheme includes the enhancement of retained grassland to species-rich grassland, enhancement and creation of native scrub, enhancement of retained woodland, and the planting of native trees and shrubs. These measures will increase habitat diversity and provide enhanced foraging, commuting and sheltering opportunities for birds, mammals, invertebrates and other wildlife.
- 8.3. To provide additional roosting and nesting opportunities, the proposed care home should incorporate integrated bat and swift bricks within suitable elevations of the building. Bat bricks should be installed on upper elevations at least 4–5 m above ground level, with entrances remaining free from artificial lighting. Swift bricks should be installed on north- or east-facing elevations at a height of at least 5 m above ground level, with a clear flight path to the entrance.
- 8.4. The enhancement measures should be implemented in accordance with the landscape proposals and maintained for the lifetime of the development to ensure that the intended biodiversity benefits are fulfilled.

9. MONITORING

- 9.1. Monitoring is recommended to ensure that the proposed habitat enhancement measures are successfully established and maintained. During construction, ecological supervision should be provided where required to oversee the implementation of mitigation measures, including vegetation clearance where necessary. Following construction, the created and enhanced habitats should be managed and monitored in accordance with a Habitat Management and Monitoring Plan (HMMP).
- 9.2. The HMMP should be prepared by a suitably qualified ecologist and set out the habitat management prescriptions, monitoring methodology, success criteria and any remedial measures required to achieve the target habitat condition. Monitoring should be undertaken over the required 30-year management period in accordance with the Biodiversity Gain Plan to demonstrate the successful establishment and long-term maintenance of the habitats.

10. SUMMARY

- 10.1. This Ecological Impact Assessment has considered the likely ecological effects of the proposed development and has identified appropriate mitigation and enhancement measures to avoid, reduce and compensate for potential impacts on ecological features. Subject to the implementation of the recommendations contained within this report, the proposed development is not anticipated to result in any significant adverse ecological effects.
- 10.2. The proposed development has been designed to retain habitats of greatest ecological value where practicable and incorporates habitat enhancement measures, including the enhancement of grassland, scrub and woodland habitats, together with the provision of integrated bat and swift bricks. These measures will increase habitat quality, strengthen ecological connectivity and provide additional opportunities for protected and priority species.
- 10.3. The recommendations set out within this report should be secured through appropriately worded planning conditions and the implementation of supporting documents, including the Construction Environmental Management Plan (CEMP), Landscape Plan, Invasive Species Management Plan (ISMP) and Habitat Management and Monitoring Plan (HMMP), as appropriate.
- 10.4. Subject to the implementation of these measures, the proposed development is considered to accord with relevant wildlife legislation and national and local planning policy relating to the conservation and enhancement of biodiversity. The proposed development is expected to deliver measurable biodiversity enhancements and Biodiversity Net Gain through the creation, enhancement and long-term management of habitats. Consequently, the development is not anticipated to result in significant adverse effects on habitats or species and will provide an overall ecological benefit, in accordance with the Kirklees Local Plan (2019).

