

**Sent:** 05 February 2026 12:25

**Subject:** ra 2024/92651 at location land at, Blackmoorfoot Road, Crosland Hill, Huddersfield, HD4 5NU

I understand that this a further response following those I have provided in March and December; however please do see a further updated response:

### **Onsite habitats and species**

A CEMP and invasive species plan will be conditioned.

### **BNG**

The BNG metric and Full Application report (Envirotech, January 2025) has been reviewed and is now acceptable. Baseline calcs are validated.

The report indicates an onsite net gain of 0.34 (18.06%) habitat units. This will be through the creation habitats and hedgerow with v low distinctiveness.

We consider that the onsite element of the BNG proposal will not result in significant onsite gain as it would be delivered by. This does therefore not need to be secured for 30 years but could be secured by a simple landscaping condition, if appropriate, to ensure it is provided and maintained for an aftercare period.

It is noted, however that the trading rules are not met due to a loss of woodland and urban trees. This consists of a loss of 0.11 individual trees and 0.51 woodland and forest units. It is noted from the report that these are to be purchased through a habitat bank.

A condition to achieve this must be added.

**Reason: To ensure the development delivers a biodiversity net gain on site in accordance with Schedule 7A of the Town and Country Planning Act 1990**

### **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**

Invasive species

No works shall commence on-site prior to the completion of an invasive species survey and appropriate removal and / or management plan and agreed in writing with the council.

Schedule 9 of the Wildlife and Countryside Act 1981 lists non-native species that are considered harmful to native biodiversity and habitats in the UK. It is illegal to release, plant, or allow these species to grow in the wild.

***Reason: In order that the proposals are implemented in accordance with the Wildlife and Countryside Act 1981 (as amended).***

BNG conditions for achievement of trading rules met for individual tree and woodland forest units.

Many thanks,  
Katie

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