



**Sheffield &
Rotherham**

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Date: 20th Sept 2017

Dear Rob

**Response on behalf of Sheffield and Rotherham Wildlife Trust
To Planning Application: 14/01079/OUT:**

'Erection of a motorway service area including proposed facilities building, hotel, filling station, parking facilities for all vehicles, access and circulation internal roads, structured and natural landscaping with outside picnic space and dog walking area, associated infrastructure and earthworks (Town and Country Planning (EIA) Regulations 2011 Schedule 2 proposal) | Smithy Wood Cowley Hill (Adjoining Junction 35 Of M1 Motorway) Sheffield 35'.

On behalf of Sheffield & Rotherham Wildlife Trust (SRWT), I write to lodge in the strongest terms our continued objection to the proposals for a new Motorway Service Area (MSA) at Smithy Wood, Junction 35 of the M1 motorway.

I write with reference to the recent correspondence with yourself and MSA Extras' representatives, especially in relations to the submitted application at junction 33, that have been recently added to the Council's planning portal.

As you will be aware, it is set out in Government Guidance that when determining this type of application it is critically important that the Council carefully considers the need for and benefits of the development itself and whether these clearly outweigh the loss of this ecologically important site in green belt.

I would like to re-iterate and add to a number of points made in our four previous objections to this proposal at Junction 35:

- Smithy Wood is a Local Wildlife Site, an ancient woodland site registered on the National Ancient Woodland Inventory and protected as Sheffield City Green Belt. Within NPPF and Local Plan policies these designations offer some of the highest protection possible for land of conservation importance.
- There is negligible driver welfare and safety 'need for and benefit of' an MSA at this location. Our previous documents provided additional data in this respect and I refer you to those.
- Irrespective of 'need' for an MSA on this stretch of the M1, which we continue to dispute, the application at Junction 33, whether successful or otherwise, demonstrates that this proposal at Junction 35 fails key planning tests for development on Ancient Woodland/Green Belt/Local Wildlife Site:
 - Can the site be Avoided? *Yes, clearly it can. There are alternatives.*
 - Are these 'very special circumstances'? *No, clearly they are not. There is nothing 'special' about this application.*

Junction 33 may not be an alternative for MSA Extra, who do not own or have rights over land there as far as we understand, but that is irrelevant. Smithy Wood can be Avoided.

- Government Guidance states that discussions on compensation *should not form part of the assessment of the merits of the proposal.* Ancient woodland is irreplaceable and so by definition harm or loss cannot be mitigated or compensated for. This has been re-stated by Natural England, again please refer to their letter dated November 2015, who also add '*Natural England consider that the irreplaceable loss of an area of ancient woodland of this size cannot be compensated for by new woodland planting or by management of existing woodland.*'
- The Strategic Benefits Plan is put forward as a proposal to 'offset the environmental effects' and offer 'compensation measures' for the residual harm caused by loss of Ancient Woodland. But to re-state - loss of Ancient Woodland cannot be compensated for. The plan also offers no certainty of benefit to Sheffield's wildlife nor to local people. Please refer to our previous correspondence for more detail.

I would also like to highlight again the hundreds of people and organisations who have written in to object to this proposal. Sheffield's ancient woodland, Local Wildlife Sites and Green Belt are key to supporting a good quality of life for local people.

This application is opportunistic based on land value. It is about significantly increasing the financial value of private land by significantly decreasing the environmental and amenity value of the site for wildlife and local people.

Smithy Wood and adjacent Local Wildlife Sites can be better managed and better protected for people and wildlife in the future. Without this development there are the resources and

grants available to invest in this woodland in order to secure the site for wildlife, local people and future generations to enjoy. We are committed to this vision for Smithy Wood.

I urge the Council to refuse this application in the near future.

If you require any further information on any of the points raised, please do not hesitate to contact me.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Liz Ballard', with a stylized flourish at the end.

Liz Ballard
Chief Executive
Sheffield and Rotherham Wildlife Trust