

Consultation Response: Kirklees Council Conservation & Design (Biodiversity)

<i>Is this a response to an informal consultation request?</i> Yes ☒ No ☐	
<i>Date</i>	12/09/2017
<i>Officer responding</i>	Tom Stephenson
<i>Application number</i>	2017_92568
<i>Purpose</i>	Review of submitted ecological information, pre-determination
<i>Location</i>	Land off Woodhead Road, Honley, Holmfirth

Assessment

Having reviewed the submitted Preliminary Ecological Appraisal I have serious concerns about the standard of survey and soundness of the evaluation presented. In particular I disagree with the classification of the main grassland habitat as 'poor semi-improved grassland', I am sceptical of the record of a raven from the site, and disagree with the evaluation of the site as low suitability for foraging and bats. The report also refers to 'redevelopment' and 'renovation', which does not appear to be applicable to the proposals and poses questions about how much of the remainder of the report relates to a different site. I cannot accept this report as supporting evidence for the proposed development.

Recommendation

Further survey information is needed to provide a robust baseline to inform the scheme design and allow the 'mitigation hierarchy' to be applied. Please see my previous consultation response for a description of the mitigation hierarchy and a description of the information requirements to support planning applications. For the avoidance of doubt, an application of this scale at this location will require an Ecological Impact Assessment (EclA).

For this specific site I will require the following survey information:

- Detailed botanical survey (National Vegetation Classification) of the grassland habitats, undertaken at an appropriate time of year.
- Breeding bird survey.
- Presence/absence bat survey of trees with recorded bat roost potential.
- Activity survey for foraging and commuting bats sufficient for a site of moderate suitability for foraging/commuting bats.
- Reptile presence/absence survey.

Based on the current level of survey information I cannot support the application. An acceptable scheme will have taken account of the baseline ecological value of the site and applied the mitigation hierarchy to avoid, mitigate or compensate for ecological impacts.

References

There are no sources in the current document.