

Consultation Response: Kirklees Council Environment Unit

Lock Street Thornhill Dewsbury outline application for 106 dwellings 2013/90249

Rationale: to ensure compliance with the Wildlife & Countryside Act 1981 (as amended), Conservation of Habitats and Species Regulations 2010 and, compliance with the National Planning Policy Framework (NPPF)

Survey report

The survey report is comprehensive and has established much of the site is of limited ecological value. There are no features with bat roost potential. However, some features of interest have been identified and recommendations are made to maintain and enhance biodiversity interest.

Existing habitats and landscaping

The semi-natural woodland corridor along the south western boundary was found to be used by foraging common pipistrelle bats and the woodland within the canal corridor is part of an important linear ecological network. Daubentons bats were found to be foraging here – all in low numbers. Although not explicit in the report, the woodland along the south western boundary also forms a connecting ecological link between the canal, rail corridor and areas beyond.

NB: Our records also show a bat roost in the residential area adjacent to this woodland corridor. However, this was not picked in the data search.

The value of this ecological network has previously been compromised to some degree by habitat fragmentation and artificial lighting. Even so, it is recommended in the report that these woodland corridors are retained and enhanced with areas of native species planting of trees and shrubs within the development. We support these proposals. However, it appears from the information provided about the development that the woodland corridor along the south western boundary is to be removed (the woodland in the canal corridor is actually outside of the proposed development site) and developed.

This loss of semi-natural habitat and ecological connectivity is unacceptable and contrary to guidance in the NPPF which sets out how development should aim to enhance ecological networks. The application as it stands should be refused on this basis.

Bats and Birds

It is also recommended in the report that other possible biodiversity enhancement measures include the installation of bat roost and bird nest features in the new development. We support this proposal and would recommend a minimum of 20 bat roost features and 20 bird nest features integral to the new build. The latter should include both swift and sparrow opportunities. These should be sited appropriate to the target species.

The removal of vegetation and buildings should be undertaken outside of the bird breeding season, March to August inclusive. If any clearance work is to be carried out within this period, a nest search by a suitably qualified ecologist should be undertaken immediately preceding the works. If any active nests are present work which may cause destruction of nests or, disturbance to the resident birds must cease until the young have fledged.

Other issues

It is important that measures are taken to ensure artificial lighting does not spill into the semi-natural corridors.

Also, historically, there are issues with the spillage of industrial waste onto the canal bank. This should be removed as part of the development and measures taken to ensure prevent further problems from domestic properties.

A landscape management plan should also be produced detailing how the retained semi-natural areas should be managed in the longer term. Resources should be provided to implement the plan.

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