

**Consultation Response from Biodiversity Officer
 KC Ecology**
2019/90988 Use of land for provision of camping facilities, formation of camper van and tent sites, erection of 5 camping pods, toilet block and wood store and associated works
Land adj, lock 38, Marsden Lane, Marsden, Huddersfield, HD7 6AF
**Date Responded:
 19/11/2019**
**Responding Officer:
 Tom Stephenson**
Responding Ref:

Assessment and Advice

The application site is located in an ecologically sensitive location between the Huddersfield Narrow Canal (a Local Wildlife Site) and the River Colne, and within the Kirklees Wildlife Habitat Network.

The proposals set out in this application will result in the creation of additional infrastructure and an intensification of the use of this site beyond the previously consented bushcraft use, which by definition is a low intensity use of the site. The proposals would inevitably result in modification of the habitats and introduction of disturbance factors, such as lighting and noise.

The supporting information indicates that the site supports locally important populations of bats, comprising at least five species. This species use the site for foraging and as part of a commuting route. There is also potential for the site to support roosting bats, but this has not been fully investigated as potential roost features would not be directly impacted.

As set out in the supporting Ecological Impact Assessment, the proposals would result in significant harm to the bat population. Mitigation has been proposed but this is sufficient only to reduce to significance of the harm to a site level impact. There does not appear to be any scope to compensate for the residual harm to bats. This conflicts with policy LP30i and para. 175 of the NPPF.

Furthermore, the proposals would result in harm to the 'function and connectivity' of the Kirklees Wildlife Habitat Network, which conflicts with policy LP30iii.

On the basis of the above impacts I cannot support the proposals.