

**Consultation Response from KC,
Ecology Unit**
2026/90387 Upper Mills, Canal Side, Slaithwaite, Huddersfield, HD7 5HA
Temporary permission for 5 year period for use of land for leisure and recreation purposes; siting of associated transient structures; erection of means of enclosure; surfacing and associated works
Date Responded: 04/06/2026
Responding Officer: Z. Hanshaw
Responding Ref: 2606/12

Good afternoon,

I have reviewed the documents submitted with this application, including the Preliminary Ecological Appraisal (PEA) (Pennine Ecology, April 2026) and the Planning Statement (Higgins + Higgins Architects, February 2026).

The PEA states that it is likely that the site has been degraded prior to the installation of the buildings. The report states *"The relatively small of loss of habitat under the footprint of the iglu sauna site can be assessed using historical aerial and 'street view' imagery as is shown in Plates 1 - 3. It appears woodland was present in Plate 1 dating from 2021. The image from 2025 shows the extent of the clearance. Plate 3, a Google 'street view' image, shows the vegetation on site prior to the clearance. Plate 4 was taken from a similar angle as Plate 3 by Pennine Ecological on the 6th of April 2026 as part of this study. It cannot be accurate ascertained, but it does appear only a small number of trees have been removed and the design of the site has been in consideration of certain trees which are shown in both Plates 3 and 4."* It is unclear if this clearance was to facilitate the development, or if it has been undertaken for different reasons.

To compensate for this loss of habitats, I would recommend that an Ecological Design Strategy (EDS) is secured as a condition of any consent. This should include reasonable compensation measures including, but not limited to, the provision of habitat boxes for birds and bats and new native biodiverse species planting.

The PEA also states that the area around the development site is *"excellent bat foraging and commuting habitat"* and has the potential to support otters. I would recommend that an external lighting strategy is secured as a condition of any consent. This should demonstrate how the development will not illuminate above 1 lux any areas of the wider site which could be suitable for nocturnal species.

Suggested conditions
Lighting strategy

No works are to commence unless a detailed lighting scheme, developed in accordance with established guidance (e.g. Bat Conservation Trust and Institute of Lighting Professionals (2023) Bats and Artificial Lighting at Night), has been drafted and agreed with the council. The Sensitive Lighting Strategy will demonstrate that the proposed lighting will not impact upon ecological networks and/or sensitive features. No areas of the wider site which could be suitable for nocturnal animals should be illuminated above 1 lux. Thereafter the agreed lighting scheme shall be implemented, subject to any variations approved in writing by the planning authority. All external lighting shall be installed strictly in accordance with the specifications and locations set out within the Lighting Strategy.

Reason: In the interests of biodiversity and in accordance with Policy LP30 and NPPF15

Ecological Design Strategy

No development shall take place until an Ecological Design Strategy (EDS) addressing mitigation, compensation and enhancement has been submitted to and approved in writing by the local planning authority.

The EDS shall include the following.

- a. Purpose and nature 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. Type and source of materials to be used where appropriate, e.g. native species of local provenance.
- f. Timetable for implementation demonstrating that works are aligned with the proposed phasing of development.
- g. Persons responsible for implementing the works.
- h. Details of initial aftercare and long-term maintenance.
- i. Details for monitoring and remedial measures.
- j. Details for disposal of any wastes arising from works.

The EDS shall be implemented in accordance with the approved details, and all features shall be retained in that manner thereafter.

Reason: In the interests of biodiversity and in accordance with Policy LP30 and NPPF15