

**Consultation Response from KC,
Ecology Unit**
2026/92610 210, Whitehall Road East, Birkenshaw, BD11 2LL
Demolition of existing dwelling and erection of detached dwelling
Date Responded: 06/10/2026
Responding Officer: Z. Hanshaw
Responding Ref: 2610/16

I have reviewed the Bat Survey Report (Middleton Bell Ecology, August 2026) and I am satisfied with the information contained within. The report details that Building 1 had moderate suitability for roosting bats, Building 2 had low suitability and Buildings 3 and 4 had Negligible suitability. Two emergence surveys were undertaken in July and August 2026 and identified low levels of bat activity comprising predominately Common Pipistrelle species. A Biodiversity Compensation and Enhancement Strategy should be secured as a condition of any consent. This should detail measures to compensate for the loss of potential bat and bird roosting features within the development, as well as other reasonable enhancements for wildlife, such as the inclusion of swift bricks.

I would also recommend that a Construction Environmental Management Plan: Biodiversity is secured as a condition of any consent. The development is adjacent to areas identified within the Kirklees Wildlife Habitat Network, and also ~100m from Priority Habitat- Deciduous Woodland. The Construction Environmental Management Plan: Biodiversity should include detailed mitigation measures to ensure that these features are not impacted as part of the proposals. An external lighting scheme should also be secured to detail how these areas will not be illuminated.

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 NPPF Policy N2

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 Kittle Point Beck (using good practice guidance such as CIRIA C532)

Reason: In the interests of biodiversity and in accordance with LP30 and NPPF Policy N2

Biodiversity Compensation and Enhancement Management Plan

A Biodiversity Compensation and Enhancement Management Plan (BCEMP) must be provided to the LPA prior to the commencement of above ground works on-site. The content of the BEMP shall include final details of the compensation measures included in Section 6.2 of the Bat Survey Report (Middleton Bell, August 2026) and include the provision of 3x bat boxes, 3x passerine nesting boxes, and 3x swift boxes. The BCEMP should detail the location of the proposed enhancement measures, persons responsible for implementing the enhanced measures and the details of initial aftercare and long-term maintenance.

Reason: In the interests of biodiversity and in accordance with Policy LP30 and NPPF Policy N2