

About the application

Application number: 2025/92713	
What is the application for?:	Reserved matters application pursuant to outline permission 2023/92079 for erect
Address of the site or building:	Rear of, 23 to 43, Moor Lane, Gomersal, Cleckheaton, BD19 4LF
Postcode:	LS10 1NB

User comments

Type of comment: An objection	
Do you wish your comments to be published on the website anonymously?	Yes
<p>I have concerns in regard to the BNG calculations.</p> <p>The site is indicated as entirely bramble scrub. However, it should be noted that there was some site clearance and this would be considered as degradation and a limitation of the habitat surveys. However, aerial imagery and occasional photo indicates that this is likely accurate.</p> <p>However, the site has multiple trees present as indicated by the Arboricultural Tree survey indicates that there are at least 41 trees present onsite, all of which are recorded as 5m or taller, and all having diameters of 140mm or more. As such all of these trees should be included within the metric assessment.</p> <p>The BNG assessment report fails to indicate which trees are included in the assessment, nor is this information included within the metric itself.</p> <p>The metric indicates 0.02ha of tree in good condition and 0.092 in moderate condition. However, there is no reference to which trees these values relate, the tree locations, or size, nor for the values of the trees to be retained. Therefore, it is unclear what these numbers actually represent. The numbers are not consistent with the values generated by the tree helper, so further justification and clarification for this deviation is required.</p> <p>The BNG assessment report states: "Trees within the boundary of the Site in areas of bramble scrub have been included in the categorisation Bramble scrub (with scattered trees)."</p> <p>However, there is no justification for this in either the metric user guidance or UKHAB survey methodology, given that the trees meet the criteria for being recorded as trees and fail the criteria for being included within scrub. Furthermore, the trees are prominent within the scrub which is low laying, and therefore, there is no confusion between what would be classified as tree or scrub (e.g. for when there is trees within other scrub habitats such as mixed scrub, willow scrub, etc.).</p> <p>Therefore, all trees recorded within arboricultural tree survey should have been included within the baseline metric assessment.</p> <p>Furthermore, the next development habitats need further scrutiny. The next development</p>	

Furthermore, the post-development habitats need further scrutiny. The post-dev. plans indicate a significant area of the landscaped area will be retained bramble scrub.

However, further consideration on the existing site clearance, and the clearance required whilst construction is undertaken should be considered. Furthermore, given the lack of amenity value associated with bramble it should be considered whether its retention is suitable and/or likely to be retained over a 30 year period, or whether the new homeowners are likely to remove the scrub.

Furthermore, the majority of the retained trees will fall within the gardens of the private dwellings and therefore cannot be secured. As such this should be recorded as a loss, or at the very least a reduction in condition to represent the fact the trees cannot be secured but will be retained.

Further to this there are four proposed trees within mixed scrub, how can these trees be managed such that the scrub does not compete for light and resources. It would be more appropriate to plant the trees within grass or low growing ornamental planting from a landscaping point of view.

The proposed trees are all recorded in moderate condition. Why was this condition applied? and what criteria are expected to be met? Will the trees be native or non-native? at least 4 trees will be largely oversailing hardstanding. None will be mature, and they are unlikely to have ecological niches. Therefore, as a precaution a poor condition should have been selected especially given the context of the site and lack of landscaping details.

As such there is an under-recording of the baseline biodiversity value of the site, and as such the value of habitats lost is likely to be much higher. There is also likely an overestimation of the value post-development.

As a result, a net gain for biodiversity will not be achieved.

As a result the commuted sum for offsetting is incorrect by a significant margin given the errors.

Therefore, nature/biodiversity will lose out directly as a result of these proposals and the inaccuracies of the ecological reports which are not consistent with the arboricultural reports.