Objection to the Sheffield Plan – Biodiversity & Nature Conservation

Impact on Local Wildlife Sites and Ancient Woodland

General Issues

Inadequate consideration of the natural environment

Concerning the plan as a whole, we feel there is little to no consideration of what benefits there are to the natural landscape, biodiversity, and access to nature; or, the adverse impacts of proposed development upon these. These sites have been selected as they score low against green belt priorities, however in most cases they are great for nature and offer people nearby access to nature. Yet, there is no Local Nature Recovery Strategy in place for the plan to assess this.

The National Planning Policy Framework (NPPF) states: "strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless: any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole." We feel that the adverse impacts of the proposed development would outweigh the benefits:

Regarding conserving and enhancing the natural environment, "Planning policies and decisions should contribute to and enhance the natural and local environment by: protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan); recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland; minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures and incorporating features which support priority or threatened species such as swifts, bats and hedgehogs; preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.

We do not feel that the plan meets any of these requirements as outlined in the NPPF.

Inadequate Protection for Designated Wildlife Sites and Ancient Woodland

Of the 14 Green Belt sites proposed to be released for development, 11 encompass or border designated Local Wildlife Sites, some of which contain Ancient Woodland. These

Local Wildlife Sites have been designated as areas which are locally important for the conservation of wildlife. They have been identified and selected for the significant habitats and species that they contain [1] - meaning they are irreplaceable and critical to the biodiversity and ecological integrity of our region. Development as outlined in *Appendix 2 - Sheffield Plan Proposed Additional Site Allocations consultation document,* within close proximity to these designated sites undermines national and local planning policy commitments to protect and enhance the natural environment, including those under the NPPF, which gives strong protection to irreplaceable habitats.

Buffer Zones

In 2021, Sheffield City Council declared a Nature Emergency and resolved "**to ensure that everything possible is being done to protect the city's biodiversity, ecology and wildlife**", yet the Sheffield Plan sets aside only the **minimum** recommended buffers for some of our most valuable wildlife habitats and ancient woodland. We feel that these proposed buffers should only be used as a starting point and each site should be assessed on a case by case basis to ensure that proper protections are in place.

We feel that many of the proposed development sites require larger buffers to ensure adequate protection of nearby Local Wildlife Sites and Ancient Woodland. The minimum applied buffers were recommended by Natural England with caveats of *"Where assessment shows other impacts are likely to extend beyond this distance, the proposal is likely to need a larger buffer zone. For example, the effect of air pollution from development that results in a significant increase in traffic",* and *"Where possible, a buffer zone should: contribute to wider ecological networks, and be part of the green infrastructure of the area"*, and *"A buffer zone should consist of semi-natural habitats such as: woodland, a mix of scrub, grassland, heathland and wetland - The proposal should include creating or establishing habitat with local and appropriate native species in the buffer zone"*[2].

Further, SCC guidance for planning officers notes that "a precautionary approach should be taken to established whether any particular development is likely to have a significant effect on ecology" and that these recommended buffers are **minimum** distances. For Local Wildlife Sites there is no standard but factors such as topography, size/type of development, and type of habitat should be considered. This has not happened and a blanket of the minimum recommended/ accepted buffers has been applied to all.

We feel that each site needs to be properly assessed, and larger buffers implemented, **before the land is deleted from the green belt and before the planning stage**. We believe that on some sites the adequate buffers needed to protect adjacent Local Wildlife Sites may make the sites unviable for development, so this **must be determined before they lose their Green Belt protection.**

Some of the proposed sites appear to contain designated urban green space zones within Local Wildlife Sites and buffers, these are described as "mixed use" - this could refer to a monoculture playing field or a playground with no physical barrier to protect sensitive

habitats. This does not align with the guidance outlined above from Natural England to "*consist of semi-natural habitats such as: woodland, a mix of scrub, grassland, heathland and wetland - The proposal should include creating or establishing habitat with local and appropriate native species in the buffer zone".*

Further, many of these Local Wildlife Sites at present experience low levels of air, noise, light, and chemical pollution, as well as low footfall. Thus, simply drawing a boundary around them does not protect them.

