

Carole Howarth

Subject: FW: 22/01170/MAF - HORN CRAG QUARRY, Silsden - Biodiversity
Attachments: Biodiversity Metric 3.0 Auditing and accounting for biodiversity Calculation tool macro free (2).xlsx

From: Masheder, Robert <>
Sent: 22 April 2022 20:48
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Cc: David Campbell <David.Campbell@bradford.gov.uk>
Subject: 22/01170/MAF - HORN CRAG QUARRY, Silsden - Biodiversity

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Dear Carole

Thank you for your consultation of 07/04/2022 regarding 22/01170/MAF - HORN CRAG QUARRY, Silsden.

We have reviewed the ecological aspects of the application including the Biodiversity Net Gain Calculation and have the following comments.

1) Biodiversity Net Gain

The proposal includes a calculation using the Defra 2.0 metric for assessing the biodiversity value of the site before and after development. This produced a net **loss of 16.04** biodiversity units. This in itself does not meet the NPPF or Environment Act 2021 which requirement developments to demonstrate a biodiversity net gain. The 2.0 metric has now been superseded by the Defra 3.0 metric and, using the same habitats and condition assessments, this produces a net **loss of 16.18** biodiversity units (-28.99%) however neither of these figures take account of the delay between habitats being destroyed and restoration of the site which is currently put at a period of approximately 20 years. The new metric allows for delays in habitat creation to be factored into the calculations. Using delays for between 10 and 20 years for the range of habitats proposed, produces a **loss of 25.10** biodiversity units (-44.99%). We consider this likely to be understated as it assumes that retained habitat on the west of the site will maintain its ecological condition during working of the site. This seems unlikely with the increased levels of dust and disturbance from blasting and machinery. The pattern of supply and demand for this building stone also produces uncertainty in the completion date for restoration of the quarry which has the potential to be much longer. There has been no proposal for off-site biodiversity creation to achieve the required biodiversity net gain.

2) Existing habitats

The site supports a range of habitats which were assessed in March 2021, relatively early in the year. Some of the habitats such as the acid grassland would have benefitted from a survey in June and testing against the West Yorkshire Local Wildlife Site Selection Criteria to get a better understanding of their value. These criteria are used to assess whether habitats are of West Yorkshire rather than just local value. Significant areas of the site were recognised as been Upland Heath a UK BAP Priority Habitat of high distinctiveness. Although the area is too small to meet Local Wildlife Site Selection Criteria it is still a valuable stepping stone site. Horn Crag Quarry sits within the grassland component of the Bradford Wildlife Habitat Network. The survey work has demonstrated that it should also be part of the heathland component of the Habitat Network. The proposals for working the site will almost cut the Wildlife Network in this location for about 20 years. This is likely to reduce the ability of species to migrate at a time when climate change makes this increasingly important for nature conservation. The NPPF paragraph 174 d) requires policies and decisions to contribute to and enhance biodiversity including by establishing coherent ecological networks that are more resilient to current and future pressures. This is the role of the Wildlife Habitat Network in Bradford and it is generally only acceptable to impinge on the network if mitigation can be provided in the form of alternative links or enhancement to the more constrained remaining corridor. There is no sign of this within this application.

3) Birds

The bird surveys for the proposed development were limited to 3 visits in April, May and June. This means that passage birds using the site as a stepping stone in March and late summer would not have been recorded. This could include species moving to or from designated sites such as Ilkley Moor or other parts of the South Pennine Moors Special Protection Area (SPA) and the North Pennine Moors SPA. This would have required surveys from March to September.

The breeding bird survey submitted as part of the application picked up on a number of notable species present during the 3 visits including song thrush, willow warbler, dunnock, meadow pipit and bullfinch all birds of conservation concern due to rapidly declining breeding success. West Yorkshire Ecology also recorded another red list bird, linnet, as likely to be breeding on the site in 2013. This is typically associated with gorse scrub such as that found on the site. There were records of curlew in surrounding fields although not recorded to be using the site within the restricted number of survey visits.

4) Bats

The Minimum Standards for Bat Surveys in West Yorkshire state that the assessment should include:

“A walkover of the survey site to assess the presence of features important to bats, in particular feeding, roosting, swarming and hibernating opportunities.”

The site includes an substantial existing quarry face which will have joint cracks likely to be suitable for hibernating and potentially swarming bats. Bats swarm around hibernation sites in September/October to mate before the winter sets in. Bat monitoring should have been undertaken of the quarry face following national best practice guidelines in this part of the year and appropriate mitigation provided.

5) Redacted

6) Ecological Impact Assessment

A Preliminary Ecological Assessment is used to define the scope of work which is required for development and an initial habitat survey. Species surveys follow on. What is missing for this application is the document which pulls the findings of these together and summarises the ecological impact. We would expect to see a detailed Ecological Impact Assessment submitted with the application.

7) On-going habitat management

The application defers details for restoration to condition but there needs to be some parameters set at this stage. The broad habitat types, minimum biodiversity value and timescale for achieving them. There should also be requirements to maintain any habitats at or above this minimum value for a period not less than 30 years together with an agreed monitoring and reporting mechanism through the planning authority.

We object to this application which we do not consider meets the requirements of the Environment Act or the National Planning Policy Framework.

Yours sincerely

Robert Mashedor
Ecological Services Team Manager
West Yorkshire Ecology Service

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