

**Sent:** 03 February 2026 15:23

**Subject:** 2025/93514 at location land at, Brownhill Farm, Old Lane, Birkenshaw, BD11 2JL

Please see ecological commentary below:

Designation

No issue

Onsite habitats and species

A Preliminary Ecological Appraisal has been provided but has elements within that are a bit vague.

- There are not details assessment notes of the buildings to justify mentioning that none of them has suitability for roosting bats. Further details / descriptions are needed as there is simply not enough to justify the permitting of demolishing buildings
- Other – *“There is no habitat on-Site or within influencing distance to support this species.”* This is provided for a few parts in the report where certain species are addressed. They should be saying the type of suitable habitat that is absent.
- A lot of the references for best practice guidance mentioned in pages 17-19 are out of date.
- For BNG – Further details on methodology, how the mitigation hierarchy was addressed; and post intervention plans are required for a complete metric.

Unfortunately, I cannot accept this report in its current state. Should these matters be addressed prior to decision then it can be reviewed again.

Many thanks, Katie

Ecology Team

Planning and Development Service

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