

3<sup>rd</sup> March 2020

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

### **Objection – Sheffield and Rotherham Wildlife Trust submission 3 - additional comments**

We submitted an objection to this application on 7/12/18 and additional objection comments 20/9/19 and our objections detailed in these letters still stand including the fact the habitat had just been mown at the time of survey and . We are writing to make an additional point and respond to the conclusions drawn in the ‘Very Special Circumstances’ reports submitted by the developers.

The additional point I would like to submit is as follows: as this site is within 500m of two Natura 2000 sites, it requires a scoping exercise to see if a Habitat Regulation Assessment (HRA) is required to consider any impacts on these sites which have *statutory* protection for nature conservation under the Habitats Directive.\* The scoping exercise methodology or HRA has not been presented in documents in the public domain.

Secondly, the Planning Statement and ‘Very Special Circumstances’ documents take the PEA and make a number of incorrect and inappropriate assumptions that we would like to respond to. They declare that the development will deliver net biodiversity gains, when this has not been properly assessed, using a tool such as the Defra Metric or otherwise. The National Planning Policy Framework, 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*”.

The sentence extracted from the ‘Very Special Circumstances’ report does not describe an appropriate biodiversity net gain. “*The proposal would represent a contemporary and innovative addition onto the green network corridor as the biodiversity enhancement zone through flora, fauna, trees and species interacting with human habitation will be in a substantially sustainable and unique approach for Dore.*” The developer suggests a ‘biodiversity enhancement zone’ consisting of tree planting, when in fact, this would be *inappropriate* as the Local Wildlife Site is designated for its grassland and heathland habitats\*\* and this would therefore *not* constitute on-site biodiversity net gain. We do not agree with four out of five of the ecological points made in Table 1 in the ‘Very Special Circumstances’ report submitted by the applicant – we have detailed these in a table below.

\*The two sites that are at the closest to the application site are: Peak District Moors (South Pennine Phase 1) SPA and the South Pennine Moors SAC and the protection of these sites is covered by relevant Habitats Directives. \*\*From the PEA “The citation sheet for Dore Moor LWS states that some of the fields that make up this site (actual field unspecified) contain ‘interesting communities for wet grassland plants’ (Lesser Spearwort, Sneezewort and Oval Sedge). During the Sheffield Grassland Survey (1998-2002), one of the fields (unspecified in the citation) was given Grade A status (English Nature) due to the presence of Oval and Common Sedge. As the survey area had been recently harvested, it was not possible to ascertain whether these species are widely present within the field defined inside the survey boundary.”

Extract of table 1 taken from the 'Very Special Circumstances Report' submitted as part of the planning application, with SRWT's response added

Biodiversity			Weight to be afforded	Impact in balancing Exercise	Sheffield and Rotherham Wildlife Trust's response
10	Enhanced biodiversity zone – draws from the setting of the PDNP	This will ensure that the development will deliver net biodiversity gains and reinforce local character through enhancing the natural setting. Furthermore, this will enhance the land from a manicured field to an exceptional green space.	Substantial	Positive	<b>Appropriate net biodiversity gain not demonstrated.</b> <i>Will not reinforce local character as the local character was species-rich grasslands and heathlands, not trees as shown in the plan. The management of the field could be altered so it is not manicured.</i>
11	Biodiversity/Ecological enhancements – removal of invasive species	Removal of the Japanese knotweed is the first step in remediating the site and ensuring that there is no immediate danger to any properties current or future.	Substantial	Positive	<b>This would be positive</b>
12	Biodiversity/Ecological enhancements – species habitats	Throughout the site, increasing biodiversity is being supported by onsite habitats through hedgehog hotels.	Substantial	Positive	<b>Net biodiversity gain not demonstrated.</b> <i>Hedgehog highways and hotels are beneficial as part of a package of biodiversity mitigation and net gain, which is otherwise not demonstrated by this application</i>
13	Networked green space	On-site green spaces public and private help to support the local green space network and reinforce the ecology of the area.	Substantial	Positive	<b>Not demonstrated</b>
14	Restoration of the LWS	The net biodiversity gain will ensure that the sites status as a LWS will be warranted. A phase 1 habitat survey revealed that there is nothing of ecological note on site. Through development and the biodiversity enhancement zone local wildlife will be encouraged to thrive on site.	Substantial	Positive	<b>Not demonstrated</b> – <i>inadequate information to make this assumption, including constraints to phase 1 survey.</i>

Yours sincerely

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