

**Sent:** 16 February 2026 11:50

**Subject:** 2026/90290 at location land off, Reservoir Street, Dewsbury, WF13 4LF

Please see ecological commentary below:

### **Designations**

No issue

### **Onsite habitats and species**

The site comprises of hardstanding, grassland, and scattered trees. Located around the boundary of the site are approximately 10 immature and semi-mature trees.

A Preliminary Ecological Appraisal has been provided, which is reasonable and acceptable.

- Bats – none of the trees on the site were considered to have suitability for roosting bats. The semi-mature trees offer some opportunity for roosting bats, but as there are more extensive opportunities beyond the site, impact will be minor. Enhancements for 2no. bat boxes are recommended.
- Birds – the site does offer opportunities for nesting birds. Recommendations have been made to minimise disturbance to nesting birds, which will be added to a conditioned CEMP. Enhancements of 2no. bird boxes have also been recommended.
- Reptiles – Though likelihood of presence is considered low, there is suitability for reptiles onsite, including rough grassland. As a result, a Precautionary Working Method Statement has been advised, and so will be conditioned.
- GCN, riparian mammals, hazel dormouse, and – it is considered unlikely that the site would be used by these species.
- Hedgehogs – The site is considered to be suitable for hedgehogs, recommendations have been provided, which will be added to the conditioned CEMP.

### **BNG**

The BNG metric and assessment report have been provided. The baseline calculations are validated.

The metric confirms that there will be a net loss of 0.04 (4.87%) habitat units. 0.04 habitat units are required to reach the statutory 10%.

It is noted that 0.89 habitat units and 0.34 hedgerow units will be created onsite with v low to medium distinctiveness. This is considered to be as significant (>0.5 units) habitat creation, and so an onsite HMMP is required.

0.04 habitat units are required to reach the statutory 10%.

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)

However, given the amount of habitat units required, it is highly recommended to achieve all net gain onsite.

### **Suggested conditions**

#### 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.

***Reason: In the interests of biodiversity and in accordance with 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***

#### PWMS - reptiles

A condition for the provision of a detailed Precautionary Working Method Statement (PWMS) is advised, e.g. Prior to the commencement of development, a detailed Precautionary Working Method Statement (PWMS) in respect of reptiles and amphibians shall be submitted to and approved by the local planning authority. In order to minimise risk and avoid harm to reptiles and amphibians, the PWMS shall include (but not be limited to) toolbox talks provided by a suitably qualified ecologist, attendance of an ECoW (Ecological Clerk of Works) as required, and careful hand search around potential reptiles and amphibians features.

In the event of encountering a reptiles or amphibians, all work must cease until the ecological clerk of works and Natural England are contacted for advice on the best way to proceed lawfully. All contractors working on site should be made aware of this advice and provided with the contact details of the ecological clerk of works.

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

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) a non-technical summary;
- b) the roles and responsibilities of the people or organisation(s) delivering the HMMP;
- c) 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;
- d) 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
- e) 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:
  - a) HMMP has been implemented; and
  - b) 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**

Many thanks, Katie

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