



PLANNING CONSULTATION RESPONSE

Application No	2025/0956
Proposal	Construction of single storey sectional concrete building for use as new storage
Address	3A Queens Drive, Old Town, Barnsley, S75 2QJ
Date of Consultation Reply	03/12/2025
Consultee	Katie Lawrence, Planning Ecologist

Consultation Assessment and Justification

Thank you for consulting me regarding the above application. My comments in relation to biodiversity are as follows:

- The statutory metric has been used to calculate the baseline and post-development values of the proposals. A statement and summary document has been provided in association with the metric. Can the applicant advise whether an ecologist undertook the calculation? Government guidance states that except for small developments using the Small Sites Metric (SSM), a developer should hire a competent person such as an ecologist to use the metric tool and advise on the metric tool's calculations (refer to: [Calculate biodiversity value with the statutory biodiversity metric - GOV.UK](#)). The qualifications of the person undertaking the calculation should be provided or alternatively the SSM should be used, with the person completing the SSM meeting the competencies as set out within the SSM User Guide.
- There is no condition assessment provided with the metric. Condition assessments should support the metric, indicating which condition assessment criterion have been passed/failed to achieve a condition of poor as indicated within the metric. If using the SSM, a condition assessment is not required as the condition of habitats is pre-set within the metric.
- The metric includes no developed areas. The proposed building should be taken into account within the metric, as do the other habitats which are included within the red line boundary which aren't to be impacted, such as the grassland and buildings to the north of the area where development is proposed.
- A plan showing the baseline habitats on site has not been submitted in association with the metric. Such a plan must be submitted as stated within the Biodiversity Net Gain Planning Practice Guidance: plan(s), drawn to an identified scale and showing the direction of North, showing onsite habitat existing on the date of application (or earlier proposed date), including any irreplaceable habitat (if applicable).
- Proposed habitat enhancement includes lowland meadows of poor condition. Lowland meadows is a very high distinctiveness habitat and the likelihood of achieving this habitat is unrealistic. Principle 7 of the Biodiversity Metric is that habitat interventions need to be realistic and deliverable within a relevant project timeframe. Lowland meadows are a habitat of principle importance under Section 41 of the Natural Environment and Rural Communities (NERC) Act and it considered unlikely that they can be created on-site. Reference should be made to the Statutory Biodiversity Metric User Guide which states that high and very high distinctiveness habitats have very specific environmental requirements to successfully establish and it should be proven how these requirements will be met. Reference should be made to habitat size, management and environmental conditions and habitat requirements.
- The enhancement of the existing grassland to other neutral grassland of poor/moderate condition is likely to be more realistic, but this depends on the use/disturbance of the grassland. Furthermore, enhancement of the grassland to other neutral grassland would be deemed to be significant, as per the government guidance, when medium distinctiveness habitats are proposed. If significant habitat enhancement is being proposed on-site, this will require a Habitat Management and Monitoring Plan (usually required as a planning condition)



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setting out how habitats will be managed for 30 years. The LPA will seek a monitoring fee to review the monitoring reports which are required by the LPA periodically over the 30-year management and monitoring period. Due to the small size of the site, the LPA would seek a monitoring fee of £5000. The fee would be secured as part of a section 106 agreement.

- Alternatively, consideration could be given to the planting of a small number of trees on site, which may achieve the required 10% net gain in biodiversity on-site. The LPA would not require a Habitat Management and Monitoring Plan if minor tree planting was proposed in this instance on the basis that management requirements of trees would be minimal. In this instance a 5-year Biodiversity Enhancement Management Plan (BEMP) would be sufficient and conditioned if planning permission was granted. If tree planting is not a suitable option, consideration could be given to the purchase of biodiversity units from a registered habitat bank, ideally within the LPA boundary.

NO OBJECTION*

**Defer for amends/further
information***

OBJECT*