

Yew Tree Lane, Holmbridge

Construction Environmental Management Plan

30th September 2025



Prepared by:

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1. Summary

- 1.1.1 Middleton Bell Ecology was commissioned on 12th September 2025 by Jake Scargill of ADP Architects, on behalf of the clients Wendy and Tim Yates, to produce a Construction Environmental Management Plan. This plan is required to inform residential conversion of the site which is located on land off Yew Tree Lane, Holmbridge.
- 1.1.2 The proposed development is set to receive planning permission (Application Number: 2025/91149) from Kirklees Council. This permission has yet to be formally issued, however, the wording of planning conditions is known.
- 1.1.3 The site comprises an area 0.28 ha in extent, which includes a traditional stone barn and outbuilding with modified grassland to the southwest, part of which is used as pasture. Included within the site is a short line of semi-mature beech trees and two semi-mature hawthorn bushes, located to the southeast of the buildings.
- 1.1.4 The site lies outside the Kirklees Wildlife Habitat Network; however, land within the network occurs close to the site, also close by are two Local Wildlife Sites. Other ecological features of interest include treelines, pasture in the southwest section of the site., roosting bats and potentially nesting birds
- 1.1.5 Tree protection fencing is to be installed prior to construction commencing and the ecological clerk of works is to attend site once the tree protection fencing is installed at which point they will meet with the site foreman to confirm other biodiversity protection zones.
- 1.1.6 Once a bat mitigation licence has been obtained, the ecological clerk of works will also attend to deliver a bat toolbox talk to construction staff and to oversee the removal of roof materials from the barn. New roost provision is to be installed in the renovated barn and construction lighting rules are set out in this document.
- 1.1.7 If building re-development works and/or any vegetation clearance works are to take place during the nesting bird season, then the ecological clerk of works will attend to undertake a nesting bird check within 48 hours of those elements of work proceeding.

2. Introduction

- 2.1.1 Middleton Bell Ecology was commissioned on 12th September 2025 by Jake Scargill of ADP Architects, on behalf of the clients Wendy and Tim Yates, to produce a Construction Environmental Management Plan. This plan is required to inform residential conversion of the site, which is located on land off Yew Tree Lane, Holmbridge (O.S. Grid Reference: SE 12190 07450; Figure 1). The proposed site layout is shown in Appendix 1.
- 2.1.2 The proposed development is set to receive planning permission (Application Number: 2025/91149) from Kirklees Council, although this has yet to be formally issued.
- 2.1.3 Draft planning conditions have been circulated, and the wording of the relevant condition is set out below:

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 / precautionary measures for the Carr Green Meadows and New Laith Fields LWSs.*

