

DCAdmin

From:
Sent: 10 July 2024 08:56
To: DCAdmin
Cc: Cllr Bill Armer; Cllr Richard Smith; Cllr JohnJ Taylor
Subject: Objection to planning application 2024/62/91242/E

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Objection to planning application 2024/62/91242/E

Please post my comments anonymously on the website and ensure all personally identifiable information is removed.

Having now had opportunity to read the Ecological Impact Assessment, that was not included with the original planning application I would like to raise some additional points:

1. Both the PEA and EclA surveys were undertaken at a sub-optimal time of year (December and February). This would be sub-optimal for botanical surveys and for many protected species such as nesting birds and reptiles.
2. Neither report mentions evidence of many of the larger species that are known to use the proposed development site such as Barn Owls, hare, and deer. If these are not mentioned, then what chance is there of the site surveys identifying any smaller species, or seasonal inhabitants?
3. The PEA (undertaken December 2022) recommended "*Further assessment of the poor semi-improved grassland during the recommended season (April – September) may be required to fully assess its value. In addition, changes to watercourses may impact upon the hydrological regime of the watercourse and could impact upon flood risk and habitats downstream*". Why was this additional assessment not undertaken -this could have been carried out in 2023 or 2024. The only suggestion can be that the developer does not want to know if there would be additional requirements to build into a BAP. Also there is little evidence to suggest that potential changes to the water course have been taken into account. The water course feeds into the Fenay Beck corridor. Nowhere in either report is this mentioned, or the local ecological importance of the Fenay Beck Corridor (Kirklees Green Infrastructure Network- D29 Fenay Beck).
4. The majority of evidence provided in both reports has been via desk survey, and the limitations of this type of survey are described within the EclA "*Desk study data is unlikely to be exhaustive, especially in respect of species, and is intended mainly to set a context for the*

study. It is therefore possible that important habitats or protected species not identified during the data search do in fact occur within the vicinity of the site.”. The fact that the WYES data pulls up no data would suggest that this area has never been surveyed for most of the priority species (and not that the species are not present). Given the fact that Stones Wood is a LWS and sits within the Kirklees Strategic Green Infrastructure Network we can assume it does support a large number of species, some of which may have ecological importance. It is easy to turn a blind eye and say that they are not having an impact if they do not know what is already present. As an uninformed individual carrying out a “desk based” search I was able to identify information not contained in this report. E.g. In the Kirklees Biodiversity Action Plan, it lists Lower Stone Wood as one of only two sites in Kirklees where the fungus *Strobilomyces floccopus* is found (the other site is in Farnley Tyas). This is a species for which Kirklees holds a significant part of the West Yorkshire population and is a Kirklees Local Species of Principal Importance.

5. It is not possible to comment on the calculations for biodiversity net gain as appendix D is missing from the EclA.
6. The EclA was submitted on the 24th April and the Landscape plan was drawn on the 25th April. This suggests that the ecological impact was not of major importance to the developer, and yet another tick box exercise. Given that one of the only true amenities in Stocksmoor is the countryside, and particularly the woodland the priority should be to ensure this is preserved for any future residents of Stocksmoor.
7. Note that separate concerns about protected species have been emailed directly to the planning officer for further consideration.

In addition to the late submission of the EclA I would like to note that Newett has still not submitted any documents relating to public consultation. From Newett’s website “*The consultation ran until 22 May 2024. We have welcomed comments from all interested members of the community. Newett Homes will review all comments received and set out how they have been considered within the planning application. A report setting out the public consultation undertaken will be prepared and submitted to Kirklees Council Planning Department as part of the planning application.*” “The lack of submission and the short consultation period would suggest this was a tick box exercise, and Newett did not intend to take any notice of the community response.