

**Consultation Response from KC,
Ecology Unit**

**2020/92067 former, Stile Common Infant & Nursery School, Plane Street, Newsome,
Huddersfield, HD4 6DF**

Erection of 30 dwellings

**Date Responded:
10/08/2020**

**Responding Officer: Amy
Reddick**

Responding Ref:

Assessment

A Preliminary Ecological Appraisal (PEA) has been provided with the application which recommends further survey to evaluate the importance of the site to foraging bats as development will result in the loss dense scrub and woodland edge habitats. This information has not been provided and therefore, the current ecological report does not give enough information to assess the potential impacts to bats on the site. It is recommended that these additional surveys be carried out prior to determination.

The PEA is based on a previous design proposal on the site therefore an updated report should be produced which combines the results of the original PEA, and any additional surveys undertaken. This should be presented as an Ecological Impact Assessment (EclA), which is required to assess the effects of the proposed development on protected species and habitats in order to design appropriate mitigation.

Although the submitted PEA has provided some recommendations for mitigation and enhancement, the current plans indicate that there will be a loss of trees and ecologically value habitat including scrub from the site, therefore further details are required in order to demonstrate a biodiversity net gain can be achieved post-development. In accordance with section 15 of the National Planning Policy Framework to encourage Biodiversity Net Gain and in line with Policy LP30 and the proposed new Environment Bill 2019/2021, a measurable increase in biodiversity should be demonstrated. The recommended metric is the Biodiversity Metric 2.0 produced by Natural England and DEFRA. Justification for habitat classification, condition assessment and strategic significance for habitats on site should be provided alongside the completed metric.

Advice to planning officer

The further bat surveys recommended within the report, should be undertaken and submitted within an EclA informed by the latest design proposals. Bat surveys should follow the Bat Conservation Trust Guidelines (Collin's, 2016) regarding to survey effort and timings. The standardised content and format of an EclA is defined in guidance by CIEEM (2018), and if followed will provide sufficient information to assessment of the proposals against biodiversity policies.

Net gains for biodiversity have not been demonstrated therefore, a completed Biodiversity Metric should be submitted in order to quantify the change in biodiversity pre and post development. The recommended metric is the Biodiversity Metric 2.0 produced by Natural England and DEFRA.

In the absence of suitable information to assess the proposals against Local Plan Policy LP30, at present I cannot support the application.