



**Sheffield &
Rotherham**

Sheffield & Rotherham Wildlife Trust

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For nature, for everyone

1st October 2019

19/03143/FUL Erection of 72no. dwellings, formation of access road, associated landscaping works and open space works | Land Off Moorthorpe Way Sheffield S20 6PD

Dear Mr Baxter

I am writing on behalf of Sheffield & Rotherham Wildlife Trust, which is a local charity and company limited by guarantee whose vision is *'to see a living landscape – an amazing, green landscape for the wildlife and people of Sheffield and Rotherham which is understood, enjoyed and cared for by local people and organisations.'* We are led by a Board of 13 Trustees elected by our membership. We employ over 30 local people and have over 50 regular volunteers as well as a wider community of occasional volunteers. We have nearly 6,000 local members and manage 16 Nature Reserves in Sheffield and Rotherham.

Objection

We are currently objecting to this application for the reasons set out below. However, if our concerns can be adequately addressed, we will consider removing our objection.

We do accept that this Site E, as well as Sites C and D (not included in this application) are on land which has been allocated for housing within the 1998 Sheffield Unitary Development Plan and that SCC have to provide a supply of housing land. However, it would have been preferable for Sheffield City Council to hold back on selling this land for development, until after a new Local Plan had been published (at least in draft format) which would have provided a more up to date assessment of the need for this substantial greenfield site to be allocated for housing. Although Site E is not designated for its ecological value, as a greenfield site that has established over many years, it clearly does have value – both ecologically and as a green space enjoyed by the existing local residents. This is evident from the number and nature of the objections and for the formation of a local action group in response to the proposed developments.

The Planning and Design Brief (2014 and updated 2017) identifies a number of ecological constraints and opportunities (p17-18) but in our opinion, these have not been sufficiently carried through into this first application.

Reasons for current objection

- 1. Insufficient Ecological Information - including the lack of an impact assessment**





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A Preliminary Ecological Appraisal (PEA) was carried out in February 2019 by consultant ecologists BWB. BWB are very clear that this is only a preliminary appraisal and that a suite of further ecological surveys is required in order to gather sufficient information for an Ecological Impact Assessment (EclA). BWB also note the constraint of February being outside of the optimum season for undertaking botanical surveys. Surveys recommended were: botanical (in season), badger, bat activity, breeding bird and reptile – we support all these recommendations. For this site, we would also like BWB to include a record search from both the South Yorkshire Badger Group and South Yorkshire Bat Group as part of their next suite of survey and reporting. We also recommend a fungi survey this season if possible.

DLP Planning have incorrectly stated in section 6.17 of their Planning Statement that “*an Ecological Impact Assessment has been prepared by BWB and a Phase 1 Habitat Survey was carried out*”.

Here is an extract from the CIEEM guidance¹ detailing the difference between a PEA and an EclA the latter of which should have been prepared to accompany this planning application. It is unclear whether the additional surveys have been carried out this season (and are just not available on the planning portal) or not, but they do need to be carried out *before* the application is considered, and *not* conditioned as they may provide information that is pertinent to the layout, decision and any conditions.

Extracted from the CIEEM guidelines. “*The results of a PEA can be presented in a Preliminary Ecological Appraisal Report (PEAR). The primary audience for a PEAR is the client or developer and relevant members of the project team, such as the architect, planning consultant, and landscape architect. It is normally produced to inform a developer (or other client), and their design team, about the key ecological constraints and opportunities associated with a project, possible mitigation requirements and any detailed further surveys required to inform an Ecological Impact Assessment (EclA). Under normal circumstances it is not appropriate to submit a PEAR in support of a planning application because the scope of a PEAR is unlikely to fully meet planning authority requirements in respect of biodiversity policy and implications for protected species.*” “*A PEA is normally used to inform an Ecological Impact Assessment (EclA). In the context of these guidelines, EclA is defined as the process of identifying, quantifying and evaluating the potential effects of development-related or other proposed actions on habitats, species and ecosystems. These guidelines should be read in conjunction with CIEEM’s Guidelines for Ecological Impact Assessment in the UK and Ireland*”².”

¹ <https://cieem.net/wp-content/uploads/2019/02/Guidelines-for-Preliminary-Ecological-Appraisal-Jan2018-1.pdf>

² <https://cieem.net/resource/guidelines-for-ecological-impact-assessment-ecia>





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The pre-application advice states that there is likely to be a significant impact on the landscape and ecology of the site and the applicant should include proposals to mitigate and compensate for the impact. We would like to see an EclA which fully considers the impacts of such a large development on a greenfield site. The additional surveys should collect sufficient data for a Biodiversity Net Gain assessment (using the [Defra 2.0 metric](#)³ tool) and this should be included as part of the EclA. One example of further guidance is available from [CIRIA](#)⁴. There is an assumption in this application about the buffer zone and landscaping proposals “*this represents a biodiversity enhancement within the site*” (section 6.44 of the Statement of Community Involvement) but there is no evidence to back this statement up in the PEA.