15m for Woodland/ Ancient Woodland

The Environment Act 2021 and the NPPF (paragraph 180) provide clear protection for irreplaceable habitats. Natural England and Forestry commission standing advice on projecting Ancient Woodland, Ancient and Veteran Trees from development "is at least 15m but 50m is preferable". A minimum 50m buffer is now widely recommended as best practice as a safeguard especially for significant developments near Ancient Woodland.

The 15m buffer zone cited in the plan is only appropriate for the protection of tree roots from mechanical damage during construction. It fails to take into account the broader and well-documented ecological impacts of development, particularly:

Air pollution:

Studies have shown that nitrogen dioxide (NO_2) on average increases by 20% in areas with large warehouse/distribution centres [3], given that this plan **disproportionately proposes** over 50 hectares of warehouse/distribution employment land in the North of Sheffield alone, this along with the additional sites still to be built on the Smithy Wood industrial estate (phase 1) and the huge increase in vehicles that the new houses will bring, will have a massive impact on pollution in this area, which already regularly exceeds legal limits. The 2023 Air Quality Annual Status Report concludes that using 2022 data, projecting forward using data from monitoring locations, it is suggested that NO_2 concentrations at many locations will continue to be problematic beyond 2023, under a "business as usual forecast scenario".

This in turn will have the following impact on public health and biodiversity, particularly in areas with more proposed development as in the North and East of Sheffield:

NO_2 emissions contribute to nitrogen deposition. There is substantial evidence that Nitrogen deposition (including that from increased transport) has a negative impact on plants and fungi in ancient woodland (which then impacts on the entire ecosystem). Trees can be directly impacted, suffering from bleaching and leaf discolouration, increased susceptibility to damage from drought, frost and diseases such as acute oak decline. Life supporting fungi and lichens are very susceptible to nitrogen deposition and there are massive knock on effects, e.g. larval food of woodland butterflies, moths and other insects. [4] Experiments have shown that NO_2 concentrations above 30–50 parts per billion (ppb) can cause visible

leaf damage in sensitive plant species. Chronic exposure at lower levels can reduce photosynthesis by damaging leaf cells and interfering with stomatal function.

The UNECE critical loads for nitrogen-sensitive ecosystems are often exceeded across Europe and the UK. For example, heathlands and bogs have critical loads of 5–10 kg nitrogen per hectare per year, but many receive 15–40 kg N/ha/year. This excess nitrogen promotes the growth of nitrogen-loving plants like coarse grasses and nettles, which outcompete slower-growing wildflowers. For example, in UK lowland heathlands, nitrogen deposition has caused a significant decline in species such as heathers and rare orchids.

Eutrophication from nitrogen compounds contributes to algal blooms in rivers and lakes. In Europe, about 70% of Natura 2000 sites (protected nature areas) exceed their critical nitrogen loads, leading to biodiversity loss.

Paragraph 174 of the NPPF stipulates that planning policies and decisions should prevent new developments from contributing to unacceptable levels of pollution and these additional sites, being so disproportionately located in the North of Sheffield will result in unacceptable increases in pollution.

Further, on the impact on public health, short-term exposure to NO_2 at concentrations above 200 micrograms per cubic metre ($\mu g/m^3$) over 1 hour can worsen symptoms in people with asthma resulting in more hospital admissions ,increased respiratory infections.

In addition, A 2020 DEFRA Air Quality Expert Group (AQEG) report highlights that freight depots and distribution centres are significant localised sources of particulate matter (PM2.5), mainly due to diesel HGVs. Particulate matter (PM10 and PM2.5) can block stomata, reducing photosynthesis and weakening tree growth and change the pH balance of soils *([5]* - DEFRA, AQEG (2020). *Impacts of shipping, aviation and freight transport on UK air quality)*.

The Clean Air Stragegy (2019) highlights that new developments generating large HGV movements contribute to urban and suburban PM hotspots.

