Yorkshire Wildlife Trust

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@YorksWildlife
Yorkshire Wildlife Trust
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DATE: 17/02/2025

BY EMAIL ONLY: katielawrence@barnsley.gov.uk
2025/0997 | Demolition of existing structures and outline planning application for up to 200 dwellings with associated infrastructure and open space. All matters except for means of access to, but not within, the site to be reserved at Low Valley Farm, Pitt Street, Darfield, Barnsley, S73 8AX.

Policy BI01 (Biodiversity and Geodiversity) of the Barnsley Local Plan[1] (Adopted January 2019) 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 (for list of the species and habitats of principal importance) and in the Barnsley Biodiversity Action Plan.

Maximising biodiversity and geodiversity opportunities in and around new developments.

Conserving and enhancing the form, local character and distinctiveness of the boroughs natural assets such as the river corridors of the Don, the Dearne and Dove as natural floodplains and important strategic wildlife corridors.

Proposals will be expected to have followed the national mitigation hierarchy (avoid, mitigate, compensate) which is used to evaluate the impacts of a development on biodiversity interest.

Protecting ancient and veteran trees where identified.

Encouraging provision of biodiversity enhancements.

[1] Local Plan

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Development which may harm a biodiversity or geological feature or habitat, including ancient woodland and aged or veteran trees found outside ancient woodland, will not be permitted unless effective mitigation and/or compensatory measures can be ensured.

Development which adversely effects a European Site will not be permitted unless there is no alternative option and there are imperative reasons of overriding public interest (IROPI)."

Policy GB1 (Protection of Green Belt) states:

"The general extent of the Green Belt is set out on the Key Diagram. The detailed boundaries are defined on the Policies Map. Green Belt will be protected from inappropriate development in accordance with national planning policy."

Policy CL1 (Contaminated Land) states:

"Where the future users or occupiers of a development would be affected by contamination or stability issues, or where contamination may present a risk to the water environment, proposals must be accompanied by a report which:

shows that investigations have been carried out to work out the nature and extent of contamination or stability issues and the possible effect it may have on the development and its future users, the natural and historic environment; and

sets out detailed measures to allow the development to go ahead safely, including, as appropriate:

- *removing the contamination;*
- *treating the contamination;*
- *protecting or separating the development from the effects of the contamination; and*
- *addressing land stability issues resulting from former coal mining activities.*

Where measures are needed to allow the development to go ahead safely, these will be required as a condition of any planning permission."

With this in mind, we will outline potential impacts that this scheme could have on the surrounding environment in our response below and highlight the importance of aligning the proposals with the current local policies. We advise that these points should be addressed before the LPA considers this scheme for approval. Our concerns relate to the following:

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Impacts Upon Biodiversity:
The Ecological Impact Assessment (EcIA) submitted by the Applicant details that the application Site is located c.600m north-west of Dearne Valley Wetlands Site of Special Scientific Interest (SSSI). The survey area falls within the Impact Risk Zone (IRZ) of this SSSI. The EcIA clearly addresses the potential impacts the development could have on Dearne Valley Wetlands SSSI and YWT are satisfied with the Applicant's reasoning as to why it is not expected that the development would have any noticeable impact on Dearne Valley Wetlands SSSI. However, as has been highlighted within the EcIA, impacts from pollution are yet to be considered by the Applicant. The Applicant's Planning Application Form highlights that the fact that the proposals are situated on land known to be contaminated, therefore an appropriate contamination risk assessment is required to be submitted.

The Applicant's Flood Risk Assessment & Drainage Strategy confirms that the Site resides within the River Dearne operational catchment to which the Site is initially connected to via the River Dove. YWT Doveside Reserve, significant for its floodplain grazing marsh habitats, is located within the flood plain of the River Dove. YWT have concerns regarding the potential for contaminated surface water to makes its way into the wider environment and negatively impact upon the above-mentioned, ecologically sensitive sites. The contamination risk assessment should locate any areas of contaminated land within the Site boundary and provide a mitigation strategy that ensures measures are put in place to either contain or remove any contaminated features from the Site. It is of utmost importance that a suitable strategy with regards to contaminated land be implemented in conjunction with the proposed surface water drainage strategy which, at present, recommends that surface water is to discharge through a connection into the surface water sewer located to the southeast of the site, in George Street.

