

JCA Ref: 22934c/Awe

June 9, 2026

Dear Sir/Madam

Re: Land at Clough Road, Slaithwaite, Huddersfield, West Yorkshire, HD7 5BZ

JCA is acting on behalf of SB Homes Limited in relation to ecological survey work at the above site.

I write further to the consultee response issued by Katie of the Ecology Team, Planning and Development Service, Kirklees Council, dated 28 February 2026.

The purpose of this letter is to clarify that, whilst bat activity surveys were recommended within the Preliminary Ecological Assessment to inform the detailed lighting design for the completed development, those surveys are not considered necessary prior to determination of the application in this instance.

The consultee response states that bat surveys:

should be completed prior to determination, together with a lighting strategy and recommendations to be secured through a Construction Environmental Management Plan.

The Preliminary Ecological Assessment dated 14 January 2026 (ref. 22934/RPS) identifies the site as having moderate potential to support foraging and commuting bats. It therefore recommends bat activity surveys in order to establish the species assemblage, relative abundance and distribution of bat activity across the site, principally so that any detailed lighting design can be informed appropriately.

The assessment also explains that the principal ecological risk would arise from inappropriate operational lighting associated with the completed development. By contrast, any disturbance during construction would be temporary, localised and capable of being controlled through standard construction-phase mitigation secured through an appropriate Construction Method Statement or Construction Environmental Management Plan.

Accordingly, our recommendation for bat activity surveys was made to inform the detailed lighting design for the finished development, rather than because such surveys are required in advance of determination.

European Protected Species (EPS) Mitigation Licences

Natural England issues European Protected Species mitigation licences where development would affect a bat roost or another resting or breeding place of a European Protected Species.

In this case, there are no structures on the site with potential to support bat roosts. On that basis, the proposed development would not give rise to impacts requiring a European Protected Species mitigation licence.

Consultee Response

The consultee response states that bat surveys should be completed prior to determination and also proposes a planning condition requiring submission and approval of a detailed bat-sensitive lighting strategy before works commence.

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

In our view, the proposed pre-commencement lighting condition provides an appropriate and proportionate mechanism to address the identified ecological risk. Given that no European Protected Species mitigation licence is required in this case, and that the principal potential impact relates to operational lighting which can be controlled through a bat-sensitive lighting strategy, we consider that the application can be determined prior to completion of the bat activity surveys.

We therefore respectfully request that the Council accepts the proposed lighting condition as sufficient to enable determination of the application at this stage.

Yours sincerely

Adam West BSc. (Hons), ACIEEM.