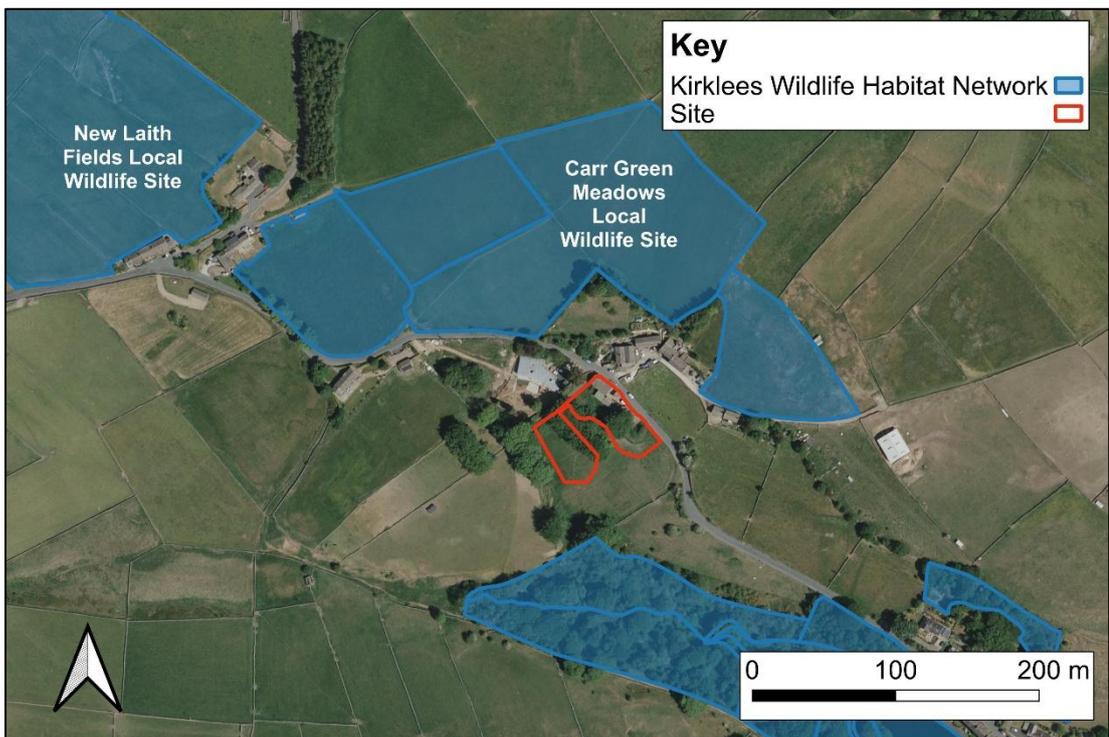
Reason: *In the interests of biodiversity and in accordance with LP30 and NPPF15.*

- 2.1.4 The development proposals were informed by a Biodiversity Net Gain Report (MBE, 2025), which included a UK Habitat Classification Survey of the site undertaken on 10th June 2025. The site comprises an area 0.28 ha in extent, which includes a traditional stone barn and outbuilding with modified grassland to the southwest, part of which is used as pasture. Included within the site is a short line of semi-mature beech trees and two semi-mature hawthorn bushes, located to the southeast of the buildings.

Figure 1. The site location, as indicated by red outline



Figure 2. Site's location in relation to Carr Green Meadows and New Laith Fields Local Wildlife Sites, as well as other areas also included in the Kirklees Wildlife Habitat Network



3. Features of Ecological Interest

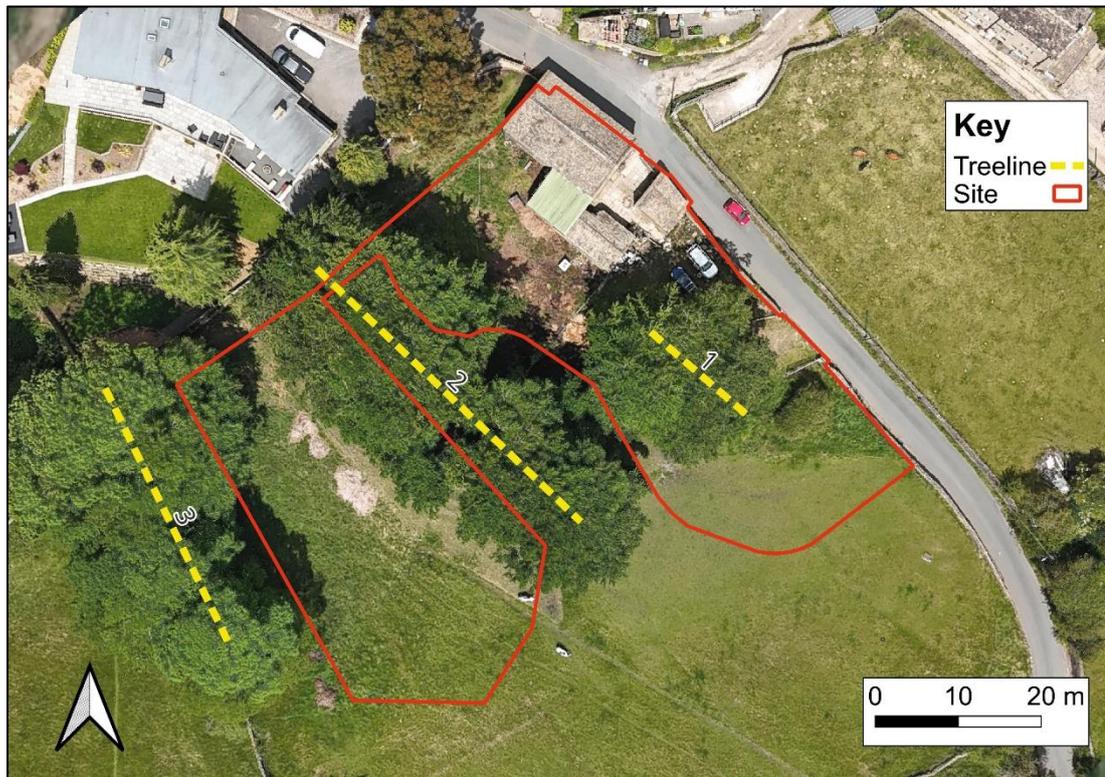
Carr Green Meadows and New Laith Fields Local Wildlife Sites