11. REFERENCES

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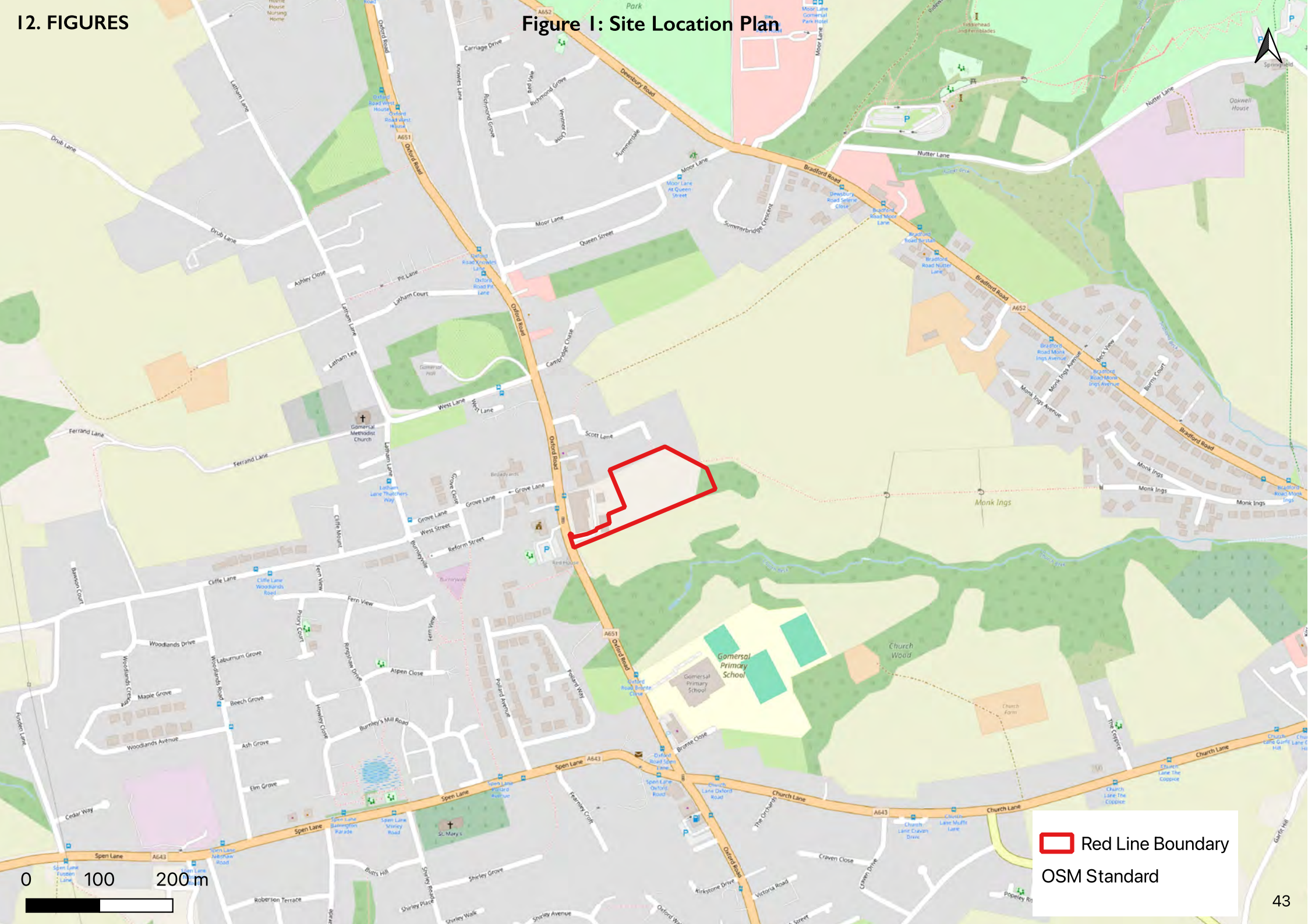
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12. FIGURES

Figure I: Site Location Plan



Red Line Boundary
OSM Standard

Figure 4: Building Plan with Building 1 (B1) and Building 2 (B2) highlighted. Base map (Doc ref: A253019 - Gomersal - AL(9)902 P2 - Existing Site Plan).

