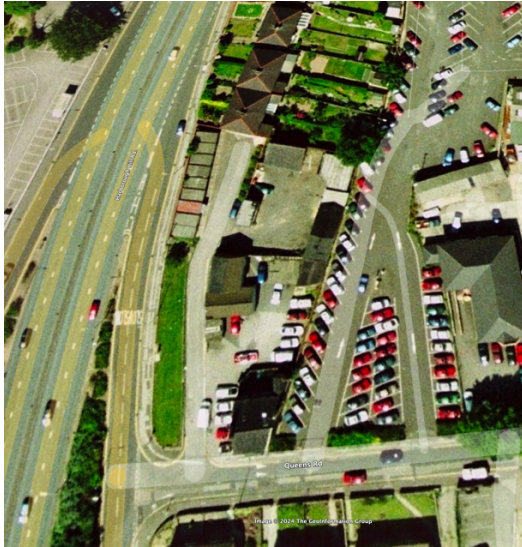


**ADP Architecture and Design Ltd**  
**Response to email from Jessica Duffield at Barnsley MBC - dated 09 January 2025**

The site comprised of a number of brick built industrial buildings and hard standing, with **no vegetation** from as early as December 2002 (earliest Google Earth record available), through until at least December 2009, see aerial images below:

**December 2002**



**December 2009**



At some point after December 2009 and before June 2015 the buildings were demolished, and the site was left vacant and unused, with a hardcore base consisting of inert materials from the demolition works and imported clean hardcore.

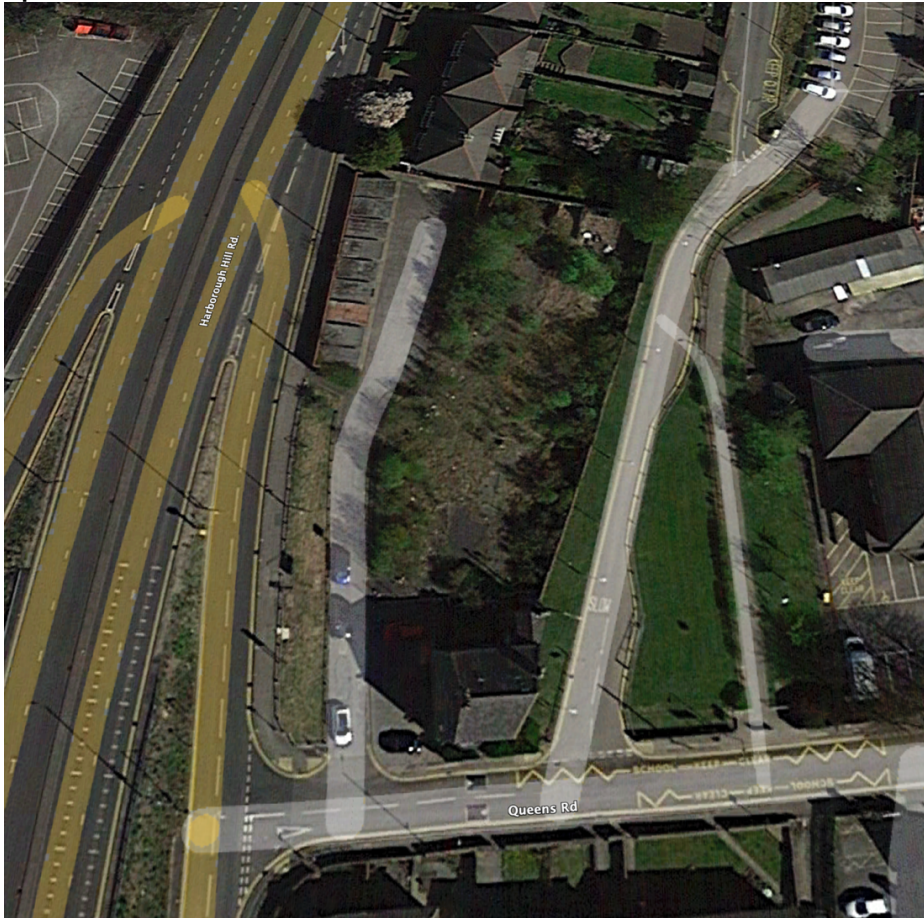
From June 2015 the site started to develop weed growth due to its derelict nature and lack of maintenance by the site's previous ownership, see image below.

