



Sheffield & Rotherham Wildlife Trust

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For nature, for everyone

12th February 2020

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

This submission is a response to the additional documents uploaded in January and should be read in conjunction with our previous submission 1/10/19 which still stands.

One of our previous reasons for objecting was the lack of ecological information. We accept that this information has now been made available in the form of an Ecological Impact Assessment (EclA) as requested and an Aboricultural Impact Assessment, and thank you for allowing us the opportunity to comment on the reports. Our comments are below.

Objection

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

1. **Reconsideration of the land allocation as part of the new Sheffield Plan?**

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, as stated in our previous response, 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 still be allocated for housing. This way the sale of the site and subsequent development would have been led by need and up to date policy and plans, rather than dated policy and plans and possible land disposal pressures. However, we appreciate that Site E has now been sold for development (this application) and it may be now only be possible to re-assess the remaining sites C and D.

In the Full Council Meeting of 12/6/19 – a motion in relation to the forthcoming revised Local Plan was carried including the following paragraph. *“(f) believes that it is of the upmost importance that Sheffield gets the right plan to build homes in sustainable locations by maximising the use of brownfield sites and avoiding development of Green Belt land.”* And *“(g) notes that the effective deployment of concentrated*





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housing, with transport and environmental infrastructure, in the city, are critical means to address the climate emergency but bring into play the need for the most careful balance of the needs of different groups of residents and Council businesses.” Although this site is not in the green belt and it does not have any ecological designations, it is a greenfield site and therefore should be considered after *low ecological value* brownfield sites (as we recognise that some brownfield sites can support significant ecological value, so each site needs to be considered case by case). It clearly does have value – both ecologically and as a green space enjoyed by the existing local residents. The latter 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. We would like to see this site assessed against other sites in the forthcoming draft Sites and Policies consultation document to enable an informed decision about whether this is the best place strategically to build houses in the short-term. If this cannot take place for Plot E (current application), then perhaps sale of the other plots could be delayed until this analysis has taken place.

2. Lack of ecological impacts assessment, green infrastructure and ecological network plan for the wider site (sites C, D and E together) and lack of a comprehensive Biodiversity Net Gain assessment

We note the removal of the MUGA from this application as it's positioning in Site C and the positioning of the surface water attenuation pond in Site D. This indicates that SCC are considering the wider site in relation to design and infrastructure, as it did when preparing the Planning and Design Brief, and we think SCC should consider the environmental impacts on the whole site in the same way. Furthermore, sites C and D have not been subjected to detailed ecological surveys or impact assessments, and land-use changes associated with this application should not be considered for the other sites without this information. Especially as there are reports of protected species near the proposed attenuation pond site (also see point 6.) There is a related issue that the new proposed location for the LEAP and sub-station is on an area of grassland and woodland that was planted as a development of public open space and buffer screening (granted in the year 2000) for the Woodland Heights development –and is therefore inappropriate - see details in the document provided by SCC following a request by the Owlthorpe Action Group.

This and the forthcoming housing developments on sites C and D would result in a loss of a large area of greenspace. As stated in in our previous submission, the wider site is over 5ha and therefore meets the threshold for an Environmental Impact Assessment. We would like Sheffield City Council to facilitate an EIA for the whole site, partly to consider the **cumulative** effects of potential development of all three plots. As it stands, the Ecological Impact Assessment only considers nearby currently submitted planning applications, says (5.29) “*Cumulative impacts are not therefore anticipated*”. In our opinion, the cumulative impact assessment should include sites C and D.





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Together, the EIA and the suite of ecological survey information should be used to inform an updated Masterplan and Biodiversity Net Gain assessment for the whole wider site. 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 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 and it does not appear to exist.

