



Sheffield & Rotherham Wildlife Trust

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For nature, for everyone

4th February 2020

Dear Ms Hope

Hollin Busk 17/04673/OUT SRWT response no.4 04/02/2020

We still object to this application for the reasons set out in our previous and still relevant submissions of 21st Jan 2018, 25th Jan 2018 and 8th February 2019 namely the site is **not currently allocated for housing – it is allocated as open space** (see previous responses for more details on this) with several local policies supporting it remaining as open space.

Biodiversity Net Gain – since the application was first submitted, the February 2019 update to the NPPF¹, Policy 170 says “Planning policies and decisions should contribute to and enhance the nature and local environment by” “d) Minimising impacts on and **providing net gains for biodiversity**”. I was therefore surprised not to see this referred to in the January 2020 Ecology report and would expect this to be specifically addressed.

Flood risk and hydrology - I cannot see the responses from the Environment Agency or SCC Drainage teams on the planning portal, but I hope that the concerns from local people about flooding on the site and in the area and fully taken into account.

Carbon reduction. With both SCC and Sheffield City Region declaring a climate emergency and the Government setting a target of net zero carbon by 2050, it is essential that all new developments take significant steps to have a minimal carbon footprint. This could include zero carbon homes and sustainable travel infrastructure – especially important in a site like where most journeys are likely to be made by car. We cannot see reference to any national or local climate change targets or policies in and expect that the planning officer will ask for this to be addressed.

Buffer zone to Fox Glen LWS. We disagree there would be no impacts on this LWS from an increased recreational pressure. We note that the proposed development has reduced in size from 93 to 85 dwellings in the modified design. The email update also says that the new “*illustrative masterplan has been revised in order to provide a number of scheme enhancements including: pulling back the northern development boundary and including additional planting.*” However, when I compare the new plan with the original plan, it looks to me as if the northern-most four plots are nearer to Fox Glen than before,

¹ www.gov.uk/government/publications/national-planning-policy-framework--2





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although I note what I assume is a buffer hedgerow on the illustration. Can the buffer zone and implementation of it (including during construction) be clarified – at least in a condition? The hedgerow should be a native hedgerow. It looks like there is now vehicular access to Fox Glen at the point as well. I can understand the desire for access for woodland and SUDS maintenance, but consideration will be required to ensure this is not used as a route for fly tipping.

Ecological mitigation. *If* the application is to be granted, then we would like the mitigation points in our previous submissions to still be considered and will reiterate these below. We note that the ecological mitigation suggested in the Jan 2020 Ecology report includes the creation of **species-rich grassland and wetland in the balancing pond, native scrub and tree planting, bird and bat boxes, low level lighting and a long-term ecological management plan.** We support these suggestions and would like to see them all as planning conditions and add details to these below which could be incorporated into conditions or sign-off by the SCC Ecology Unit as appropriate.

The species-rich grassland will require early discussions with the Ecology Unit, no topsoil and a suitable seed source – either from a SCC meadow or a reputable supplier such as [Emorsgate](#) or [Naturescape](#). Long-term sustainable management of the grassland will need to be considered.

We 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

Swift bricks could also be included. As swifts and sparrows nest in groups, nest bricks should be clustered in suitable areas of the development, two to four bricks per dwelling, resulting in an equal number overall of nest sites and residential units^{2,3}. An impartial booklet, 'Facts about Swift Bricks' (Newell 2019a) listing many brands and suppliers can be downloaded from the Action for Swifts website ([Action for Swifts website](#)).

Low level lighting. A condition could be made for an ecologically sensitive lighting plan, to include zero light spill into Fox Glen with the requirement for post-development checks. Reference can be made to

² Day J., Mayer, E. and Newell, D. (2019) *In Practice* CIEEM 104 p38-42

³ Gunnel, K., Murphy, B. and Williams, C. (2013) [Designing for biodiversity: a technical guide for new and existing buildings 2nd ed](#) Bat Conservation Trust and RIBA Publishing London





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[‘Bats and artificial lighting in the UK’](#)⁴ – joint publication by the Institution of Lighting Professionals and Bat Conservation Trust

Hedgehogs are not mentioned in the mitigation. We would also like to addition of safe route for hedgehogs as per our previous submission and highlighted in [government guidance](#) as an example of how biodiversity net gain can be achieved. We request 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](#).

Natural play. We would like to see at least some of the play features to be ‘natural play’ – a number of elements could be factored into the landscape plan. For examples in Sheffield, visit the following: Manor Castle grounds; Heeley Millennium Park; Dyke Vale Road or Tannery Park. These sites show that playful elements should be built into the landscape as a whole, rather than designated within a formal ‘play area’ traditional metal equipment on hardstanding or a rubber carpet with a fence around it. Playspaces which use more natural elements such as vegetation, landform and sand provide more opportunities for play and look good, i.e. they have a higher play value (research undertaken by the University of Sheffield⁵). Wooden play equipment would be preferable over metal or plastic in this setting.

This concludes our comments at this stage. We reserve the right to comment on further revisions or plans submitted in relation to this application and would appreciate involvement in any discussion of the matters raised above.

Yours sincerely

Dr Nicola Rivers

Living Landscape Development Manager

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⁴ www.theilp.org.uk/documents/guidance-note-8-bats-and-artificial-lighting/

⁵ 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.





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