

Planning ContactCentre

From: ENVU Biodiversity and Land Use
Sent: 04 February 2026 14:18
To: Kerri Simpson
Cc: Planning ContactCentre
Subject: RE: 2025/60/91511/E - 9, Park Road, Westborough, Dewsbury, WF13 4LQ
Attachments: ER-9001-01 PEA Statutory Metric.pdf

Please see updated commentary based on the report

Bats

- Building 1 was assessed to have moderate suitability for roosting bats. 2no bat emergence surveys are required as a result. These should take place in the active bat season May-August (September sub-optimal) and be separated at least three weeks apart. This cannot be conditioned predetermination due to planning guidance and Case Law (CO/2820/2008 / 2009 EWHC 1227(Admin)). There is a recommendation for hibernation surveys – however, this is confusing as the assessment states “*the building is exposed to the elements from smashed windows and large openings which is likely to create unstable temperatures inside, unsuitable for large maternity colonies or hibernating bats.*” Please can there be clarification this as if hibernation surveys are required from November to March, bearing in mind that this survey was completed in January 2026, it will cause a massive delay to determination.
- Building 2 is observed to have negligible potential for roosting bats.
- The trees onsite were observed to have negligible potential for roosting bats. The overall site offers limited opportunities for foraging bats.

Precautionary recommendations have been provided for birds and hedgehogs, which will be covered by a conditioned CEMP.

BNG

The proposed development claims to be for the construction of a single self-build or custom-build dwelling, as defined in section 1(A1) of the Self-build and Custom Housebuilding Act 2015.

So long as the case officer is happy with the required paperwork regarding Self-build and Custom Housebuilding Act 2015 then I have no further queries.

Please do let me know if further information does come to light.

Suggested conditions

Bat conditions to be confirmed once the 2no emergence surveys are completed and the report is provided / reviewed. Also, clarification on the need for a hibernation survey to be provided by the applicant’s ecologist. This cannot be conditioned predetermination due to planning guidance and Case Law (CO/2820/2008 / 2009 EWHC 1227(Admin)).

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 watercourses and waterbodies (using good practice guidance such as CIRIA C532)

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

Many thanks, Katie

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