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BY EMAIL ONLY: developmentmanagement@barnsley.gov.uk

HYBRID PLANNING APPLICATIONS FOR LAND SOUTH OF BARUGH GREEN ROAD, BARNSELY (2021/1089 for the employment element and 2021/1090 for the residential element)

Many thanks for consulting Yorkshire Wildlife Trust regarding this hybrid application. Due to the large amount of documentation our comments are restricted to the Ecology Chapter of the Environmental Statement (ES) and the Biodiversity Net Gain (BNG) information. We are supportive of the LPA Ecology Team comments on these and other documents, including the BEMP, particularly with regard to the need to manage the retained ancient woodland and retained hedgerows on site.

We acknowledge that this is a site allocated in the Local Plan and trust that the Planning Authority will ensure full compliance with the requirements of the Barnsley West/ MU1 Masterplan Framework.

We consider that at present there are inconsistencies within the planning application and areas requiring more consideration prior to determination, as follows.

Biodiversity Net Gain

We have reviewed the BNG calculations and the development will result in a net loss of watercourse units. We note the documentation states that *'Any ditches lost will be fully compensated by 'Bioswales', which are coded in the area-based calculations in the Metric rather than in the linear waterbodies calculation. It is therefore considered that there will be no net loss of linear waterbody habitat albeit this will change in form from ecologically poor dry and seasonally wet ditches, to 'Bioswales' designed to provide as much ecological enhancement as possible. 67m of ditch habitat will be lost, to be replaced by 61m of Bioswale'*.

Section 3.2 of the Executive Summary states...*'The drainage strategy has also been revised, introducing smaller dry detention basins within the residential and employment parcels. These basins have been designed to be dry for the majority of the time, only holding water after intense downpours'*.

More information is required on the proposed bioswales, and whether these features will provide the same ecological function as the ditches lost – for example the ditch banks which may be absent from a bioswale could provide habitat for species such as water vole. Will the bioswales hold water all year, will they support aquatic vegetation etc?

It would be helpful to have the excel metric itself in order to allow full scrutiny of the figures.





We appreciate that a phased development is now proposed, which means that it should be possible for compensation for the loss of habitats to be in place prior to the later phases commencing.

However, we would like to ensure that each phase of the development is capable of delivering 10% BNG. It is not acceptable to rely on later phases to deliver the required BNG.

Ornithology

We have significant concern about the impact on breeding birds, particularly ground nesting species, given the arable and modified grassland habitats present within the application boundary.

The ES states that lapwing and skylark are both known to use the site for breeding and overwintering and will likely see residual impacts associated with displacement due to the complete loss of suitable habitat on site. This is concluded to be a major adverse residual impact at a Local level. Please can the applicant confirm how many breeding territories of each species are to be impacted. We would also like to check that surveys for willow tit have been completed, as the area is a stronghold for the species.

We do not agree with the statement '*The magnitude of this impact is difficult to quantify as the extent of displacement cannot be predicted with any scientific certainty*'. If the habitat is to be completely lost, then it is certain that impact will occur.

We understand that the phased approach to the development will mean the gradual displacement of ground nesting species, but there doesn't appear to be any compensation proposed for the loss of ground nesting bird habitat, and overwintering habitat for these species. It is essential that this is rectified prior to determination. Nb. We note the proposal to install 100 bird boxes but this will not provide compensatory habitat for ground nesting species.

Watercourses

The ES states that '*a small section of the stream located within the woodland areas to the north of Hermit Lane is likely to be culverted, to facilitate the creation of a development platform*'. It is our understanding that the Environment Agency generally opposes the culverting of watercourses due to adverse ecological and flood defence effects. This is also not in accordance with the MU1 allocation policy which states that the development should '*Retain, buffer and manage the watercourse, grassland and woodland north-east of Hermit Lane*'

Evidence should be provided that all alternatives to this have been exhausted. Should culverting be accepted as the only option, continuity of bankside vegetation is essential.





Ancient Woodland

We are pleased to see that ancient woodland is to be retained in line with the mitigation hierarchy due to its status as irreplaceable habitat as defined in the National Planning Policy Framework, and 15m buffer retained in order to provide adequate protection in line with standard guidance.

However, have the recreational impacts of such a large number of residential properties in close proximity to the retained ancient woodland been adequately assessed? Has sufficient management proposals been presented to ensure that this habitat is managed appropriately to maximise its biodiversity potential. We note that footpaths will be formalised to prevent desire lined but we are supportive of the LPA Ecology team comments in the requirement for the monitoring of recreational impacts. The management plan for this area should be adaptive in order to address any issues which arise.

With reference to the culverting proposals discussed above, confirmation that impacts to the woodland habitat as a result of this culverting proposal have been considered is also required. Does this woodland form part of the ancient woodland complex which has been described? We would strongly object to any impact to ancient woodland due to its status as irreplaceable habitat.

There is also some indication that impacts to parcels of woodland identified as ancient are included in the metric, which contradicts other documents. In the interests of transparency, the impacts on ancient woodland should be clarified and provided to consultees.

Recreational Impacts

In general, recreational impacts appear to have been under-estimated in the documents. The impact of 1560 dwellings, equating to perhaps 4500 new residents (conservative estimate three residents per dwelling) on the adjacent retained ancient woodland, Local Wildlife Sites and other habitats is likely to be considerable. Please refer to our research article on the types of management issues we encounter on our reserves. *Human Impacts on Nature Reserves – The Influence of Nearby Settlements, Fin Rylatt, Lauren Garside and Sara Robin 2017 CIEEM In practice magazine*
https://cieem.net/wp-content/uploads/2019/11/InPractice97_Sep2017_DiscUpdated.pdf

I trust these comments are helpful.

Kind regards,

The Planning Team





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