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 including green infrastructure within any development and ecological networks throughout the whole wider site and into the surrounding areas. The EclA (1.10) refers to the NPPF *"Planning policies and decisions should contribute to and enhance the natural and local environment by d) minimising impacts on and providing **net gains for biodiversity**, including by establishing **coherent ecological networks** that are more resilient to current and future pressures."*

Ideally for this and the wider site, a comprehensive Biodiversity Net Gain (BNG) assessment (using the Defra 2.0 metric^{1,2} tool or equivalent) should be carried out as part of the EclA to ensure a 10% gain in line with Government recommendations^{3,4}. Chapter 8 of the EclA makes suggestions of how BNG could be achieved but it is unclear which of these may be employed and the detail is lacking to know whether a BNG would actually be achieved. Government guidance² says that *"Care needs to be taken to ensure that any benefits promised will lead to genuine and demonstrable gains for biodiversity."* One example of further guidance on BNG is available from CIRIA⁵.

¹ <http://publications.naturalengland.org.uk/publication/5850908674228224>

² <https://www.gov.uk/guidance/natural-environment>

³ <https://www.gov.uk/government/consultations/biodiversity-net-gain-updating-planning-requirements>

⁴ <https://www.gov.uk/government/news/environment-bill-sets-out-vision-for-a-greener-future>

⁵ <https://www.ciria.org/ItemDetail?iProductCode=C776F&Category=FREEPUBS>





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3. Lack of clarity on the Local Wildlife Sites buffers and impacts

We reiterate the references we made to national and local policies on Local Wildlife Sites but will not repeat them here. As it says in section 5.2 of the Ecological Impact Assessment (EclA) - Owlthorpe Local Wildlife Site is both to the north and west of the proposed development site. A woodland buffer is talked about to the north but no buffer is talked about to the west adjacent to the LWS there. We are concerned that the linear vegetation proposed to be removed (G11a, G11b, and G12 in the Tree Protection Plan) to make way for plots 34-39 may possibly be the boundary of the LWS? Could a map be provided to clarify this please? The suggestion is to transplant tree group G11 and the majority of G12 but we would detail on how likely this is to work?

Also on the Tree Protection Plan along the northern boundary we are unclear about the overlap between the 'dense tree canopy', 15m woodland buffer, and 'tree protective fencing' - is the dense tree canopy already a buffer to the woodland, or is the developer suggesting a new buffer? Is there confidence that the protective fencing would not damage the existing woodland? Again if the LWS boundaries were overlaid on this map it may make things a little clearer.

Either way, as we said in our previous submission, 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 any construction footprint.

The Ecological Impacts Assessment Chapter 5. Assessment of Effects, says that the primary impacts on the LWS would be increased disturbance and loss of connectivity and that without mitigation, the impact would be considered moderate at the County level. This could be an underestimate we do not agree with point 5.8 *"The woodland is well used by walkers and increased recreational pressure is considered likely to be negligible"*. 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). Buffer zones can help to mitigate this impact but there will still be impact from recreational pressure.

The mitigation measures suggested (Chapter 6 of the EclA) focus on the 15m buffer between the woodland and the development and the suggestion of additional litter bins. Again, we would like to see the buffer for both boundaries of the LWS to increase the mitigation. We do support litter bins as long as there is a long-term arrangement in place for regularly emptying the bins.

We may be willing to remove this objection if clarity can be provided on this matter to our satisfaction.





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4. 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. For example, **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](#).
5. **Hedgerow.** The Preliminary Ecological Assessment states “*Defunct Hedgerow 3.16 The south-western Site boundary appeared to comprise an overgrown hedgerow (see Photograph 7), which was becoming overtaken with bramble scrub. Species such as hawthorn and holly Ilex aquifolium were visible, but these had grown leggy and no longer retained functionality as a hedgerow. Short sections were more typical of a hedgerow form, but it was not considered that these would fall under the description of the Hedgerow Regulations 1997.*” However, this is disputed by Owlthorpe Action Group which provide information that the hedgerow is historical, including historical maps and a series of aerial shots from Google Earth. UDP Policy GE15 Trees and Woodlands (quoted in the EclA and the Planning and Design Brief says “*Trees and Woodland will be encouraged and protected by b) requiring developers to retain mature trees, copses and hedgerows, wherever possible, and replace any trees which are lost*”. The EclA Table 7 suggests the hedgerow is to be retained. This is confusing – which hedges are to be retained or removed? This needs to be clarified on maps as on the Tree Protection Plan it looks as if there are sections of two hedgerows to be removed. This could be in breach of the Hedgerows Regulations and local planning policy and the issue needs clarification.
6. **Attenuation pond, SUDS and Ochre’s Dyke** – we support the pre-application advice for natural swales based SUDS. As it stands the attenuation pond does not look like a biodiverse reedbed and it suggests that it would not support 1in2 year storm water. We are concerned that the run-off water could be polluted and inter into the dyke in the Local Wildlife Site. We recommend that a biodiverse reedbed filtration system is 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.





