

DC Admin

From: ENVU Biodiversity and Land Use
Sent: 30 March 2026 10:48
To: Kerri Simpson
Cc: Planning ContactCentre
Subject: 2025/93514 at location land at, Brownhill Farm, Old Lane, Birkenshaw, BD11 2JL

Hi There,

I'm afraid that none of the matters I raised in my original comments have been addressed.
To be clearer:

A Preliminary Ecological Appraisal has been provided but has elements within that are a bit vague.
☒ There are no 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. **There are not enough internal nor external photos of the buildings to justify whether they have any ecological constraints.**

☒ 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☒ A lot of the references for best practice guidance mentioned in pages 17-19 are out of date.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.

I'm afraid that I cannot comment on this any further.

Many thanks, Katie
Ecology Team
Planning and Development Service
Place Directorate – Skills and Regeneration
PO Box 1720,
Huddersfield,