

**From:** Amy Reddick  
**Sent:** 28 January 2021 11:34  
**To:** Victor Grayson  
**Cc:** Laura Hobbs  
**Subject:** RE: Chidswell - Leeds Road - Ecological Design Strategy - 2020/92331 and 2020/92350

I agree with the comments made by Yorkshire Wildlife Trust (YWT).

Although the Ecological Design Strategy (EDS) outlines important themes and concepts to be incorporated into the design of the development, it fails to address key comments made by KC Ecology and the YWT. No woodland management plan is mentioned, which is required to alleviate impacts on the two ancient woodland and local wildlife sites adjacent to the site, and although hedgerows have been specified at the red-line boundary of the site, no planting in between the development and the Ancient woodlands has been specified. In addition, although it is stated new opportunities for breeding birds will be created, the EDS fails to mention any provisions for farmland birds of which the site was identified as being of district importance. Compensation should focus on providing habitat for skylark and yellowhammer, such as incorporating skylark plots, as recommended within the breeding bird surveys in the environmental statement. A phased working method will also be required to prevent disturbance to farmland birds throughout the construction period, although this is expected to be addressed in the production of a Construction Ecological Management Plan (CEMP).

Other factors to be considered within the EDS are the retention or translocation of hedgerows classified as important under the Hedgerow Regulations. Based on the exclusion of the aforementioned aspects, the current EDS seems to be incomplete as it does not address a number of negative ecological impacts predicted as a result of the proposals. Therefore, it is not considered that the proposals are in accordance with LP30i or the NPPF to "*result in no significant harm to biodiversity*".

Notwithstanding the above, the changes to the biodiversity metric calculations as requested by KC Ecology and YWT do not appear to have been carried out or incorporated into the EDS and therefore it has not been demonstrated that a measurable biodiversity net gain is capable of being achieved post-development. A 10% net gain in biodiversity is required in accordance with Local Plan Policy LP30ii and Section 15 Paragraph 175 of the NPPF.

I trust these comments are helpful, please let me know if you need to discuss. I agree that a meeting with the applicant team would be useful at some point (perhaps with YWT present as well if they agree/are available?).

Kind regards,

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