Noise pollution: Numerous studies show that noise has a significant negative impact on wildlife. Noise pollution from traffic and construction interferes with animals' ability to hear vital sounds such as calls from individuals and the approach of predators, alters foraging habits, increases vigilance and thus stress, and can cause physical damage to physiology.[6], [7]. Woodland bats, protected under UK law and the Habitats Directive, are particularly sensitive to noise, with impacts measurable up to 100m from the source. Disruptions to echolocation interfere with their ability to navigate and hunt, potentially leading to population decline. [8]. A meta-analysis into the effects of anthropogenic noise on animals concluded that noise drastically negatively affects many species of amphibians, arthropods, birds, fish, mammals, mollusks, and reptiles and phylogeny contributes little to the variation in response to noise - suggesting all species are equally affected by noise pollution which means development so close to Local Wildlife Sites where these animals reside could be detrimental to biodiversity. [9].

Light pollution: Artificial lighting disturbs nocturnal wildlife, including bats, birds and many species of invertebrate. These disruptions impact breeding, foraging, and predator-avoidance behaviours. [10]. Owls are significantly negatively impacted by artificial light, their hunting, navigation, and breeding behaviours, potentially leading to reduced hunting success, disorientation, and impaired communication. Even for non-nocturnal birds, there is significant evidence that circadian rhythms are impacted resulting in typical bird song patterns being altered, which negatively impacts reproductive success. [11]

10m for watercourses

All of the above impact wildlife inhabiting watercourses, including via particulate and chemical runoff during and after development. Further, the plan appears to solely focus on watercourses where they are present, ignoring other habitats and ecological features.

Aquatic wildlife needs stream, riparian and upland habitat for breeding, nesting and hibernation as well as the ability to move through the landscape. Effects of development can lead to reduced reproductive rates, changes in behaviour, rise in stream temperature, advantage to invasive species studies have shown that narrow buffers are insufficient to mitigate from the impact of adjacent land development. [12] - *Houlahan, J. E., and C. S. Findlay. 2004. Estimating the "critical" distance at which adjacent land-use degrades wetland water and sediment quality. Landscape Ecology 19 (6): 677–690.*

Given these cumulative pressures, we recommend a minimum buffer of **at least 50m - 100m** for development sites that **partly** border any Local Wildlife Site and/or Ancient Woodland, supported by robust ecological assessments, to truly mitigate indirect impacts. (Specifically for sites: *Land at Forge Ln – SCC site ref NWS30; Land between Storth Ln and School Ln – SCC site ref NWS31; Land to the South of M1 motorway J.35 – SCC site ref NES36; Land at Wheel Ln and Middleton Ln – SCC site ref NES39; Land between Bramley Ln and Beaver Hill Rd – SCC site ref SES30; Land between Lodge Moor Rd and Redmires Conduit – SCC site ref SWS18; Land to the North of Parkers Ln – SCC site ref SWS19; Hesley Wood, North of Cowley Hill – SCC site ref CH04.*). Further, where proposed development sites envelope a LWS and isolate it from the surrounding area, we do not feel **any** buffer would mitigate negative impacts. (Specifically for sites: *Land between Creswick Avenue and Yew Ln – SCC site ref NES37; Holme Ln Farm and land to the West of Grenoside Grange, Fox Hill Rd – SCC site ref NES38; Handsworth Hall Farm, land at Finchwell Rd – SCC site ref SES29)*

Impact of Traffic and Road Infrastructure

The plan's facilitation of new road networks and increased traffic will have a direct negative effect on local wildlife populations. Roads fragment habitats and restrict the movement of species, particularly mammals, amphibians, and reptiles. They also result in increased

roadkill, especially among hedgehogs, badgers, deer, and amphibians. These deaths are not only tragic but contribute significantly to local biodiversity decline.

Cumulative and Long-Term Impacts - Harm Outways the Economic Benefit

When considered cumulatively, the proposed developments and associated infrastructure pose a serious risk to the ecological network across Sheffield. The Trust is concerned that in general, insufficient weight has been given to the long-term impacts on biodiversity, species movement, ecosystem resilience, and public natural assets.