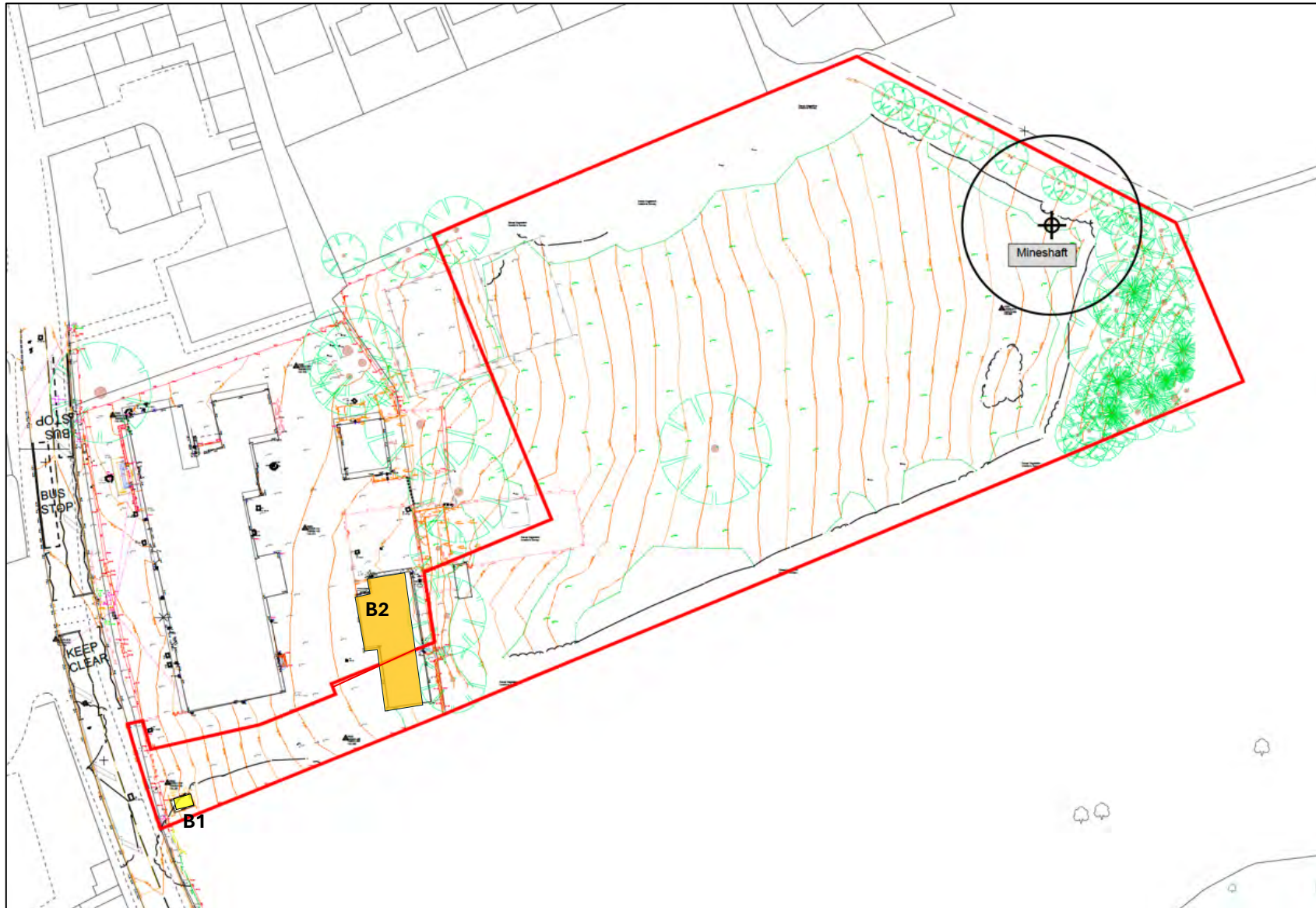


Figure 5: Plan highlighting trees (in yellow) to be lost to the development. Base plan; topographical survey.

