Consultation Response from KC, Ecology Unit
2026/92751 Former Birkdale High School, Wheelwright Drive, Dewsbury, WF13 4JB
Prior notification for demolition of former school buildings
Date Responded: 12/10/2026 **Responding Officer: Z. Hanshaw** **Responding Ref: 2610/19**

I have reviewed the Preliminary Ecological Appraisal (Curra Terrae, July 2026) and the Bat Survey Report (Middleton Bell Ecology, August 2028).

The Preliminary Ecological Appraisal states that there is Priority Habitat- Deciduous Woodland onsite, which should not be lost or impacted by the proposals. As this application is solely for the demolition of the building, it is expected that this woodland will be retained, but mitigation measures to ensure that there are no impacts on the woodland, such as from vehicles or dust during the demolition, should be secured. I would recommend that these are included in a Construction Environmental Management Plan: Biodiversity which is secured as a condition of any consent.

The Preliminary Ecological Appraisal also states that there is a low likelihood of Great Crested Newts, common amphibians, badgers and reptiles being present onsite, due to the isolated location, but there is suitable habitat for them within the site. Best practise mitigation measures, to ensure that these species are not impacted during the demolition should also be included in the Construction Environmental Management Plan: Biodiversity. This should include pre-commencement surveys for badger and breeding birds, as well as precautionary working method statements for amphibians and reptiles.

Invasive non-native species (INNS) including Yellow Azelea, Wall Cotoneaster and Cherry Laurel were also identified onsite in the Preliminary Ecological Appraisal. To minimise the risk of spreading Invasive Non-Native Species and to ensure compliance with the Wildlife and Countryside Act 1980, an INNS Management Plan should be prepared and implemented prior to the commencement of any works. This should set out measures for the identification, treatment, removal and disposal of these species onsite, as well as ensure that there is no further spread of these throughout the site, and offsite.

The Bat Survey Report identifies that there are at least 2 bat roosts present within the buildings, and that a bat licence will be required for this demolition. The mitigation measures identified in Section 6 of the Bat Survey Report should be secured as a condition of any consent alongside a copy of the NE licence.

Finally, the compensation and enhancement measures included in Section 6 of the Bat Survey Report and 4.3 of the Preliminary Ecological Appraisal should be compiled and a Biodiversity Compensation and Enhancement Management Plan should be secured as a condition of any consent. This should provide the final details of the compensatory and enhancement measures, including their location and long-term maintenance.

Recommended conditions

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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 Reptiles and Amphibians
- Precautionary Working Method Statement for Badger

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

Biodiversity Compensation and Enhancement Management Plan

A Biodiversity 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 enhancements in Section 6 of the Bat Survey Report and 4.3 of the Preliminary Ecological Appraisal. The BCEMP should detail the location of the compensatory and enhancement measures, persons responsible for implementing the 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

Invasive species

No works shall commence on-site prior to the completion of an invasive species survey and appropriate removal and / or management plan and agreed in writing with the council. Schedule 9 of the Wildlife and Countryside Act 1981 lists non-native species that are considered harmful to native biodiversity and habitats in the UK. It is illegal to release, plant, or allow these species to grow in the wild.

Reason: In order that the proposals are implemented in accordance with the Wildlife and Countryside Act 1981 (as amended).

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.