Consultation Response:
Kirklees Council Conservation & Design

Purpose	*Review of ecological reports submitted in support of application 2016/991158.* *Reviewed reports include:* *1. Preliminary Ecological Appraisal (March 2016)* *2. Bat Emergence Survey (June 2016)*
Location	*Flockton Green Working Mens Club, Barnsley Road, Flockton, Huddersfield, WF4 4AA*

Assessment

Preliminary Ecological Appraisal

This report is produced in line with current guidance in BS 42020 and from CIEEM, and is intended as a document to inform scheme design. The purpose of a Preliminary Ecological Appraisal (PEA) is to indicate the need for any further survey, to identify possible ecological constraints to allow impacts to be 'designed out' during the design phase, and to identify opportunities for ecological enhancement. These reports, according to current guidance, should not be submitted in support of planning unless there is no requirement for further survey or for ecological mitigation.

According to current guidance planning applications should be accompanied by an Ecological Impact Assessment (EcIA), which will also assess the significance of any impacts that cannot be fully mitigated, and highlights the need for compensation where this is the case.

That said, I agree with the findings and recommendations made in the PEA, which are summarised as:

- Further bat survey;
- Consideration of the impacts caused by run-off to Flockton Beck;
- Precautionary approach to vegetation clearance to avoid impacts to badger and hedgehog, and to check for invasive species;
- Protection of trees and hedgerows adjacent to the site during construction;
- Enhancements including:
    - Native planting;
    - Hedgerow and tree planting;
    - Hedgehog access through fences;
    - Bat and bird boxes.

Bat Emergence Survey

The survey effort is sufficient for the purpose of the survey, i.e. to determine if bats are using the site for roosting. The survey indicates that bats are not roosting on site and that the habitats to the north of the working mens club is not important as a foraging habitat.

It seems unlikely that demolition of the buildings will result in a significant impact to bats.

Recommendation

Given the low value of the habitats on site and the absence of bat roosts I don't think it's necessary to produce a full EcIA. However, there are a number of measures for impact avoidance that are relatively complex and should therefore be set out in a Construction Environment Management Plan (CEMP).

It would also be useful to see the enhancement measures set out in a Landscape and Environmental Management Plan (LEMP) showing the locations of bat/bird boxes and landscape proposals.