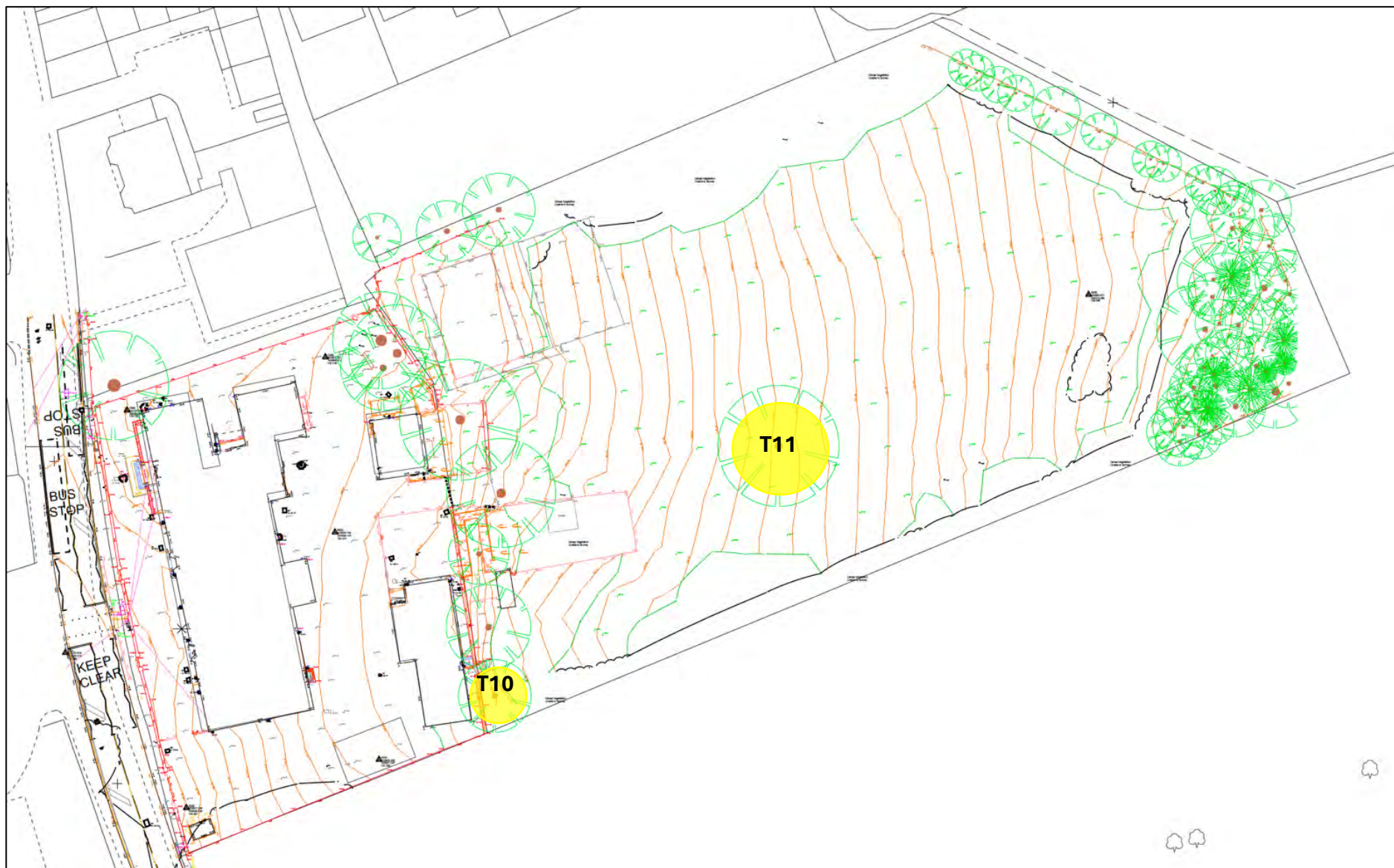


Figure 6: Waterbodies within 500 m of the site boundary (red line). Base map sourced from MAGIC.co.uk.

