Sent: 21 August 2025 09:24

Subject: 2025/90457 at location The Croft, 150, Denby Lane, Upper Denby, Huddersfield, HD8 8UN

Please see ecological commentary below:

Designations
No issue

Onsite habitats and species
The Preliminary Ecological Appraisal is reasonable and acceptable.

- There are recommendations for birds, badgers, and reptiles. A CEMP is required to cover them.
- Bats – all surveys required prior to determination
    - The building onsite is determined to have high value suitability for bats. 3no. presence / absence surveys are required to be completed to determine whether NE EPS licence is required.
    - 5no. trees (T2, T3, T4, T6 and T21) are determined to have low suitability for roosting bats. Surveys are not required but works should follow a precautionary approach in line with best practice guidance (Collins, 2023).
    - 1no. tree (T22) is determined to have moderate suitability for roosting bats (2no. presence / absence surveys required).
- Species listed on Schedule 9 of the Wildlife and Countryside Act 1981 (as amended) were recorded within the site, Montbretia (Crocosmia x crocosmiiflora). An invasive species survey and management / removal plan is to be conditioned.
- Enhancements are also recommendations for bats, birds, trees planting to replace felled trees, hedgerow planting, and hedgehogs.
- A lighting strategy condition will also be added.

BNG
The development claims to be a custom build, which would make it exempt as set out in Schedule 7A of the Town and Country Planning Act 1990 (as amended). So long as the case officer is happy with the required paperwork regarding Self-build and Custom Housebuilding Act 2015 then I have no further queries. Please do let me know if further information does come to light.

Suggested conditions

Bats – surveys must be completed prior to determination due to moderate (tree) and high (building) suitability for roosting bats.

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).

PWMS – Trees T2, T3, T4, T6 and T21
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).

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
- 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

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

Many thanks,

Katie

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