

Planning ContactCentre

From: ENVU Biodiversity and Land Use
Sent: 19 May 2025 09:21
To: Planning ContactCentre
Subject: 2025/90508 at location Lubrizol Ltd, Syngenta Ltd, Leeds Road, Huddersfield, HD2 1FE

Please see my commentary below.

Designations

No issue

Onsite habitats and species

The Preliminary Ecological Appraisal is reasonable and acceptable. There are recommendations of precautionary measures for amphibians, badgers, bats, birds, invertebrates, and hedgehogs. These can be covered in a CEMP. Enhancement measures can also be considered for conditions.

BNG

A Biodiversity Net Gain Assessment has been provided; however, this assessment shows a net loss, and the report shows no plan to make up for the shortfall. We recommend the applicant provides at least an outline of the intended route to achieving net gain.

We need 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 data centre.
- A 30-year Habitat Management and Monitoring Plan (HMMP)

A minimum of 0.22 habitat units will need to be achieved to ensure the development delivers a biodiversity net gain on site in accordance with Schedule 7A of the Town and Country Planning Act 1990. Currently there is a net loss of 0.2 low distinctiveness habitat units. For a site with such a low amount of biodiversity units at stake I would advise that the applicant provide a plan for achieving on-site net gain.

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.

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

- Pollution Prevention Plan for the River Colne (using good practice guidance such as CIRIA C532)

Reason: In the interests of biodiversity and in accordance with 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

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
- insect towers in available areas of greenspace surrounding the development Site

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

Many thanks,
Katie

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