

**Consultation Response from KC,
Ecology Unit**

2019/94099 Kirklees Council Depot, 1-3, St Paul's Road, Mirfield, WF14 8AX

Demolition of existing building and erection of two-storey supported living apartment block (13 apartments) with associated offices, gardens and parking spaces

**Date Responded:
27/04/2020**

**Responding Officer: Amy
Reddick**

Responding Ref:

Assessment

Ecological information has been submitted with the application including Bat Activity Surveys and an Ecological Impact Assessment (EclA), these indicate a high level of bat activity on and adjacent to the site with a common pipistrelle bat roost located in an adjacent tree within Ings Grove Park and two bat roosts confirmed within Building 2. The roosts within the building consist of a common pipistrelle roost and soprano pipistrelle roost, although the location of only one of these roosts has been described within the report, the status of the roosts has not been assessed (ie, whether they are day, transitory or maternity roosts) and the potential impacts to local bat populations due to the removal of these roosts is not quantified. The report recommends that work to Building 2 must be carried out under a licence from Natural England, however this does not equate to adequate mitigation for the resulting loss of bat roosts from the site. In addition, further information on how the significant common pipistrelle bat roost within the tree in the adjacent Ings Grove is to be protected during the construction and operational stages of the development is required. Without this information the proposals do not satisfy the requirements of Policy LP30i.

The EclA makes a number of recommendations for ecological enhancement on the site including a lighting design, hedgehog highways, faunal boxes and native planting, however details are limited and no plan demonstrating where these are to be installed on the site is provided. In accordance with NPPF, to encourage Biodiversity Net Gain and in line with Policy LP30ii, a measurable increase in biodiversity should be demonstrated by the development proposals.

Advice to planning officer

Further information regarding the mitigation of effects on local bat populations due to the development should be provided. As the development needs to demonstrate a net gain in biodiversity I advise that this all of this information is addressed as part of an Ecological Design Strategy (EDS). The EDS should include the following:

- a. Purpose and conservation objectives for the proposed works.
- b. Review of site potential and constraints.
- c. Detailed design(s) and/or working method(s) to achieve stated objectives.
- d. Extent and location/area of proposed works on appropriate scale maps and plans.
- e. Seasonal timings of works with regards to roosting bats and nesting birds.
- f. Replacement bat roosts and/or protection of roost sites, including the roost within the adjacent tree in Ings Grove Park.
- g. An appropriate lighting design illustrating how impacts to existing and replacement bat roosts will be minimised.
- h. Location (shown on appropriate scale plans) of specific make and model, or design, of habitat boxes, such as bat boxes, bird boxes and hedgehog refuges. Habitat boxes to be integral to new structures where such opportunities exist.
- i. A planting schedule and planting plan showing the inclusion of native species of tree and shrub to be included within/at the boundary of the application area, and how this achieves the stated purpose.
- j. Persons responsible for implementing the works.
- k. Details of initial aftercare and long-term maintenance.
- l. Details for monitoring and remedial measures.