3.1.1 The site does not include any land falling within either a Local Wildlife Site or the Kirklees Wildlife Habitat Network, however, it is located close to land falling under one or both designations. Figure 2 shows the site's location in relation to Carr Green Meadows and New Laith Fields Local Wildlife Sites, as well as other land included in the Kirklees Wildlife Habitat Network. All land falling within the Kirklees Wildlife Habitat Network and particularly that designated as a Local Wildlife Site is considered to be of particular ecological interest.

Tree lines within the site

3.1.2 Three treelines are present either within, partially within, or adjacent to the site. The locations of these treelines are shown in Figure 3. These treelines comprise features of ecological interest.

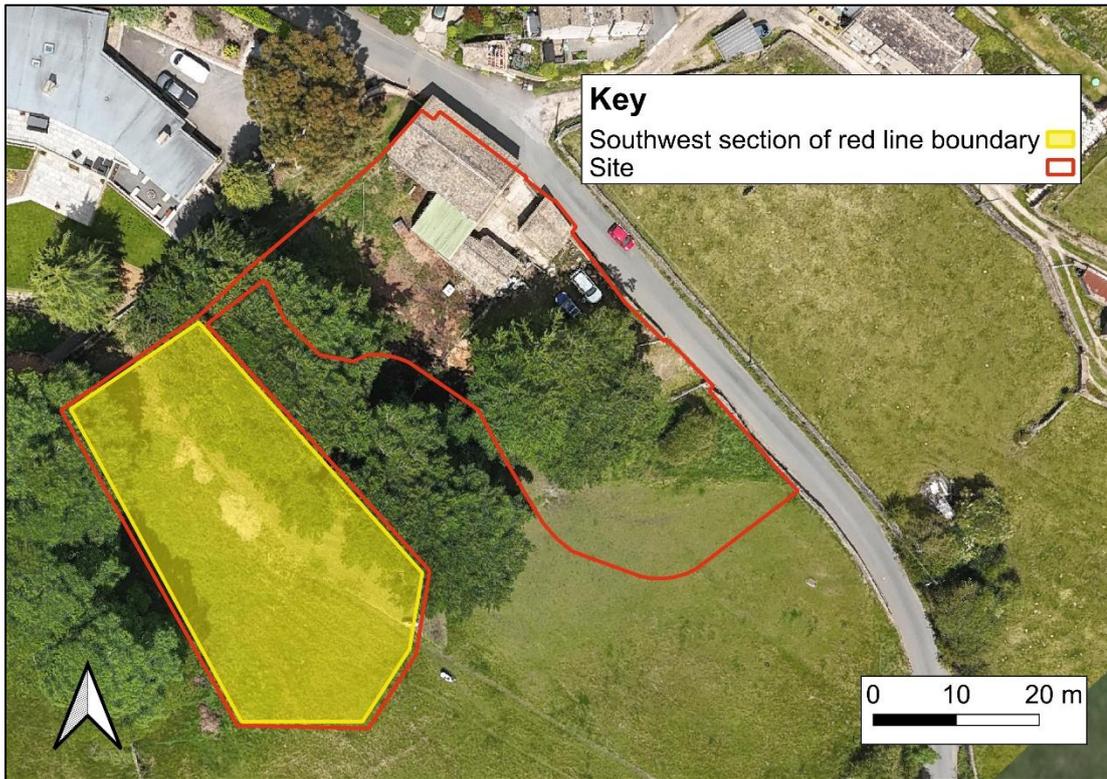
Figure 3. Treelines and their identification numbers



