From: ENVU Biodiversity and Land Use <ENVUBiodiversityandLandUse@kirklees.gov.uk>
Sent: 02 April 2025 15:35
To: Planning ContactCentre <Planning.ContactCentre@kirklees.gov.uk>
Cc: Edward Cheseldine <Edward.Cheseldine@kirklees.gov.uk>
Subject: 2025/90439 at location Church of the Holy Innocents, Vicarage Road, Dewsbury, WF12 9PD

Please see my comments below from an ecological / biodiversity perspective:

Designations
No issue

Onsite habitats and Species
The Ecological Impact Assessment is reasonable and acceptable. Recommendations have been made for bats, birds, habitats, and invasive species. A CEMP will be appropriate to cover the majority of these recommendations.
A series of bats surveys were completed and reported on within the report – it is confirmed that there is a single bat roost within the tower and spire of the church. The report confirms that this roost is unlikely to be disturbed during works, but a PWMS will be required to cover this. A lighting condition will also be provided.

BNG
The Biodiversity Net gain section of the EcIA was reasonable and acceptable.
A non-significant net gain will be achieved off-site, with 0.3 habitat units being achieved, achieving a 56.48% net gain. A planning condition requiring a 30-year habitat management and monitoring plan (HMMP) will be suitable in this case.

Suggested conditions:

Habitats / Species

CEMP

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.

Bats
PWMS
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).

Lighting scheme required
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 of the Kirklees Local Plan and NPPF15

Non-significant Offsite Gain
The development shall not commence until a Habitat Management and Monitoring Plan (the HMMP), prepared in accordance with the approved Biodiversity Gain Plan and including:

a. *a non-technical summary;*
b. *the roles and responsibilities of the people or organisation(s) delivering the HMMP;*
c. *the planned habitat creation and enhancement works to create or improve habitat to achieve the biodiversity net gain in accordance with the approved Biodiversity Gain Plan;*
d. *the management measures to maintain habitat in accordance with the approved Biodiversity Gain Plan for a period of 30 years from the completion of development; and*
e. *the monitoring methodology and frequency in respect of the created or enhanced habitat to be submitted to the local planning authority, has been submitted to, and approved in writing by, the local planning authority.*

Notice in writing shall be given to the Council when the:

a. *HMMP has been implemented; and*
b. *habitat creation and enhancement works as set out in the HMMP have been completed.*

Within 6 months of the development being in use:

a. *the habitat creation and enhancement works set out in the approved HMMP have been completed; and*
b. *a completion report, evidencing the completed habitat enhancements, has been submitted to, and approved in writing by the Local Planning Authority.*
c. *The created and/or enhanced habitat specified in the approved HMMP shall be managed and maintained in accordance with the approved HMMP.*

Monitoring reports shall be submitted to local planning authority in writing in accordance with the methodology and frequency specified in the approved 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.

Hope this helps.
Many thanks,
Katie

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