Sent: 18 February 2026 09:44

Subject: 2025/92968 at location 29, Huddersfield Road, Mirfield, WF14 8AE

Please see ecological commentary below.

Designations
733m south of site – considered too far to be impacted by works

Onsite habitats and species
The site has the River Calder directly adjacent to the south and is within 200m of Priority Habitats - deciduous woodland.
There is an EPS licence bat return within 500m of the site.
The site consists of buildings, vegetated garden, hedgerow, hardstanding, trees, grassland, hedgerow, ruderal, and bramble scrub.

A Preliminary Ecological Appraisal (Estrada Ecology, February 2026). It is reasonable and acceptable.
It is confirmed that the majority of the habitats are to be removed to allow the development of a residential area.

Trees
The Tree Survey report (James Royston Arboriculatural Consultant, September 2025) has also been reviewed for consideration. A number of the larger trees onsite do hold value and should be retained. A tree protection condition for trees to be retained (Outline Planning, Heneghan Architecture, September 2025) will be added.

Bats

- Building A, the converted stable, has **low** (1no presence/absence surveys required) roost suitability and Building B, Hall house, has **moderate** (2no presence/absence surveys required) roost suitability. These surveys will need to be completed during optimal bat survey season (April -August) and must be conducted prior to determination. This cannot be conditioned predetermination due to planning guidance and Case Law (CO/2820/2008 / 2009 EWHC 1227(Admin)). Further conditions will be provided following this.
- The trees within the survey area were determined to provide **negligible** suitability for bats.
- The site provides suitable foraging and commuting habitat for bats, in the form of the line of trees on site and the open modified grassland. The trees along the western boundary of the site and the canal south of the site both provide good commuting corridors to the site. Lighting strategy and precautionary measures via a CEMP are to be conditioned.

Birds
The individual trees, bramble scrub and shrubs within the vegetated garden all provide suitable habitat for nesting birds. Precautionary measures have been recommended and will be added to a CEMP.

Hedgehogs

The site has suitability for hedgehogs. Precautionary measures have been recommended and will be added to a CEMP.

Reptiles / Amphibians
The modified grassland, ruderal/ephemeral, bramble scrub, and garden scrub all provide suitable opportunities. Overall, the site appears to be regularly managed. Precautionary measures have been recommended and will be added to a CEMP.

Otters
There is a canal 10 m south of the survey area, which could be used by transient Eurasian otter (*Lutra lutra*). Precautionary measures have been recommended and will be added to a CEMP.

Enhancements for bats, birds, hedgehogs, reptiles, invertebrates, and biodiversity will also be conditioned.

BNG
The Biodiversity Net Gain Assessment report (Ecological Statement of Biodiversity Net Gain – Baseline, October 2025) and metric (Aimee McManus BSc (Hons) - Estrada Ecology Ltd, September 2025) has been provided and reviewed. The baseline calcs are validated. There is a 10m buffer between works onsite and the watercourse – therefore it is accepted that watercourse units have not been considered in this application.

The metric confirms that there will be a net loss of 7.77 habitat units. 0.17 habitat units are required to reach the statutory 10%.
8.55 habitat units and 0.19 hedgerow units are required to achieve the statutory 10% net gain. There is currently not a clear plan within the report nor from the applicant on how this is to be achieved. Given the high value of habitat units onsite a BNG plan is required prior to determination to ensure it is understood how net gain is to be achieved and how much is to be achieved onsite (preferably as much as possible). A clearer description of how the mitigation hierarchy has been addressed will also be required.

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 Records Centre.
- A 30-year Habitat Management and Monitoring Plan (HMMP)

Suggested conditions

BNG conditions to be provided once mitigation hierarchy matters are clearer and an outline BNG Plan is provided

Bats – Presence / absence surveys (1no for Building A and 2no for Building B) to be provided prior to determination to understand whether roosts are present and if an EPS bat licence is required.

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

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

Tree protection

A Hedgerow and Tree Protection Plan detailing measures for the protection of trees and hedgerows during the works will be submitted to and approved by the LPA prior to the commencement of works on site, including site clearance and delivery of materials.
Hedgerow and tree protection measures will include temporary fencing for the protection of hedgerows in accordance with BS 5837:2012 Trees in relation to design, demolition and construction – Recommendations. Any alternative fencing type or position not in accordance with BS 5837:2012 will be agreed in writing by the LPA prior to the start of development.
The root protection fencing will define the works exclusion zone around hedgerows and trees. Activities liable to be harmful to hedgerows and trees are prohibited within this exclusion zone, unless agreed in writing with the LPA. The approved hedgerow and tree protection measures will remain in place until the completion of development or unless otherwise agreed in writing with the LPA.
Reason: In the interests of biodiversity and in accordance with Policy LP30 and NPPF15

Ecological Design Strategy / BEMP

No development shall take place until an ecological design strategy (EDS) addressing mitigation and enhancement has been submitted to and approved in writing by the local planning authority.
The EDS shall include the following.

a. Purpose and nature conservation objectives for the proposed works.
b. Review of site potential and constraints.
c. Detailed design(s) and/or working method(s) to achieve stated objectives.
d. Extent and location/area of proposed works on appropriate scale maps and plans.
e. Type and source of materials to be used where appropriate, e.g. native species of local provenance.
f. Timetable for implementation demonstrating that works are aligned with the proposed phasing of development.
g. Persons responsible for implementing the works.
h. Details of initial aftercare and long-term maintenance.
i. Details for monitoring and remedial measures.
j. Details for disposal of any wastes arising from works.

The EDS shall be implemented in accordance with the approved details, and all features shall be retained in that manner thereafter.
Reason: In the interests of biodiversity and in accordance with Policy LP30 and NPPF15

Many thanks,
Katie

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