



**Proof of Evidence by**  
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**West Yorkshire Ecology Service**  
**West Yorkshire Joint Services**  
**on behalf of**  
**City of Bradford MDC**

**Appeal by Mr Andrew Calvert**  
**Land off Fishbeck Lane, Silsden, West Yorkshire, BD20**  
**ONR**  
**Ref: APP/W4705/W/23/3332884**

West Yorkshire Joint Services

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## 1.0 Introduction

- 1.1 I am Robert Masheder, Ecology Service Team Manager at West Yorkshire Ecology Service a department within West Yorkshire Joint Services a local governmental body which provides services and advice to the 5 district councils of West Yorkshire.
- 1.2 I hold a Bachelor of Science (Hons) in Mining Geology and am an Associate of the Royal School of Mines.
- 1.3 I have 27 years of full-time experience working in ecology linked to Development Control and Forward Planning. For the last 17 years have been a Senior Ecologist and then Ecology Service Team Manager with West Yorkshire Ecology Service. Before this I was Senior Ecologist with Yorkshire Wildlife Trust for 10 years.
- 1.4 I was responsible for producing the Bradford Wildlife Habitat Network, similar Wildlife Habitat Networks for Leeds, Calderdale and Kirklees and more detailed Wildlife Habitat Networks for a number of Neighbourhood Plans. I also sit on the Local Sites Partnership and have been responsible for developing the current Local Wildlife Site Selection Criteria for West Yorkshire and a programme of resurveying and assessing existing and new Local Wildlife Sites across West Yorkshire.
- 1.5 The evidence I have prepared and provide for this Inquiry and in this Proof of Evidence are my true and professional opinions.
- 1.6 This evidence is given in respect of an appeal made against the Council decision in relation to planning application 23-00829-MCF.

## 2.0 Scope of evidence

- 2.1 The evidence will demonstrate that the proposal will result in significant harm to the Bradford Wildlife Habitat Network over a long time scale of more than 30 years with uncertainty surrounding negative ecological impacts beyond this timeframe.
- 2.2 Uncertainty in habitat re-creation over such long time frames can be viewed in many ways. Species which currently exist on the site may have become locally extinct within the area which makes natural colonisation impossible, this could include birds where we have already seen larger numbers appearing every 5 years on the red and amber lists of rapidly declining breeding birds listed in Birds of Conservation Concern. These are the most obvious species but there are many more biotic groups likely to be facing problems from regional, national or international adverse changes beyond the scope of this inquiry such as global warming, air pollution, use of pesticides and demand for land. Examples of these might be Aculate Hymenoptera (bees wasps and ants), Lepidoptera (butterflies and moths), Arachnids (spiders), lichens, fungi and lower plants such as mosses. The additional risk from the proposal comes from destruction of established habitat and attempt to re-create the habitat. This might superficially look the same with for example an established range of woody heathland vascular plants (heather, bilberry, crowberry) and even have a variable age structure, improving the 'condition' of the habitat but what about the diversity of invertebrates, mosses and fungi?

- 2.3 It will also challenge the acceptability of the loss of upland heathland, a habitat of “high distinctiveness” under the current Defra Biodiversity Net Gain (BNG) metric, which will take over 30 years to re-establish this habitat to its current biodiversity value. This constitutes long-term net loss of biodiversity at a time when the Government recognises that the country is suffering a biodiversity crisis.
- 2.4 These long-term impacts and uncertainty to the habitat network and upland heathland habitat make the proposal unacceptable under the Policy EN2(D and E) and EN9 of the Bradford UDP.

### **3.0 Objections**

#### **3.1 Bradford Wildlife Habitat Network (BWHN)**

##### 3.1.1 Background

3.1.2 The BWHN was created following the Government’s report “A Green Future: Our 25 Year Plan to Improve the Environment” p58 which refers to Prof. Sir John Lawton’s recommendations requiring “more habitat; in better condition; in bigger patches that are more closely connected”.

3.1.3 The BWHN takes designated nature conservation sites international (SPA/SAC), national (SSSI) and local (LWS) and provides better links between them using broad habitat types woodland, grassland, heathland and wetland. These links were mapped by experienced ecologists using a combination of habitat, species and aerial photography data. Wherever possible this maintained a continuous corridor aimed at helping a wide range of species disperse in the face of climate change.

Limiting the distance between broad habitat types helps to maintain the biodiversity of habitats.