Section 11(e)(ii) of the NPPF states that any adverse impacts of development should significantly and demonstrably outweigh the benefits and we suggest that in addition to concerns with the plan as a whole, this certainly cannot be demonstrated for the sites which contain Local Wildlife Sites or Ancient Woodland.

Conserving and enhancing the natural environment

- **Requirement to mitigate impact on South Pennine Moors and Peak District Dales:** In the updated Habitats Regulations Assessment there is a legal requirement to apply mitigation measures to address the impact of increased visitors. This includes the provision of alternative green spaces. We would argue that for the greatest mitigation to climate change, economic benefits and recreation, this provision should be natural green spaces as specified in Sheffield's Green and Open Space Strategy (2010-2030) and that this should be, at least, part funded by the developer. Within this plan, there does not seem to be any policy to address the development and management of these mitigation measures, nor does it specify who will be ultimately responsible for the maintenance of these green spaces, i.e. there should be robust service level agreements with any development companies to ensure that proper management of these sites is included in the plan.

- **Deletion of additional Green Belt outside of the development sites:** It is noted that most of the Green Belt sites have additional land being deleted from the Green Belt which fall outside of the development sites and almost all of these deletions contain local wildlife sites or ancient woodland. SCC have applied an inconsistent approach to these deletions, claiming these are pockets of land which have become ineffective as Green Belt after the site has been designated. However, taking the Hesley Wood site as an example, the development site and the deletions remain entirely surrounded by Green Belt with no obvious boundary. Opposingly, there are pockets of Green Belt with clear boundaries at the site South of M1 which have not been deleted.

  These deletions have a concerning impact on the protections given to the local wildlife sites and ancient woodland that they contain.

- **Green Space Allocations**

Urban Green Space (UGS) Zones
It is noted that the Sheffield Plan refers only to UGS zones, and as mentioned above, most of the additional Green Belt deletions outside of the development boundaries contain Local Wildlife Sites, ancient woodland, and/or high priority natural habitats. This is not the specific national policy designation of Local Green Space (LGS) as detailed in paragraphs 101–103 of the National Planning Policy Framework (NPPF, July 2021).

NPPF Paragraph 101 states that "The designation of land as Local Green Space through local and neighbourhood plans allows communities to identify and protect green areas of particular importance to them."
Paragraph 102 sets out the criteria for LGS designation:

"Local Green Space designation should only be used where the green space is:
a) in reasonably close proximity to the community it serves;
b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and
c) local in character and is not an extensive tract of land."

Paragraph 103 confirms that "**Policies for managing development within a Local Green Space should be consistent with those for Green Belts.**"

This means that LGS designations offer high levels of protection, equivalent to Green Belt policy under NPPF Section 13 (Protecting Green Belt Land, paragraphs 137–151), and development is only permitted in very special circumstances.

In contrast, Urban Green Space (UGS) is a local policy tool defined in the Sheffield Local Plan under Policy GE12 of the Unitary Development Plan (UDP) 1998, now proposed to be carried forward. UGS policy is set locally and does not benefit from the national level of protection provided by the NPPF for LGS or Green Belt.

Calling something an Urban Green Space does not make it a Local Green Space (LGS) under national planning policy, and therefore does not automatically confer NPPF-level protection. During the consultation phase, this distinction has not been made clear to the public. There are instances of planning officers stating that UGS offers the same protections as LGS or Green Belt, or even greater protections, which is misleading and contrary to national policy guidance.

Creation of new or enhancement of existing green space

The Sheffield Plan (Policy NE2) states that developers will be required to provide new, or improvements to existing, green spaces that are accessible to the public. The NPPF states that new residents should be able to access good quality green spaces within a short walk of their home (Paragraph 98).

The plan converts these areas into Urban Green Space, but does not specify in what way they will be protected. In addition, the Habitat Regulations Assessment states that "alternative green spaces should be **created** or enhanced" the reclassification of

Green Belt land to urban green space cannot be considered as creation or enhancement of natural green space.

