

**Consultation Response from KC,
Ecology Unit**
2025/93543 land at, former Clough Mill, Clough Road, Slaithwaite, Huddersfield, HD7 5DB

Erection of 31 dwellings (c3) with access from Clough Road and associated works including engineering operations, construction of retaining walls and landscaping
Date Responded: 30/09/2026
Responding Officer: Z. Hanshaw
Responding Ref: 2609/59

I have reviewed the Preliminary Ecological Appraisal (JCA, January 2026), the Biodiversity Net Gain Metric, the Biodiversity Accounting Assessment Report (JCA, January 2026) and the Letter from JCA dated June 2026.

In line with the previous KC Ecology comments, I am satisfied with the information provided with regards to Great Crested Newts, , Birds, Reptiles, Hedgehogs and Invasive Non-Native Species. The Letter from JCA details that the bat surveys were recommended in the PEA to inform the lighting design scheme. These should be undertaken, and details can be provided as part of an external lighting condition which can be secured as a condition of any consent. I would recommend that the external lighting scheme does not only consider bats, but does also consider other nocturnal wildlife, as well as the impact on any areas of vegetation.

However, the Biodiversity Accounting Assessment Report (JCA, January 2026) does not appear to have been updated following the application revisions. Additionally, the report and the Biodiversity Net Gain Metric identify that there are 4.45 Habitat Units (HUs) at baseline. Post development there is proposed to be 1.49 HUs. This is a net loss of 66.43%. The report does not detail how this development proposed to achieve net gain, either through the purchase of offsite units or enhancement on further land within the applicant's ownership. From the site plan it looks like there is some woodland within the blue line boundary which may be suitable to be enhanced to deliver some Biodiversity Net Gain uplift.

In February 2026 it was reported that Woodland and Forest Units cost upwards of £34,000 and this development would need to purchase at least 3.4 units of this.

Additionally, since the Biodiversity Net Gain information was submitted, this site has been identified in the West Yorkshire LNRS. The Metric does detail that the Woodland onsite is formally identified in a local strategy, as the site is already designated as part of the Kirklees Wildlife Habitat Network. However, the metric should be updated in line with the published LNRS.

The previous KC Ecology comments also highlighted that degradation had occurred onsite and requested further information on this to be provided. This has not yet been. This information includes a more detailed methodology regarding when the Biodiversity Net Gain assessment "relevant date" was set. Information on how this should be calculated is available here: [Biodiversity net gain - GOV.UK](#). Any assessment of habitat from aerial imagery should be ecologically conservative.

The NPPF 2026 N2c states development should "*take suitable opportunities to connect to and strengthen ecological networks that extend beyond the site, drawing on the measures proposed by Local Nature Recovery Strategies.... And other relevant assessments*" and N2d states development should "*conserve and enhance existing natural features of visual, historic or nature conservation value (such as established trees and hedgerows)*". It is clear that this proposal does

not align with these points in the NPPF, as the site has already been partially cleared with no consideration to the conservation of features of nature value, and no proposals to strengthen ecological networks are included within the scheme design.

Further information to show how this development can be achieved in line with NPPF Policy N2, and the requirements of the Environment Act 2021, should be provided.

