

## DC Admin

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**From:** ENVU Biodiversity and Land Use  
**Sent:** 03 February 2026 12:29  
**To:** Planning ContactCentre  
**Subject:** 2026/90174 at location Longley Farm, Longley, Longley Lane, Holmfirth, HD9 2JD

Please see ecological commentary below:

### Designations

No issue

### Onsite habitats and species

The following documents have been reviewed:

- Preliminary Ecological Appraisal, JCA, December 2025.
- Ecological Impact Assessment report, JCA, January 2026.
- Amphibian Survey and Report, JCA, June 2025.
- Bat Emergence Survey and Report, JCA, July 2025.

All reports are reasonable and acceptable. The following conclusions have been made:

- Habitats pond - The development will see the loss of an area (10%) of the pond. However, it also includes a new wetland area being created which could provide suitable habitat for amphibians in the future. The pond, though will decrease in size, will be enhanced.
- GCN – The pond had average suitability as a habitat for GCN. An eDNA survey was completed in June 2025, which returned a negative result. No newts were observed during the survey. GCN licence is not required. However, a precautionary approach is recommended, which will be added to the conditioned CEMP.
- Bats – The building onsite was assessed to have low suitability for roosting bats. A single bat dusk emergence survey was conducted on the building in July 2025. No bat roosts / emergences were observed during the survey. No licence is required; however precautions have been recommended, which will be added to a conditioned CEMP. The overall site holds low suitability for foraging and commuting bats, as a result a lighting strategy has been recommended to reduce impact, which will be conditioned.
- Birds – The site was observed to have suitability for nesting birds through the scrubs, buildings, and trees. Precautionary measures for clearance have been provided – and will be conditioned as part of a CEMP.
- Invertebrates – the site has potentially suitable habitat for invertebrates (grassland and mature trees). Site clearance may have adverse impacts on invertebrate species. Recommendations have been provided, which can be added to the conditioned CEMP.
- Otter – the pond does possess foraging opportunity for otters; however, no evidence of otters have been found, and the surrounding habitat lacks connectivity for otters to come to site. Recommendations of precautionary measures during the development stage have been provided and will be added to the conditioned CEMP.
- Brown hare and hedgehogs – the site offer foraging opportunities for these species and so clearance will result in a negative impact. Mitigation measures have been recommended, which will be added to the CEMP.

- Sch 9 invasive species - pontic rhododendron *Rhododendron ponticum* - has been observed onsite, the management and removal of this will be conditioned as part of works.
- Enhancements have been recommended and will also be conditioned for birds, bats, invertebrates, and biodiversity.

Results: A CEMP, lighting strategy, and enhancements will be conditioned.

## **BNG**

The BNG Assessment report and metric have been reviewed. The baseline calcs are validated. Offsite habitats will be created in an area close to the site. It must be confirmed that this area is within the ownership of the applicant, and under their control for creation / enhancement / management / maintenance.

The metric and report conclude that there will be a net gain of 1.05 (10.35%) habitat units and 0.18 (630.64%) hedgerow units. The trading rules are met.

The metric shows that there will be onsite creation and enhancement of 10.11 habitat units and 0.20 hedgerow units. There will also be offsite creation and enhancement of 1.40 habitat units, resulting in a net change (gain) of 1.04 habitat units. This will be through the creation and enhancement of v low to medium distinctiveness habitats. This includes grassland, trees, heathland and scrub, ponds, and modified grassland).

As a significant amount of biodiversity units will be created onsite, and the net gain is also the result of offsite units – a HMMP for 30 years will be conditioned.

## **Suggested conditions**

### Onsite BNG – 30 year HMMP - DRAFT

The development shall not commence until a Habitat Management and Monitoring Plan (the HMMP), prepared in accordance with the approved Biodiversity Gain Plan and including:

- a non-technical summary;
- the roles and responsibilities of the people or organisation(s) delivering the HMMP;
- the planned habitat creation and enhancement works to create or improve habitat to achieve the biodiversity net gain in accordance with the approved Biodiversity Gain Plan;
- the management measures to maintain habitat in accordance with the approved Biodiversity Gain Plan for a period of 10 years from the completion of development; and
- the monitoring methodology and frequency in respect of the created or enhanced habitat to be submitted to the local planning authority, has been submitted to, and approved in writing by, the local planning authority. Notice in writing shall be given to the Council when the:
  - HMMP has been implemented; and
  - habitat creation and enhancement works as set out in the HMMP have been completed.

The created and/or enhanced habitat specified in the approved HMMP shall be managed and maintained in accordance with the approved HMMP. Monitoring reports shall be submitted to local planning authority in writing in accordance with the methodology and frequency specified in the approved HMMP.

We also recommend a draft biodiversity gain plan is submitted.

***Reason: To ensure the development delivers a biodiversity net gain on site in accordance with Schedule 7A of the Town and Country Planning Act 1990***

### 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:

- Summary of potentially damaging activities
- Identification of "biodiversity protection zones"
- 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.

**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**

#### Ecological Design Strategy – for invertebrates, birds, bats and biodiversity

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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