

Adam Walker

Subject: FW: Planning consultation request - Discharge of conditions at Land West of Ashbrow Infant & Nursery School, Huddersfield (2020/90549)
Attachments: 202_Here_today_here_tomorrow_2010_summary.pdf

From: Masheder, Robert [mailto:Robert.Masheder@wyjs.org.uk]

Sent: 09 March 2020 14:45

To: Adam Walker <Adam.Walker@kirklees.gov.uk>

Subject: RE: Planning consultation request - Discharge of conditions at Land West of Ashbrow Infant & Nursery School, Huddersfield (2020/90549)

Dear Adam

Thank you for your email requesting comments on the CEMP and LEMP.

These comments are not detailed. Please could JCA Ltd be requested to check through their report for errors and address them including, but not exclusively, the following:

- 1) The language need to be 'definitive' at this stage in the planning process. It should not be offering a choice of options. Or using words such as "may" or "might".
- 2) Please could all of the species recommended around page 14 be checked again the list of invasive/potential invasive species covered by the attached document "Here today here tomorrow 2010". These pick out plants which are likely to cause invasive species problems of the future. One of the species on page 14, *Rosa rugosa* is listed on Sch 9 of the Wildlife and Countryside Act 1981 (as amended) as being illegal to plant in the wild. *Cornus alba* (High risk) , Japanese barberry *Berberis thunbergii* (*moderate risk*) should also be changed. Using [Ctrl][F] can help with searching.
- 3) Grassland management on page 17 and later tables such as Table 7.7 do not make sense. Please can all of these consistently say: "Grass to be cut twice in every year and the arisings removed, the first cut to be in early July and the second in September. Cutting should only be undertaken when ground conditions are dry enough to prevent rutting.". *Rhinathus minor* (yellow rattle) should be introduced in year 3 as this will reduce the vigour of the grasses. The cutting should be undertaken just after the pods start to become ripe in early July.
- 4) Blue Property Management UK Ltd need to be tied down to a much more rigid costed work programme over at least the next 30 years with a review every 5 years. The review and revised costs should be agreed with the planning authority in consultation with the district ecologist and residents living in the dwellings. This should help to ensure that Biodiversity Net Gain, as required by the NPPF, is achieved, without residents being subjected to unreasonable charges.
- 5) Bird boxes on page 25 are insufficient in number. The proposal will result in significant loss of breeding habitat for passerine birds. There should be a minimum of 1 bird nesting feature per dwelling/home. These should be long lasting woodcrete.
- 6) We have not been able to find the seed mixes to be used for wildflower grassland. These should all be locally native species appropriate to the site soil conditions.
- 7) Lighting is covered in the CEMP at 6.3.2. This refers to luminaire temperatures of <4200K. This does not conform to the ILP guidance quoted in a previous paragraph which recommend warm white light <2700K on page 18/25. The latter is much better for bats and also better of residents trying to get a good night's sleep. This needs to be agreed before the light fittings are ordered. The current plan seems to want to leave this until the houses are being occupied.

We hope that these comments are useful.

Regards

Robert



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