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Sent: 07 March 2025 14:12

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

Subject: 2024/93605

I've reviewed the available information here, including the (interim) EclA, BNG Assessment, and the Bat and Badger reports undertaken by Brooks Ecological.

Biodiversity Net Gain

The proposed development would result in significant habitat loss, with the Biodiversity Net Gain (BNG) Assessment indicating a loss of 25.95 Habitat Units and a requirement of 28.81 Habitat Units to achieve a 10% net gain. The application does not clearly demonstrate how the Biodiversity Gain Hierarchy has been applied, especially given the presence of medium distinctiveness habitats. Furthermore, the Ecological Impact Assessment (EclA) indicates that BNG is expected to be secured off-site. Considering the substantial number of Habitat Units involved, it is advised that this information be agreed upon prior to issuing the biodiversity gain condition to ensure that any off-site benefits can be secured locally and to comply with Policy LP30 of the Kirklees Local Plan.

Ecology

The applicant has submitted an interim EclA, which is insufficient. A fully completed EclA, including completed ecological surveys where necessary, should be submitted with the planning application. I take note of the badger and bat survey reports, but understand bird surveys are outstanding. There is also no information on reptiles and amphibians.

Currently, there is an objection on ecological grounds until the LPA receives a completed EclA.

With regards

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