

Your Ref:
Our Ref: 264018/4

15 July 2026

To whom it may concern,

Re: Woolley Colliery Road, Darton – Reuse of Site-derived Concrete Rubble within Biodiversity Enhancement Areas

This letter has been prepared to explain the purpose behind the retention and reuse of site-derived concrete rubble, including large concrete fragments and demolition arisings, within the biodiversity enhancement areas at Woolley Colliery Road.

Whilst such materials may initially appear to be waste, they have been intentionally repurposed as habitat features in line with the approved Biodiversity Management Plan (BMP) and the site's Biodiversity Net Gain (BNG) objectives. The BMP specifically promotes the creation of Open Mosaic Habitat (OMH), habitat banks, scrapes and varied topography to benefit invertebrates, reptiles and other wildlife. It also identifies the use of aggregate-based substrates and habitat banks as key ecological enhancement measures.

The concrete rubble has therefore been reused as a habitat-forming material rather than disposed of off-site. The larger fragments create a diverse and varied substrate with cavities, crevices and exposed mineral surfaces that provide shelter, basking areas and overwintering opportunities for reptiles and invertebrates. These conditions closely reflect the disturbed ground environments associated with Open Mosaic Habitat and contribute to the ecological diversity sought by the BMP.

The reuse of these materials also supports sustainable construction principles by reducing waste export from the site and minimising the need to import additional materials. This approach makes beneficial use of existing resources while contributing directly to the ecological objectives of the development.

In addition, some of the larger concrete fragments have been positioned at the base of newly created habitat mounds and topographical features. Their purpose is to deter unauthorised motorcycle access, which could otherwise damage sensitive habitat creation areas during establishment. By discouraging vehicle encroachment, the materials help protect newly created ecological features and improve the likelihood of achieving the long-term habitat and biodiversity targets set out within the BMP.



Accordingly, the retained concrete rubble should not be considered waste material. Instead, it forms part of a deliberate ecological design strategy that enhances habitat diversity, supports the delivery of Open Mosaic Habitat, protects newly established biodiversity features and assists in meeting the requirements of the approved Biodiversity Management Plan, Biodiversity Net Gain commitments and associated planning conditions.

Yours sincerely



Operations Manager – Head Office

