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Sent By Email: ntucker@deloitte.co.uk

Trevor Mayne
Biodiversity Officer
Planning Policy Group
Barnsley Metropolitan Borough Council
1 Westgate
Western St
Barnsley
S70 2DR

CHELTENHAM
Second Floor
Darwin House
67 Rodney Road
Cheltenham
GL50 1HX
01242 903110

CARDIFF
02921 671900

CIRENCESTER
01285 740427

info@edp-uk.co.uk
www.edp-uk.co.uk

Dear Trevor

Project Reference: 2019/1244
Site: Darton Lane, Darton

The Environmental Dimension
Partnership Ltd. Registered as a
Limited Company in England and
Wales. Company No. 09102431.
Registered Office: Tithe Barn,
Barnsley Park Estate, Barnsley,
Cirencester, Gloucestershire
GL7 5EG

I write to inform you of our response to two sets of comments received from Wildscapes for the above application, received on 23.11.20 and 25.02.21. For ease, I have copied each comment and inserted our response to it below with reference to the appropriate section in the relevant updated document.

Comments Received 23.11.20

On the Ecology Appraisal (edp3487_r003)

Please could you provide confirmation and evidence that the Phase 1 survey and update, the NVC survey and update and the Biodiversity Net Gain calculations used in the Ecological Appraisal (October 2020) were carried out by a suitably competent ecologist.

All surveys have been carried out by Phil Quinn (MCIEEM) an experienced field ecologist with over twenty-nine years' experience of botanical survey and ecological site evaluation.

This has been updated to include Phil's CIEEM membership in paragraph 2.15.



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The Design and Access Statement (August 2019) references expectations written into the site allocation of Site HS2, including the retention of species-rich meadows to the west of the site, and retention of a buffer strip of vegetation adjacent to the disused railway line to the south. However the Indicative Site Layout map (Appendix EDP1) shows only partial retention of the meadows to the west, and there does not appear to be a buffer strip of vegetation running along the disused railway line. The proposed attenuation basin would provide a partial buffer.

The parameter plan has been updated to show an ecological buffer (Edward Architecture 0708 EA-A S20201130D). It does not form part of the ecology documents.

The Ecological Appraisal states (Section 2.3) that biological records were obtained from Sheffield Biological Records Centre, it should be clarified that these are records from Barnsley's biological records database which is hosted by Sheffield.

This has been clarified in paragraph 2.3.

The Ecological Appraisal scopes out bat surveys, however we find it surprising that given the likelihood of bats using the scrub and trees along the adjacent disused railway line, a suitable bat survey was not commissioned, particularly as the development design shows roads and houses backing straight onto the railway line without a buffer area (apart from the attenuation basin) which will cause disturbance to this species. The possibility of disturbance is acknowledged in Section 4.32 where a sympathetic lighting design is recommended. We recommend that suitable bat surveys are undertaken to inform the application.

With a sensitive lighting scheme devised to avoid lighting on the disused railway, there will be no significant impact on bats as the foraging habitat on the Site itself has very limited value. No bat surveys are therefore considered necessary. See Table 2.1. and paragraphs 4.29-4.33 within the update Ecological Appraisal.

The Ecological Appraisal scopes out badger surveys, Table 2.1 says no evidence of badger was returned during the desk study or seen on site and the summary of key ecological receptors in Section 3.37 does not mention badgers. However Section 3.31 says a single badger record in the vicinity of the site was returned, and Section 3.32 says that the railway cutting provides suitable badger habitat and that badger may use the site for foraging. We recommend that a suitable badger survey is undertaken to inform the application.

There are no badger setts on Site and no field evidence of badger has been found in any of the surveys conducted at the Site. It is possible that small numbers of badgers use the Site for foraging as part of a wider territory. Therefore, precautionary methods of working have been recommended for inclusion in the Ecological Construction Method Statement (ECMS). See Table EDP 2.1 and paragraphs 4.34 to 4.36.

The Ecological Appraisal determines that 1.9ha of MG5 type grassland to the west of the site [Fields 1 and 3 on the site plan] is classified as Lowland Meadows, a Priority Habitat, and we agree with this

assessment. The NVC study of other areas of grassland appears sound and we broadly agree with the results. We welcome the recommendation that these grasslands should be retained and enhanced. There is a suggestion that grasslands could be translocated but this does not appear to be developed further in the report.

The translocation of grasslands is no longer being considered as an option.

On the Biodiversity Impact Assessment (now appended to the Ecology Addendum; edp3487_r005)

The Biodiversity Impact Assessment (BIA) has now been removed from the Ecological Appraisal to avoid confusion. Everything in the BIA is now discussed within the Ecology Addendum only.

