

**Consultation Response from KC,
Ecology Unit****2026/91564 land off, Heaton Grange, Hanging Heaton, Batley, WF17 6EN****Erection of 21 dwellings****Date Responded: 23/07/2026****Responding Officer: Z. Hanshaw****Responding Ref: 2607/28**

Good afternoon,

I have reviewed the documents submitted as part of this application. I have no ecological concerns with this development but note that further information with regards to Biodiversity Net Gain will need to be provided.

The submitted Ecological Impact Assessment (Whitcher Wildlife, May 2025) and the Biodiversity Net Gain Metric identify that there are 3.78 Biodiversity Units (BUs) for area habitats at baseline, and 0.29 hedgerow BUs at baseline. Post development there is proposed to be 3.71 area BUs and 0.33 hedgerow BUs. This is a net gain of 12% for hedgerows, but a net loss of 2% for area habitats. The Ecological Impact Assessment states that the purchase of offsite units will be required for this development to deliver the legally required 10% Net Gain. I would recommend that further information on the purchase of these is provided, including how many units will be required to purchase, as well as information on the availability, cost and provider. The submitted metric should be updated to reflect this information.

There are also a number of inconsistencies between the submitted plans and the Biodiversity Net Gain assessment and Ecological Impact Assessment.

The Post Development Habitat Map (page 34 of the Ecological Impact Assessment) shows that there will be Other Neutral Grassland to the east of the site, which is identified as a drainage attenuation area in the Site Layout Plan. The metric should be updated to include this area as an attenuation basin, if that is the proposal.

An area of Dense Scrub proposed at the side of the road, to the west of plot 5. I am not convinced how viable this area of scrub will be, nor if it is appropriate in this location.

The proposed Other Neutral Grassland (ONG) is set out to be in Moderate condition, but no information on how this will be achieved. It also appears to connect with an existing playground, and 50 individual trees are also proposed in this area. Details on the viability of moderate condition ONG, in this area, should be provided.

The Ecological Impact Assessment reports that an existing line of trees will be removed, due to their size, as they are growing on a retaining wall, but then proposed that they will be replaced. If large trees are not permitted to grow on the retaining wall, then I would recommend that they are not replanted in this location.

The Planting Plan shows non-native trees and non-native shrubs will be planted within the development site. I would recommend that this is updated to ensure that only native species are included within the Planting Plan. The Planting Plan also shows areas of non-native shrubbery where the Post Development Habitat Map shows dense scrub.

I would recommend that the above plans and documents should be updated, alongside the Biodiversity Net Gain Metric, to ensure consistency between the submitted documents.

A Construction Environmental Management Plan: Biodiversity will also be required to be secured as a condition of any consent. This should include Precautionary Working Method Statement for Hedgehogs, and an Invasive Non-Native Species removal plan. An appropriate landscaping or habitat management plan may also be required as a condition of any consent, depending on the further information submitted with regards to the site Biodiversity Net Gain.

Recommended conditions

The statutory Biodiversity Net Gain Plan condition will apply to this development. The Biodiversity Net Gain Informative should be included in any decision notice. Further Biodiversity Net Gain conditions may be required once further information is provided.

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:

- Invasive Native Species Removal eradication strategy

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 proposed included in Section 5 of the Ecological Impact Assessment (Whitcher Wildlife, May 2026) and 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