

From: Amy Reddick <Amy.Reddick@kirklees.gov.uk>

Sent: 14 July 2021 15:44

To: Victor Grayson <Victor.Grayson@kirklees.gov.uk>

Cc: Laura Hobbs <laura.hobbs@ywt.org.uk>

Subject: RE: 2021/92086 - land at Bradley Villa Farm, Bradley Road, Bradley, Huddersfield, HD2 2JX

INITIAL CONSULTATION RESPONSE

Biodiversity Net Gain

The submitted ecological information does not demonstrate that the proposals will achieve a net gain for biodiversity. In accordance with Section 15 of the National Planning Policy Framework to encourage Biodiversity Net Gain and in line with Policy LP30 and the proposed new Environment Bill 2019/2021, a measurable increase in biodiversity should be demonstrated by the development proposals. As highlighted within the Pre-application advice by both KC Ecology and Yorkshire Wildlife Trust, a completed Biodiversity Metric assessing the site's ecological baseline and the predicted post-development value is required.

The recommended metric is the latest version of the Biodiversity Metric produced by Natural England and DEFRA. Justification for habitat classification, condition assessment and strategic significance for habitats on site should be provided alongside the completed metric. Kirklees [Biodiversity Net Gain Technical Advice Note](#) (released June 2021) should be referenced throughout to ensure the correct information is submitted and that a **10% net gain for biodiversity** is demonstrated.

It is noted that landscaping details are currently limited in scope and, although it would have been prudent to incorporate biodiversity net gain and the associated landscaping required to achieve this from early in the design process, therefore net gain calculations will currently be required to be carried out on a worst-case scenario basis. Each phase of the development should demonstrate a 10% net gain for biodiversity, in addition to the overall master plan, which should complement the current proposals.

The Environment Statement states "*The scheme is predicted to provide net gains for biodiversity as there is scope to provide habitat enhancements within the wider allocation site. Biodiversity Net Gain calculations using the Defra 2.0 metric will be completed by The Wildlife Trust.*" It is appreciated that Redrow may be working collaboratively with the WT to produce a suitable scheme, however this information is required pre-determination in order to ensure a biodiversity net gain is capable of being incorporated into the proposals, and that enhancements are appropriate to the ecological functions and opportunities extant on the site and local area.

I will provide a full response with regards to the ecological impacts of the proposal upon my return.

Kind regards,

Amy Reddick BSc (hons) MSc
Biodiversity Officer

Conservation and Design Team
Growth and Regeneration
Kirklees Council, Planning, Civic Centre 1, High Street, Huddersfield HD1 2NF

Email: Amy.Reddick@kirklees.gov.uk

