

Sent: 17 March 2026 08:26

Subject: 2025/90889 at location Former Combs Hostel, Hall Lane, Thornhill, Dewsbury, WF12 0PL

Please see ecological commentary below:

Designations

No issue

Onsite habitats and species.

The Ecological Impact Assessment (Whitcher Wildlife Ltd. Ecological Consultants, July 2025) has been provided and reviewed.

The site consists of broadleaved woodland, mixed scrub, bramble, grassland, vegetated urban land, hedgerow, hardstanding, buildings, and bare ground. There are a number of watercourses and waterbodies within 500m of the site. The site is also directly adjacent to areas of priority deciduous woodland habitat in Rectory Park which is to the site of the site.

From reviewing degradation photos back to 2021, it appears that there were building in the central east of the site.

- GCN – there are 6no ponds within 320m of the site. Ponds 3, 4, and 5 were assessed with eDNA sampling, returning negative results. Ponds 1, 2, and 6 were assessed as being highly unlikely to provide suitable habitats for GCN. As a result, it is considered unlikely that GCN would be using the site.
- Bats – the buildings that are still onsite were observed to have no potential for roosting bats. There are multiple trees onsite, the majority of which do not possess bat roosting features. There are a number of trees with ivy coverage, and these are deemed to have potential for roosting bats. The overall site is deemed to provide low to moderate value foraging and commuting habitat for bats as the woodland and hedgerow habitats provide connectivity throughout the surrounding habitat.
- Birds – the site has a lot of features to support nesting birds – bird nests were even found onsite during the walkover survey.
- Reptiles – the site has suitable habitat for common reptiles due to the combination of scrub, grassland and open ground with multiple areas of refugia throughout the rubble and debris of the demolished buildings.
- Hedgehogs – the site offers suitable areas with and grassland that which provide a good source of invertebrate prey.

There are recommendations for the species mentioned above to minimise impact during works. These will be added to a CEMP. There will also be conditions for tree protection measures for retained trees and a lighting strategy. Enhancements will also be conditioned, along with a LEMP.

It is recommended that a retention pond / SuDs are considered to (1) encourage biodiversity further (2) reduce risk of run off to nearby watercourses, ponds, and priority woodland habitats. Further information is to be provided by the applicant.

BNG

The information in the Ecological Impact Assessment (Whitcher Wildlife Ltd. Ecological Consultants, July 2025) and the BNG metric (Xanthe Walker, May 2025) are not aligned.

The EcIA appears to take into account the degradation of the site due to the demolition of the buildings, and the metric does not.

The EclA also appears to present predictions of habitat / hedgerow units to be created onsite, and the metric does not.

The metric does not confirm where the data for the baseline units has been attained.

As a result, the baseline calcs cannot currently be validated and no further commentary can be offered.

Suggested conditions

BNG conditions to be provided once the baseline matters are resolved.

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:

- Mitigation measures for the priority deciduous woodland habitat to the south of the site.
- Pollution Prevention Plan for the watercourses and waterbodies (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

Tree protection

A Hedgerow and Tree Protection Plan detailing measures for the protection of trees and hedgerows during the works will be submitted to and approved by the LPA prior to the commencement of works on site, including site clearance and delivery of materials.

Hedgerow and tree protection measures will include temporary fencing for the protection of hedgerows in accordance with BS 5837:2012 Trees in relation to design, demolition and construction – Recommendations. Any alternative fencing type or position not in accordance with BS 5837:2012 will be agreed in writing by the LPA prior to the start of development.

The root protection fencing will define the works exclusion zone around hedgerows and trees. Activities liable to be harmful to hedgerows and trees are prohibited within this exclusion zone, unless agreed in writing with the LPA. The approved hedgerow and tree protection measures will remain in place until the completion of development or unless otherwise agreed in writing with the LPA.

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

Ecological Design Strategy – for invertebrates, reptiles, hedgehogs, birds, biodiversity, and bats.

No development shall take place until an ecological design strategy (EDS) addressing mitigation and enhancement has been submitted to and approved in writing by the local planning authority.

The EDS shall include the following.

- a. Purpose and nature conservation objectives for the proposed works.
- b. Review of site potential and constraints.
- c. Detailed design(s) and/or working method(s) to achieve stated objectives.
- d. Extent and location/area of proposed works on appropriate scale maps and plans.
- e. Type and source of materials to be used where appropriate, e.g. native species of local provenance.
- f. Timetable for implementation demonstrating that works are aligned with the proposed phasing of development.
- g. Persons responsible for implementing the works.
- h. Details of initial aftercare and long-term maintenance.
- i. Details for monitoring and remedial measures.
- j. Details for disposal of any wastes arising from works.

The EDS shall be implemented in accordance with the approved details, and all features shall be retained in that manner thereafter.

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

LEMP

A landscape and ecological management plan (LEMP) shall be submitted to, and be approved in writing by, the local planning authority prior occupation of the development. The content of the LEMP shall include the following.

- a. Description and evaluation of features to be managed.
- b. Ecological trends and constraints on site that might influence management.
- c. Aims and objectives of management.
- d. Appropriate management options for achieving aims and objectives.
- e. Prescriptions for management actions.
- f. Preparation of a work schedule (including an annual work plan capable of being rolled forward over a five-year period).
- g. Details of the body or organisation responsible for implementation of the plan.
- h. Ongoing monitoring and remedial measures.

The LEMP shall also include details of the legal and funding mechanism(s) by which the long-term implementation of the plan will be secured by the developer with the management body(ies) responsible for its delivery. The plan shall also set out (where the results from monitoring show that conservation aims and objectives of the LEMP are not being met) how contingencies and/or remedial action will be identified, agreed and implemented so that the development still delivers the fully functioning biodiversity objectives of the originally approved scheme.

The approved plan will be implemented in accordance with the approved details.

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

Many thanks,
Katie

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