

Sent: 30 March 2026 16:07

Subject: 2025/93464 at location Spinksmire Mill, Huddersfield Road, Meltham, Holmfirth, HD9 4AN

Please see ecological commentary below:

Reviewed

- Preliminary Ecological Appraisal (Brooks Ecological, July 2025)
- Ecological Impact Assessment (Brooks Ecological, March 2026)
- White-Clawed Crayfish Survey (Brooks Ecological, September 2025)
- Riparian Mammal Survey (Brooks Ecological, October 2025)
- Bat Emergence Survey Report (Brooks Ecological, September 2025)
- Biodiversity Net Gain Assessment (Baseline) (Brooks Ecological, September 2025)
- BNG Statutory Metric (Brooks Ecological, December 2025)
- Design Statement (Loroc Architects, February 2026)
- Planning Statement (Alistair Flatman Planning, December 2025)

Designations

Folly Dolly Falls LWS – 120m north of the site

Onsite habitats and species

- The site consists of hardstanding, gravel, derelict land, grassland, and a watercourse.
- Invasive species – Sch 9 listed Montbretia and Himalayan Balsam has been observed onsite. Japanese Knotweed was noted to be adjacent to the site, by the watercourse. Survey / removal measures are to be conditioned
- GCN – the site is considered unlikely to support GCN.
- Bats – Building 1 is observed to have low suitability for roosting bats. An emergence survey was carried out, and it was found that there were no roosting bats in the building. The culvert onsite offered moderate potentials for roosting bats. Surveys were conducted and it was noted that there were not roosting bats using the culvert. Building 2 and the caravans offered negligible potential for roosting bats.
- Birds – the site offered some suitability for nesting birds. Conditions for considerate timings are to be conditioned, as well as precautionary measures in the CEMP.
- Hedgehogs – the site offered limited suitability for hedgehogs. Precautionary measures have been recommended, which will be added to a CEMP.
- Riparian mammals – the watercourse offers potential for water voles, otters, and white-clawed crayfish. eDNA sampling for WCC was conducted and returned negative; searches were also conducted and no evidence of WCC was noted. A late season survey was conducted for water voles or otters. Though no evidence of either species was found – precautionary measures have been recommended, which will be added to a CEMP.

BNG

The BNG Baseline report and metric have been provided. The baseline calcs are validated.

In order to achieve statutory net gain – a minimum of 0.32 habitat units and 0.16 watercourse units will be required.

No plan has currently been offered of how this is to be achieved, and so currently there is a net loss onsite. BNG conditions for net gain will be required, including and Biodiversity Gain Plan.

Suggested conditions

BNG Statutory Net Gain condition to be added by case officer

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

Invasive species

No works shall commence on-site prior to the completion of an invasive species survey and appropriate removal and / or management plan and agreed in writing with the council. The survey must be undertaken at the optimal time of year; between May and September.

Schedule 9 of the Wildlife and Countryside Act 1981 lists non-native species that are considered harmful to native biodiversity and habitats in the UK. It is illegal to release, plant, or allow these species to grow in the wild.

Reason: In order that the proposals are implemented in accordance with the Wildlife and Countryside Act 1981 (as amended).

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

Many thanks,
Katie

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