Consultation Response from Ellen Milner, Yorkshire Wildlife Trust		
2021/93689 Land to the south of, Ravensthorpe Road / Lees Hall Road, Dewsbury		
Hybrid application for full planning permission for engineering works, drainage and utilities connection for the provision of site access from Forge Lane and Ravensthorpe Road and associated works; and for outline permission for erection of residential development and mixed use development (including community facilities) with associated works including the provision of internal estate roads and parking, landscape works (including provision of public open space, tree clearance/replacement/woodland management and ecological management) and sustainable urban drainage works drainage principles		
Date Responded:	**Responding Officer:**	**Responding Ref:**

Thank you for consulting Yorkshire Wildlife Trust on this application. Yorkshire Wildlife Trust works across the whole of Yorkshire, managing more than 100 reserves and with a membership of over 44,000. It is the second oldest of the 46 Wildlife Trusts which work in partnership to cover the whole of the UK. The Trust's principal vision is to work for a Yorkshire rich in wildlife, valued and enjoyed by people.

Yorkshire Wildlife Trust's mission is to create a Yorkshire rich in wildlife for the benefit of everyone with more wildlife, more wild places and more people having a strong connection to nature. Yorkshire needs a recovery of wildlife on land and sea. This can be achieved by creating and protecting and connecting, wildlife-rich landscapes and seas (living landscapes and living seas) in a Society where nature matters.

We have reviewed the Eco Impact Assessment (Buro Hapold 12.10.21) and the Bat Survey Report (Penny Anderson, Oct 21) and have the following comments/queries:

- The northern part of the site borders the Yorkshire Wildlife Trust Lower Calder Valley Living Landscape and therefore biodiversity enhancement which complement this wildlife corridor would be supported.
- With regard to Biodiversity Net Gain, we note that there is a predicted 11.64% net gain in area-based habitats and a 33.60% net gain in hedgerow habitats. We are encouraged the 10% net gain appears to be achievable within the site boundary, which would be in line with the emerging Environment Bill. However, only headline results have been provided and therefore we would welcome submission of the metric, with supporting information including condition assessments.
- As this is the first phase or a larger development (Phase 1 of HS61), is there one overall Green Infrastructure and biodiversity enhancement strategy to ensure a cohesive approach? 10 % biodiversity net gain will be required as each phase.
- There will be a residual impact of the loss of ground nesting bird habitat – specifically skylark (2-3 territories affected) – has this been addressed?
- A visual inspection bat survey of a mosque building has been undertaken from accessible viewpoints. However, no internal inspection has been detailed which is required in line with BCT Good Practice Guidelines (2016). We would also advise that emergence surveys are required prior to the determination of the planning application. We do not agree that '*presence/absence surveys were not considered necessary to inform this assessment'*. This is because the bat survey results conclude that that a roost is likely to be nearby based on level of pipistrelle activity (10m after sunset) – possibly along residential houses to north. It is therefore feasible that a roost could be located in the mosque. Lighting levels are likely to be similar for the residential buildings, and it does not seem an adequate justification to discount the mosque building based on lighting levels. Surveys should be undertaken to prove presence/likely absence.

- Has wintering bird potential been assessed for the application site? If not we would advise this is undertaken prior to determination.
- It is essential that the 18.8ha of Green Infrastructure which has been proposed is multifunctional and accessible, to ensure that there are no recreational impacts on nearby Local Wildlife Sites and ancient woodlands.
- Lighting along the edge of the retained woodland could cause disturbance – a careful lighting strategy is therefore required. We would advise that a lighting plan is submitted comprising a horizontal illuminance contour plan in line with best practice guidance in relation to impacts of lighting on wildlife.

- Some technical issues were encountered which resulted in the loss of data from one of the SM2 static recorders at Location 1 in the second round of monitoring, and at Location 2 in the third round of monitoring – will these surveys therefore be repeated in order to ensure a full dataset?

I trust these comments are helpful – please get in touch if you require any further information.