

## DC Admin

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**From:** ENVU Biodiversity and Land Use  
**Sent:** 29 September 2025 07:57  
**To:** Planning ContactCentre  
**Subject:** 2024/92031 at location Headlands Works, Headlands Road, Liversedge, WF15 7NT

### Categories:

Please see ecological commentary below:

### Designations

No issue

### Onsite habitats and species

The Preliminary Ecological Appraisal (Brooks Ecological, May 2024), Bat and Badger Survey (Whitcher Wildlife Ltd., September 2024), and Bat Emergence Survey Report (Brooks Ecological, July 2025) have been observed, but do provide a confusing image / idea of ecological constraints onsite.

- Invasive species – Himalayan balsam – were found on the site. An invasive species survey management plan must be completed onsite.
- Bats –
  - Four buildings were identified on site (Whitcher Wildlife Ltd., September 2024). Buildings 1, 2, and 4 were observed to have moderate potential for roosting bats; and Building 2 was observed to have a low potential for roosting bats. Bat surveys were undertaken (Brooks Ecological, July 2025) where no bats were observed to be roosting within the buildings; however, Tawny owls were observed to be using building 4. A PWMS will be conditioned for the buildings for bats and the tawny owls in Building 4.
  - There are several trees onsite of medium distinctiveness and appear to have suitability of bats (T1, T2, T3, T4, T5, T6, T7, T8, T9) ground level tree bat roost assessments will need to be conducted, and the finding provided in a report prior to determination. There is also no confirmation of trees to be maintained or removed onsite.
  - Due to the density of the vegetation and trees bat activity surveys of the whole site would need to be conducted prior to determination to understand the value of the site to bats.
- The site is observed to have high suitability for nesting birds. Further review should be considered as surveys were not recommended.

### BNG

The site is applicable to BNG; however, no report, habitats conditions assessment, nor statutory metric (excel format) has been provided for validation.

No further comments are to be made until these are provided.

**Reason: To ensure the development delivers a biodiversity net gain on site in accordance with Schedule 7A of the Town and Country Planning Act 1990**

### Suggested conditions

No conditions will be provided until an Ecological Impact Assessment is provided for:

- Bat activity sites of the entire site
- Ground Level Tree Bat Roost Assessments

- Badger Surveys
- Invasive Species Survey
- Habitat retention study

***Reason: In order that the proposals are implemented in accordance with the Wildlife and Countryside Act 1981 (as amended).***

Many thanks,  
Katie

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