Pasture in the southwest section of the red-line boundary

3.1.3 The red-line boundary includes the northwest polygon, within which development is to take place (Appendix 1), and the southwest polygon which is to be subject to ecological enhancement works, with a thin connecting section between (Figure 4). No construction works are proposed to take place in the southwest section of the site and thus no land-take is required. Pasture in this area is considered to comprise a feature of ecological interest.

Figure 4. Southwest section of site



Bat roost within barn and foraging bats on site

- 3.1.4 A common pipistrelle day roost, used by a maximum count of one bat, was recorded from the southeast elevation of the barn (MBE, 2025b). In addition, land within the site to the southwest of the barn was used quite extensively by foraging common pipistrelle, with a *Myotis* bat species also recorded active on the site. Roosting, foraging and commuting bats are of considerable ecological interest.

Plate 1. Bat roost location on barn



Nesting birds

- 3.1.5 The buildings and trees on site display suitability for use by nesting birds, with nesting birds considered to comprise a feature of ecological interest.

4. Ecologically Sensitive Working Practices and Biodiversity Protection Zones

No site works within Carr Green Meadows and New Laith Fields Local Wildlife Sites, or other areas of the Kirklees Wildlife Habitat Network

- 4.1.1 The site is located on the southern side of Yew Tree Lane, with Carr Green Meadows and New Laith Fields Local Wildlife Sites situated to the north of this minor road. Both Local Wildlife Sites lie outside the client's ownership. Given the nature and scale of the proposals, and with Yew Tree Lane forming a boundary, the development is not considered likely to negatively affect either site. The locations of the Local Wildlife Sites have, however, been highlighted to the client, who has committed not to use them for any development-related activities (e.g. storage of materials or waste). Similarly, the woodland approximately 40 m south of the site, which forms part of the Kirklees Wildlife Habitat Network, will not be accessed or used in connection with the works.

Protection of retained trees

- 4.1.2 Of the treelines shown on Figure 3, Treeline 1 is to be retained. However, groundworks will need to take place within the normal root protection area of these trees, as they are located within a turning area to the southeast of the new house (Appendix 1). The edge of this turning area should be clearly marked, and prior to the commencement of other development works on site, a ring of tree protection fencing must be installed to prevent damage to the trees from activities such as the storage of materials at their base.
- 4.1.3 Treeline 2 is partly within the red-line boundary but predominantly outside it. Construction activities are planned immediately northeast of this treeline. Consequently, tree protection fencing is to be installed along the northeast edge of the treeline, in accordance with British Standard 5837 (2012): Trees in relation to design, demolition and construction, to ensure the full root protection zones are included. No tree protection fencing is required along the southwest edge, as no potentially damaging activities will take place in this area.
- 4.1.4 Treeline 3 is located wholly outside the proposed development zone, with the only works to take place in the southwest section of the red-line boundary to comprise ecological enhancement of the adjacent grassland and some tree planting. It is not considered that tree protection fencing is required in relation to this treeline.
- 4.1.5 Tree protection fencing should comprise either permanent post and rail fencing, or Heras fencing (Plate 2). This fencing should remain in place for the duration of the construction scheme. Construction staff are to be instructed not to enter the fenced sections of the site without prior agreement from the site foreman. Any works, other than foot access or non-intrusive survey works, are to be undertaken only following agreement with the project ecologists (Middleton Bell Ecology). Signs should be fitted to fencing stating that no access is permitted to these fenced biodiversity protection zones without prior agreement from the project ecologists.

