



PLANNING CONSULTATION RESPONSE

Application No	2025/0908
Proposal	Re-engineering and Restoration of Yew Tree Quarry through the importation of non hazardous Excavated Soil Materials
Address	Stairfoot Brickworks, Wombwell Lane, Stairfoot, Barnsley, S70 3NS
Date of Consultation Reply	19/11/2025
Consultee	Katie Lawrence, Planning Ecologist

Consultation Assessment and Justification

Thank you for consulting me regarding the above application. Documents submitted in support of the application include the Ecology chapter of the Environmental Impact Assessment (EIA) and associated specialist reports detailing surveys for breeding birds, foraging and commuting bats, reptiles and invertebrates. A BNG assessment and associated metric have also been submitted. The ecology chapter references a Preliminary Ecological Appraisal (PEA) and great crested newt report, but these do not appear to have been submitted. Can the applicant supply these?

Prior to discussing each of the documents submitted, it should be noted that species surveys undertaken on site were all carried out in 2023 and are therefore over two years old. CIEEM advises that once survey data is over 18 months old, an ecologist will need to undertake a site visit and may also need to update desk study information. This should be undertaken by an appropriately qualified ecologist in relation to the species type (i.e. entomologist in relation to invertebrates) who will assess any significant changes in habitat conditions on site and the possible requirement for a fully updated suite of surveys. An updated desk study should also inform this assessment. The applicant should consider the requirement for fully updated surveys in case there is a delay in a planning decision being made, as once survey data is over three years old it is unlikely to be valid (refer to CIEEM advice note also attached). A full update of the reptile survey is considered unnecessary as it can be assumed that grass snake is present based on the survey results provided; however, due to the proposed loss of the pond on site, I consider it appropriate for an updated eDNA survey to be carried out to re-assess the presence/absence of great crested newts.

Bat Survey Report

- Bat transect surveys and surveys using static recorders were carried out during the active season of 2023. Bat activity was noted to be high and a range of species recorded, with common and soprano pipistrelle being the most abundant. Bat activity was largely concentrated to woodland habitats and the ponds on site (within the red and blue line boundary).
- The report references a building and trees on site which are assessed as having bat potential. Are these features located within the proposed development site or within the blue line boundary? If located within the site, will they be affected by the proposals? The report should be amended to clarify this.
- The report discusses the requirement for a sympathetic lighting scheme on site in relation to proposed external lighting. Is external lighting necessary within the proposals site?
- The report includes no recommendation for the installation of bat boxes. This should be incorporated within the recommendations to enhance opportunities for roosting bats on site, as per the National Planning Policy Framework and the Biodiversity and Geodiversity SPD.

Breeding Bird Survey Report

- The breeding bird survey identified that the site supports a typical range of common and very common species and assessed the site as being of local importance for breeding birds.
- Section 4.2 of the report is contradictory in that it says four survey visits have been carried out to the common bird census methodology; however paragraph 4.2.1.5 advises that



approximately six survey visits are proposed. Six visits would have ideally been undertaken, this being in line with the Breeding Bird Survey methodology; however, as four visits were undertaken rather than the usual three visits, as per the traditional BTO BBS method, this is considered acceptable. As discussed above, an updated walkover to note any changes in habitat condition and updated desk study is still considered necessary to assess whether the original survey data is still relevant.

- The report details that skylark was recorded within the site during three of the four survey visits. Is this within the red line or blue line boundary as it is not clear on the survey maps provided within the appendix? A bird recorded to the south-east of the survey area has a code SL; however, this code relates to swallow rather than skylark. This should be checked and amendments made, where necessary. The maps would ideally be digitised so that it is clear as to what species were recorded, as it is currently difficult to decipher.
- The site is considered to offer suitable habitat for little ringed plover (Schedule 1, Wildlife and Countryside Act 1981) and the desk study does indicate that this species has been recorded in the area previously. It is appreciated that this species was not recorded during the breeding bird survey, but it is considered appropriate that precautionary measures are adopted during proposed re-engineering works in relation to this species. This can be detailed within a Construction Environmental Management Plan (CEMP) which can be conditioned if planning permission is granted.
- Recommendations have been made within the report for precautionary works and the provision of nest boxes. Again, such measures can be secured by way of planning conditions.

Reptile Survey Report

- Grass snake were recorded within close proximity of the proposals site (within the blue line boundary) and it is assumed that the species utilises the site, in particular the pond.
- Precautionary works are recommended as is the creation of suitable habitats including ponds, log piles and egg heaps. The ecology chapter states that a pond cannot be created as part of the restoration works but this should be reconsidered on the basis that the pond is likely to offer key feeding habitat for grass snake as well as being found to be of value for bats, as discussed above. The creation of ponds within the restored site is discussed further below.
- Monitoring of grass snake is recommended during the re-engineering phase. It is also considered appropriate that monitoring is undertaken once the site has been restored to assess any impacts on the grass snake population as the result of the re-engineering works. This can be undertaken alongside monitoring which will be necessary as part of the Biodiversity Net Gain requirement.

Invertebrate Survey Report

- The invertebrate survey undertaken in 2023 covered the proposals site and land within the blue line boundary. The survey recorded nine species of value, though five of these are now more common than their status suggests. The impact of the proposals has been assessed as relatively minor. As detailed above, an updated walkover to consider any change in site condition and an updated desk study should be carried out to assess if the survey report is still relevant.
- Recommendations are made within the report for forb-rich grasslands with bare ground (30% of total area) scrub, deadwood and wetlands. Again, the creation of a pond is discussed further below.

