

**Consultation Response from KC,
Ecology Unit****2026/91305 Lower Whitegate Farm, White Gate Road, Cartworth Moor, Holmbridge,
Holmfirth, HD9 2TH****Change of use of grazing field to dog exercise field, change of use of three redundant farm
buildings to dog kennels and an indoor and outdoor dog exercise arena****Date Responded: 04/06/2026****Responding Officer: Z. Hanshaw****Responding Ref: 2606/14**

Good afternoon,

I have reviewed the documents submitted with this application. The Small Sites Metric demonstrates that 26 individual trees will be planted within the development site, which is sufficient to deliver 10% net gain onsite. The Post Development Habitat Plan identifies that these trees will be native species, suitable for the landscape, and will be planted with a minimum of 3m spacing. I would suggest that this density of planting is too high for individual trees, as at fully grown the canopy of these would overlap and create a more woodland-like habitat. Additionally, a couple of the proposed trees could be planted within the enclosed dog field. In a more open grown context, such as the middle of a field, the growth of a tree can be very different to that where there is competition from other trees. Across the country there are many concerns that, with the increasing prevalence of Ash die back, *Phytophthora ramorum* infections, and historic loss of Elm trees, the number and density of landscape trees is reducing considerably. Areas with scattered individual trees have been found to support greater levels of biodiversity than comparable areas without trees, and scattered trees are keystone structures for vertebrates, invertebrates, mosses and lichens. The Biodiversity Net Gain informative should be included in any decision notice and I would recommend that the current planting plan is revised prior to the discharge of the Gain Plan.

Given the surrounding rural landscape and habitats, I would also recommend that an external lighting strategy is included as a condition of any consent. This is required to ensure that the sensitive ecological features within the landscape will not be illuminated as part of the development.

Suggested conditions:**Biodiversity Net Gain informative****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