Plate 2. Tree Protection Fencing



Protection of pasture in the southwest section of the red-line boundary

- 4.1.6 The connecting link along the northwest edge of the site, within the red-line boundary, is publicly accessible. Consequently, it is not possible to install a fence in this location to prevent access to the southwest area of the site during construction. Construction staff will, however, be instructed not to enter the southwest section of the site (Figure 4) for any reason, including the storage or tipping of materials or the movement of vehicles

Protection of roosting, foraging and commuting bats

- 4.1.7 A bat mitigation licence is required to permit the re-development of the existing barn. To protect hibernating bats, works are to commence outside the peak hibernation period (December to February). The first phase of the re-development will include a bat toolbox talk for site staff, the supervised removal of roofing materials overseen by a licensed bat ecologist, and the transfer of any bats encountered into a release box.
- 4.1.8 In order to safeguard roosting bats in the long-term, three integrated bat boxes are to be fitted in the walls of the re-developed barn, with exclusively bat safe roofing membrane (Appendix 2) to be fitted in the new roof.
- 4.1.9 In order to avoid temporary lighting impacts upon foraging and commuting bats, any new external site lighting, erected during the construction period, should only be illuminated when the site is in active use. Security lighting on storage areas should be subject to proximity sensor timed illumination only. Any new site lighting is to be low height, directional and pointing downwards and preferably a warm white in colour.

Protection of nesting birds

- 4.1.10 In order to safeguard nesting birds any building conversion works should commence outside the main bird nesting period, as should any vegetative site clearance (March to August, inclusive). If elements of these works are required during the nesting bird season, then they will be preceded by a nesting bird check, to be undertaken by an ecologist within 48 hours of clearance works.

5. Timetable of Works

Table 1. Works timetable

Development activities and timing		
Activity	Timing	Notes
Installation of tree protection fencing	Prior to commencement of works	To comprise either post and rail fencing, or Heras fencing
Meeting between ecological clerk of works and site foreman	Prior to commencement of works	To clarify biodiversity protection zones and restrictions within these areas
Protection of roosting, foraging and commuting bats	First phase of barn re-development works	Licensed bat ecologist to be present during roof strip, to take place following delivery of toolbox talk. Rules to be followed in relation to construction lighting
Nesting bird protection/ building re-development and vegetation clearance	September to February	If carried out during March-August then to be preceded by nesting bird check

6. Responsible Persons and Role of Ecological Clerk of Works

Persons responsible for implementation of this document

- 6.1.1 The clients (Wendy and Tim Yates) will be responsible for the installation of all measures detailed in this document and commissioning an ecological clerk of works.

Role and responsibilities of ecological clerk of works

- 6.1.2 The ecological clerk of works is to attend site once the tree protection fencing is installed at which point they will meet with the site foreman to confirm the biodiversity protection zones.
- 6.1.3 The ecological clerk of works will also attend to deliver a bat toolbox talk to construction staff and to oversee the removal of roof materials on the barn. If building re-development works and/or any vegetation clearance works are to take place during the nesting bird season, then the ecological clerk of works will also attend to undertake a nesting bird check within 48 hours of those elements of work proceeding.

7. References

MBE (2025a) Yew Tree Lane, Holmbridge – Biodiversity Net Gain Report. Middleton Bell Ecology.

MBE (2025b) Yew Tree Lane, Holmbridge – Bat Survey Report. Middleton Bell Ecology.

Appendix 1. Proposed Site Layout

Appendix 2. Bats and Roofing Membranes

Standard roof membranes can cause the death of significant numbers of bats. Traditional bitumen coated roofing felt is recommended where roosting bats are expected to be present.

