

Consultation Response from KC, Ecology Unit
2026/90937 Gomersal St Marys C of E First & Nursery School, Shirley Avenue, Gomersal, Cleckheaton, BD19 4NA
Redevelopment of school, including demolition of existing buildings; erection of single storey building; external works including provision of hard and soft PE and play spaces; sub-station; associated landscaping; installation of temporary building during construction
Date Responded: 11/06/2026 Responding Officer: Z. Hanshaw Responding Ref: 2606/26

Good morning,

I have reviewed the revised documents including the Landscape Management Plan (One Environments, May 2026), Biodiversity Mitigation and Enhancement Plan (Estrada Ecology, June 2026), Bat Survey Letter Report (RSK Biocenus, June 2026), Precautionary Working Method Statement (RSK Biocenus, May 2026).

The External Lighting Design demonstrates that areas identified in the Biodiversity Mitigation and Enhancement Plan (Estrada Ecology, June 2026) will not be illuminated >0.2lx, and that the colour temperature of all lighting is 2700K. This is therefore suitable, wildlife friendly lighting, and an external lighting condition is not required.

The Precautionary Working Method Statement (RSK Biocenus, May 2026) and Bat Survey Letter Report (RSK Biocenus, June 2026) identify that there are no bats currently roosting onsite, and identify suitable mitigation measures for these species, as well as other protected species and habitats.

The measures included in the Landscape Management Plan (One Environments, May 2026), Biodiversity Mitigation and Enhancement Plan (Estrada Ecology, June 2026), Bat Survey Letter Report (RSK Biocenus, June 2026), Precautionary Working Method Statement (RSK Biocenus, May 2026) should be secured as a condition of any consent.

In line with the previous comments, I would recommend the following conditions are included in any consent.

Construction Environmental Management Plan: Biodiversity
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.
- i) Pollution prevention plans

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

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).