

DC Admin

From: ENVU Biodiversity and Land Use
Sent: 29 September 2025 11:33
To: Planning ContactCentre
Subject: 2025/90956 at location Moorlands Cricket Club, Mirfield Memorial Park, Huddersfield Road, Mirfield, WF14 8AE

Follow Up Flag: Follow up
Flag Status: Flagged

Categories:

Hi There,

Please see an [updated](#) commentary below for this application:

Designations

No issue

Onsite habitats and species.

- There are a number of returns priority habitats, including deciduous woodland, within 100m of the site.
- There also appears to be a number of mature trees on-site, with good connectivity to further habitats.

Further information is required prior to decision. Several records for protected and priority species and habitats are present within 1km of the site. A Preliminary Ecological Appraisal is therefore required prior to decision to assess the site habitats, the likely presence of protected and/or priority species, and the value of site habitats to protected and/or priority species.

Reason: In the interests of biodiversity and in accordance with LP30 and NPPF15.

BNG

A few matters here need to be addressed with regards to the metric:

Competent person

It is not mentioned that those who completed the Ecological Impact Assessment, and the Statutory Metric met the requirements for a competent person as stated in BS 8683:2021. Please can training and experience be mentioned with regards to this?

Photos

There is a lack of photos to demonstrate the habitats on-site.

SSM – use of trees

The Small Sites metric calculator states that 1 medium tree, 4 large trees, and 2 very large trees will be planted post development.

The Small Sites Metric User guide states that “When planting trees post-development size class is determined by the size of the tree at site-planting.” The natural size increases of planted trees within post-development calculations must not be recorded. Newly planted individual trees must be recorded as “Small” at the time of planting unless tree translocation is taking place. No management plans indicate that large tree translocation is taking place. As such, a revised metric where the trading rules are met and the Number of New Trees Planted Post-Development column within 1d. – Tree area calculator uses the Small categorisation for trees is required prior to decision.

Priority habitat within 500m

As mentioned about the site is near to a priority habitat (deciduous woodland). Therefore, the main metric, not the small sites metric will need to be used instead. The main metric will need to be completed by a Suitably Qualified Ecologist and contain a BNG assessment, which accompanying

HCA assessment and excel format of the metric. The waterbody near the site is >10m from the redline boundary so it is unlikely that this will need to be considered in the calculations.

Site walkover:

There is no mention of a site walkover being completed.

Result

By virtue of a lack of accurate and updated information, an assessment of how 10% biodiversity net gain will be achieved is not possible and as such, if granted planning permission, there is no guarantee if 10% biodiversity net gain will be achieved, hence would be contrary to Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021).

Suggested Conditions

To be confirmed following provision of a full PEA of the site and building, and **clarifications on an updated BNG Assessment.**

Many thanks,
Katie

Ecology Team
Planning and Development Service
Place Directorate – Skills and Regeneration
PO Box 1720,
Huddersfield,
HD1 9EL
