

Planning ContactCentre

From: Zara Hanshaw
Sent: 27 April 2026 15:39
To: Planning ContactCentre
Subject: RE: Attached letter from Kirklees Council regarding application number cc at location New Mills, Brougham Road, Marsden, Huddersfield, HD7 6AZ

Good afternoon,

I have reviewed the documents submitted with this application and have the below ecological comments.

Designated sites

The Preliminary Ecological Appraisal (Futures Ecology, July 2025) identifies that the development could impact on the South Pennine Moors SAC, South Pennine Moor Phase 2 SPA and Peak District Moors Phase 1 SPA through air pollution and recreation. A detailed Air Quality Assessment has been completed to consider the potential for air quality impacts arising from increased traffic; however, these ecological receptor sites were screened out as part of the detailed Air Quality Assessment. Therefore, recreation is the only impact still to be assessed. As the application does not set out the number of housing units that will be created as part of this development it is not yet possible to quantify the recreational impacts. However, as this application is not seeking consent for the residential units at this stage, I am satisfied that recreation impacts do not need to be considered at this time. They will need to be considered with the application for residential development.

The development is also within an Impact Risk Zone for the South Pennine Moor, and Dark Peak SSSIs for water supply. Natural England should be consulted on these proposals and details of the water supply and impact on the SSSI should be provided.

Protected species

The Preliminary Ecological Appraisal (Futures Ecology, July 2025) states that the majority of the buildings onsite have Low potential for bat roosts i.e. have the potential to be used by individual bats, opportunistically, whilst building BA and BE.1 have moderate and high bat roosting potential respectively. The Bat Survey Report (Lucion, October 2025) identified that 7 bat roosts are present onsite, across 6 buildings, including a single maternity roost for Common Pipistrelle. A licence from Natural England will be required for the works to be completed.

Both the Preliminary Ecological Appraisal (Futures Ecology, July 2025) and the Bat Survey Report (Lucion, October 2025) identify that the buildings onsite have potential to be used by hibernating bats, but no further hibernation surveys have been completed. I note that the Preliminary Ecological Appraisal (Futures Ecology, July 2025) identifies areas of suitability for hibernation which are not accessible. In this instance, the scheme of monitoring via static detectors, as recommended by Lucion, should still be undertaken. Further conversations with Natural England may be required should this evidence prove inconclusive or insufficient. The results of these surveys are required, prior to determination to provide the Authority with certainty of the likely impact of the development on protected species.

The Bat Survey Report (Lucion, October 2025) also identified that an active Barn Owl nest is present onsite, with 2 other roosting sites also identified. Further Barn Owl surveys are also recommended in the report. These should be completed, prior to determination to ascertain the correct mitigation and compensation measures for barn owls and ensure that these can be adequately secured.

Please let me know if you would like any further information.

Best wishes,

Zara Hanshaw ACIEEM

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