
Sent: 09 July 2025 12:58

Subject: RE: Ecology consultation - 2024/93156 Healey Lane Mills, Healey Lane, Batley

Please see ecological commentary below.

Designations

No issue

Onsite habitats and species

- The PEA provided was reasonable and acceptable. The buildings were considered to have moderate potential for roosting bats. The site has some potential for birds. No further protected species concerns were raised.
- The Preliminary Bat Roost Assessment was reasonable and acceptable. There are potential roosting features on the building, however there were no field signs of bats. Two emergence surveys were recommended due to the moderate suitability of the building.
- The emergence survey report provided was reasonable and acceptable. No bats were observed emerging from the buildings. However, there were concerns raised over hibernating bats.

As a result, a PWMS will be conditioned for bats, and an informative provided for birds.

BNG

A Biodiversity Net Gain Assessment has been provided; however, this assessment shows a net loss of 0.13 biodiversity (habitat) units on-site. At least 0.14 habitat units is required to achieve 10% net gain. The report shows no plan to make up for the shortfall.

This should either be requested or conditioned that 10% net gain needs to be achieved.

We recommend the applicant provides at least an outline of the intended route to achieving off-site net gain. It would be good to have this information in advance of a planning decision because, if offsite gain is required, it will need to be secured with a section 106 agreement. If a section 106 agreement is needed, we recommend the applicant provides sufficient information for the heads of terms of an agreement prior to determination of the application

In addition to the information already provided, this information would comprise:

- A plan that follows the UK Habitat Classification showing the spatial locations of the habitats represented in the enhancement and/or creation tabs of the biodiversity metric (i.e. the target habitats).
- The georeferenced spatial data used to create both above plans (in either .shp or .gpkg format) and written permission to share this data with West Yorkshire Ecological Services.
- A 30-year Habitat Management and Monitoring Plan (HMMP)

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

PWMS

A condition for the provision of a detailed Precautionary Working Method Statement (PWMS) is advised, e.g. Prior to the commencement of development, a detailed Precautionary Working Method Statement (PWMS) in respect of bats shall be submitted to and approved by the local planning authority. In order to minimise risk and avoid harm to bats, the PWMS shall include (but not be limited to) toolbox talks provided by a suitably qualified ecologist, attendance of an ECoW (Ecological Clerk of Works) as required, and careful hand stripping around potential bat roosting features.

In the event of encountering a bat, all work must cease until the ecological clerk of works and Natural England are contacted for advice on the best way to proceed lawfully. All contractors working on site should be made aware of this advice and provided with the contact details of the ecological clerk of works.

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

Informatives

Birds

All works should be timed to occur outside nesting bird season (typically March to August, inclusive). If this is not possible all potential bird nesting opportunities must be checked by a suitably experienced ecologist within 24 hours prior to works. If any active nests are found, the ecologist should advise on suitable species-specific works exclusion zones. The exclusion zones should be regularly monitored by the ecologist and remain in place until the young have fledged the nest or the nests are otherwise deserted.

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

BNG condition can be provided once further information is provided and reviewed.

Many thanks,

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