

OBJECTION TO DRAFT (ENGROSSMENT) SECTION 106 AGREEMENT (LEEDS ROAD)
2020/60/92331/E

81 Heybeck Lane
Dewsbury
WF12 7QX

13th October 2025

I strongly object to this draft agreement for the following reasons:

There is no commitment to remedy lost biodiversity on site.

I cannot iterate enough what a beautiful, special, unique place this is with its wonderful mix of hedgerows, streams, fields and the ancient woodlands and it is teeming with endangered and specially protected wildlife. It is of at least district wide importance for habitats and wildlife that is on the red list of endangered species including farmland breeding birds. This document, effectively, would agree that this can be lost here.

Chidswell and Dogloitch Wood are unique & cannot be recreated.

There is no commitment to complete any biodiversity work until 90% occupancy. From a wildlife and ecology point of view this is a nonsense. There won't be any wildlife by that time and the document does not say what will happen to the habitat. The Chidswell application has a suggested construction period of 20 years, so how long will 90% occupancy be before remediation work has to be done?

The commitment to managing any habitat is the minimum requirement of 30 years. What are the applicant's long term plans? With no commitment after 30 years, the land is open to new applications after this. In the long term, there is in reality no commitment to retaining any wildlife or habitat here.

As has been the case throughout the process since its inception in 2011, no detail is given how biodiversity net gain is going to be achieved.

I am in disbelief that KMC and the applicant believe that it is right to allocate the ancient woodland to offset loss in biodiversity from this proposal.

Dogloitch Wood is protected by:

- Area based TPO: Dogloitch Wood TPO/01/87/w3;
- Ancient woodland status on the Natural England, Ancient Woodland Inventory
- Lowland Deciduous Woodland that is a UK Habitat of Principal Importance.
- Local Wildlife Site status due to extensive bluebell cover. Local Wildlife Sites are classed as locally designated sites of importance for biodiversity in the NPPF December 2024.
- Part of the strategic Kirklees Wildlife Habitat Network, in the 2019 Local Plan. Therefore of strategic importance.
- Within the Kirklees Pennine Foothills Biodiversity Opportunity zone;

Ancient woodlands are classed as irreplaceable in the NPPF December 2024.

Nothing should be done to diminish the natural character, resilience and self-sustainability of Dogloitch Wood's intricate and highly complex ecosystem.

Dogloitch Wood is not a park. It should not be turned into a park. It is unclear from the document what it is to be turned into. It is an ancient woodland and should be protected and conserved as such. Proposals in the draft agreement suggest such possibility.

Dogloitch Wood has a character unlike any other. It has developed its own ecosystem over many hundreds of years. It is unique and irreplaceable.

We have very little woodland in North Kirklees. Dogloitch Wood is exceptional.

Irreplaceable habitats cannot be used to offset loss of biodiversity. They are already an established and unique ecosystem and should not be interfered with.

Dogloitch Wood gives immense benefits for health, wellbeing, quiet restoration and green recreation.

In 2024, the developer applied (2024/TWA/91423/E) to carry out felling in Dogloitch Wood and its neighbour Dum Wood.

This was a sickening application which did not give any detail and proposed a generic felling of all deadwood 10 m each side of the informal path around 3 sides of Dogloitch wood plus other works. Works were proposed in Dogloitch's neighbour, Dum Wood by the same landowner/applicant. This would have completely destroyed the character of the woods and caused tremendous harm and diminished their integrity. This would be irreversible harm to 2 rare ancient woodlands in north Kirklees.

Despite a formal refusal from KMC to this application the applicant's agents still carried out felling work in Dum Wood. This felling included a suspected bat roost.

Whilst the 2025 application was more detailed and emergency work done to an oak sensitively done, the arboricultural officer still partially refused the 2025/TWA/90781/E application.

The reason I raise this, is that the applicant's approach to managing the wood has shown itself to be highly inappropriate.

Whilst I am aware that tree preservation orders will still apply, I am extremely concerned that granting this application, will effectively grant a 'blanket approval' for any work that the developer wishes to be done risking the health, character, integrity and sustainability of the wood and it will be lost.

Dogloitch & Dum Woods are home to many different breeding birds, mammals and insects. They are home to rare fungi and fungi ancient woodland indicator species which work together with the rest of the woodland ecosystem.

There are many bats around the whole of Dogloitch Wood & Chidswell. It is an integrated habitat mosaic.

I am concerned that there is still no mention of how the woods are to be protected from drying with water being taken away by the proposed urbanisation. The draft agreement talks of Sustainable Urban Drainage Systems but there is no evidence given to date that these are viable.

Dogloitch Wood provides:

- Habitats for wildlife
- Recreation and wellbeing
- Flood storage and protection
- Urban cooling
- Air cleaning
- Water filtration

This proposed site currently enables agriculture, biodiversity and a destination of green recreation, health & wellbeing. There is nothing in this draft agreement on how this will be improved, moreover, there is nothing in the draft agreement to ensure it is not lost.

I cannot see any mitigation for deterioration in air quality.

Impacts to Dogloitch Wood from, for example, noise, vibration, light, heat, desiccation, increased predation, invasive species, littering, fouling will reduce the health of the wood and its ability to provide these ecosystem services, compounding the negative effect on air quality.

We are in a nature and climate emergency. It is vital for all of us that we protect these precious spaces and habitats.

The draft (Engrossment) Section 106 (Leeds Road) does not provide such protections.