

## About the application

Application number: 2025/91370	
What is the application for?:	Demolition of existing dwelling and erection of 50 dwellings with associated acc
Address of the site or building:	Land at, Gynn Lane, Honley, Holmfirth, HD9 6LF
Postcode:	

## User comments

Type of comment: A general comment	
Do you wish your comments to be published on the website anonymously?	<input checked="" type="checkbox"/> Yes
<p>The PEAR contained sensitive information in relation to badgers. The page came with a warning stating that it should be removed before been made public, and this did not occur.</p> <p>The BNG metric has not been provided for scrutiny and nor have the condition assessment sheets.</p> <p>A BNG assessment had been carried out initially on the to determine the baseline, and a further updated assessment with fixed layout proposals.</p> <p>However, the onsite baseline values have changed between the two assessments with no explanation and no obvious changes in the red line. Area habitats have increased from 6.96 to 7.11 units, and watercourse units have decreased from 0.77 to 0.65 units. While the change in area is fairly insignificant (2% increase), the change in watercourse units is significant (16% decrease).</p> <p>There is no indication of the grassland quadrat surveys / woodland surveys so it is difficult to understand the conditions of these habitats. The woodland is made up of two parcels that are assessed as a single unit which achieves moderate condition. Has the HPI status of this woodland been confirmed?</p> <p>The woodland will be enhanced to good condition but there is no detail on how this will be achieved or whether it will be achievable. What condition criteria are being targeted and is enhancement to good condition realistic. As a lot of units are obtained from the enhancement of this woodland, further considerations should be made.</p> <p>The garden was dismissed as a low distinctiveness habitat, while some trees (medium sized or larger) were considered, the habitat as a whole was not. What is the ground flora like, would the habitat be considered as scrub or woodland, if so the habitat should be recorded as such regardless of garden status, to avoid underrecording biodiversity.</p> <p>Areas along the southern boundary have been indicated for habitat creation and enhancement and include areas of scrub and other neutral grassland. These habitats</p>	

enhancement and include areas of scrub and other neutral grassland. These habitats are fairly linear and tucked behind the development. Therefore, it is unclear how these habitats will be secured and the conditions maintained (or achieve the conditions proposed as this is not presented). There hasn't been enough consideration for the long-term (30 year) management of these habitats.

Furthermore, randomly shaped areas of grassland are being considered as retained. However, this does not seem to have considered the nature of development and site clearance works. How practical would it be to retain these areas, and then implement the enhancements post-development.

Finally, the planting proposals in the southeast include the planting of trees within scrub. Will these trees be prominent within the scrub, how will they (the scrub and the trees) be maintained / accessed. Will the trees be distinguishable from the scrub? Is this habitat likely to become woodland (this same question could be asked of the POS in the southwest, which is indicated on some plans as a woodland area)?

An area of the site in the southwest has been put in the blue line, however, this seems to be part of the landscaping rather than a dedicated BNG offsetting area - furthermore, this area is indicated within various plans as being part of the overall open space. Therefore, this area should be adopted into the red line.

A section of the watercourse will be culverted further beneath the access to the site, a new outfall pipe and realignment of the channel. This is detailed further in the drainage strategy. This has not been considered within the watercourse metric calculations as the watercourse is indicated as retained, when it should in fact be considered as lost, and a culvert created.

As such, the watercourse unit losses are likely higher than that stated within the BNG assessment.

Furthermore, the culvert / outfall headwall along the north bank is not within the red line. All development should be within the red line, as such these areas should be removed from the blue line and put into the red line. In addition, consideration on the impacts to the woodland should be considered within these areas, such as the need to clear vegetation (e.g. T1-T5, T7) to gain access to the watercourse and construct the culvert / headwall.

Strategic significance. The site falls within the Valley Slopes BOZ. Habitats listed within Table 1 of the Kirklees BNG Advice Note should be assigned high SS when located within the corresponding Biodiversity Opportunity Zone. Scrub and lowland deciduous woodland are both listed in Table 1 under valley slopes. However, scrub habitat has not has the relevant SS category applied.

Overall, there is inconsistency in the reporting of the baseline habitats. The red line does not include all areas of development / landscaping (area around culvert works and area in southwest). The post-development habitats lack detail and consideration of long term management (including the woodland where the majority of offsetting will occur). The post-development habitats have not considered the drainage works and as such have not considered impacts to the watercourse units or to the woodland.

As such, there is no clear understanding of what the baseline value of the site is, and whether BNG is deliverable. The site is currently demonstrating a loss and if the above is considered this loss may be considerably higher.