

**Sent:** 19 February 2026 12:52

**Subject:** 2025/91184 at location land off, Bretton Street, Savile Town, Dewsbury, WF12 9BZ

Please see this as a continuation from my original commentary, as this update will only concern BNG based on the updated reports provided by the applicant

Based on the BNG report and metric completed on 26<sup>th</sup> November 2025:

It is noted that 3.46 habitat units and 0.71 watercourse units will be created or retained onsite. As this is a significant number of units. As a result, a HMMP for 30 years will be conditioned.

A minimum of 4.63 habitat units and 0.81 watercourse units will need to be achieved to ensure the development delivers a biodiversity net gain on site in accordance with Schedule 7A of the Town and Country Planning Act 1990. Currently there is a deficit of 1.16 habitat units and 0.10 watercourse units.

**There is a mention to purchase credits. The purchased of credits are a last-resort option purchased from the UK government (via Natural England) when on-site or local off-site biodiversity improvements are unachievable. The purchase of units from a habitat bank is advised and should be considered first.**

There appears to be a net loss, and the report shows no plan to make up for the shortfall. We recommend the applicant provides at least an outline of the intended route to achieving net gain.

We need this information in advance of a planning decision because, if offsite gain is required, it will need to be secured with a section 106 agreement. If a section 106 agreement is needed, we recommend the applicant provides sufficient information for the heads of terms of an agreement prior to determination of the application. In addition to the information already provided, this information would comprise:

- A plan that follows the UK Habitat Classification showing the spatial locations of the habitats represented in the enhancement and/or creation tabs of the biodiversity metric (i.e. the target habitats).
- The georeferenced spatial data used to create both above plans (in either .shp or .gpkg format) and written permission to share this data with West Yorkshire data centre.
- A 30-year Habitat Management and Monitoring Plan (HMMP)

All original conditions suggested still stand following this.

Many thanks, Katie

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