

**Consultation Response from KC,
Ecology Unit**

2026/91763 Land off Barnsley Road, Denby Dale, Huddersfield

Erection of 40 residential dwellings and associated works

Date Responded: 05/08/2026

Responding Officer: Z. Hanshaw

Responding Ref:

I have reviewed the Preliminary Ecological Appraisal (PEA) (Brooks Ecological, October 2025), the Biodiversity Net Gain Assessment (Brooks Ecological, February 2026), the Badger Assessment and Report (Brooks Ecological, December 2025), the Ecological Impact Assessment (Brooks Ecological, December 2026) and the Biodiversity Net Gain Metric (June 2026).

Further information on Biodiversity Net Gain is required. The submitted Biodiversity Net Gain Assessment details that on site at baseline there are 5.8 habitat units (HU), 0 hedgerow units (HeU) and 0.29 watercourse units (WU). Post development onsite there will be 5.56 HU, 0.21 HeU, and 0.35 WU. This is a net loss of 4.17% for HU, and a net gain of 18.68%. The development proposes offsite enhancement, immediately adjacent to the development, with a baseline of 3.13 HU, and a post intervention value of 4.02 HU. In total this results in a net gain for habitats of 11.61% and for watercourses of 18.68%. However, the trading summaries have not been met, and therefore the Biodiversity Net Gain is not substantiated. The Biodiversity Net Gain User Guide states that Rule 1 of the metric rules is "*The trading rules of this biodiversity metric must be followed*" and "*If you do not follow these rules, you cannot claim a biodiversity net gain.*" The Biodiversity Net Gain Assessment therefore sets out that Biodiversity Units will need to be purchased to satisfy the trading rules. 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. This website ([July 2026 BNG Pricing Report — Biodiversity Units UK](#)) publishes estimates of Biodiversity Unit prices. At the time of writing, Watercourse Units are approximately £127,772 and Individual Trees units are £29, 074.

The development also proposes enhancements within the 15m buffer for the Ancient Woodland. Notwithstanding the appropriateness of a 15m buffer, as this buffer is required to as part of the mitigation for the woodland, habitat creation and enhancement within this area can only account up until No Net Loss ([What you can count towards a development's biodiversity net gain - GOV.UK](#)). I would recommend that the Biodiversity Net Gain Assessment is updated to make this clear, and show what is contributing to No Net Loss, and what is contributing as an enhancement.

The onsite and offsite Biodiversity Net Gain enhancements proposed as part of this development will need to be secured via a S106 agreement. A Habitat Management and Monitoring Plan will need to be provided as part of this to detail how the enhancements will be maintained and monitored for 30 years. The off-site enhancement will also need to be registered with Natural England on the Biodiversity Net Gain register, once the legal agreement and Habitat Management and Monitoring Plan are finalised.

I would also recommend that the Ecological Impact Assessment is updated to detail what the impacts on the ancient woodland will be. The Proposed Site Plan shows an offshoot from the development through the Ancient Woodland to the Beck. Is this to do with the drainage of the site? No details what the impacts of this on the Ancient Woodland have been provided within the ecological reports. I would recommend that the Ecological Impact Assessment is updated to

provide further detail on this. Ancient Woodland is an irreplaceable habitat, and activities which negatively impact on the woodland should not be permitted.

From the Site Layout Plan, it also appears that the gardens for dwellings 1-6 are within the buffer zone for the Ancient Woodland. This is inappropriate. 15m is the minimum buffer for root protection purposes. Homeowners are permitted to undertake works in their garden which could negatively impact on the trees and ancient woodland, such as installing an impermeable surface, or digging and damaging the tree roots. The scheme should be amended to ensure that the buffer around the ancient woodland is free from all development. I would also recommend that this buffer is extended to a more appropriate distance. [Research has shown](#) that 95% of human encroachment activity was found within 34m of a woodland edge, and where gardens backed onto woodland, residents were likely to install gates to permit themselves access to the woods. Measures such as a 30 or 35m planted buffer, are likely to reduce this encroachment.

The Ecological Impact Assessment states that there are a low number of protected or Priority species onsite, with impacts on breeding birds, badger and bats identified. The Ecological Impact Assessment also identifies that invasive species are onsite.

If you are minded to approve this application, a Construction Environmental Management Plan: Biodiversity will be required as a condition of any consent. This should set out suitable mitigation measures for the protection on the adjacent woodland and watercourse, as well as for protected and priority species. I would also recommend that an invasive species removal strategy, supported by an additional survey during the peak season for botanical observation, is included within this document.

Finally, I would recommend that an Ecological Design Strategy is secured as a condition of any consent. This should include details of the faunal provisions, such as hedgehog access routes, bat and bird boxes, as well as a detailed external lighting scheme to show how areas which are ecologically sensitive will not be illuminated.

Recommended conditions

The statutory Biodiversity Net Gain Plan condition will apply to this development. A legal agreement will be required to secure the onsite and offsite habitats proposed, and a Habitat Management and Monitoring Plan will be required before the legal agreement can be finalised. Further Biodiversity Net Gain conditions may be required subject to the updated Biodiversity Net Gain information received. A Habitat Management and Monitoring Plan template may be downloaded from Natural England: [Habitat Management and Monitoring Plan Template - JP058](#).

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 Ancient Woodland
- Eradication strategy for INNS onsite, following an updated survey within the peak survey period for species identification

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

Ecological Design Strategy

No development shall take place until an Ecological Design Strategy (EDS) addressing mitigation and enhancement measures for faunal species has been submitted to and approved in writing by the local planning authority.

The EDS shall include the following.

1. Purpose and nature conservation objectives for the proposed works.
2. Review of site potential and constraints.
3. Detailed design(s) and/or working method(s) to achieve stated objectives.
4. Extent and location/area of proposed works on appropriate scale maps and plans.
5. Details of faunal provisions for bats, birds and hedgehogs to be integrated into the design
6. Timetable for implementation demonstrating that works are aligned with the proposed phasing of development.
7. Persons responsible for implementing the works.
8. Details of initial aftercare and long-term maintenance.
9. Details for monitoring and remedial measures.
10. Details for disposal of any wastes arising from works; and
11. A lighting design strategy for biodiversity.

The EDS shall be implemented in accordance with the approved details, and all features shall be retained in that manner thereafter.

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

