Hightown Lane, Holmfirth

Discharge of Condition 10

Construction Environmental Management Plan (CEMP: Biodiversity)

2026

Client	Millson Group LTD
Project Title	Hightown Lane, Holmfirth
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1. Introduction

1.1 Background

1.1.1 Rachel Hacking Ecology Ltd (RHE) was commissioned in 2026 by Millson Group Ltd (the Client) to provide ecology consultancy services in connection with a proposed development at land north of 39 Hightown Lane, Holmfirth (the 'site'). The site received planning permission in 2026 from Kirklees Council for the erection of a detached dwelling (part within a conservation area) (planning reference 2026/62/90868/W). As part of the planning permission, several conditions were attached. Condition 10 relates to the provision of a Construction Environmental Management Plan for Biodiversity (CEMP: Biodiversity).

Condition Wording

1.1.2 Condition 10 states: "*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."

1.2 Scope

1.2.1 This CEMP: Biodiversity (CEMP) has been prepared to enable discharge of condition 10 and should be read in conjunction with the Preliminary Ecological Appraisal[1] prepared by RHE (2026) for the above-mentioned application.

1.2.2 In accordance BS 42020:2013 Biodiversity Code of Practice for planning and development the present document provides details of the mitigation measures that will be carried out so that adverse impacts on biodiversity.

[1] RHE (2026). *Hightown Lane, Holmfirth* Preliminary Ecological Appraisal.

2. Potential Damaging Construction Activities

2.1.1 Potentially damaging construction activities are generic throughout the construction phase of the development so the risk assessment will apply to the entire site. The Preliminary Ecological Appraisal[1] identified the following ecological features that are at risk:

- Badger *Meles meles*
- Bats
- Hedgehog *Erinaceus europaeus*
- Nesting Birds

2.1.2 Potentially damaging construction activities and the features at risk from each activity are summarised in Table 1. Controls (mitigation and protection measures) will be described in detail in the relevant sections of this document.

Table 1. Potentially Damaging Construction Activities

Construction Activity	Features at risks	Risk Rating (Before Controls)	Risk Rating (After Controls)
Site Compound Installation	Badger, Hedgehog, Nesting Birds	Moderate	Negligible
Storage of materials and equipment	Badger, Hedgehog, Nesting Birds	Moderate	Low
Installation of artificial lighting	Nesting Birds, Bats	Moderate	Low
Noise	Nesting Birds	Moderate	Negligible
Groundworks (vegetation removal)	Badger, Nesting Birds, Hedgehog	High	Low
Groundworks (re-profiling)	Nesting Birds, Hedgehog, Badger	High	Low
Excavations	Hedgehog, Badger	High	Low
Pollution spills	All Features	High	Low

3. Biodiversity Protection Zones

3.1.1 To enable development all the on-site grassland habitats will be lost. Thus, on-site habitat protection is not required and there are no Biodiversity Protection Zones on site. However, the off-site Sycamore tree will require protection to ensure it is not damaged during the construction phase. The required protection should be prescribed by a Suitable Qualified Arboricultural consultant (SQA) and will include protective fencing where appropriate.

4. Protection Measures: Rationale and Methods

4.1.1 General precautions include:

- Implement dust suppression measures during periods of dry weather to avoid covering vegetation.
- Turn off combustion engines when idle to reduce emissions, which can cause damage to the vegetation.
- Avoid stockpiling soils, rubble and any other construction materials outside the compound and service designated area.
- Vehicles must be re-fuelled only at the designated service area.
- There will be no storge of fuels, chemicals, liquids (apart from water), or powders within outside the compound service area.

4.1.2 The rationale and methods for avoiding adverse impacts on specific ecological features are set out below.

4.2 Avoidance of Harm to Bats

Rationale

4.2.1 On-site habitats offer limited foraging opportunities for bats; however, it is likely that foraging bats will utilise the off-site wooded habitats to the west. These off-site habitats provide suitable foraging and roosting opportunities for bats. Therefore, there is potential for disturbance to bats commuting or dispersing between these two habitats from the use of artificial lighting during the construction phase.

Methods

4.2.2 Night working will be avoided so that artificial lighting is only required for security purposes.

4.2.3 In accordance with guidance[2], if artificial lighting is required during the construction phase it will be kept to a minimum and directed away from the west and south boundary drains to avoid illuminating potential bat foraging and commuting habitats.

4.2.4 UV elements, metal halide, and compact fluorescent luminaires should be avoided.

4.2.5 LED luminaires should be used where possible due to their lower intensity and good colour rendition.

[2] Institution of Lighting Professionals. 2023. *Bats and Artificial Lighting at Night. Guidance Note GN08/23*. Institution of Lighting Professionals, Warwickshire.

