

**Consultation Response from KC,
Ecology Unit**
2024/92236 Wood Street Mills, Wakefield Road, Scissett, Huddersfield, HD8 9JS
Demolition of existing industrial building and erection of storage and distribution building with car park and associated engineering works
Date Responded: 30/09/2026
Responding Officer: Z. Hanshaw
Responding Ref: 2609/58

I have reviewed the following documents:

- Biodiversity Net Gain Assessment (Brooks Ecological, June 2026)
- Biodiversity Net Gain Metric (Brooks Ecological, June 2026)
- Planning Statement (Sheppard Planning, July 2026)
- Proposed Site Plans, drawing nos. 0006 and 0005 (Martin Walsh Architectural, 2025)
- eDNA Technical Report (Sure Screen Scientifics, July 2024)
- Site Inspection Report (Brooks Ecological, June 2024)
- Bat Emergence Survey Report (Brooks Ecological, July 2024)
- River Condition Assessment (RCA) Report (Brooks Ecological, June 2024)
- Preliminary Ecological Appraisal (PEA) (Brooks Ecological, May 2024)
- Arboricultural Impact Assessment (James Royston, August 2026)
- Previous KC Ecology Comments
- Environment Agency Comments

In line with the previous KC Ecology comments, I am satisfied with ecological information provided for bats, birds, riparian mammals, White-Clawed Crayfish (WCC) and invasive non-native species. The Bat Emergency Survey Report details that bats are likely absent onsite, and the eDNA surveys and hand search concluded that the watercourse does not support WCC, Signal Crayfish or Crayfish Plague.

However, the PEA, Bat Survey Report, RCA, and Site Inspection Report produced by Brooks Ecological include details to state that the results are only considered valid for 18 months, and as such would now be considered out of date. I note that the Biodiversity Net Gain Assessment is the only report still considered in date, as it has been revised but this was not completed following a revised site walkover, but still based on the site assessment from 2024. I would therefore recommend that these surveys are reverified by an updated site walkover, and further surveys are completed, if necessary.

I would also request that further information on the delivery of Biodiversity Net Gain onsite is provided. The Metric and Report detail that there are 1.73 habitat units at baseline and 0.49 watercourse units at baseline. Post development there would be 1.29 habitat units, and 0.49 watercourse units. This equates to a net loss of 25.64% of habitat units and a net gain of 1.67% in watercourse units. This does not meet the 10% net gain requirement as set by the Environment Act. The Biodiversity Net Gain report states that offsite units will be required for this development. I would recommend that further details of this offsetting are provided. I strongly support the proposed de culverting and enhancement measures proposed within the watercourse, I note that the enhancements proposed are low impact, as any major works would need to be considered by a hydrological expert. It may be appropriate to consider this further, as the [the figures from February 2026 put the cost of offsite purchase of watercourse units](#) at £141,450 and the cost of woodland credits at upwards of £33,922. This report also details that watercourse units are scarce. The cost of these units may have an impact on the viability of the development and

therefore I would recommend that further consideration to the mechanism to achieve Biodiversity Net Gain is considered. The comments from the EA detail that the Applicant may own or manage more of the River Dearne than included within this redline boundary, and therefore there may be opportunities to deliver the net gain for watercourse and habitats within the applicant's ownership, which may reduce the costs of Biodiversity Net Gain delivery.