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**Our ref:** RA/2025/148612/01-L01  
**Your ref:** 2025/91905  
**Date:** 19 August 2025

Dear Danielle

**ERECTION OF TEMPORARY VETERINARY SURGERY AND ASSOCIATED WORKS  
LAND AT, WOODHEAD ROAD, HONLEY, HOLMFIRTH, HD9 6PU**

Thank you for your consultation regarding the above proposal which we received on 30 July 2025.

We have reviewed the following documents: *Ecological Impact Assessment (EclA) Report, Arboricultural Implications Assessment, Arboricultural Method Statement, Proposed Site Layout* and have the following comments to make.

**Environment Agency Position**

The ecological enhancements that have been proposed will require a management plan to be in place. This will ensure the landscape provides a maximum benefit to people and the environment. The construction phase proposed as part of this development could also have an unacceptable effect on protected species using the site.

In light of the above, the proposed development will only be acceptable if a **planning condition** requiring a landscape management scheme and construction management plan is included.

**Condition - Landscape and ecological management plan and construction management plan**

No development shall take place until a Landscape and Ecological Management Plan (LEMP) and Construction Environmental Management Plan (CEMP), including long-term design objectives, management responsibilities and maintenance schedules for all landscaped areas (except privately owned domestic gardens), has been submitted to, and approved in writing by, the LPA. The LEMP and CEMP shall be carried out as approved and any subsequent variations shall be agreed in writing by the LPA.

The LEMP shall include, but not be limited to, details of the following elements, as specified in the EclA:

- habitat to be retained and created (EclA Section 5), including:
  - Trees to be retained
  - Trees to be planted
  - Mixed scrub to be planted
- any additional native grass and wildflower planting to be incorporated into the scheme, as recommended in EclA paragraph 7.1.3
- maintenance regimes
- treatment of site boundaries and/or buffers around water bodies
- management responsibilities
- a sensitive lighting scheme designed in accordance with the ILP Guidance GN01 and GN09 (2023), as recommended in EclA paragraph 7.1.5

The CEMP shall include, but not be limited to, the following elements:

- The establishment of protection zones to protect retained habitat and the watercourse
- Measures to mitigate the impacts on nesting birds, roosting bats and hedgehogs during treeworks and vegetation clearance as recommended in EclA Section 7
- A sensitive lighting scheme during the construction phase to mitigate impacts on foraging and commuting bats as recommended in EclA Section 7
- Measures to mitigate pollution risks to the adjacent watercourse
- Responsibilities for managing environmental risks, including the appointment and duties of an Ecological Clerk of Works (ECoW)

### **Reasons**

To ensure the protection of wildlife and supporting habitat.

This approach is supported by paragraphs 187 and 193 of the NPPF which recognise that the planning system should conserve and enhance the environment by minimising impacts on and providing net gains for biodiversity. If significant harm resulting from a development cannot be avoided, adequately mitigated, or as a last resort compensated for, planning permission should be refused. Without this condition we would object to the proposed development because it cannot be guaranteed that the development will not result in significant harm to nesting birds, bats and hedgehogs, or that the proposed measures to achieve Biodiversity Net Gain on the site would be secured.

The approach is also supported by Section 40 of the NERC Act 2006 as amended by section 102 Environment Act 2021, which establishes a general duty on public authorities, to conserve and enhance biodiversity through the exercise of its functions.

### **Environmental permit - Advice to Applicant**

The Environmental Permitting (England and Wales) Regulations 2016 require a permit to be obtained for any activities which will take place:

- on or within 8 metres of a main river (16 metres if tidal)
- on or within 8 metres of a flood defence structure or culverted main river (16 metres if tidal)
- on or within 16 metres of a sea defence
- involving quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert
- in the floodplain of a main river if the activity could affect flood flow or storage and potential impacts are not controlled by a planning permission

For further guidance please visit <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits> or contact our National Customer Contact Centre on 03708 506 506. The applicant should not assume that a permit will automatically be forthcoming

once planning permission has been granted, and we advise them to consult with us at the earliest opportunity.

We trust that the above information is useful. If you require any further assistance, please do not hesitate to contact the Sustainable Places Team Inbox.

Yours sincerely

**Miss Julia Beltrandi**  
**SP Team Member**

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