

Memo

Department of Place

**Countryside and Rights of Way
Service**

**To: Carole Howarth
Department of Place
Planning, Transportation
and Highways
Development Services
Bradford Team
Britannia House
Bradford
BD1 1HX**

**Biodiversity Team,
4th Floor, Britannia House
Bradford BD1 1HX**

From: David Campbell

Tel: 01274 434321

Fax:

E-Mail: david.campbell@bradford.gov.uk

My Ref:

Your Ref: 23/00829/MCF

Date: 17/05/2023

Application Number: 23/00829/MCF

Grid Ref: 405261 447976

Proposal: Re-opening of Horn Crag Quarry for the purposes of releasing a proven locally distinctive building stone resource.

Location: Horn Crag Quarry Off Fishbeck Lane Silsden Keighley West Yorkshire

Thank you for consulting the Biodiversity Team on proposals in application 23/00829/MCF

Birds

We are satisfied with the findings of the foraging bird surveys, that the site does not represent supporting habitat to the South Pennine Moors Annex I Species or the breeding bird assemblage. As such there is no further assessment against the habitat regulations required. We are also satisfied that the breeding bird surveys and the assessment of the breeding bird assemblage appropriately value the site's importance for breeding birds and recommends appropriate mitigation of effects on breeding birds.

Bats

We are also satisfied that the bat emergence and hibernation surveys have provided an accurate assessment of the site's use by bats, both as a roost and foraging/ commuting location and that the site is unlikely to be used as a roost and has low value as a foraging site.

Reptiles

We are satisfied that reptile surveys indicated a probable absence or negligible use of the site by reptiles.

However, we object to this application as it represents a long-term loss of priority and other habitats which cannot be suitably mitigated in reasonable timeframes by habitat creation or enhancement within the site boundary.



Habitat Loss and Biodiversity Net Gain

We welcome the considerable work that has gone into the 'snapshot approach' for habitat restoration and biodiversity net gain. This approach shows how incremental extraction and habitat restoration can begin mitigating for habitat loss even while the quarry is active. As with many quarries, there is potential, in the long term to create habitats of the same or greater ecological value than the existing. Long term benefits of restoration must be viewed in relation to the loss of existing, established habitats and the length of time taken for restoration to happen.

The presence of priority habitat on the site, coupled with the restrictive site boundary compared to the extraction area means the approach is not effective at returning to an overall Net Gain for biodiversity until around Year 30 and the required enhancement (10% Net Gain) not being reached until between Year 30 and Year 35.

Other quarry examples we have seen which make use of the snapshot approach have benefitted from a larger site area and lower distinctiveness baseline habitats allowing an overall ecological enhancement and net gain to be reached through creation of higher value habitats, after a relatively short timeframe. As this is not the case at Horn Crag, the opening of the long abandoned and naturalised quarry, and excavation of additional unworked land, will represent a biodiversity loss for around 30 years, assuming the extraction works and restoration works proceed as planned.

In addition, the restoration phasing plan relies on the success of habitat creation in relatively small areas of the quarry whilst extraction continues in adjacent areas. We are concerned that successful establishment of habitats in these areas will have increased difficulty and be more likely to be unsuccessful and/ or be delayed due to shading from quarry face to the south and east as well as dust from the active face and operational areas to the north and west. These issues compound the already very challenging heathland habitat creation.

Habitat Network

The application site is included in the Wildlife Habitat Network. Whilst other supporting habitats to the network exist outside the mapped areas, the role of the Horn Crag quarry site to habitat connectivity is of significance. The working of the site will result in a weakening of the mapped network, removing priority and BAP habitats from the network for the life of the operational quarry.

In summary, we consider the scale and timeframes for habitat loss and restoration to be unacceptable. The opening of the quarry, which has not been worked legally or extensively since the 1800s and has naturally regenerated to priority heathland and Bradford BAP grassland habitats would result in unacceptable habitat loss to the area for an extended period with risks to restoration that may result in delays to restoration. The application does not therefore comply with Policy EN2 of Bradford's Core Strategy, the NPPF or the Environment Act, 2021.

[REDACTED]