

DATE 21/11/22

BY EMAIL ONLY: DC.Admin@kirklees.gov.uk

RE: 2020/60/92350/E - Land south of, Heybeck Lane, Chidswell, Shaw Cross, Dewsbury

Yorkshire Wildlife Trust has reviewed the recently submitted ecological information for this application. We note that applications 2020/60/92331/E and 2020/60/92350/E are closely linked. We have submitted separate comments on 2020/60/92331/E in relation to recently submitted Biodiversity Net Gain documentation.

We have the following comments on this application:

- There are numerous issues within our previous objection (01/09/2020) which are not addressed by the recent submissions. We would therefore be grateful if the applicant could review our previous objection and respond accordingly.
- With regard to the age of survey data, the original ecological surveys were undertaken in 2018/19. An updating walkover survey was undertaken in October 2022, which the Biodiversity Net Gain Assessment Report (Brooks Ecological, November 2022) acknowledges is outside the optimum period. The letter response to Chidswell Action Group (Brooks Ecological 11/10/22) states that *'For reports aged 18 months to 3 years, CIEEM advise that a professional ecologist should undertake a site visit and review the validity of the reports'*. However, surveys undertaken in 2018 are four years old, and CIEEM Guidance<sup>1</sup> for 'more than 3 years' is *'The report is unlikely to still be valid and most, if not all, of the surveys are likely to need to be updated (subject to an assessment by a professional ecologist, as described above)'*. We therefore ask the planning authority to ensure that this application is being assessed based on an accurate and up-to-date baseline, the importance of which is detailed within the CIEEM Ecological Impact Assessment Guidelines<sup>2</sup>.
- With regard to the submitted Biodiversity Net Gain Assessment, it should also be noted that the completion of the Defra metric is just one part of the Biodiversity Net Gain process. It is also necessary to demonstrate how the project complies with the ten good practice principles

<sup>1</sup> <https://cieem.net/wp-content/uploads/2019/04/Advice-Note.pdf>

<sup>2</sup> <https://cieem.net/resource/guidelines-for-ecological-impact-assessment-ecia/>





**Yorkshire**  
**Wildlife Trust**

1 St. George's Place,  
York, YO24 1GN

 01904 659570

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 Yorkshire Wildlife Trust

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of net gain<sup>3</sup>. As good practice, we advocate for this information to be provided as part of the application documents and made available for consultation prior to determination.

We trust these comments are helpful. Please do get in touch if you require any further information.

Kind regards,

**The Planning Team**  
**Yorkshire Wildlife Trust**

[planning@ywt.org.uk](mailto:planning@ywt.org.uk)

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<sup>3</sup> <https://cieem.net/wp-content/uploads/2019/02/Biodiversity-Net-Gain-Principles.pdf>

