



**Sheffield &  
Rotherham**

**Sheffield & Rotherham Wildlife Trust**

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*For nature, for everyone*

20<sup>th</sup> September 2019

18/04034/OUT Outline application (all matters reserved) for the erection of 22 dwellings | Land Adjacent 127 - 139 Long Line Sheffield S11 7TX

Dear Ms Smith

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 submitted an objection to this application on 7/12/18 and our objection and planning policy reasons for objecting still stand. However, having reviewed the submitted documents again, we would like to add the following detail to our previous objection in the following areas.

- 1. Constraints to the ecological survey resulting in insufficient data.**
- 2. Lack of a full assessment of the impacts on the Local Wildlife Site including lack of application of the mitigation hierarchy.**
- 3. Misleading interpretation of the Preliminary Ecological Report in the Planning Statement.**
- 4. Inappropriate proposed ecological mitigation/compensation.**

1. The survey for the PEA was carried out in July 2017 but the report states in the constraints section (section 3.3) that *"The field under survey had been recently cut at the time of the survey, preventing any accurate assessment of the flora present away from the field margins from being made."* and in section 4.2 *"The field had been recently cut on the day of the survey and had a very short sward, preventing identification of species composition across the main body of the site"*. As the LWS is designated by its habitats, it is our opinion that the constraints on this survey meant that it may have been not possible to identify the current value of the area of the site in question and to consider





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this against the planning policies designed to protect LWS, and against the mitigation hierarchy. No species lists have been included with the PEA for example. It is unclear from the LWS citation sheet which of the fields was given a Grade A status for its grassland species and whether this is the same field which is the. If part of the Local Wildlife Site has lost some of its value over the years (see point 3), then this should be referred to the Sheffield Local Wildlife Site Panel to consider whether the current boundaries are still appropriate. For the Panel to consider this, an up to date botanical survey (carried out by an experienced botanist) with no ecological constraints would be needed.

2. The map in Appendix 1 of the Preliminary Ecology Appraisal (PEA) shows the land designated as Dore Moor Local Wildlife Site (number 23). It is our opinion that the applicant and their consultants have underplayed the significance of the development on this site designated for its nature conservation value.

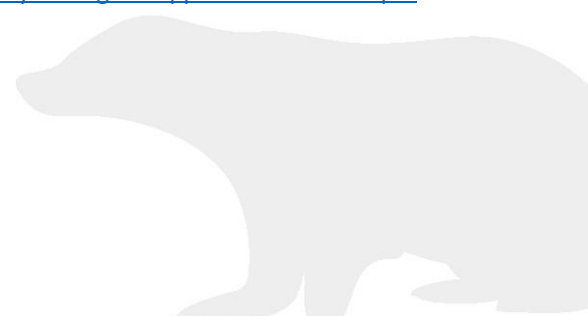
The PEA also states (section 2.3) that *“There were no definite plans for development at the time of the survey. The ecological assessment was made as part of an exploratory approach to ascertain whether the location would be suitable to construct a small number of properties in the north-western corner of the land parcel.”*

In 2017, the consultants had not had a full brief on the proposal for 22 houses to occupy the full site and not just ‘a small number of properties in the north-western corner of the land parcel.’ As such the consultants have not undertaken a full impact assessment (including the mitigation hierarchy) on the LWS which we think is essential for a designated site.

According to CIEEM guidance<sup>1</sup> (see extract below), the PEA should have either been superseded by or turned into an Ecological Impact Assessment (EclA) to accompany the planning application 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*

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





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*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<sup>2</sup>.*

3. It is also our opinion that the 'The ADAS Planning Statement' draws incorrect conclusions from the PEA (also prepared by ADAS).

In Section 1.1, the Planning Statement says

"The site has a non-statutory designation as a Local Wildlife Site (LWS) Dore Moor and as such an ecology report has been completed which reveals there are no protected species and any biodiversity found onsite is **desolate**."

And in section 2.1, the report says "Our client recognises the unique opportunities and challenges that face the site as it is a Local Wildlife Site (LWS) but the ecological value is currently **non-existent**"

However nowhere in the PEA does the word 'desolate' appear –this is an incorrect conclusion based on a survey conducted in sub-optimal conditions (following a recent cut). In Section 6 of the PEA '**The Ecological constraints and Opportunities, Recommendations for Mitigation and Further Survey**', the consultant Ecologists actually state "**Non-statutory Designated Sites**. The site lies within the Dore Moor LWS, which is noted for its biological interest in the form of priority habitats and was last assessed in 2011. SBRC (Tel: 0114 2053618) should be contacted with regard to determining the value of the survey area with respect to the wider LWS."

It is unclear whether this has taken place and what the outcome is – perhaps this could be put into the public domain?

In section 6.2 of the PEA, the consultant states.

"The habitat in the survey area could not be fully assessed due to the freshly cut condition of the field. However, the physical profile of the land suggests that the marshy grassland in the south-east corner is unlikely to extend over the entire survey area. The recorded habitat type in the field is not directly specified in the LWS citation (Appendix 3), but judging by its current condition, it is considered unlikely that land in this section of the LWS is either particularly species rich, or of a high ecological value. No recommendations for mitigation are made."

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





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However, the consultant has not provided evidence (e.g. species list) to back this up, probably due to the constraints of the field being recently mown, and we therefore would like to see a precautionary approach taken of a repeat survey in the optimal time of year by an experienced botanist.

4. In Section 1.2 the Planning Statement boldly states *“In regards to these sensitive characteristics the proposal provides the biodiversity enhancement zone and spacious private gardens to encourage greater biodiversity.”*

And in Section 4.1 the Planning Statement says *“in this instance, the development of this site would bring about significant improvement to the ecological value of the site, this is further investigated in the Preliminary Ecological Assessments”*

However, there is no assessment – such as a Biodiversity Net Gain assessment using the Defra metric 2.0 (beta test version now available) - that the proposals would result in greater biodiversity, this is an assumption which may be flawed.

The ‘Biodiversity Enhancement Zone’ indicated on the site plan shows an area planted with trees with no additional detail. However, Dore Moor LWS was designated for its grassland and heathland habitats. Unimproved grassland and lowland heathland are the two habitats that have undergone the largest declines in Sheffield (ref: [State of Nature in Sheffield 2018 report](#))<sup>3</sup> and it is vital that the remaining areas of habitat are protected. This is one of the roles of the Local Wildlife Site designation. It is unclear whether or how the field has been managed between the previous ecological survey of 2011 and now. This would need to be further explored for any proper consideration of impact and subsequent informed mitigation hierarchy discussion. As it stands, we would not support planting trees in a grassland/heathland Local Wildlife Site as mitigation or compensation and the applicant cannot come to the conclusion that this would bring about significant environment improvement to the ecological value of the site

Regards

Dr Nicola Rivers

Living Landscape Development Manager

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<sup>3</sup> <https://www.wildsheffield.com/wildlife/wildlife-conservation/sheffield-state-of-nature/>