- **No Ecological Assessment Reports:** Amongst the published papers associated with the Sheffield Plan, there is no detailed Ecological Assessment Report. Both the Integrated Impact Assessment and the Site Selection Methodology papers refer to ecological assessment taking place. The Integrated Impact Assessment claiming that there is a Net Gain in Biodiversity across the Sheffield Plan without publishing the details of this and the Site Selection Methodology stating that sites with significant ecological value were excluded, however this does not appear to have been the case.
- **Increased access to local wildlife sites** (especially for those sites which would be completely surrounded by development)
- Dog waste - containing nitrogen phosphorus and pathogens which are harmful to aquatic life
- Flea & tick treatments - Studies by the Imperial College London, have demonstrated that these common parasiticides have a serious impact on aquatic life, especially paddling and swimming.[13]
- Direct spread of disease
- Impact of free ranging domestic cats on birds, mammals and reptiles - implicated in the extinction of at least 63 species and the endangerment of a further 367. [14]

Brownfield first Strategy

While the Sheffield Plan adopts a **brownfield first** approach in principle, the policy lacks any effective mechanism to ensure that brownfield sites are actually developed ahead of Green Belt or greenfield land. In practice, developers are more likely to pursue Green Belt sites due to their relative ease and profitability. These sites typically require less remediation, involve fewer constraints, and offer greater margins. As a result, there is a serious risk that greenfield and Green Belt land will be developed prematurely, undermining the plan's sustainability objectives, long-term urban regeneration goals and as the plan contains more housing and employment opportunities than has been requested by the Inspectors, unnecessarily putting local wildlife sites and ancient woodland at risk of serious damage which would be against the NPPF.

The Plan should incorporate a **robust, enforceable phasing mechanism** or **sequential test**, where planning permissions on Green Belt or greenfield sites can only be granted once it is clearly demonstrated that:

- Brownfield land supply is demonstrably exhausted or not viable;
- All reasonable measures to bring brownfield land forward (including public sector facilitation and infrastructure support) have been taken;
- A clear delivery pipeline for brownfield development has been exhausted or proven unworkable.

In addition, policy tools such as development quotas, financial incentives/disincentives, or a brownfield-first condition tied to infrastructure funding or housing delivery targets could be used to strengthen adherence.

