Consultation Response from KC, Ecology Unit
2021/93432 Brookes Mill, Armitage Road, Armitage Bridge, Huddersfield, HD4 7NR
Change of use and alterations to Mill Building 29 to form Wellness Centre (Listed Building within a Conservation Area)
Date Responded: 12/05/2022 **Responding Officer: Gareth Hey** **Responding Ref:**

Assessment

Following on from my initial comments, a Preliminary Ecological Assessment (PEA) has been submitted with the application. The PEA provides a robust assessment of the sites baseline. The PEA recommends that a number of survey should be undertaken at the site, including the following which are summarised from the report:

- **Bat emergence/re-entry surveys.** The preliminary roost assessment undertaken alongside the PEA determined the building to be of high roosting suitability for bats. As such, in accordance with current guidelines (Collins, 2016) the building on site should be subject to three further bat surveys between May and September.

- **Great Crested Newt.** Due to the presence of suitable habitat on site and the close vicinity to waterbodies within the local area. An eDNA test for the presence of GCN is required which can only be undertaken between April 15th and June 30th. It is recommended this is undertaken without delay, as a positive result (for presence) could trigger the requirement for population surveys which have a timeframe of six surveys between March 15th and June 15th.

- **Reptiles.** Due to the presence of suitable habitat on site, a survey for the presence of reptiles is required using artificial refugia and visual surveys which can only be undertaken between April and September.

The government circular on Biodiversity and Geological Conservation (ODPM, 2005) and recent explanatory note from Natural England (Natural England, 2020) indicates that information on protected species, and in particular European protected species (including bats), should be made available prior to determination.

The PEA outlines the ecological baseline of the site and the predicted post-development value utilising the biodiversity metric 2.0. The development proposals in their current form result in a net gain in habitats of 80.24% (1.50 habitat units). This allows the proposals to be brought forward in line with LP30. A Biodiversity Enhancement Management Plan is likely to be required through condition in order to ensure that the above habitat units can be delivered and managed for a period of 30 years. This will be secured through a separate condition, that will be provided once the below information is received.

Advice to Planning Officer

The results of the above surveys, in addition to the data collected as part of the original PEA, should be used to inform an Ecological Impact Assessment (EcIA) (CIEEM, 2017 & 2018)

Required Actions-

- **Completion of bat, GCN and reptile surveys.**
- **Completion of EcIA including information collected from further surveys and original PEA**