Tab A1 – Site Habitat Baseline - 1.91 Ha of semi-improved grassland corresponding with NVC category MG5 was noted as a Priority Habitat: Grasslands – Lowland Meadow in the Ecological Appraisal)... However this habitat has been entered into the Metric as Grassland – Other neutral grassland which gives Medium distinctiveness. The habitat should be entered as Grassland – Lowland meadows; altering the entry to the correct habitat gives a Very High distinctiveness and a likelihood of requiring bespoke compensation, with the 0.75Ha area that is scheduled to be retained and enhanced giving an Unacceptable Loss warning.

The baseline condition for this grassland has been entered on this tab as Moderate which is a reasonable assumption, although fuller information on the condition assessment would be useful.

This has now been updated to lowland meadow in moderate condition. More detail on the current and proposed habitat conditions are discussed and this has been added to the Ecology Addendum.

Tab A2 – Site Creation - We query the entry in Line 12, where the grassland around the SuDS pond is set to “match the MG5 communities of the retained grassland” – is the intention to create Lowland Meadow (in which case the Proposed habitat type needs to be amended) or is it to create a good quality neutral grassland? The two score differently.

It is to create lowland meadow and the BIA has been updated.

The Mixed Scrub connectivity has been scored as having Medium Ecological connectivity; following a paper from Natural England in August 2020 all connectivity is to be set to Low until Metric 3.0 is issued, so this will need to be amended.

All ecological connectivity has been changed to low.

1.57Ha of Urban-vegetated garden have been included as part of habitat creation. There is no explanatory note, but if this represents the gardens that will be attached to the residential units and privately owned, these should not be included in the calculations. This is because there is no ability to manage the habitats or condition of private garden areas so no guarantee that it will contribute to net gain on site.

It is correct that there is no ability to manage these habitats, that is why they're set to poor condition as standard. These habitats must be included otherwise there would be a numbers discrepancy and an error in calculation. There is an option for this habitat in the drop down tab, therefore they must be included.

1.1Ha of Developed land – sealed surface has been included; there is no explanatory note so it is not clear if this includes housing, roads or both. This should be clarified to ensure that all of the development area is accounted for in the calculations.

This habitat includes all sealed surfaces - housing and roads. As the project is at outline stage, we do not have further details and landscaping layouts to break this down further. All sealed surfaces are the same, there is no impact on score. The inclusion of additional trees, etc., will only improve score so setting it all to 'sealed surface' is a worst case scenario and appropriate for this outline stage.

Tab A3 – Site Enhancement - This tab pulls through the retained area of grassland from Tab A1, which has been wrongly categorised. When it is corrected to Grassland – Lowland Meadow, the calculation will be updated.

This has been updated.

Offsite Data - No offsite compensation sites have been proposed and thus there is no data available, meaning that Biodiversity Net Gain cannot be calculated.

This has been updated, see below comments.

On the Outline Ecological Management Plan (EMP; edp3487_r004)

The Outline Ecological Management Plan specifies that a LEMP will need to be conditioned. A CEMP should also be produced.

The production of an ECMS is already discussed in appraisal and paragraph 1.7 of the EMP.

The Outline EMP gives a general overview of how the site should be managed for biodiversity. The grassland management plan seems reasonable, however no positive target or keystone species are identified, although undesirable weeds are listed. It would be beneficial to list target species that would be monitored, for example the components of MG5 grassland could be included in the plan, or birdsfoot trefoil, important for the dingy skipper, a species of note which was mentioned in the Ecological Appraisal (Section 3.36). A species list for pond planting has been supplied and looks appropriate.

Further detail on desirable species and desired condition level has been added to the EMP in paragraph 2.10 but the key is not specific species but the grassland's affinity to the MG5 communities already present as already discussed in paragraph 2.9.

The Outline EMP does not specify the target condition of the retained grassland; Section 1.6 simply says 'improve the condition'. This needs quantifying using the BNG condition assessments. Similarly, 'establish new high quality wet grassland habitat and scrub within the proposed SuDS basin' will need to be amended to specify habitats, area and condition.

This has been updated to include the desired condition in section 1.6 of the EMP. Details on the habitat condition assessments of each habitat can be found in the Ecology Addendum.

Comments Received 25.01.21

Comments on the Ecology Addendum (edp3487_r005)

The identification of areas for offsetting is welcomed. Both areas are nearby and under the control of a Wildlife Trust. The off-site grassland habitats identified are appropriate as grassland is being lost on site. Information should be supplied to make clear that this proposed management is in line with the 'Additionality principle' of BNG, for example the proposed works are not already being funded from existing sources.

