



Brooks Ecological
Unit A, 1 Station Road,
Guiseley
LS20 8BX

Dear Mr Mayne,

Following the Wildscapes CIC consultation response to planning application number 2021/1149 – Land off High Street, Great Houghton, further clarity has been provided through this letter and via updates to the EclA, Biodiversity Metric and landscaping proposals. Given the length of the consultation response, only the salient issues are addressed here, with the principal points of the response provided in bold type face by Wildscapes CIC used as topic headings.

Once this correction has been made the results are likely to show a larger net loss on-site.

This point relates to the split of the suburban mosaic habitat type into developed land; sealed surface and vegetated gardens at a ratio of 70:30, as per guidance. In this instance, given the proposed layout, it was feasible to accurately map the areas which will be occupied by developed land or vegetated gardens. As such, each habitat type has been measured accurately and accounted for separately in the metric. These areas have not been measured as one and are not subject to splitting using any ratio.

...which could be at least partially addressed by replacing some of the proposed non-native shrub planting with native species within the landscaping for the development.

If the corrected full calculation shows that some biodiversity units will need to be delivered off-site, this will need to be scoped out at the application stage i.e. potential sites and habitats will need to have been identified by the developer and assessed for their ability to deliver additional units as part of the submission at this stage.

Rather than addressing the shortfall in Biodiversity Habitat Units through replacement of ornamental landscape planting with native species further areas on site have been ascribed to be sown and appropriately managed with species rich grassland. This allows the site to deliver a minor net gain. Although we always encourage our clients to strive for at least 10% net gain, based on your advice that at present Barnsley will only pursue a 10% Net Gain in the regions Masterplan Framework Areas, no further compensation should be required.

Site Policy (SH90) requires retention and maintenance of the northern hedge, the retention of valuable hedges within any development and mature trees to be assessed for their ecological value with any valuable or veteran trees being retained.

The northern hedge will be retained almost in its entirety, a small break is required to allow the connection of footpaths through the site with the adjacent public right of way. All hedges were assessed against the Hedgerow Regulations (1997) criteria and



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none were found to be assessed as “important” under these regulations. This is reported on in the Preliminary Ecological Appraisal.

This has not yet been clarified that we can see.

A section of hedgerow to the north-east corner of the site is currently absent. This will be gapped up with native, species rich hedging as part of the landscaping proposals. Similarly, the gap to the north-west corner will be infilled. Furthermore, an additional section of new native, species rich hedge is proposed towards to southern end of the north-west boundary.

In summary there is still confusion and lack of consistency between the plans and documents regarding hedge removal/retention which needs to be clarified – both for decision making at this stage, but also to avoid errors on site if planning is granted. As removal of the northern hedge is contrary to the Site Policy, this clarity should be provided now to enable you to make an informed judgement on the impact of these proposals

We acknowledge that there has previously been some discrepancy between the various plans and reports produced for the site, arising from various documents being updated at different phases as a reaction to consultation responses and evolving proposals. We hope these matters have now been resolved in the all the latest iterations. The northern hedge will be retained, as will the majority of the central hedgerow and various sections along the north western boundary where removal is not required for access or visibility splays.

These should be indicated on plans now as integrated features are preferable to external boxes.

With the exception of the pole mounted barn owl box, it is intended to exclusively use integral bird and bat boxes around the site. The developer is committed to the provision of faunal features which will be set out in the Site's Biodiversity Enhancement and Management Plan which can be produced as a standard condition of planning, as per BS42020.

we recommend a final check for roosting Barn Owls before demolition of the barns – particularly if taking place during breeding season

The developer is in agreement with this Reasonable Avoidance Measure, its requirement will be detailed and committed to in the Site's Construction Environment Management Plan (Biodiversity) which can be produced as a standard condition of planning, as per BS42020.

The updated Site Layout plan shows a combination of timber and 'pier and panel' fencing' and brick walls and we cannot see any access provision for hedgehogs marked on this plan. We recommend that a series of 13cmx13cm holes are marked on the Site Layout plans (and other relevant plans) with the input of Brooks to create a hedgehog highway.

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The developer is committed to limiting the fragmentation of hedgehog foraging grounds. Access features will be included in all suitable garden fence panels which will be set out in the Site's Biodiversity Enhancement and Management Plan which can be produced as a standard condition of planning, as per BS42020.

I hope the above, and updated relevant reports, address all concerns raised by Wildscapes CIC but should you need any further information, please do not hesitate to contact us.

Best Wishes

For and on behalf of Brooks Ecological Ltd.

Sam Kitching BSc (Hons), MCIEEM,
Principal Ecologist



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