

**Consultation Response from KC,
Ecology Unit**
2026/91494 Land off, Penistone Road, Birdsedge, Huddersfield, HD8 8XP
Outline application for erection of residential development, including associated infrastructure works. All matters reserved except means of access into (but not within) the site from Penistone Road.
Date Responded: 25/06/2026
Responding Officer: Z. Hanshaw
Responding Ref: 2606/71

Good morning,

I have reviewed the Preliminary Ecological Appraisal (PEA) (Estrada Ecology, March 2026), the Biodiversity Net Gain Report (Estrada Ecology, May 2026) and the Indicative Landscape Masterplan (DRaW, May 2026).

The PEA states that the habitats onsite are of low value, comprising primarily poor condition modified grassland, with small areas of bramble scrub, ephemeral vegetation and introduced shrub. However, the habitats immediately adjacent to the development to the north and west have high ecological value, comprising priority habitat, ancient woodland, and the River Dearne. The Indicative Landscape Masterplan shows that the development will include extensive green space, with areas of species rich grassland, new woodland and public open space.

The development is proposing a Net Gain of 29.33%, through a combination of onsite and offsite enhancement adjacent to the existing woodland. I note that the habitat creation has been assigned High Strategic Significant, as the site is identified in the West Yorkshire LNRS, but this is not correct for all habitats. The Biodiversity Net Gain User Guide states that an "intervention can be classed as "formally identified in a local strategy" where it meets the following criteria:

1. the location of the habitat parcel has been mapped in the Local Habitat Map as an area where a potential measure has been proposed to help deliver the priorities of that LNRS; and
2. the proposed intervention is consistent with the mapped potential measure in the LNRS for the habitat parcel"

I would recommend that the Biodiversity Net Gain Metric is updated to rectify this assessment. I would also note that any habitat enhancement proposed within a buffer zone for Ancient Woodland can only count in the metric [up to no net loss](#). This should be made clear in any subsequent Biodiversity Net Gain submission.

As the development is proposing off-site habitat enhancement, this will need to be secured via a S106 agreement, and the off-site area registered on the Biodiversity Net Gain Off-site Register.

I note that the Air Quality Assessment (Redmore Environmental, March 2026) does not identify any sensitive ecological receptors but misses the ancient woodland adjacent to the site. The [Government website on Ancient Woodland](#) identifies that air pollution arising from development can have a big impact on Ancient Woodlands, and I would recommend that this is considered further where possible.

Recommended conditions

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)
- Pollution Prevention Plan for the Priority Habitats and Ancient Woodland
- Precautionary Working Method Statement for riparian mammals, hedgehogs, reptiles and amphibians
- Invasive species survey and appropriate removal and / or management plan for Snowberry

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

Habitat Management and Monitoring Plan – for onsite habitats created

The development shall not commence until a Habitat Management and Monitoring Plan (the HMMP), prepared in accordance with the approved Biodiversity Gain Plan and including:

- a) a non-technical summary;
- b) the roles and responsibilities of the people or organisation(s) delivering the HMMP;
- c) the planned habitat creation and enhancement works to create or improve habitat to achieve the biodiversity net gain in accordance with the approved Biodiversity Gain Plan;
- d) the management measures to maintain habitat in accordance with the approved Biodiversity Gain Plan for a period of 30 years from the completion of development; and
- e) the monitoring methodology and frequency in respect of the created or enhanced habitat to be submitted to the local planning authority, has been submitted to, and approved in writing by, the local planning authority. Notice in writing shall be given to the Council when the:
 - a) HMMP has been implemented; and
 - b) habitat creation and enhancement work as set out in the HMMP have been completed.

The created and/or enhanced habitat specified in the approved HMMP shall be managed and maintained in accordance with the approved HMMP. Monitoring reports shall be submitted to local planning authority in writing in accordance with the methodology and frequency specified in the approved HMMP.

We also recommend a draft biodiversity gain plan is submitted.

Reason: To ensure the development delivers a biodiversity net gain on site in accordance with Schedule 7A of the Town and Country Planning Act 1990.

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. This should include the enhancement measures outlined in paragraph 7.2 of the Preliminary Ecological Appraisal (Estrada Ecology, March 2026). 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