The problem

Standard non-bitumen coated membranes (including almost all breathable membranes) used below roof slates and tiles present a significant problem for bats. Over time, strands are pulled away from the surface of these materials as bats crawl over them. These fuzzy strands are very strong and can tangle and trap bats, sometimes causing the death of bats over multiple years¹.

One example we have encountered comprised a pipistrelle roost which formed in a building extension constructed in 2009. Over the course of just 13 years the roofing felt degraded to the extent that it trapped and killed more than 10 bats. Fortunately, the problem in this roost was identified and remedial work was undertaken to replace the roofing membrane in 2022.

Plate A2.1. Four dead pipistrelles tangled in breathable roofing membrane



Although a new roof might be considered to lack potential bat access points, that is often not the case. Roofs covered with stone slates almost always have gaps large enough to be accessed by bats, this is often also the case where imitation stone slates are used. On older buildings the uneven roof timbers and/or building design also often results in gaps on wall tops and between slates. Even on new builds it is often possible for bats to access potential roosts via features such as dry verge capping. Some bats can access a space no wider than a biro pen, therefore it is not surprising that they can find their way into most buildings.

Safe roofing membranes (and membranes behind cladding)

From a bat perspective, the best membrane option for areas where roosts are expected comprises traditional hessian-backed Type 1F bituminous felt. This product has been widely and safely used as a secondary weather barrier since approximately the 1950s/1960s. Wooden sarking has also been used for many decades and if appropriately treated, is safe for

¹ Wearing S. Essah E., Gunnel K. & Bonser R. (2013) Double jeopardy: the potential for problems when bats interact with breathable roofing membranes in the United Kingdom. Architecture and Environment

use in bat roosts. Wooden sarking also has the benefit of providing adding additional insulation and it is usually breathable.

At the time of writing (and to our knowledge) two products have passed the 'snagging propensity' test; consequently these products are approved by Natural England for use in bat roosts. This test attempts to replicate the wear and tear which results from bats crawling over the membrane. The approved products are: TLX BatSafe^{2,3} and SIGA Majcoat 350. Although they have passed this test, it is unclear how these membranes will degrade in the medium-long term, particularly in larger bat roosts. Therefore we do not recommend that they are used for roosts with multiple bats, and particularly for large (maternity roosts). A third product, SIGA Majcoat 200 SOB Diffusion, passed the test for its upper surface only. This product should not be used in known bat roosts or locations where bat mitigation is to be installed. Although none of these products are considered to be as safe as traditional Type 1F bituminous felt, they may provide an option for roofs where future bat use cannot be ruled out, and a breathable solution is required.

Additional considerations

In recent years a fairly substantial proportion of the lofts we have surveyed which had existing breathable felt, were found to have been damaged by wasps (Plate A3.2). The wasps appear to have chewed holes in the felt and formed nests. This doesn't appear to be a problem associated with traditional bitumen coated roofing felt. Any holes within roofing felt are likely to significantly reduce its functionality as a secondary weather barrier. Where bats or birds come into contact with breathable roofing membranes, they can also damage it causing it to leak, they can also significantly reduce the breathability of the felt in that location.

Plate A2.2. Damage to a breathable roofing membrane adjacent to a wasp nest



Traditional bituminous Type 1F roofing felt is a non-breathable product and therefore ventilation is required. Sufficient ventilation can be usually be achieved, even in buildings with vaulted ceilings, however, some consideration during the design stage is required. Products to increase the ventilation within roofs where bituminous Type 1F felt has already been installed are also available.

² <https://www.gov.uk/government/publications/bats-apply-for-a-mitigation-licence#full-publication-update-history~:text=Use%20of%20safe%20roofing%20membranes>

1.1.1 ³ TLX BatSafe requires all joints and cut edges to be taped in order to prevent the fraying of bare edges.