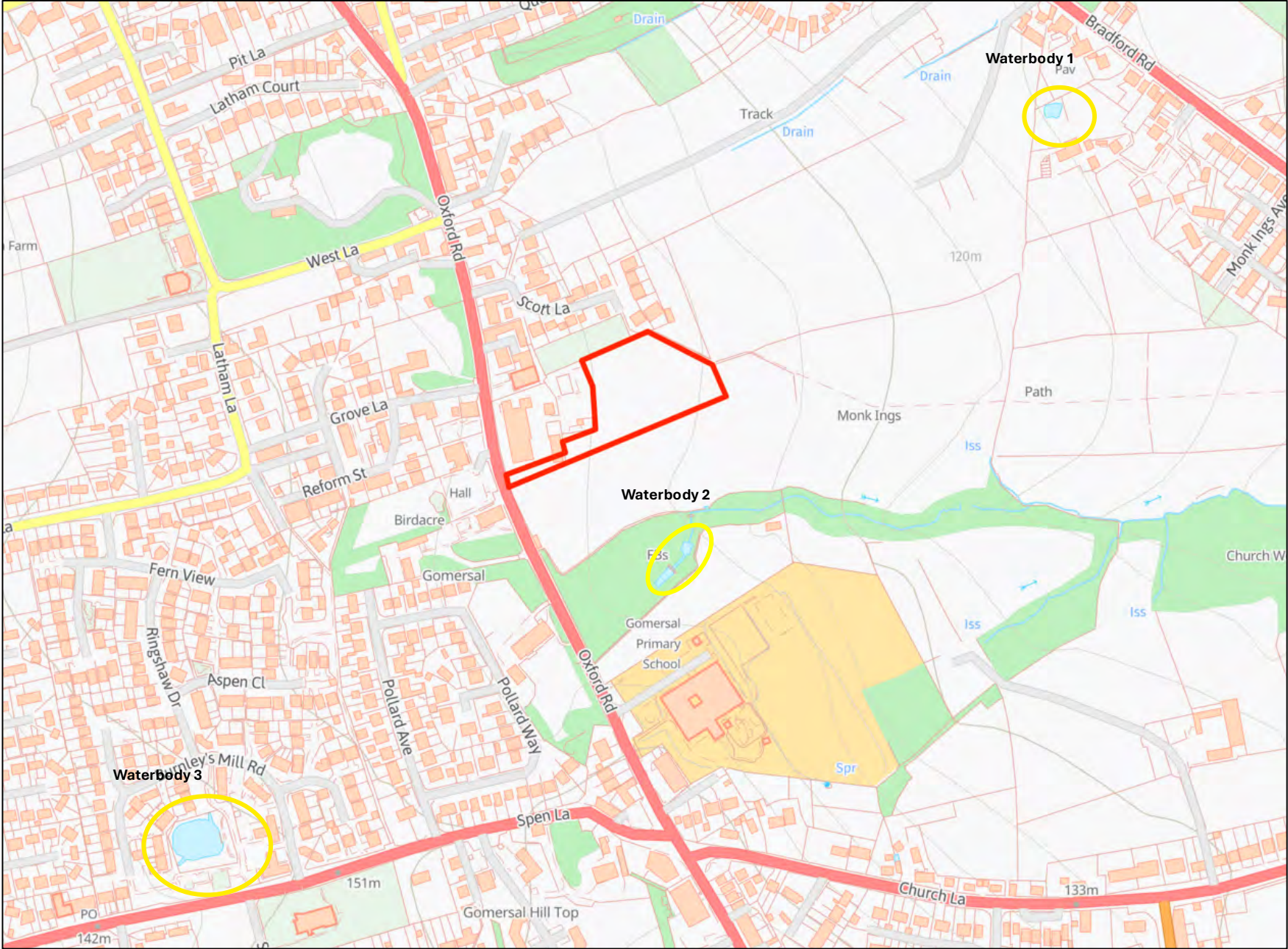
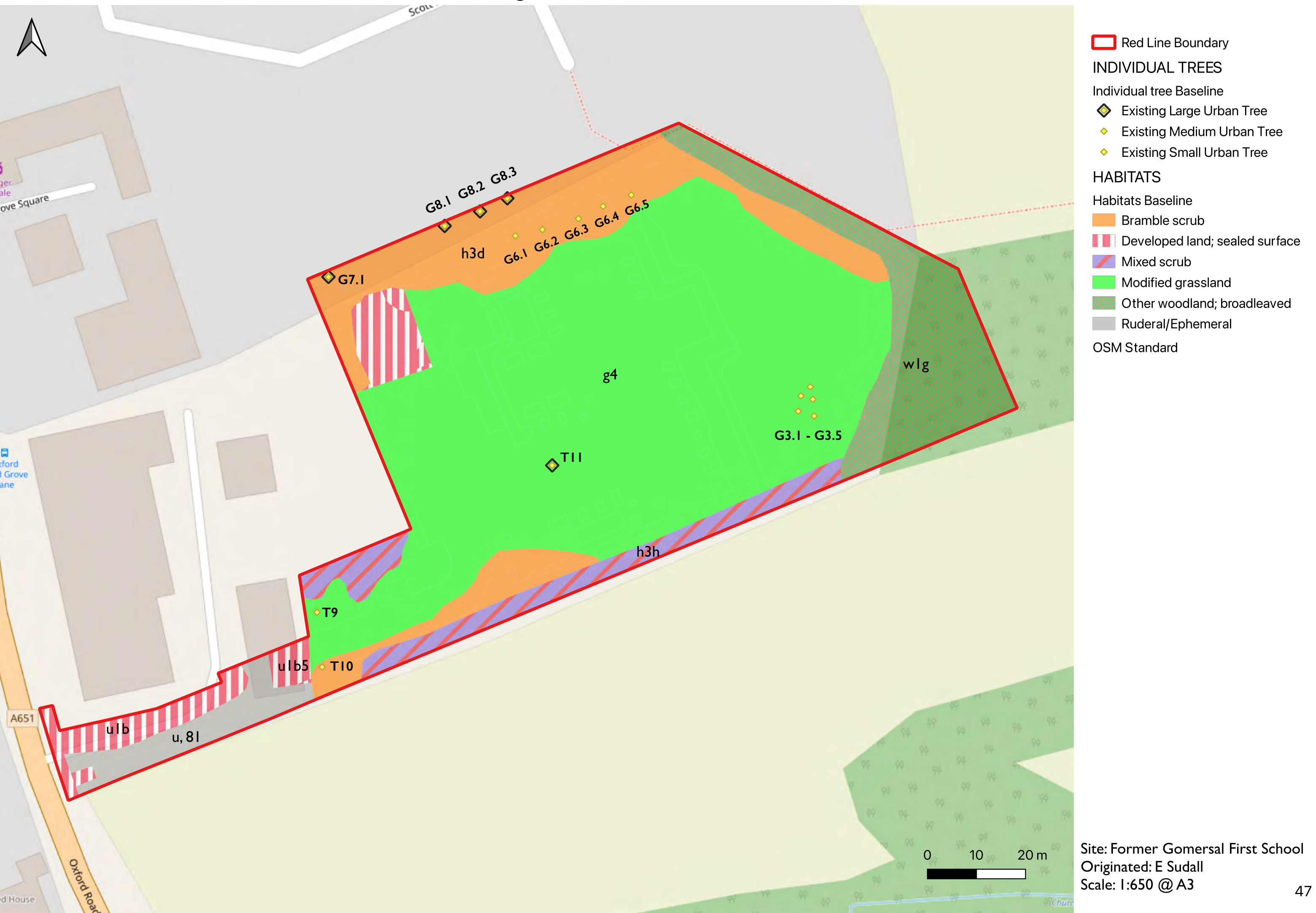