3.1.4 The BWHN was adopted into the Bradford Core Strategy which provides additional context (para 5.4.58).

The Wildlife Habitat Network running through the proposal site links the South Pennine Moors SAC/SPA/SSSI to the east with Great Gill, Silsden Reservoir Woodland, Brown Bank Marsh and Bracken Ghyll Local Wildlife Sites to the west. This uses a mixture of acid grassland, heathland and woodland habitats.

3.1.5 The Wildlife Habitat Network is given protection by Policy EN2(E) of the Bradford Core Strategy

“The Council will seek to establish coherent ecological networks that are resilient to current and future pressures. Development which would cause serious fragmentation of habitats, wildlife corridors or have a significantly adverse impact on biodiversity networks or connectivity will be resisted”.

### 3.2.1 Objection

3.2.2 The proposal site straddles the Wildlife Habitat Network which is currently 72m wide at this location. Phases 1 to 4, including the main site access road will reduce the width of the corridor to less than 10m. The remaining habitat will be upland acid grassland, of low distinctiveness, and of poor condition.

3.2.3 The distance which many species will need to travel before they can circumvent the quarry along this narrow corridor of poor quality habitat will be approximately

450m, although this will change with different phases of extraction and restoration. The disturbance to this habitat is likely to be high, being immediately adjacent to the working quarry or areas which are in the process of being restored.

3.2.4 This level of disruption will effectively sever the Wildlife Habitat Network in this location for a period 20 years of extraction and initial restoration. It will then take up to a further 22 year for different habitat types to reach agreed “condition” under the proposed Defra BNG snapshot metric.

.3.2.5 This will cause loss and fragmentation of habitats which will have significant adverse impact on the biodiversity network over a long period of time. This does not conform to Policy EN2 (E) in the Bradford Core Strategy.

## **3.2 Biodiversity Gain**

3.2.1 The site supports significant areas of upland heathland habitat, a UK Biodiversity Action Plan Priority Habitat. This is mapped in Brooks Ecological Ltd Biodiversity Net Gain Assessment (23/11/2021) figure 2 (page 5/22) Habitat map - pre-development. This is a Priority Habitat in the context of Bradford UDP Policy EN2D(1).

“Proposals that may have an adverse impact on important habitats and species outside designated sites need to be assessed according to the following criteria:

1. The potential for adverse impact on important/priority habitats that occur outside designated sites”

3.2.2 This is a habitat recognised in the Defra Biodiversity Metric as being of “high distinctiveness”. Development should ‘avoid adverse effects’ to such habitat whenever possible. When not possible mitigation should be the same habitat type of the same or better condition.

3.2.3 In the case of this development only 8% of upland heathland is retained. The remaining 92% is lost and has to be re-created, a process which is lower down the mitigation hierarchy and carries with it associated delay and risks before the habitat reaches appropriate “condition”.

3.2.4 The Defra Biodiversity Metric provides guidance on the relative “distinctiveness” of different habitat types and the length of time it will take to re-create replacement habitat. In the case of upland heathland this is estimated to be 20 years.

3.2.5 The Brooks Ecological baseline survey recorded 1.3620ha of upland heathland habitat within the site. In Phases 1 to 4, the first 10 years of the development, 0.9054ha (66.47%) of this habitat will be lost.

3.2.6 Restoration of the south-eastern parts of Phases 2 to 4 starts in year 10 with 0.8066 ha of heathland habitat (BNG Assessment figure 10). This will take a projected 20 years to attain ‘moderate’ condition. This means that it will take 30 years after the loss of the heathland before 89% will have been restored to moderate condition. The

remaining 11% will be restored 5 years later (BNG Assessment Figure 12) at the northern end of Phases 2 to 4. For this remaining 11% of the baseline heathland habitat, it will have taken 35 years to return to moderate condition.

3.2.7 During the 35 year period of quarrying and restoration the main heart of this habitat will be taken out, leaving only small areas of fragmented, original habitat. Newly created habitats will be relatively immature as soils and vegetation structures stabilise and species try to settle into new niches. These will be subjected to increased levels of disturbance from adjacent mineral extraction and restoration activity. Long-term loss of biodiversity from habitat loss or significant degradation over at least 35 years does not meet the requirements of Policy EN9A(4).

“The development would not lead to a long-term net loss of biodiversity, to the loss or significant deterioration of any irreplaceable habitats, or to the permanent disruption of a significant ecological network,...”

3.2.8 Following cessation of quarrying in year 20, the remaining heathland habitat will commence restoration. Heathland in this area will achieve moderate condition in year 42 when restoration is complete.

## **4.0 Conclusion**



4.0.1 The proposed development does not meet the requirements of Policy EN2(D(i) and E) or Policy EN9A(4) of the Bradford UDP.