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Additional comments on the EclA

7. Data searches

As stated in our previous response, for this site, we would have liked BWB to include a record search from both the South Yorkshire Badger Group and South Yorkshire Bat Group as part of the EclA. We also recommended a fungi survey and an invertebrate survey in light of the fact that 295 invertebrate species have been found in the wider site and LWS. This information was taken from the Heritage Board Trails on site and quote data collected by/held by SCC Ecology Unit – although clarification is needed on which were recorded on Site E.

8. Bird survey

The knowledge and experience of the surveyors is not made clear. The Common Bird Census (CBC) method used has now generally been replaced with the Breeding Bird Survey – which would be four visits –including one crepuscular survey which may have picked up the owls that the local people have reported. However, the time of year and day and conditions were suitable. The total number of species seen (22) was lower than that seen by the Sheffield Bird Study Group (SBSG) and is therefore likely to be an under-recording of species using the site. SBSG have recorded 60-78 bird species, including 15 Red listed⁶ and 18 Amber listed⁶ species (sources: Heritage Board Trails and letter from SBSG), and recorded 35 species on one autumn walk (although the areas surveyed may have not been directly comparable). We would recommend further surveys, particularly for owls. If this is not possible then the desk-top data should be combined with the 2019 survey data and a precautionary approach taken to ensure adequate mitigation and compensation. We support the letter from Peter Brown from the SBSG who says *“There is no reference to the value of the threatened habitat to the birds which use the site for feeding, shelter and protection both in Spring and at other times of the year”*. Government guidance says *“Where birds are displaced by development, especially Section 41 birds and red and amber listed species, a suitable amount of replacement habitat should be considered.”*⁷ If evidence of impact on Barn Owls is revealed by further desktop information or survey, 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/>

⁶ <https://www.rspb.org.uk/birds-and-wildlife/wildlife-guides/uk-conservation-status-explained/>

⁷ <https://www.gov.uk/guidance/wild-birds-surveys-and-mitigation-for-development-projects#survey-methods>



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If our major concerns detailed in the 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.

9. **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. For example a good new guidance document is the 'Bats and artificial lighting in the UK – joint publication by the Institution of Lighting Professionals and Bat Conservation Trust
<https://www.theilp.org.uk/documents/guidance-note-8-bats-and-artificial-lighting/>
10. **Trees.** We support the recommendation made in the Arboricultural Survey of retaining category A and B trees. 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.
11. **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.
12. It is unclear whether there are orchids on this Site, but if so, 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/>)
13. We support the EclA recommendation for **bird and bat boxes** (6.8 and 6.12). But we would like to see a higher number than that recommended in the report. We would like 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.
14. We support the mitigation measure 6.24 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.





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- As 6.24 states, this is now in line with [government guidance](#)⁸. An example of a hedgehog highway for large housing developments can be found on the SCC planning portal, ref number: [17/01443/FUL](#)
15. 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. We support the Campaign to Protect Rural England's 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. This could include zero carbon homes, sustainable travel infrastructure and an investigation into a bus service. The amended energy report only suggests a 20% cut in carbon, which is minimal.
 16. 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 of Sheffield⁹) 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](#)
 17. 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

⁸ <https://www.gov.uk/guidance/natural-environment#green-infrastructure> (023 Reference ID: 8-023-20190721)

⁹ 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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