

**Sent:** 08 July 2025 10:13

**Subject:** 2023/91491 at location Prickleden Mills, Woodhead Road, Holmfirth, HD9 2JU

Please see ecological commentary below:

### **Designations**

No issue

### **Onsite habitats and species.**

The Ecological Impact Assessment (Nov. 2024, Collington Winter Environmental - CW20-180 RPT 004) provided is reasonable and acceptable. The supporting Protected Species Survey report (June 2023, Collington Winter Environmental - CW20-810 RPT 002) is also noted. There are a number of detailed recommendations within Sect 5 of the report (PDF pages 18-25) for mitigation and enhancement. These must be adhered to a placed into a CEMP which must be implemented onsite.

### **BNG**

It is noted that Statutory BNG is exempt due to the timing of this application.

The Biodiversity Net Gain and River Condition Assessment (Nov 2024, Collington Winter Environmental - CW20-810 RPT 001) is noted, however it is mentioned in point 5.1.1 that the DEFRA 4.0 metric was used for this report. At this moment in time Version 3.0 of the DEFRA tool has been provided, and does not match the results in the report.

Please can the correct BNG DEFRA tool for this application be provided – and in excel format for review.

### **Suggested conditions**

#### Habitats / Species

A condition for a CEMP: Biodiversity (Construction Environment Management Plan) is advised, e.g. No works shall take place until a Construction Environmental Management Plan (CEMP: Biodiversity) has been submitted to and approved in writing by the local planning authority. The CEMP (Biodiversity) shall include the following:

- a) Summary of potentially damaging activities
- b) Identification of "biodiversity protection zones"
- c) Practical measures (both physical measures and sensitive working practices) to avoid or reduce impacts during construction (these may be provided as a set of method statements)
- d) The location and timing of sensitive works to avoid harm to biodiversity features.
- e) The times during construction when specialist ecologists need to be present on site to oversee works.
- f) Responsible persons and lines of communication.
- g) The role and responsibilities on site of an ecological clerk of works (ECoW) or similarly competent person.
- h) Use of protective fences, exclusion barriers and warning signs.

The approved CEMP: Biodiversity shall be adhered to and implemented throughout the construction period strictly in accordance with the approved details, unless otherwise agreed in writing by the local planning authority.

***Reason: In the interests of biodiversity and in accordance with LP30 and NPPF15***

BNG conditions to be provided once appropriate information provided.

Many thanks,  
Katie  
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