

**Sent:** 18 December 2025 10:36

**Subject:** ra 2024/93605 at location Land at, Main Avenue, Cowlersley, Huddersfield, HD4 5US

The GLTA bat survey report has been provided. The table below has been updated **in green** as a result. No further information has been provided apart from this, following my original comments on 22<sup>nd</sup> October 2025.

Arboriculture Report and Impact Assessment	AWA Tree Consultants, December 2024	Noted a number of mature trees of concern onsite. The majority of these trees are noted (through review of photos and tree data in report) to be suitable for roosting bats and nesting birds.	Tree protection for retained trees condition to be provided Lighting strategy for bats and birds' condition to be provided  <b>KS updated comments 18.12.25</b> <b>A GLTA has been provided, which is acceptable. It confirms that the mature trees onsite have negligible potential for roosting bats.</b>
Interim Ecological Impact Assessment	Brooks Ecological, December 2024 – ER-7172-04	Impacts on bats, birds, [redacted] other fauna mentioned; however, note enough detail.  No mention of further species – reptiles, GCN, dormice, etc.  Some recommendations for impact and mitigation mentioned, but not enough details for specific protected species.	Noted the following mentioned: <ul style="list-style-type: none"><li>• Preliminary Ecological Appraisal – mentioned but does not appear to be available for review [redacted]</li><li>• Roosting bats (tree assessment) – not available for review</li><li>• Bat activity – available and acknowledged – however, it is noted that this is an interim report, and surveys have not been fully completed at time of this report being written.</li></ul>

			<ul style="list-style-type: none"> <li>Breeding birds – mentioned but does not appear to be available</li> </ul> <p>Conditions to be confirmed once ALL reports updated (where appropriate), provided, and reviewed</p>
Ecological Impact Assessment	Brooks Ecological, December 2024 – ER-7172-04C	<p>Impacts on bats, birds, other fauna mentioned; however, note enough detail.</p> <p>No mention of further species – reptiles, GCN, dormice, etc.</p> <p>Some recommendations for impact and mitigation mentioned, but not enough details for specific protected species.</p>	<p>Noted the following mentioned:</p> <ul style="list-style-type: none"> <li>Preliminary Ecological Appraisal – mentioned but does not appear to be available for review</li> <li>Bat activity – available and acknowledged – however, it is noted that this is an interim report, and surveys have not been fully completed at time of this report being written.</li> <li>Roosting bats (tree assessment) – not available for review</li> </ul>
Construction Management and Mitigation Plan	Strata, July 2025	Ecological effects mentioned, but not enough detail to specific habitats and species	Further information on species to be impacted a CEMP (biodiversity) to be conditioned to ensure measures conducted.
<p>Biodiversity Net Gain Assessment – Part 2 (not marked as superseded)</p> <p>Accompanying metric (Marked as superseded) – noted in “Start” tab as completed on 13<sup>th</sup> December 2024</p>	Brooks Ecological, December 2024 – ER-7172-03A	Baseline biodiversity unit calcs noted to be 28.58 habitat units	<p><b>Baseline calculations are different in both report and so overall BNG assessment cannot be validated. Further confirmation / details must be provided before review of application can continue.</b></p> <p><b>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</b></p>
<p>Biodiversity Net Gain Assessment – Part 2 (not marked as superseded)</p> <p>Accompanying metric (not marked as superseded) – “Start” tab cannot be found and so cannot be confirmed when completed.</p>	Brooks Ecological, December 2024 – ER-7172-03C	Baseline biodiversity unit calcs noted to be 34.99 habitat units	<p>Note:</p> <p>Given details above regarding priority habitats, etc. It is noted that both BNG assessment show a significant net loss of such a valuable site – further review to attain as much onsite net gain as possible is required.</p>

Many thanks,

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