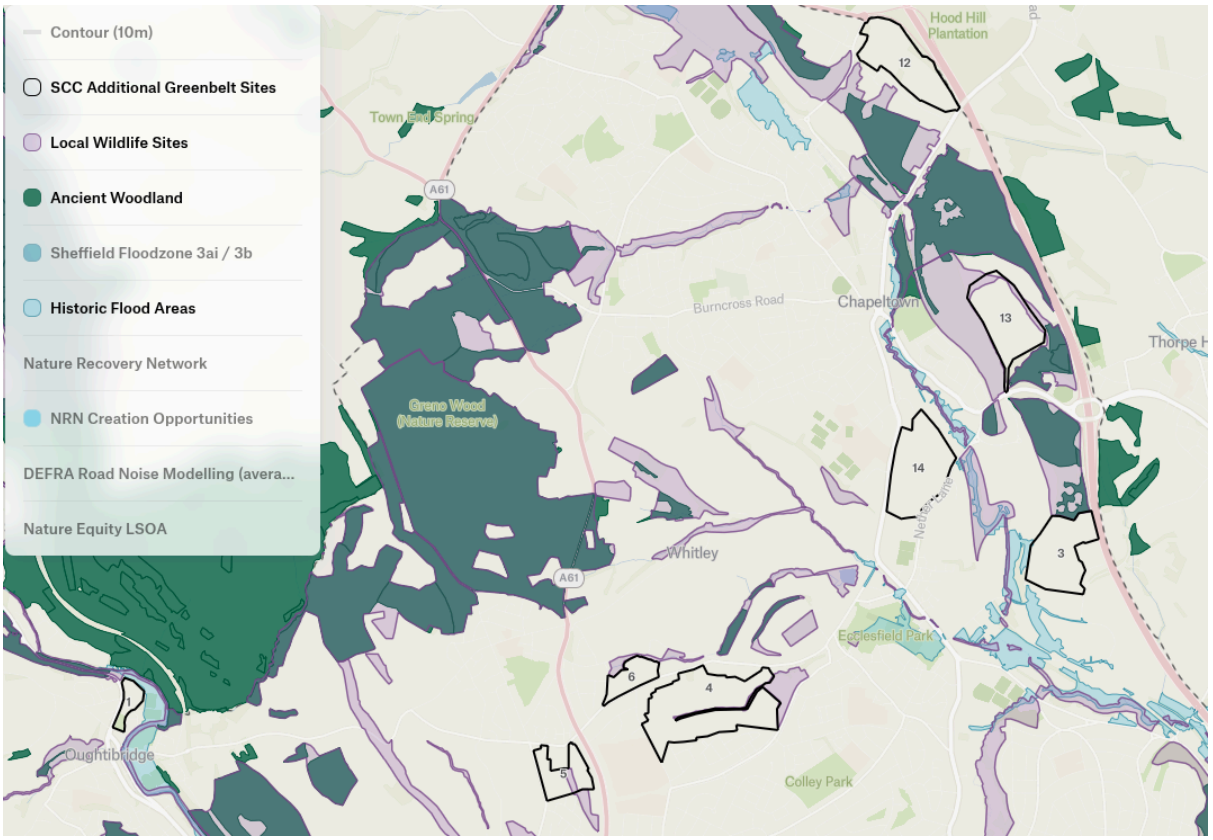
Flooding and recommended mitigations

There have been no detailed flood risk assessments (desktop only), which appear to have mainly considered the effects on people and not fully considered the effects on nature - i.e. risk to people is very low where there are clear escape routes should serious flooding arise, whereas there has been no mitigation for local wildlife sites. Further, there appears to have been no consideration of impact of flooding on neighboring developments which lay outside the site boundaries.

The recommended SuDS mitigations are standard requirements and do not take into account the soil types or practicalities of large SuDS.

Negative impacts of regular flooding on woodland and other habitats: physical damage to trees and plants, impacts on growth, soil erosion and degradation, reduced oxygen supply, influx of pollutants and disease, and fatalities, all of which lead to biodiversity decline.

Downstream assessments have not been taken into account and the cumulative effects of the disproportionate number of developments in the north Sheffield area have not been considered. The below map demonstrates this by showing the areas of historic flooding and the correlation to the local wildlife sites, existing urban green spaces and homes and businesses.



Map to show a cluster of development sites, the local wildlife sites and ancient woodland and historic flooding

Nature Equity Mapping

The Sheffield and Rotherham Wildlife Trust have developed a map to identify and address the disparities in access to nature and quality greenspaces - it combines multiple social, health, and environmental factors to pinpoint communities with the greatest need for support. [15] .

The mapping scores areas across Sheffield on a scale of 1-10, with 1 representing the lowest 10% of areas with the greatest inequality. For areas with a lower Nature Equity score that have been identified as a site for proposed development, we are concerned that development will further lower this score.

We are aware that *Appendix 2 - Sheffield Plan Proposed Additional Site Allocations consultation document* states "developers will be required to provide new, or improvements to existing, green spaces that are accessible to the public. The NPPF states that new residents should be able to access **good quality green spaces** within a short walk of their home, whether through onsite provision or through access to offsite spaces." and that "where there are valuable ecological features within a site, conditions have also been proposed which require the retention of those features".

However, there is nothing specified in current plans around the type of greenspace, currently only designated as mixed use urban greenspace, or identification and retention of "valuable ecological features". Our data suggests access to **nature** is important for wellbeing and nature equity, and, as an example, open access monoculture playing fields or a playground does not constitute nature or quality greenspace. We feel any high quality habitats could not be viably created and maintained in built up residential and employment areas, and any greenspaces created will not have as great value for nature or be as biodiverse as existing Green Belt land, which at present mostly has Public Rights of Way through it and is accessible, thus nature equity in these areas will decrease.