The PEA also states the development is the risk zone of a number of SSSIs and that an assessment and consultation with Natural England is required – this has not been carried out (or has not been made publicly available) and again needs to be undertaken *before* a planning decision can be made.

Given the points made above, and the fact that the wider site will be over 5ha and over 150 houses in total (EIA thresholds for housing updated in 2017⁵)– we would like to see the wider site subject to an Environmental Impact Assessment, of which the EclA will form a component.

The Arboricultural Survey also recommends that “*an Arboricultural Impact Assessment and associated Tree Protection/Removal Plans should be produced once development plans for the Site have been finalised.*” We support this.

2. **Lack of clarity on buffer zones around the Local Wildlife Sites.**

We note that the application includes a 15m buffer zone from the Ancient Woodland around Ochre Dyke in the Local Wildlife Site (number 266 Owlthorpe). We welcome this and the extended areas of open space along some of this buffer, but would like to see clearly on a map where the buffer zone is in relation to the tree trunks/ canopy/LWS boundary/ancient woodland boundary or fence-line – to ensure that a conservative approach is being taken of at least 15m from any one point. We would also like to see a similar buffer zone for the area of Local Wildlife Site (number 266 Owlthorpe) to the west of the site. No buffer for this edge is mentioned at all or indicated on the plans and having

³ <http://publications.naturalengland.org.uk/publication/5850908674228224>

⁴ <https://www.ciria.org/ItemDetail?iProductCode=C776F&Category=FREEPUBS>

⁵ <https://www.freeths.co.uk/2015/05/06/environment-bulletin-recent-changes-to-the-environmental-impact-assessment-eia-thresholds/>





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visited the site, it is unclear where the exact boundary is. There are some trees, hedgerows and shrubs in this area and if these could be left as a natural buffer zone, that would be the preference – although again a clear diagram or map showing the boundaries and buffer zone and vegetation to be retained is required. Anyone involved in clearing any land on Site E would need to be clear on these buffer zones - for example, they could not form part of the construction footprint. Buffer zones to protect LWS are particularly important as we know that housing can have a negative impact on protected sites in close proximity. For example – see the study by Rylatt, Garside and Robin (Sep 2017 CIEEM 'In Practice' no.97) detailing the negative impacts of housing on nature reserves (pdf available on request). The Preliminary Ecological Assessment for this application suggests that if the application was approved, the LWS will require mitigation measures and more detail is required about what these measures would be. We would like to see this included in an EclA.

We appreciate that Sheffield City Council are in the process of renewing their planning policies, but the current Core Strategy includes policies to protect the Strategic Green Network (CS73) from development and the draft 'City Policies and Sites Pre-submission Plan' (2013) includes the Policy G1 which states:

"Local Nature Sites will be protected and enhanced and Local Nature Reserves will also be maintained for their wildlife value, for community use and as an educational resource. Development that would significantly harm their wildlife or geological value, either directly or indirectly, will not be permitted other than in exceptional circumstances, when the developer will be required to:

e. ensure the loss is kept to a minimum and include measures to mitigate any harm; and

f. compensate for any loss by creating or enhancing habitats of equal or greater value elsewhere within the site or nearby, and recording of features of geological significance that would be unavoidably lost or damaged.

g. carry out any compensatory measures before the accepted damage takes place."

- 3. Lack of a Green Infrastructure and ecological network plan for this and the wider site.** This and the forthcoming housing developments on Sites C and D will result in a loss of a large area of greenspace. As stated in point 1 above, as the wider site is over 5ha (C, D and E together), it meets the threshold for an Environmental Impact Assessment and we think that Sheffield City Council should facilitate an EIA for the whole site. Together, the EIA and the suite of ecological survey information (see point 1) should be used to inform a Masterplan and Biodiversity Net Gain assessment for the whole site. We would like to be consulted on these stages. The indicative Masterplan (Figure 20 of the Planning and Design Brief 2017 version) shows some indicative green links which is a start but it is unclear if these





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are continuous or what habitat they area. The Planning Statement says (4.17) *“The majority of the public open space for the scheme will be provided as part of a **green infrastructure framework** for the wider site. We would also like to see green links through the middle of the development in the form of, for example, native street trees, native shrubs and native wildflower verges. This phase of the development will deliver new play equipment in the form of a LEAP and Multi-Use Games Area (MUGA) to the south east of the site, which will form part of a wedge of green space between future phases of development and the existing Moorthorpe Rise development.”* We welcome this but have not seen this **green infrastructure framework** in the public domain? Please see my comments below about natural play. We note the pre-application advice from SCC says *“Consideration should be given to softer boundaries to the green edges of the site such as hedges...Tree planting would help to create green fingers extending into the site connecting with the woodland.”* We support this and would like to see the detail.

If our major concerns detailed in the three points above can be addressed and the application is to be approved – we have the following recommendations, some of which may be suitable to condition.

