

**Consultation Response from KC,
Ecology Unit**

2025/90889 Former Combs Hostel, Hall Lane, Thornhill, Dewsbury, WF12 0PL

Demolition of existing hostel and erection of residential development comprising 34 dwellings

Date Responded: 29/07/2026

Responding Officer: Z. Hanshaw

Responding Ref: 2607/51

Good morning,

The submitted Ecological Impact Assessment (Whitcher Wildlife, July 2025) and the Biodiversity Net Gain Metric identify that there are 5.75 Biodiversity Units (BUs) for area habitats at baseline, and 0.62 hedgerow BUs at baseline. Post development there is proposed to be 2.87 area BUs and 0.04 hedgerow BUs. This is a net loss of 7% for hedgerows, and 50% for area habitats. The Ecological Impact Assessment states that either the purchase of offsite units will be required or off-site areas will be used, to ensure that this development delivers the legally required 10% Net Gain.

I would recommend that further information on how 10% Net Gain will be achieved, is provided prior to determination. This should include details on the purchase of the offsite units, including how many units will be required to purchase, as well as information on the availability, cost and provider, or the off-site enhancements and what management will be undertaken. The submitted metric should be updated to reflect this information.

The comments and recommended conditions from the previous KC Ecology comments (dated March 2026) still apply. I note that updated information on a SuDS or retention pond hasn't been provided.