4.2.6 Warm light sources of (27000Kelvin or lower) should be used to reduce the blue light component and contain peak wavelengths higher than 550nm to avoid wavelengths most disturbing to bats.

4.2.7 Only luminaires that have a negligible or zero Upward Light Ratio and have good optical control should be used, and they should always be mounted horizontally with no light output above 90° and / or no upward tilt to avoid illumination and light spill on the boundary features.

4.3 Avoidance of Harm to Hedgehog & Badger

Rationale

4.3.1 The proposed work will require excavation of pits and trenches. Hedgehog, Badger and other mammals can be attracted to fresh excavations and spoil heaps because of foraging opportunities, and there is a risk of harm to Hedgehog, Badger and other mammals from excavations that are left overnight without cover or an escape route.

Methods

4.3.2 Night-time works is to be avoided. Hours of construction are detailed within the Construction Method Statement.

4.3.3 If pits or trenches cannot be backfilled before the end of the working day, the risk of harming Hedgehog and other mammals will be minimised by covering smaller excavations overnight and ensuring that larger excavations such as trenches and pits are ramped at one or both ends to allow animals to escape.

4.3.4 Any pipes that have a diameter of more than 60mm will be capped at both ends or stored off the ground (higher than 250mm) to avoid entrapment of Hedgehog. Larger pipes will also be capped to avoid entrapment of large mammals such as Badger and Fox.

4.4 Avoidance of Harm to Nesting Birds

Rationale

4.4.1 The site offers nesting opportunities for birds. In the absence of mitigation, construction works, particularly vegetation clearance operations, have the potential for incidental harm to active nests.

Methods

4.4.2 All construction works that might directly (vegetation clearance) or indirectly (noise) impact upon breeding birds shall be carried out between September to February, outside the bird breeding season.

4.4.3 If it is not feasible to carry out the clearance works during winter months, potential nesting habitats within or in close proximity to the construction zone will be checked by an Ecological Clerck of Works (ECoW) immediately in advance (no more than 48hrs prior commencing) of the work. Only if no nesting

activity is detected should works proceed. If nesting activity is detected, active nests will be protected by a suitable buffer (minimum 4m) until nesting is complete, as confirmed by the ECoW.

5. Location and Timing of Sensitive Works

5.1.1 In the absence of mitigation, if clearance of the bracken/grassland must take place during the bird nesting season (March to August inclusive) there is potential for incidental harm to active nests

5.1.2 Therefore, vegetation clearance undertaken during this time will require the presence of an ECoW supervise the works (as described in section 4.3).

6. Responsible Persons, Roles, and Lines of Communications

6.1 Responsible Persons

6.1.1 The main construction contractor will be responsible for appointing an ECoW.

6.1.2 The ECoW, where required, will attend a site induction before carrying out any works on the site.

6.2 Role of ECoW

6.2.1 The ECoW will be responsible for ensuring that the works are carried out in accordance with the contents of the CEMP. If necessary, the ECoW will provide written evidence to confirm that the required standard of work has been achieved. This will require a pre-commencement visit, visits during and upon completion of the construction phase and liaison with the site management team.

6.2.2 After each visit the ECoW will complete an inspection sheet containing descriptions and photographic evidence of activities. Inspection sheets will be supplied to the Site Manager (or the Construction Management Team). The ECoW will be responsible for managing the paperwork.

6.2.3 Modifications to the CEMP must be agreed in advance by the ECoW and must comply with relevant legislation, and national and local planning and biodiversity policies.

6.3 Communications

6.3.1 The Site Manager and Construction Management Team will liaise directly with the ECoW and all formal communications will be in writing.

6.3.2 Attendance on site and completion of any ecological tasks will be supported by appropriate paperwork (worksheets) to verify that the work has been carried out as specified.

6.3.3 Worksheets will be signed and dated by the ECoW and the Site Manager or an appropriate member of the Construction Management Team following completion of a visit or a task.

6.3.4 Signed digital worksheets /inspection sheets will be held by the Site Manager and the ECoW and upon request will be made available for examination to appropriate persons or organisations.

7. Fences, Barriers, and Signs

7.1.1 A temporary fence will be installed along the western boundary to protect the off-site multi-stemmed Sycamore tree from damage. It will be necessary to ensure that the root protection area (RPA) is also protected, with no excavations within 15 meters of the trunk/stem or as specified by an SQA.

7.1.2 Other fences, barriers, and warning signs are not required.

Appendix 1. Habitat Survey Plan