- **Trees.** We support all the recommendation made in the Arboricultural Survey - including the retention of the category A and B trees, and have already mentioned the need for more detailed tree plans. We note that some of the periphery trees are to be retained in the design but recommend that any mature trees lost should be replaced by three young ones, to address loss of carbon sequestration and related biodiversity benefits. These should be native trees from a reputable supplier who take appropriate biosecurity measures.
- **Management of the woodland buffer** as part of the landscape plan to benefit the red listed bird the willow tit as this is a potentially important corridor for this species. As tree thinning (which is needed) takes place ‘willow tit stumps’ can left in situ. Sheffield and Rotherham Wildlife Trust or Angus Hunter from the SCC Ecology Unit can advise on the details.
- We would like to see an **orchid translocation plan** – the current location of the orchids should be mapped and expert opinion sought on the translocation process as it is not always straightforward (e.g. from Plantlife or British Orchids <http://britishorchids.co.uk/translocation-of-pyramidal-orchids/>)
- **Green Roofs** What has happened to *“The approach should include the incorporation of green roofs on as many homes as possible”* in the Planning and Design Brief (updated 2017)? We would like to see these designed into the scheme, in line with SCC’s [Guideline CC1 in the Climate Change and Design SPD](#).





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- **Ecologically sensitive lighting would be required for this scheme** – especially at the buffer zones with the Local Wildlife Site/ancient woodland. This can include directional lighting using cowels to insure zero light spill into the ancient woodland. Details of an ecologically sensitive lighting plan (including a requirement for post-development checks) should be included within an Ecological Design Strategy (EDS) and required as a condition of any planning consent
- BWB have recommended a breeding bird survey and a bat activity transect so we do not yet know the results of these surveys. However local residents have reported several bird species including: buzzards, sparrowhawks, green woodpeckers, common whitethroats, thrush, red-legged partridges, and barn owls (foraging ground). We would like to see mitigation for loss of barn owl foraging habitat. The Barn Owl Trust have information on how to manage land for barn owls <https://www.barnowltrust.org.uk/how-to-manage-land-for-barn-owls/>
- We also ask for **bird and bat boxes** to be integrated into buildings throughout the development. Integrated bat (and bird) boxes have been shown to be effective and can be purchased for as little as £30/ box (e.g. <https://www.nhbs.com/build-in-woodstone-bat-box>). Were at least one appropriately sited integrated box per dwelling be incorporated in what are expected to be tightly sealed new dwellings, then it would be reasonable to expect that the new development would support populations of roosting bats and nesting birds (such as the house sparrow). Details of including the integrated boxes should be included within an Ecological Design Strategy (EDS) and required as a condition of any planning consent
- We also request for a '**hedgehog highway**' to be implemented in the scheme, by creating suitable sized holes (13cm/5 inches square) at the bottom of fences, or preferably using hedges instead of fencing to allow hedgehogs to move freely throughout the site. An example of a hedgehog highway for large housing developments can be found on the SCC planning portal, ref number: [17/01443/FUL](https://www.scc.gov.uk/planning/17/01443/FUL)
- We support the Campaign to Protect Rural England's additional views that the newbuild homes should be very low carbon (preferably Passivhaus or equivalent) and that the overall density could be increased with an enhanced design to encourage active modes of travel.
- LEAP play area. Wooden play equipment would be preferable over metal or plastic in this setting and we are pleased to see timber equipment suggested such as the Timber Junior Swing, Amazon and Playspace 3 and no metal fencing. However, we suggest in addition some additional '**natural play**' elements that could be factored into the landscape plan for this area. Playspaces which use more natural elements such as vegetation, landform and sand provide more opportunities for play i.e. they have a higher play value (research undertaken by the University





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of Sheffield⁶) and look good. For examples in Sheffield, visit the following: Dyke Vale Road; Tannery Park; Manor Castle grounds; or Heeley Millennium Park. These sites show that playful elements should be built into the landscape as a whole, rather than designated solely within a formal 'play area'. A native wildflower area could also be part of the landscape plan here – this would require no topsoil and a suitable seed source – either from a SCC meadow or a reputable supplier such as [Emorsgate](#) or [Naturescape](#)

- **SUDS** – we support the pre-application advice and recommend natural swales to be designed in consultation with Roger Nowell at SCC. We agree that these require management on an on-going basis – this could be part of a wider Ecological Management Plan – see below.
- We would like to see an **Ecological Management Plan** as a planning condition for the whole site. We would like this to be managed by an organisation which has ecological knowledge (rather than just landscape/grounds maintenance) and the ability to involve local people (including Owlthorpe Community Forum) through a stakeholder group or similar given the level of local interest. SRWT and our consultancy arm Wildscapes may be suitable candidates to consider. **This would need to be funded** by S106/CIL/a small annual household levy.

This concluded my comments at this stage. We reserve the right to comment on further revisions or plans submitted in relation to this application and are happy to be further consulted on this scheme.

Yours sincerely

Nicky Rivers

Dr Nicola Rivers

Living Landscape Development Manager

⁶ Woolley, H. and Lowe, A. (2013) Exploring the relationship between design approach and play value of outdoor play spaces. *Landscape Research* 38(1) 53-74.

