

By email to: [REDACTED]

5th September 2024

RE – PEAK ECOLOGY LTD RESPONSE TO COMMENTS MADE BY BARNSELY METROPOLITAN BOROUGH COUNCIL'S PLANNING ECOLOGIST IN RELATION TO PLANNING APPLICATION 2024/0373

Dear Katie,

Thankyou for your feedback on the above application. We have reviewed your comments and made amendments to our Preliminary Ecological Appraisal (PEA) report and Biodiversity Net Gain Assessment as required, which will be re-submitted for your consultation.

Stated below are the comments which require actions (sent by email and dated July 15th 2024) along with the measures which we have undertaken to address each point:

Preliminary Ecological Appraisal

- The PEA includes records obtained from Barnsley Biological Record Centre, which is welcomed; however, it was also advised that data should be obtained from the South Yorkshire Bat Group and South Yorkshire Badger Group within the pre-application advice. Records should be obtained from these organisations to inform the assessment.

Peak Ecology's response: data has since been obtained from South Yorkshire Bat Group (31st July 2024) and South Yorkshire Badger Group (3rd August 2024), results of which are included within the amended PEA report.

- Section 3.1.1 of the PEA references priority habitats located outside of the site within the 2km search area; however, it does not detail the presence of deciduous woodland mapped on the governments MAGIC website which falls within the site boundary.

Peak Ecology's response: The PEA report has been amended to state the following - The governments MAGIC website identifies a 0.1ha of deciduous woodland onsite, towards the sites NW corner. However, during the habitat survey, it was confirmed that this is no longer present, and likely hasn't been present for a long time. The habitat within that area comprised vegetated bunded materials undergoing successional growth.

- The PEA identifies the presence of Open Mosaic Habitat on Previously Developed Land (OMH) on site, with a mosaic of habitats recorded including ephemeral/short perennial, tall ruderal, grassland and bare ground on land that was previously developed. Paragraph [4.3.1.1](#) of the PEA sets out that this habitat is not currently considered to be a UK BAP Priority Habitat due to lack of indicator species, with only nine of the fifty-two characteristic species (for Northern England) recorded onsite. Characteristic species are listed within the Joint Nature Conservation Committee (JNCC) document which provides a description of OMH. I do not agree

with the ecologist's assessment in that this habitat cannot be considered to be priority habitat due to lack of indicator species. The JNCC document lists five criterion which must be met for field recognition of OMH and none of these criteria include a threshold of indicator species that needs to be met. From descriptions provided within the PEA it is considered that there is a mosaic of habitats on site which meet the JNCC criteria to be deemed OMH. This habitat type is a Priority Habitat and therefore of principle importance. Planning Policy BIO1 states "Development will be expected to conserve and enhance the biodiversity and geological features of the borough by: Protecting and improving habitats, species, sites of ecological value and sites of geological value with particular regard to designated wildlife and geological sites of international, national and local significance, ancient woodland and species and habitats of principal importance identified via Section 41 of the Natural Environment & Rural Communities Act 2006" From the proposals plan provided the majority of habitat proposed to be affected by the development appears to be largely areas of hardstanding, with minor loss of habitats which fall under the OMH definition, such as neutral grassland and sparsely vegetated land. Consideration should be given to the retention of these habitats, where possible. If not feasible, the loss should be mitigated through the enhancement of retained habitats and creation of suitable habitats, which appears to be demonstrated in the metric submitted with the application as part of the Biodiversity Net Gain requirement.

Peak Ecology's response: the site was reassessed by Technical Director Jessica Eades on 12th August 2024 who has confirmed the presence of OMH onsite. The PEA report (and BNG) has been amended to reflect this.

Biodiversity Net Gain – Statutory Metric

- A Statutory Metric has been submitted as part of the Biodiversity Net Gain requirement of the application. The metric indicates that a gain of 18.70% in habitat units and 1014.33% in hedgerow units can be achieved on site; however, the applicant's ecologist should consider the following and make amendments to the metric, where necessary.
- Information detailing condition assessments for baseline habitats and condition assessment criteria targeted in enhanced/created habitats has not been submitted with the application. This should be provided to support the metric.

Peak Ecology's response: all condition assessments are detailed within the Biodiversity Net Gain Assessment report (which has been amended to reflect the OMH on site).

- The proposals site is located within the Dearne Valley Heart Nature Improvement Area. Habitats on-site pre and post-development should be set as being located within an area formally identified in local strategy under the strategic significance multiplier of the metric. This information was given in the pre-application advice.

Peak Ecology's response: BNG amended accordingly.

- As detailed above, OMH appears to be present on site. Amendments should be made within the metric accordingly to include this habitat type.

Peak Ecology's response: BNG amended accordingly.

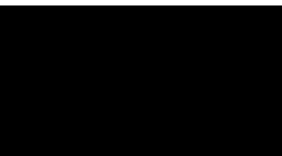
- The PEA identifies the presence of lowland mixed deciduous woodland priority habitat on site; however, within the metric, the other woodland, broadleaved habitat type has been used. This should be amended, where necessary. The executive summary of the PEA details that all areas of woodland on site will be retained as part of the proposals and should be protected. The metric indicates that there will be a loss of woodland habitat on site. As discussed above in relation to the OMH on site, planning policy BIO1 details that development will be expected to conserve and enhance habitats of principle importance. Clarification should be provided as to whether woodland habitats will be retained as part of the proposals, or if losses are to occur, how this is to be mitigated.

Peak Ecology's response: BNG amended accordingly.

It is hoped that the above comments and reports amendments/BNG amendments are satisfactory and that the application can proceed,

If you have any questions at all/wish to discuss further, please don't hesitate to contact me,

Kind regards,



Helen Staton
Senior Ecologist
Mobile: 