

**Consultation Response from KC,
Ecology Unit****2026/91627 Land at, Dunford Road, Hade Edge, Holmfirth, HD9 2RT****Erection of 22 dwellings (Use Class C3) associated development including access,
landscaping, ancillary infrastructure, and parking****Date Responded: 30/06/2026****Responding Officer: Z. Hanshaw****Responding Ref: 2606/80**

Good morning,

I have reviewed the Preliminary Ecological Appraisal (PEA) (Whitcher Wildlife, June 2026) and I am satisfied with the information contained within. The PEA states that the site habitats are of generally Poor condition, and low ecological value, consisting of Modified Grassland, Hazel Scrub, Vegetated Garden, and Artificial Unvegetated Unsealed Surface. The only Moderate condition habitat onsite consists of 5 Rural Individual Trees.

The PEA identified that several of the buildings onsite were of Low suitability for roosting bats and a single emergence survey was undertaken on the 4th of June. This did not identify any bat roosts within the buildings to be impacted, but a single Common Pipistrelle roost was identified in a neighbouring building onsite. Precautionary measures for bats will need to be secured as a condition of any consent.

The PEA also identified Swallows nesting within the buildings, and a small amount of habitat suitable for foraging hedgehogs. Precautionary working methods for these should also be included in any consent. The PEA also states that the site has low suitability for reptiles, with only the dry-stone walls providing any suitable features, and precautionary methods for reptiles should also be secured as part of any consent. I would recommend that these are collated as part of a Construction Environmental Management Plan: Biodiversity which can include all appropriate construction phase environmental and ecological mitigation.

The Biodiversity Net Gain Metric, and Section 5 of the PEA, identify that this development will deliver Biodiversity Net Gain through off-site enhancements, on neighbouring land owned by the applicant. This will need to be secured via a legal agreement, and the off-site enhancement site will need to be registered on the [Off-Site Register](#). A Habitat Management and Monitoring Plan will be required for the off-site enhancement area to be agreed as part of the legal agreement. This Habitat Management and Monitoring Plan is therefore required to be submitted at this stage.

Recommended conditions**Biodiversity Net Gain**

A legal agreement will be to secure details included in the (to be submitted) Habitat Management and Monitoring Plan and the Off-Site Biodiversity Enhancement Area.

The statutory Biodiversity Net Gain Plan condition will apply to this development and will need to be submitted as a discharge of condition application. The Biodiversity Net Gain Informative should be included in any decision notice.

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:

- Precautionary Working Method Statements for Bats
- Precautionary Working Method Statements for Swallows
- Precautionary Working Method Statements for Hedgehogs
- Precautionary Working Method Statements for Reptiles

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. This should include the final details of the enhancements recommended in Section 6.6 of the Preliminary Ecological Appraisal (Whitcher Wildlife, June 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