



CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN: BIODIVERSITY (CEMP: BIODIVERSITY)

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| SITE NAME & ADDRESS | Turnbridge Mills, Quay Street, Huddersfield, HD1 6QT |
| PLANNING APPLICATION REF. | 2025/62/91122/W |
| DEVELOPMENT PROPOSAL | Redevelopment of site for mixed-use |
| DATE | 18 March 2026 |

1. INTRODUCTION

Knight Sky Ecology was commissioned to provide ecological consultancy services in relation to the development proposals at Turnbridge Mills. The development received planning permission on 13 March 2026.

The submission of a Construction Environmental Management Plan: Biodiversity (CEMP: Biodiversity) is required to discharge Condition 37 of the planning permission notice.

2. SCOPE & AIMS

There are several overlaps between the information requirements of other planning conditions and the key biodiversity features identified within this site. Consequently, this CEMP: Biodiversity does not address bats, as licensing and documentation requirements for bats are secured under Conditions 35 and 36. Similarly, biodiversity enhancements fall outside the scope of this document as they are secured via planning condition 38. The scope of this CEMP: Biodiversity is therefore intentionally limited.

The primary purpose of this CEMP: Biodiversity is to assess risks to the remaining key biodiversity features and to set out a clear framework for the mitigation measures and procedural controls that must be implemented throughout the construction programme to avoid or minimise impacts on biodiversity. The contractor responsible for delivering the works will be required to comply with all measures set out herein to ensure adherence to the planning permission, relevant environmental legislation, and recognised good-practice guidance. This CEMP: Biodiversity details how biodiversity mitigation measures will be applied on site.

The key ecological features covered by this CEMP: Biodiversity are:

1. Nesting birds (including peregrine); and
2. Sir John Ramsden Canal (Huddersfield Broad Canal) Local Wildlife Site (LWS)

3. BIODIVERSITY RISK ASSESSMENT

Nesting Birds

Bird species recorded nesting within buildings at the site include common swift and blue tit. There were reports of peregrine previously nesting on Building B; however, enhancement measures have been undertaken in previous years to provide nest sites on the mill building to the south of the site as a separate matter to this development proposal and the details are not included within the scope of this document.

The construction works require demolition of all buildings aside from Building D. Under the Wildlife and Countryside Act 1981 (as amended), it is illegal to intentionally take, damage or destroy a wild bird's nest while it is being used or built and it is illegal to intentionally take or destroy eggs.

Birds listed under Schedule 1 of the Act receive the highest level of legal protection under the Wildlife and Countryside Act 1981. While all wild birds are protected from being killed or having their nests destroyed while in use, Schedule 1 species are additionally protected from intentional or reckless disturbance while they are nesting or rearing young.

In the absence of mitigation, the works may result in the destruction of nest sites and the killing or injury of birds if the works are undertaken within the nesting bird season (generally accepted as March to August inclusive).

Sir John Ramsden Canal LWS

The LWS is to the direct east of the site. It is designated for its standing open water and value for appreciation of nature. The east wall of Building B forms one side of the canal in the location of the site. This building is to be demolished.

Activities adjacent to the canal will include: the erection of scaffolding; demolition of buildings and operation of plant and machinery. Such works increase the risk of pollutants entering the watercourse.

4. BIODIVERSITY PROTECTION ZONES

There are no official biodiversity protection zones on the site. A site plan of all relevant biodiversity features is provided in Figure 7.1. Buffer distances for nesting birds are specified in Section 5. The entire canal is to be protected during construction activities.

5. MITIGATION

Nesting Birds

Where possible, the demolition of buildings, works to existing buildings, and removal of vegetation from the site shall be undertaken outside the bird breeding season, March to August inclusive.

In any areas where demolition is required during nesting bird season, an Ecological Clerk of Works will provide a nesting bird check.

The ECoW is to check and record the presence or absence of nesting within the area no more than 24 hours prior to works commencing.

Should a nesting bird be identified, the works will be postponed until the nest is no longer in use (i.e., until the young have fledged). A bird nest protection zone will be erected around the nest should any continuing works pose a risk to that nest. This zone will be demarcated with care taken not to obstruct flight paths. The extent of the protection zone will be assessed on a case by case basis and is dependent on the type of works taking place along with the location and species. A minimum of a 5m buffer distance shall be adopted for common passerines.

Peregrine

Should evidence of a peregrine nest be identified during the nesting bird check further measures will be required to avoid disturbing this species. This may include halting any further works on the building. Natural England is also to be consulted to confirm the buffer distance should a Schedule 1 listed nest site be identified.



Sir John Ramsden Canal LWS

In accordance with planning condition 25, a separate CEMP is to be submitted, detailing the precautionary working measures that will be implemented during the works. This includes measures to protect the adjacent canal. A pollution-prevention plan for the canal is to be provided, setting out controls to prevent dust, debris, and run-off from exposed soils entering the watercourse during demolition. All demolition and construction activities must be undertaken in full accordance with the approved CEMP, which shall remain in force for the entire duration of the works.

Planning condition 23 additionally requires detailed information relating to foul, surface-water, and land-drainage arrangements for the development. This includes measures to prevent pollution of the adjacent canal, particularly in relation to potential hydrocarbon contamination associated with the proposed service yard and its use by large vehicles.

