

**Consultation Response from KC,
Ecology Unit**
**2026/91076 Builders Yard, The Old Brickworks, Top O' Th' Bank, Thurstonland,
Huddersfield, HD4 6UY**
Demolition of existing building and erection of detached dwelling with ancillary works
Date Responded: 29/07/2026
Responding Officer: Z. Hanshaw
Responding Ref: 2607/53

I have reviewed the updated ecological information provided.

The GCN HSI & eDNA Testing Survey & Report (JCA, 2026) details that the HSI for Pond 1 is below average, and Good for Pond 2. Subsequently a eDNA survey was undertaken which had a negative result. Therefore, it is not expected that GCN will be impacted by the development.

The correspondence from Rachel Hacking Ecology (July 2026) states that 2 of the 3 required bat surveys have been completed, and the site has a Common Pipistrelle roost. A bat license will be required for the demolition of the building. A bat survey report should be submitted with the results of the final survey and mitigation measures prior to the determination of this application. An external lighting strategy should also be secured as a condition of any consent, which should show how areas which are sensitive for nocturnal wildlife, like bats, will not be illuminated.

As recommended in the Preliminary Ecological Appraisal (PEA) (JCA, 2026) a Construction Environmental Management Plan: Biodiversity should be secured as a condition of any consent. This should include detailed mitigation measures for Local Wildlife Sites, herpetofauna, and nesting birds. Additionally, as recommended in the PEA, a pre-commencement badger survey should be undertaken. Results of this should be provided as a condition of any consent.

Cotoneaster was also observed onsite, and an Invasive Non-Native Species (INNS) eradication strategy should be secured as a condition of any consent.

The Biodiversity Accounting Assessment Report (JCA, 2026) states that 10% net gain for biodiversity can be achieved through a combination of on-site and off-site enhancements. The off-site enhancements will need to be secured via a legal agreement and registered on the Natural England Biodiversity Net Gain Sites register. Potentially the red line boundary could be amended to include the enhancements within a separate red line boundary, in which case the enhancements can be secured as a condition of any consent.

Recommended conditions

The biodiversity net gain informative should be included in any decision notice and a legal agreement will be required for the off-site enhancements.

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

Construction Environmental Management Plan for 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.

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.

The CEMP must also include the following specific plans / documents:

- Pollution Prevention Plan for the watercourses and waterbodies (using good practice guidance such as CIRIA C532)

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

Biodiversity Enhancement Management Plan

A Biodiversity Enhancement Management Plan (BEMP) must be provided to the LPA prior to the commencement of above ground works on-site. The content of the BEMP shall include the following.

- Purpose and conservation objectives for the proposed enhancement measures
- Detailed designs to achieve the stated objectives
- Location of the proposed enhancement measures
- Persons responsible for implementing the enhanced measures
- Details of initial aftercare and long-term maintenance.

Reason: In the interests of biodiversity and in accordance with Policy 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).