Figure 7: UKHab Baseline Habitat Plan



13. APPENDICES

13.1. Appendix A: Planning Policy, Legislation and Guidance

Policy / Legislation	Relevance to the scheme
Environment Act 2021	The proposed development is subject to the statutory Biodiversity Net Gain requirements. Habitat creation and enhancement measures have been incorporated into the design to contribute towards achieving the required biodiversity gain.
Conservation of Habitats and Species Regulations 2017 (as amended)	Building 2 was assessed as having Low suitability for bats and a Potential Roost Feature was identified within Tree 11. Appropriate precautionary measures have been recommended.
Wildlife and Countryside Act 1981 (as amended)	Building 2, woodland, trees and scrub provide nesting habitat for breeding birds. Himalayan balsam was also recorded on site. Appropriate mitigation and management measures have been recommended.
Protection of Badgers Act 1992	Although no evidence of badgers was identified, suitable foraging habitat is present and Reasonable Avoidance Measures have been recommended.
Natural Environment and Rural Communities Act 2006	Habitats including woodland and scrub, together with Species of Principal Importance such as hedgehog and swift, have been considered within the assessment.
National Planning Policy Framework (2026)	The proposed development has been assessed in accordance with the mitigation hierarchy, with measures proposed to avoid and minimise adverse ecological effects and provide biodiversity enhancements. The relationship of the development with wider nature recovery and ecological connectivity has also been considered.
Kirklees Local Plan Policy LP30	The development retains habitats, protects the adjoining Kirklees Wildlife Habitat Network and includes habitat creation and enhancement measures.
West Yorkshire Local Nature Recovery Strategy	Habitat enhancement proposals contribute towards local nature recovery objectives by improving habitat quality and connectivity.

13.2. Photographs



Photo 1: Modified grassland



Photo 2: Bramble scrub



Photo 3: Woodland in eastern corner, extending along northern boundary of the site.



Photo 4: Himalayan balsam noted in woodland.



Photo 5: Individual trees (Tree 11)



Photo 6: Group of small cherry trees towards the east of the site.



Photo 7: Individual trees (T10 visible on the right of the image)



Photo 8: Mixed scrub towards the centre of the site.



Photo 9: Ruderal / ephemeral



Photo 10: Building 2.