

**Consultation Response from KC,
Ecology Unit**
2026/92204 4, Back Lane, Grange Moor, Huddersfield, WF4 4EJ
Demolition of existing dwelling and garage and erection of 8 dwellings with associated works
Date Responded: 13/08/2026
Responding Officer: Z. Hanshaw
Responding Ref: 2608/28

I have reviewed the Small Sites Metric and Condition Assessment Sheets, the Preliminary Ecological Appraisal (PEA) (Pennine Ecological, July 2026), the Bat Activity Survey Report (Pennine Ecological, July 2026), the draft Biodiversity Net Gain Plan (Joe's Blooms, July 2026), and the Pre- and Post- Development Maps. I am satisfied with the ecological information provided.

The PEA states that the site is unlikely to support Great Crested Newts, given the distance and intervening land use between the development and the nearest pond. Similarly, there is suitable habitat onsite for common amphibians, but no connectivity to nearby ponds. The site could support a low number of small mammals, including hedgehogs, but is unlikely to support larger species such as badger. I would therefore recommend that a Construction Environmental Management Plan: Biodiversity is secured as a condition of any consent. This should include appropriate mitigation measures for the construction phase of the development, to ensure that no wildlife will be harmed as part of the proposals.

The Small Sites Metric and Biodiversity Net Gain Plan detail that the habitats onsite are of Moderate distinctiveness or lower, with no higher value habitats present. There is a total of 1.0128 habitat units at baseline, and 0.3833 hedgerow units at baseline. Post development there will be 0.2785 habitat units and 0.3833 hedgerow units. This is a net loss of 73% for area habitats and 24% for hedgerows. The Biodiversity Net Gain Plan sets out that offsite units will be purchased, and includes a certificate to detail that Off-Site Units are available to be purchased for this development. The statutory Biodiversity Net Gain Condition will apply, and a final Biodiversity Net Gain Plan will need to be submitted to discharge this condition, with the final details of the Units purchased.

The Bat Activity Survey Report details that the building onsite supports 2 Common Pipistrelle day roosts and a bat licence will be required for the demolition of the building. A copy of this licence should be provided as a condition of any consent. I would also recommend that an external lighting strategy, to demonstrate how areas which are used by commuting and foraging bats, and other nocturnal animals, will not be illuminated as part of the proposals, is secured as a condition of any consent.

Recommended conditions

The statutory Biodiversity Net Gain Plan condition will be required. 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 Statement for Bats

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 the following.

- a) Purpose and conservation objectives for the proposed enhancement measures
- b) Detailed designs to achieve the stated objectives
- c) Location of the proposed enhancement measures
- d) Persons responsible for implementing the enhanced measures
- e) Details of initial aftercare and long-term maintenance.

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

Bat licence

No development shall commence, including demolition, until one of the following has been submitted to the local planning authority:

- a) A licence issued by Natural England pursuant to Regulation 55 of The Conservation of Habitats and Species Regulations 2017 authorising the specified activity/development to go ahead; or
- b) written confirmation of Site Registration under the Bat Mitigation Class Licence or Earned Recognition Scheme; or
- c) A statement in writing from the relevant licensing body to the effect that it does not consider that the specified activity/development will require a licence.

The development shall be undertaken in accordance with the approved scheme and retained thereafter.

Reason: To ensure that appropriate measures are in place with regard to protected species and biodiversity, in accordance with Policy LP30 of the Kirklees Local Plan, Chapter 15 of the National Planning Policy Framework, and the Conservation of Habitats and Species Regulations 2017 (as amended). This pre-commencement condition is necessary to ensure that the relevant Licence is obtained, and any relevant mitigation measures are secured, at the appropriate stage of the development process.