

Sent: 07 August 2025 09:18

Subject: 2025/91184 at location land off, Bretton Street, Savile Town, Dewsbury, WF12 9BZ

Please see ecological commentary below:

Designations

No issue

Onsite habitats and species

The Preliminary ecological appraisal is reasonable and acceptable.

- There are recommendations for bats, birds, and hedgehogs.
- There are recommendations for enhancements for bats, birds,
- A PWMS is recommended for reptiles, which will be conditioned to be added to the CEMP.
- A survey for Otters were recommended as a result of suitability of the Calder and Hebble Navigation. The survey was conducted, and though no evidence of otters were identified, a PWMS is advised, which will be conditioned to be added to the CEMP.

BNG

Based on the BNG report and metric completed on 19th May 2025:

It is noted that 4.21 habitat units and 0.71 hedgerow units will be created or retained onsite. As this is a significant number of units. As a result, a HMMP for 30 years will be conditioned.

A minimum of 4.63 habitat units and 0.78 watercourse units will need to be achieved to ensure the development delivers a biodiversity net gain on site in accordance with Schedule 7A of the Town and Country Planning Act 1990. Currently there is a deficit of 0.42 habitat units and 0.07 watercourse units.

There appears to be a net loss, and the report shows no plan to make up for the shortfall. We recommend the applicant provides at least an outline of the intended route to achieving net gain.

We need this information in advance of a planning decision because, if offsite gain is required, it will need to be secured with a section 106 agreement. If a section 106 agreement is needed, we recommend the applicant provides sufficient information for the heads of terms of an agreement prior to determination of the application. In addition to the information already provided, this information would comprise:

- A plan that follows the UK Habitat Classification showing the spatial locations of the habitats represented in the enhancement and/or creation tabs of the biodiversity metric (i.e. the target habitats).
- The georeferenced spatial data used to create both above plans (in either .shp or .gpkg format) and written permission to share this data with West Yorkshire data centre.
- A 30-year Habitat Management and Monitoring Plan (HMMP)

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 Calder and Hebble Navigation near the site (using good practice guidance such as CIRIA C532)
- Precautionary Working Method Statement for Otters
- Precautionary Working Method Statement for Reptiles

- Precautionary Working Method Statement for Hedgehogs

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:

- 3no bat boxes
- 2no bird boxes on mature trees
- Small holes within fences (and other mechanisms) for hedgehogs' mobility.
- Planting fruit bearing trees and species-rich grassland to increase foraging opportunities for badgers.

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

Significant Onsite Gain

- *The development shall not commence until a Habitat Management and Monitoring Plan (the HMMP), prepared in accordance with the approved Biodiversity Gain Plan and including:*
 - *a non-technical summary;*
 - *the roles and responsibilities of the people or organisation(s) delivering the HMMP;*
 - *the planned habitat creation and enhancement works to create or improve habitat to achieve the biodiversity net gain in accordance with the approved Biodiversity Gain Plan;*

- *the management measures to maintain habitat in accordance with the approved Biodiversity Gain Plan for a period of 30 years from the completion of development; and*
- *the monitoring methodology and frequency in respect of the created or enhanced habitat to be submitted to the local planning authority, has been submitted to, and approved in writing by, the local planning authority.*
- *Notice in writing shall be given to the Council when the:*
 - *HMMP has been implemented; and*
 - *habitat creation and enhancement works as set out in the HMMP have been completed.*
- *Within 6 months of the development being in use:*
 - *the habitat creation and enhancement works set out in the approved HMMP have been completed; and*
 - *a completion report, evidencing the completed habitat enhancements, has been submitted to, and approved in writing by the Local Planning Authority.*
 - *The created and/or enhanced habitat specified in the approved HMMP shall be managed and maintained in accordance with the approved HMMP.*
 - *Monitoring reports shall be submitted to local planning authority in writing in accordance with the methodology and frequency specified in the approved HMMP.*

Reason: To ensure the development delivers a biodiversity net gain on site in accordance with Schedule 7A of the Town and Country Planning Act 1990.

Further BNG conditions will be provided once commentary of how 10% to be achieved is received from the applicant.

Many thanks,
Katie

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