

Sent: 09 September 2025 07:40

Subject: RE: Attached letter from Kirklees Council regarding application number 2025/90413 at location Land adjacent, 40, Manchester Road, Slaithwaite, Huddersfield, HD7 5JA

Please see ecological commentary below:

Designations

The Huddersfield Narrow Canal LWS is approx. 110m north of the site and is considered to be within the Zone of Influence of the site.

Onsite habitats and species

The Preliminary Ecological Appraisal is reasonable and acceptable.

- Invasive species Rhododendron has been observed onsite. A condition for a full invasive species survey and management plan will be conditioned.
- The buildings and trees do not display any potential for roosting bats. It is recommended that clearance of the site is completed with care; therefore, a PWMS will be conditioned. The site is isolated, though does display opportunity for foraging and commuting, a lighting strategy is to be conditioned.
- The site was assessed for its suitability to provide potential nesting and foraging opportunities for common species of bird. There is advice for vegetation removal, which will be covered by a CEMP.
- The site was assessed for its suitability to support reptiles – in its current state the site is considered to hold low suitability for reptiles. A PWMS for reptiles will be conditioned.

- Enhancements for birds, bats, hedgehogs, bees, and planting of flowers and fruit trees will also be conditioned. A Biodiversity Enhancement Plan Survey and Report, and should include the information requested, if applicable.

BNG

The site is applicable for Biodiversity Net Gain. Please can a BNG Assessment report and metric be provided.

Suggested conditioned

BNG conditions will be added once a BNG Assessment and report is retained.

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.

The CEMP must also include the following specific plans / documents:

- Mitigation / precautionary measures for the Huddersfield Narrow Canal LWS.
- Pollution Prevention Plan for the watercourse (using good practice guidance such as CIRIA C532)

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

Reason: To ensure the protection of badgers in compliance with the Protection of Badgers Act 1992 and Schedule 6 of the Wildlife and Countryside Act 1981 (as amended).

Lighting strategy

No works are to commence unless a detailed lighting scheme, developed in accordance with established guidance (e.g. Bat Conservation Trust and Institute of Lighting Professionals (2023) Bats and Artificial Lighting at Night), has been drafted and agreed with the council. The Sensitive Lighting Strategy will demonstrate that the proposed lighting will not impact upon ecological networks and/or sensitive features. Thereafter the agreed lighting scheme shall be implemented, subject to any variations approved in writing by the planning authority. All external lighting shall be installed strictly in accordance with the specifications and locations set out within the Lighting Strategy.

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

PWMS - Bats

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.

PWMS - reptiles

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 reptiles and amphibians shall be submitted to and approved by the local planning authority. In order to minimise risk and avoid harm to reptiles and amphibians, 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 search around potential reptiles and amphibians features.

In the event of encountering a reptiles or amphibians, 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).

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).

Enhancements

A Biodiversity Enhancement Management Plan must be provided to the LPA prior to the commencement of works on-site. It must include the following items that will be installed post development:

- 2no bat boxes
- 2no bird boxes
- 1no bee box
- Small holes within fences (and other mechanisms) for hedgehogs' mobility.
- A planting scheme should be implemented within the scheme to create a trees and hedgerows. Plantings should comprise native species of high biodiversity value

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

Many thanks,
Katie

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