Due to the increased risk of contaminated surface water associated with residential developments of this size (during both the construction and operational phases), there is considerable concern relating to the impacts of the scheme on the surrounding, natural environment should polluted, discharged water make its way into the local water network. In this instance, and in the absence of further investigation, pollution events could be significant and the Trust request that a Construction Environmental Management Plan (CEMP) be prepared which describes the robust pollution prevention mitigation measures necessary to deal with risks to groundwater posed both by the construction phase and operational phase of the development.

The Site's western boundary is situated immediately adjacent to the designated Green Belt. With the Local Plan confirming that areas of Green Belt have been released to accommodate for increased

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employment and residential requirements, it is important that developments minimise their impacts on the retained Green Belt where possible. YWT welcome the current landscaping, which describes a minimum 5m buffer between the Site boundary and the dwellings/street infrastructure. However, we note that this buffer is comprised of "open space" in some sections and therefore the effectiveness of the buffer will be reduced in limiting impacts on the neighbouring Green Belt, especially in regards to recreational, noise and light related pressures. The Trust requests that additional buffer planting, particularly along the Site's western boundary, be proposed by the Applicant to further reduce impacts on neighbouring Green Belt habitats and increase connectivity between the Site and the wider environment. The EcIA details that *"no lighting will be directed at the western boundary of the site"*. The Trust requests the Applicant includes a sensitive lighting scheme to support these proposals. This should include a finalised lighting plan based on the final design of the development and seek to incorporate sensitive landscaping and the placement of wildlife enhancement features into the overall Site design. The final lighting plan should aim to maintain and create dark corridors for light sensitive species, such as bats and nocturnal insects. We would advise that a Landscape and Ecological Management Plan (LEMP) be produced by the Applicant and secured through a condition, to further secure the provision and maintenance of these biodiversity protection measures.

Biodiversity Net Gain Strategy:
As a legal requirement, a Biodiversity Impact Assessment (BIA) and Biodiversity Net Gain (BNG) Metric, alongside a robust Habitat Condition Assessment, should be submitted by the Applicant to demonstrate that on-site habitats are left in a measurably better state (under the Environment Act 2021[2] this should be a minimum of 10% net gain) than in their current condition prior to the development. A BIA has been included within the Applicant's EcIA, with both the HCA and BNG Metric being submitted separately to the planning portal. It is noted that the Applicant aims to offset their biodiversity deficits on off-site land, which YWT considers disappointing given the EcIA describes how the use of the Site for offsetting *"would be beneficial to the Dearne Valley Green Heart Nature Improvement Area[3]"*. BNG could also be used as an opportunity to enhance the ecological functionality of the Site for species present within the River Dove and YWT's Doveside Reserve.

The Applicant's HCA cover sheet has not been filled in, with the survey date(s) and weather conditions not available. The BIA describes that "*given the time of year the survey was undertaken, the below* (baseline habitat calculations) *is a guideline only".* The Trust requests that further information be provided in support of such an application, with update surveys carried out during

[2] Environment Act 2021
[3] DVGH Nature Improvement Area

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the correct time of year to inform a robust BIA for the proposed development. Such information should include an up-dated metric, demonstrating how a minimum of 10% BNG will be achieved and how trading rules will be met in relation to the identified off-site offsetting land. An updated BNG statement/report should also be provided by the Applicant, considering an increase in the provision of habitat creation on-site. This should be achieved through the Applicant aligning habitat proposals with the Biodiversity Gain Hierarchy and Principle 1 of BNG good practice[4]. YWT would welcome receipt of this update BIA, to allow for further review.

We would also advise that a Habitat Management and Monitoring Plan (HMMP) be produced by the Applicant, to further inform the monitoring and management of these proposed enhancements. The Trust urges the Applicant to further assess the impacts of the loss of the habitats from within the application Site and ask that the LPA takes into consideration how the resultant losses in biodiversity may be contrary to the relevant local policies.

We trust that you have found these comments useful and would be happy to be consulted again when these comments are addressed. Thank you for consulting Yorkshire Wildlife Trust

Kind regards,

The Planning Team
Yorkshire Wildlife Trust

planning@ywt.org.uk

[4] Biodiversity-Net-Gain-Principles.pdf