**June 2015**



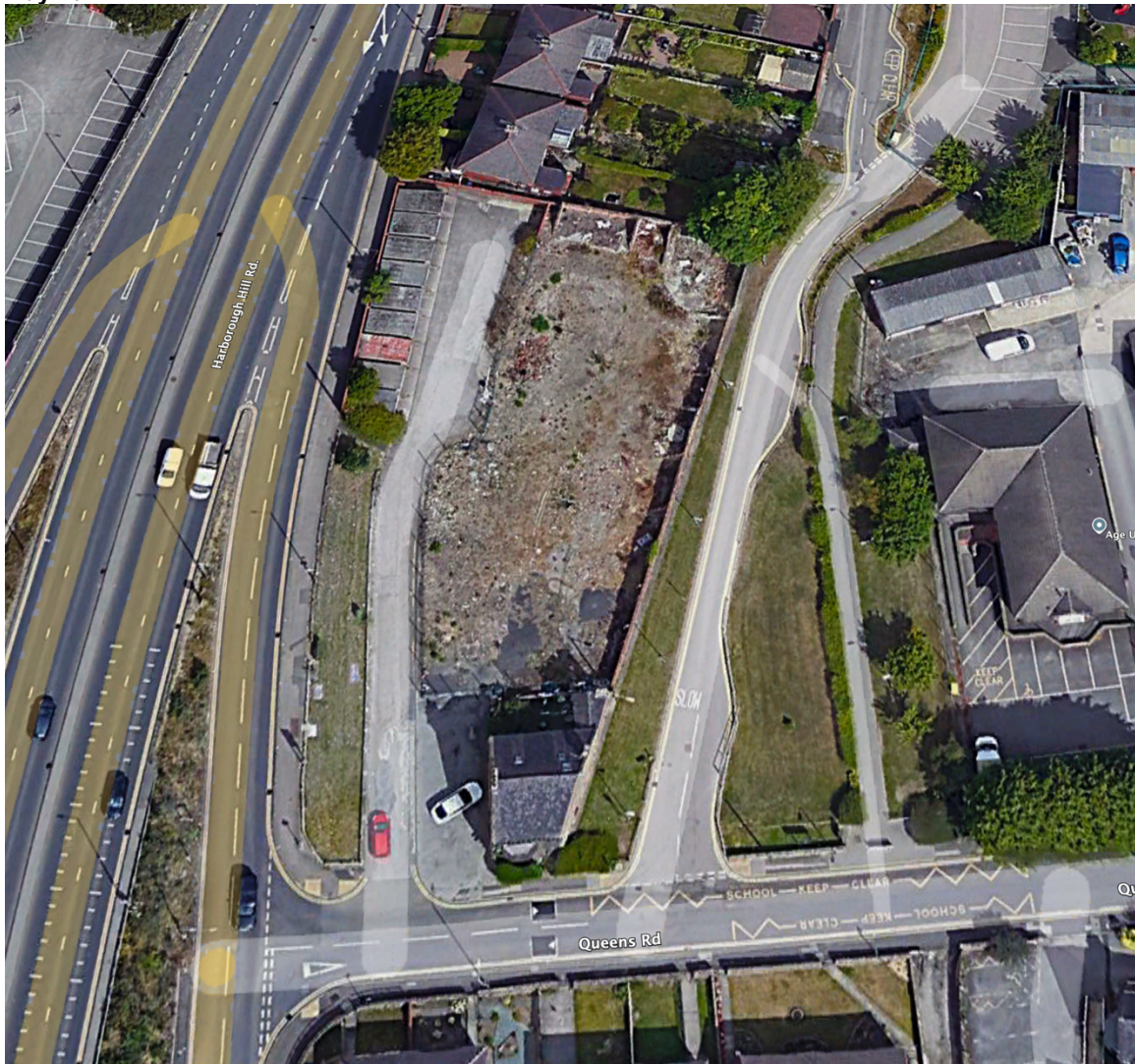
In the period of June 2015 and April 2021, the unmaintained derelict site became unkempt, with the vigorous growth of weeds with no particular habitat value, see Google Earth and Street View images below.

**April 2021**



At some stage between April 2021 and May 2022, the owners of the site, who are not the current applicant, cleared the site of the weeds and debris, in order to maintain a degree of tidiness and keep the site under control. See image below of site in May 2022 with **no vegetation**.

May 2022



The site remains as per the image above in its present state.

The BNG Assessment requirement became mandatory for minor developments on 02 April 2024, a minimum of 2 years **after** the site was cleared of weeds and debris. We reiterate that the site was hardstanding, debris and rubble from the previously demolished buildings, which was subsequently cleared of the weed growth. This was certainly **not** wildflower grassland enriched with habitat.

ADP applied for outline planning permission for the construction of 4 dwellings and associated works in February 2024: application nr. 2024/0192, which was granted permission in September 2024, for the then site owners. There was no request for BNG Assessment during this application, and no mention of any BNG Assessment requirements within the conditions attached to this approval.

Barnsley MBC Biodiversity Officer suggests that "unauthorised degradation" *may* have taken place on the site. To our knowledge the definition of "unauthorised degradation of onsite habitat", is when the biodiversity value of an on-site habitat decreases due to activities that take place before a planning application is submitted. Indicating that the site is intentionally cleared of habitat potential. There was no vegetation of habitat potential on the site for the applicant to clear prior to submission of the current planning application, nor has the site ever had any habitat potential. We contest therefore that any unauthorised degradation of the site has taken place. The application therefore withholds the claim of de minimis exemption in relation to BNG.