

Sent: 25 February 2026 08:57

Subject: 2026/90310 at location land off, Sunny View, White Lee, Batley, WF17 8FP

Please see ecological commentary below

Designations

No issue

Onsite habitats and species

A Preliminary Ecological Appraisal has been provided (Whitcher Wildlife Ltd., Nov 2025) has been provided. The site consists of a fence, hedgerows (priority habitat), scrub, and neutral grassland.

- Birds – The site offers high suitability for nesting birds. Precautionary measures have been advised, which will be added to a CEMP.
- Bats - The site provides moderate potential foraging and commuting habitat for bats, with routes between other areas of suitable habitats in the surrounding area and potential roosts in surrounding residential properties. Lighting scheme and site layout design to include connective corridors on the boundaries which would connect to the wider landscape have been recommended.
- Reptiles – the site offers suitability for reptile, however due to a lack of connectivity to the wider landscape, and regular disturbance by dogwalkers, etc. it is deemed unlikely that many reptiles are using the site. However, a Precautionary Working Method Statement is recommended.
- Hedgehogs – The site offers high suitability for hedgehogs. Precautionary measures have been advised, which will be added to a CEMP.
- Enhancements for bats and bords have also been recommended, which will be conditioned.

Further comments:

It is noted that an Urban Greenspace Review document has been provided (Pegasus group, Feb 2026); however, this and the EclA and the Proposed site layout (nieman, June 2025) does not display attenuation ponds, ditches, etc. to make up for lost run off area for the development itself and the surround residential areas and to encourage further wildlife.

BNG

The metric, HCA, and details of the results / plans have been provided in the EclA. The baseline calcs have been validated.

However, the report does not discuss how BNG Principles and mitigation hierarchy have been met. This will need further details to validate the commentary below.

The metric displays a net loss of 2.38 habitat units and a net gain of 0.41 (1219.24%) hedgerow units. It is noted that 7.61 habitat units and 0.45 hedgerow units are to be created onsite. This a significant number of habitat units, and so an onsite HMMP will need to be created. It is mentioned that the deficit 3.38 habitat units are to be purchased. A condition to ensure 10% net gain of these habitat units will need to be provided.

Suggested conditions

BNG condition to achieve 10% to be provided for 3.38 habitat units deficit. Though further commentary of how principles and mitigation hierarchy net to be provided.

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

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

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).

Ecological Design Strategy / BEMP – fir attenuation ponds / ditched, biodiversity, bats, and birds

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

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

Hope this helps.
Many thanks, Katie

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