It is our understanding that the proposed works are not funded from any other source but this will need to be confirmed with Yorkshire Wildlife Trust (YWT).

It is not clear where the baseline information for the off-site offsetting information has been derived from. Please could you confirm the source and recency of the baseline botanical information provided for Wilthorpe (Barnsley) Canal, and that the habitat has been assessed by a suitably competent ecologist. The baseline condition also needs to be assessed using the BNG Technical Supplement – it is not clear that this has been done.

Both areas have been assessed by YWT staff or volunteers, not ecologists. It has been assessed by us using the BNG supplement but on a precautionary basis due to lack of detailed survey information.

The baseline botanical information provided for Smithies Marsh is insufficient to confirm that the baseline habitat and condition has been correctly identified. As it is possible from the description that the site could be classed as Lowland Meadow (a priority habitat), we suggest that an up to date botanical survey is carried out in the spring to correctly assess the baseline habitat, and condition assessed using the technical supplement. Alternatively, a precautionary approach could be taken where the habitat is entered into the metric as Grassland - Lowland Meadows with the condition assessed as Fairly Poor, given the description of poaching and over-grazing.

This has been set as lowland meadow in poor condition as a precaution. See paragraph 3.4.

We would normally expect a habitat map of the offsetting site(s) to be provided. The map attached to the Ecology Addendum highlights the areas for target work. Are these areas completely homogenous?

If so this map may be acceptable to the LPA Ecologist. If not, then a more detailed habitat map should be produced that can be cross-checked with the baseline provided in the Metric.

YWT do not have extensive enough survey information for this to be produced.

Sections 3.2 and 3.4 state that condition will improve on the target sites after the areas are enhanced/managed. A monitoring program will need to be put in place to show how condition will be assessed against target. The temporal multipliers in the Metric show that Lowland Meadow takes 12 years to move from Fairly Poor to Fairly Good condition. An email from Nolan Tucker shows that the YWT lease for Wilthorpe Canal expires in 2028; how will the management plan be enacted after this date?

Discussions are currently ongoing between YWT and Barnsley Metropolitan District Council (BMDC) about extension of the lease for both areas of land for another 30 years. If an agreement is reached and YWT will implement the mitigation long term then this should be sufficient as a guarantee.

On the BIA (appended to the Ecology Addendum)

No changes have been made in Metric Version 1.6 to the on-site baseline or post development habitats; therefore our comments on the Metric in our letter dated 23/11/2020 have not yet been addressed. The headline net gain/loss calculations will not be accurate until the alterations suggested in our previous letter are made, or the LPA Ecologist agrees that they can remain as they are. Therefore, this analysis only covers the off-site habitat baseline and habitat creation/enhancement as presented in the updated Metric.

The BIA has been updated to include all of the previous comments.

Off-site baseline: *in the Ecology Addendum, the 1Ha area of Wilthorpe Canal has been described as Lowland Meadow, however this has been entered into the Metric as Grassland – other neutral grassland. This should be changed to Grassland – lowland meadow.*

This has been changed to lowland meadow.

As in the comments above, the habitat assessment of Grassland - other neutral grassland for a 2.5Ha area of Smithy's Marsh needs to be confirmed through survey, or amended to Grassland – lowland meadow following a precautionary principle.

The precautionary measure has been taken as we do not have recent survey data.

The condition assessments of Fairly Poor for both parcels should be evidenced through use of the Technical Supplement – for example including a table showing how the parcels meet or do not meet the assessment criteria.

Text on condition assessments of the biodiversity offsetting areas has been added to the Ecology Addendum.

Ecological Connectivity has been set as Medium. A consultation response issued by Natural England in August 2020 made the decision to set Ecological Connectivity as 'Low' for all habitats until the next version of the Metric is issued. Accordingly, the connectivity should be changed to Low.

This has been changed.

Off-site enhancement: *in the Ecology Addendum, the target habitat is described as Lowland Meadow for both parcels. In the Metric the proposed habitat has been set as Grassland – other neutral grassland. This should be changed to Grassland – lowland meadow.*

This has been changed.

Again, following the guidance from Natural England, the Ecological Connectivity score should be set to Low.

This has been changed.

The compensation appears to be inside LPA or NCA, or deemed to be sufficiently local, to the site of biodiversity loss – the LPA Ecologist can confirm this.

I trust this letter and the updated document provides you with all you require at this stage.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Vicky Fletcher', with a long, sweeping horizontal line underneath.

Vicky Fletcher BSc (Hons), PhD, ACIEEM

Senior Ecologist

Mobile: 07468 691423

Email: vickyf@edp-uk.co.uk