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20/07/2026

Consultation Response – Outline application, including the consideration of access and layout, for two commercial units (use class B2 and/or B8) and associated works. Land off Forge Lane, Thornhill Lees, Dewsbury, WF12

West Yorkshire Ecology Service submits the following comments:

1. The site lies close to the Calder and Hebble Navigation. This water body was surveyed by Goulder in 2014 who recorded good standing water aquatic plant communities including narrow-leaved water plantain, *Alisma lanceolatum*, a Kirklees Biodiversity Action Plan Priority Species close to the proposal site. Other species in the survey list have made this a candidate Local Wildlife Site but it has not yet been resurveyed and assessed using the current West Yorkshire best practice methodology. Floating water-plantain, *Luronium natans*, which is a Wildlife and Countryside Act Schedule 8 Protected Species is also recorded as present in the nearby canal system and may be present adjacent to the site. Both are dismissed in the Ecology report (19/06/2025 - 22374 *Ecological Impact Assessment Report R1 Issue*) but in our view the canal within the zone of influence of the proposal should have been subjected to an aquatic plant survey and tested against Local Wildlife Site selection criteria.
2. The Height and Massing of the buildings have been handled as a reserved matter in the application. These together with the impact of off-site tree planting along the canal are essential in looking at the shading impact on plants within the canal. The application demonstrates that it may be possible to develop part of the site with mitigation but has not currently adequately addressed limitations which should be imposed to protect the plants in the canal, as described in point (1).
3. We would also highlight the potential for lighting impacts along the canal corridor, in particular with respect to the potential for impacts on bats and otters. Details of light spill mitigation from the site onto the canal corridor are necessary to assess the potential for such impacts.

Yours sincerely

Rachel Huxham
Ecology Service Manager
West Yorkshire Ecology Service