Biodiversity Net Gain (BNG) assessment

- Areas of the site are mapped as habitats of principle importance on the governments MAGIC website, including the majority of the quarry area as Open Mosaic Habitat on Previously Developed Land (OMH) and Deciduous Woodland along where access is proposed. Within the metric these habitats are not input as priority habitats and assigned habitats of a lower distinctiveness, including ruderal/ephemeral and other broadleaved woodland. Within my EIA scoping response, I advised that these mapped habitats should be assessed against the relevant JNCC definitions to see if they meet these. This doesn't appear to have been done (though it may be included within the PEA which doesn't appear to have been submitted). I have undertaken a site visit and consider that the quarry site does not meet the JNCC definition of OMH with this area largely comprising bare ground



with very limited development of vegetation and lacking a mosaic of habitats. In addition, the woodland habitat along the proposed access route does not appear to meet the definition for priority broadleaved woodland, being relatively immature. Unless this is already detailed within the PEA, evidence should be set out on why these habitats are not representative of priority habitat despite being mapped as such on the governments MAGIC website.

- It is noted that sections to the south, where access is proposed, are mapped as tall ruderal vegetation and modified grassland. These areas were surveyed in relation to a separate planning application (ref: 2024/0373) for a glass recycling centre. I undertook a site visit in July 2024 when reviewing this application, following which it was agreed that areas of the site (including parts of the access route which falls within this applications boundary) met the JNCC definition of OMH, with annual species, ruderals, inundation species and areas of open grassland. Reference should be made to the ecology report submitted in relation to this application and amendments made, where necessary. As the baseline survey was undertaken at a suboptimal time within the year (February 2025), this is likely to be the cause of the downgrading of these habitats.
- Furthermore, in the post-development map submitted for the site, the habitats along the access route are mapped as retained. It is appreciated this can be recorded as the case for areas of hardstanding but can clarification be given on this in terms of areas of habitat (grassland, tall ruderal, etc.) as it is presumed that these areas will be highly disturbed during works as they will be used for access. It would be more appropriate for these areas to be recorded as lost and replacement habitat proposed.
- Strategic significance appears to have been recorded as low for some habitats; however the site is located within the Dearne Valley Green Heart Nature Improvement Area and therefore habitats within the baseline and post-development tab can be recorded as high as per guidance within the Statutory Biodiversity Metric Guidance.
- The BNG calculation indicates that the habitat trading rules have not been met as there is a loss of an area of standing water on site and there are no proposals for ponds on site. The BNG report states that this will be offset through the purchase of pond units from the adjacent habitat bank site. I consider this a missed opportunity with ample space for a pond to be created once habitat restoration works take place. This would be in line with the biodiversity metric hierarchy, and also offer opportunities for invertebrates, bats and reptiles, as set out within the recommendations of the reports submitted. Reconsideration should be given to the inclusion of a pond on site.
- The proposed re-engineering works are estimated to take approximately two years to complete. The delay in the creation/enhancement of habitats should be reflected in the metric, where necessary.
- A number of habitats proposed to be created/enhanced are targeted to achieve conditions of good. Justification should be provided on how these will be achieved, such as which criterion scores for woodland condition can be realistically attained, phosphate levels of the soil used in grassland creation, etc.

Ecology Chapter

- The ecology chapter assesses ecological features on site of value based on the survey work undertaken and considers potential impacts and proposes mitigation in the aim of reduced residual impacts. Comments in relation to the ecology chapter are set out below.
- Paragraph 4.3.14 states that the pond within the site has been assessed as a priority pond due to the presence of notable fauna. It is presumed that this is due to the presence of grass snake, a UK BAP species on site, with this species being recorded in relatively close proximity to the pond within the proposals site. The BNG metric submitted has included the pond as a non-priority habitat. Due to the presence of grass snake, I would agree with the assessment of the pond being priority habitat and the metric should be amended accordingly, with further consideration given to replacement pond/s on site. Paragraph 4.9.1 states the creation of new pond habitat within the restored site is not feasible or realistic due to the nature of the infill works and the requirement for the infill material to be capped and the landform designed to shed water. Is it not possible to profile an area of the capped land to form a pond? I am not in agreement with the residual impact assessment (table 4.7) which states that there will be a negligible impact as a result of the loss of the pond. Species assessments have found the pond to be a feature that is used by foraging bats, likely to be used by grass snake and invertebrates. Planning policy BIO 1 states that



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priority habitat (habitats of principal importance under Section 41 NERC Act 2006) should be protected and enhanced. It is appreciated that due to the nature of the proposals, retention of this habitat is not possible; however, the loss of the pond should be mitigated through the creation of a new pond/s.

- The ecology chapter indicates that broadleaved woodland on site meets priority status, as mapped on the MAGIC website. Within the BNG assessment the woodland habitat is mapped as other broadleaved woodland, rather than a priority woodland habitat of high distinctiveness. As detailed above, it is not considered that the woodland meets the JNCC definition of priority deciduous woodland, and as set out above, justification as to why this is the case should be provided.
- The impact on grass snake following proposed restoration of the site is considered to be significant prior to mitigation due to the loss of the pond, basking slopes and increased disturbance from public access. More effort should be made to mitigate this impact. As discussed, a new pond/s should be provided on site and features provided for reptiles, such as basking banks, log piles, etc. in areas inaccessible to the public. Residual impacts have been assessed as negligible; however, I do agree with this assessment due to the loss of the pond on site, a potential a key food source for grass snake.
- A Construction Environmental Management Plan (CEMP) is recommended within the chapter, which is welcomed. This would include precautionary measures in relation to species of importance on site and retained/adjacent habitats and should also include measures to reduce indirect impacts (noise, dust pollution, etc.) to habitats of value outwith the site boundary, such as statutory and non-statutory designated sites. A CEMP can be conditioned if planning permission is to be granted.

NO OBJECTION*

**Defer for amends/further
information***

OBJECT*