

Sent: 20 April 2026 09:53

Subject: 2026/90937 at location Gomersal St Marys C of E First & Nursery School, Shirley Avenue, Gomersal, Cleckheaton, BD19 4NA

Hi There,

Please see ecological commentary below:

Designations

No issue

Onsite habitats and species

The site is an active school, mainly comprising 11 no school buildings, hardstanding, and an area of modified grassland with scattered trees, scrub, and hedgerows also present.

- Bats – 3no of the school buildings were observed to be suitable for roosting bats (Building EFAA and Surestart Children’s Centre as moderate; B2 as low). Bat surveys were completed in 2023 – no roosting bats were recorded. B2 in a later survey was observed to have negligible potential for roosting bats. All other suitability statuses for the rest of the building onsite remain unchanged. A PWMS for bats will be conditioned, particularly for the Building EFAA and Surestart Children’s Centre, which are to be demolished. None of the trees onsite were noted to have suitability for bats, though the site does offer suitability for foraging and commuting bats. Tree protection measures and a lighting strategy will be conditioned.
- Birds – the site offers suitability for nesting birds in the trees, scrub, and hedgerows. Pre-works checks will be conditioned, along with precautionary measures to minimise impacts in a CEMP.
- Invasive species – Sch 9 listed species *Cotoneaster* sp. (*Cotoneaster*) and *Crococsmia × crocosmiiflora* (*Montbretia*) were observed onsite. Management / removal measures will be conditioned.
- Reptiles – the site offers suitability for the common species of reptiles. Precautionary measures in a CEMP will be added.
- GCN – the site does offer some suitability for amphibians, but due to the lack of accessible / suitable ponds it is considered highly unlikely that amphibians are using the site. Precautionary measures in a CEMP will be added.

- Hedgehogs – the site has suitability for hedgehogs. Precautionary measure will be added to a CEMP.
- Enhancements has also been recommended for bats, birds, hedgehogs, and reptiles, these will be conditioned.

BNG

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

There will be a net loss of 2.60 habitat units and a net gain of 0.33 hedgerow units. It is noted that 1.89 habitat units and 1.43 hedgerow units will be retained / created / enhanced onsite. A 30-year HMMP will be conditioned as a result.

3.05 habitat units are required in order to achieve the statutory 10% net gain. A post-development condition to achieve the 10% net gain is required.

Suggested conditions

BNG: Post development 10% net gain condition required.

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

Tree protection

A Hedgerow and Tree Protection Plan detailing measures for the protection of trees and hedgerows during the works will be submitted to and approved by the LPA prior to the commencement of works on site, including site clearance and delivery of materials.

Hedgerow and tree protection measures will include temporary fencing for the protection of hedgerows in accordance with BS 5837:2012 Trees in relation to design, demolition and construction – Recommendations. Any alternative fencing type or position not in accordance with BS 5837:2012 will be agreed in writing by the LPA prior to the start of development.

The root protection fencing will define the works exclusion zone around hedgerows and trees. Activities liable to be harmful to hedgerows and trees are prohibited within this exclusion zone, unless agreed in writing with the LPA. The approved hedgerow and tree protection measures will remain in place until the completion of development or unless otherwise agreed in writing with the LPA.

Reason: In the interests of biodiversity and in accordance with Policy LP30 and NPPF15

PWMS - Bats

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 bats shall be submitted to and approved by the local planning authority. In order to minimise risk and avoid harm to bats, 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 stripping around potential bat roosting features.

In the event of encountering a bat, 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).

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).

Invasive species

No works shall commence on-site prior to the completion of an invasive species survey and appropriate removal and / or management plan and agreed in writing with the council.

Schedule 9 of the Wildlife and Countryside Act 1981 lists non-native species that are considered harmful to native biodiversity and habitats in the UK. It is illegal to release, plant, or allow these species to grow in the wild.

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

Ecological Design Strategy / BEMP – for invertebrates, birds, bats, hedgehogs, 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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