Furthermore, planning condition 34 stipulates that no demolition works shall commence on Building B and/or Building C until full details of all works relating to, or affecting, the retained wall(s) adjacent to the canal have been submitted and approved.

The canal is designated for its standing open water and its value for the appreciation of nature. There are no specific biodiversity features requiring protection beyond safeguarding the open-water environment itself. This document should therefore be read in conjunction with all submissions prepared to discharge planning conditions 23, 25, and 34.

Demolition works will take place directly adjacent to, and in parts over, the canal. All works must therefore be undertaken in accordance with the Code of Practice for Works Affecting the Canal & River Trust (Canal & River Trust, 2017 – Parts 1–3). Section 8.3 of Part 2 provides specific good-practice measures relevant to demolition activities as set out below:

- *Demolition works adjacent to and over the canal are likely to require adequate screening to prevent debris from landing on Trust property. There should be no debris encroaching upon the Trust land.*
- *Dust suppression is likely to be required during demolition works, particularly near densely populated areas, sites with typically strong winds or mooring sites alongside the canal.*
- *Debris piles are to be kept to manageable sizes as per the waste management plan to inhibit the release of dust into the atmosphere and, must not create run off towards the waterway.*
- *Once demolition works have been completed, a canal bed survey or similar might be required to be undertaken by the promoter to ensure that no material has entered the waterway. The promoter may wish to carry out a pre-start survey.*
- *The passage of boats on the navigation and the use of the towpath must be maintained unless otherwise agreed.*
- *Monitoring during demolition works is likely to be required to check design allowances are not being exceeded. If damage to a Trust structure is detected, the third party shall be responsible for the full & immediate reinstatement (to the Trust's written satisfaction) of the affected structure and any associated costs.*
- *Extreme caution needs to be taken when removing structures located below canal water level (e.g. cellars, basements), as they may also be retaining ground water, which is associated with the Canal adjacent, furthermore you might need to instigate temporary works to ensure the waterway structure remains in place throughout your works.*



- *The canal environment, particularly derelict structures, can be home to bats, birds and other protected wildlife, and consideration should be given to the need to protect them during the works.*
- *Where contaminated material is encountered (e.g. asbestos sheeting), steps outlined in the waste management plan must be followed to protect workers and the public from contact with the material or with gases or liquids arising from it. All necessary permits remain the responsibility of the promoter.*
- *The Promoter is encouraged to recycle construction waste, where appropriate. Additionally, the Trust requires that materials suitable for re-use in other areas of the network (e.g. Such as copings and castings) must be carefully removed and transported to a storage area. The Trust retains ownership of all such materials unless agreed upon prior with the Works Engineer.*

6. ROLES AND RESPONSIBILITIES

The parties responsible for the delivery of the biodiversity (and other environmental) commitments are provided below along with a brief overview of responsibilities.

Project Manager – Contractor

Responsible for overall project delivery, construction management and provision of resources to ensure delivery of environmental requirements and commitments on site. They must monitor construction activities to ensure that identified and appropriate control measures are effective and in compliance with the relevant documents including this CEMP: Biodiversity.

Site Environmental Advisor (Contractor)

Ensuring compliance with environmental legislation, consents, objectives, targets and other environmental commitments, including those arising from all environment related documents.

Ecological Clerk of Works

An Ecological Clerk of Works (ECoW) is to be appointed prior to the commencement of any scheme works and will oversee all biodiversity related aspects of the scheme throughout the duration of the construction programme. The role of the ECoW is to advise on how works should be undertaken in accordance with the relevant good practice, precautionary working measures, legislation and mitigation and to monitor compliance with all measures as set out. Where risks are not being appropriately managed, or unforeseen risks emerge, the ECoW has the power to stop works if necessary. The ECoW should report to and provide any requirements for remedial action to the Site Environmental Advisor and Contractor's Project Manager who would be responsible for implementation. The responsibilities of the ECoW are to include (but not limited to):

- Review and assessment for necessary pre-commencement checks, identification of mitigation including task specific and general item.
- Delivery of inductions and toolbox talks to contractors in order to explain the ecological sensitivities of the site and the precautionary working measures to be adopted in relation to each relevant biodiversity feature.
- Ensure completion of toolbox talk signature sheet.
- Monitor delivery of the measures set out within the pollution prevention plan.
- Supervise construction activities where required (i.e., within any areas which pose a risk of impact to sensitive features).
- Undertake nesting bird checks prior to any vegetation clearance / demolition during the nesting bird season of March to August (inclusive).



- Directly advise on and oversee bat and bird box installation.
- Provide regular updates to stakeholders and the project team.
- Ensuring any relevant wildlife licences / consents are in place as required.
- Advising on unforeseen risks as they emerge.



7. BIODIVERSITY FEATURES - SITE PLAN

Figure 7.1 provides an overview of the site, the location of the canal, confirmed nesting sites and confirmed bat roost locations (to be covered under a separate planning condition). It will be the responsibility of the EcoW to attend the site to carry out any necessary checks prior to the works on any building within the site.

Figure 7.1. Plan of biodiversity features

