

From:
Sent: 13 October 2025 11:44
To: DC Admin
Subject: 2020/60/92331/E Planning Application Objection

Planning Application 2020/60/92331/E Kirklees Council 13 October 2025

I would like to register an objection to the above application for approval of a new S. 106 agreement, which includes a proposal to use existing ancient woodland for Biodiversity Net Gain (BNG) funding. This is not legally permitted as land for BNG must be of low ecological value in order to be improved. This precious ancient woodland is not land of low ecological value. The ancient woodlands are of extremely high value to the local communities as amenities. How will this be address whilst at the same time looking to offset, in these established ancient ecosystems, biodiversity loss throughout the whole sites?

I am a Kirklees resident actively involved in environmental projects throughout Kirklees including in the Batley area. I have been instrumental in running two wildlife and biodiversity walks through the area affected by this planning application. I am concerned at the loss of such areas of rich biodiversity and nature close to urban areas of Kirklees (and Wakefield and Leeds residents). I have also previously registered objections to this application for housing and industrial development on behalf of Kirklees Cycling Campaign (on the impact on the environment of traffic and transport growth beyond the capability of the roads network).

There is no commitment to remediate biodiversity loss on site so this could impact the benefits of green recreation on the footpath network in these recreation destination areas. Public open space access is vague. Furthermore, as the construction site is grassland, it cannot be legal or moral to fell ancient woodland to create new grassland. I have read counsel's opinion for the Chidswell Action

Group on Heybeck site of 17 acres, and I am disturbed at the approach of Kirklees Council.

The Hon Mr Justice Kerr in the recent Judicial Review on Heybeck commented that biodiversity issues "had not been adequately addressed, in my judgement, at the time the decision under challenge was made; hence the third ground of challenge would have succeeded were it not for SPO(2)". He went on to state "The Committee might well have asked for updated biodiversity work to be done before deciding whether to proceed."

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