

---

**From:** ENVU Biodiversity and Land Use

**Sent:** 19 May 2025 09:21

**To:** Planning ContactCentre <Planning.ContactCentre@kirklees.gov.uk>

**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, the assessment does not include the waterbody information, which is within 10m of the site. Therefore, the assessment is deemed as incomplete.

### **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**

#### **BNG**

**BNG conditioned will be provided once the assessment is completed.**

Many thanks,  
Katie

Ecology Team  
Planning and Development Service  
Place Directorate – Skills and Regeneration  
PO Box 1720,  
Huddersfield,  
HD1 9EL

---