Nature Recovery Network Mapping

The South Yorkshire Mayoral Combined Authority have commissioned a map of connected areas of land and water in Sheffield which is - or could be - protected, great for nature, and helping mitigate the effects of climate change. This network was established to work toward the 2020 UK Government target of protecting at least 30% of land and sea for nature by 2030.

Just 4.9% of habitats on the map have been identified as great for nature ("core priority habitat" on the map) and 29.4% identified as priority habitat in need of restoration or improvement/ in moderate or poor condition (shown as "restoration"). There are also priority habitats identified of 'unknown condition' - this is due to accessibility issues to further determine conditions or gaps in available data, but this means that these sites could be great for nature. Further, two types of habitat creation opportunities have been

developed - ‘buffer areas’ to extend existing priority habitats, and ‘stepping stone areas’ to improve the connectivity between priority habitats.

The data came from models and the best data available in 2021; further, we carried out some ground truthing work across reserves and as part of the Sheffield Lakeland Landscape project. To understand the true picture, site checks should be carried out to ground-truth the map, particularly in areas where priority habitat of unknown condition has been identified. However, we believe that our Nature Recovery Network map presents the most accurate picture from the data currently available, hence why we have used this mapping layer against the proposed development sites in addition to Local Wildlife Sites, Ancient Woodland, Nature Equity scoring, and so on. See our interactive map here.

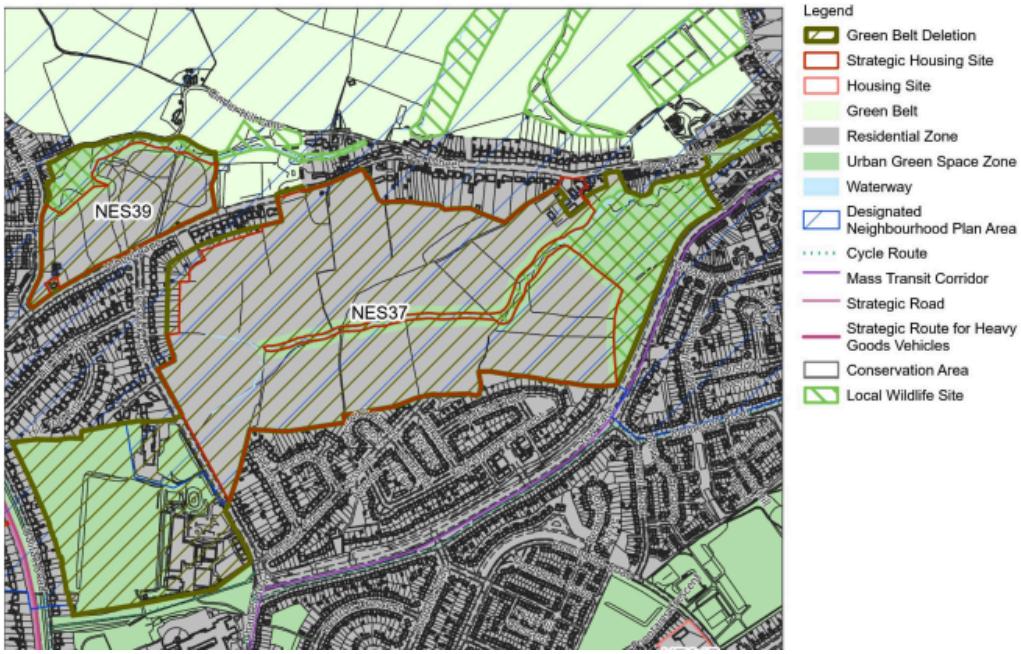
Thus, many of the proposed development sites include areas of priority habitat (of varying conditions), and/or buffer and stepping stone areas. Some of these are separate to Council designated Local Wildlife Sites, but similarly we feel strongly that development on or closely adjacent to these areas would be detrimental to our important habitats and biodiversity. Further, before any green belt sites are released we feel that this ground truthing work should be carried out as above with LWS buffer sizes, to determine the impact on a site by site basis.

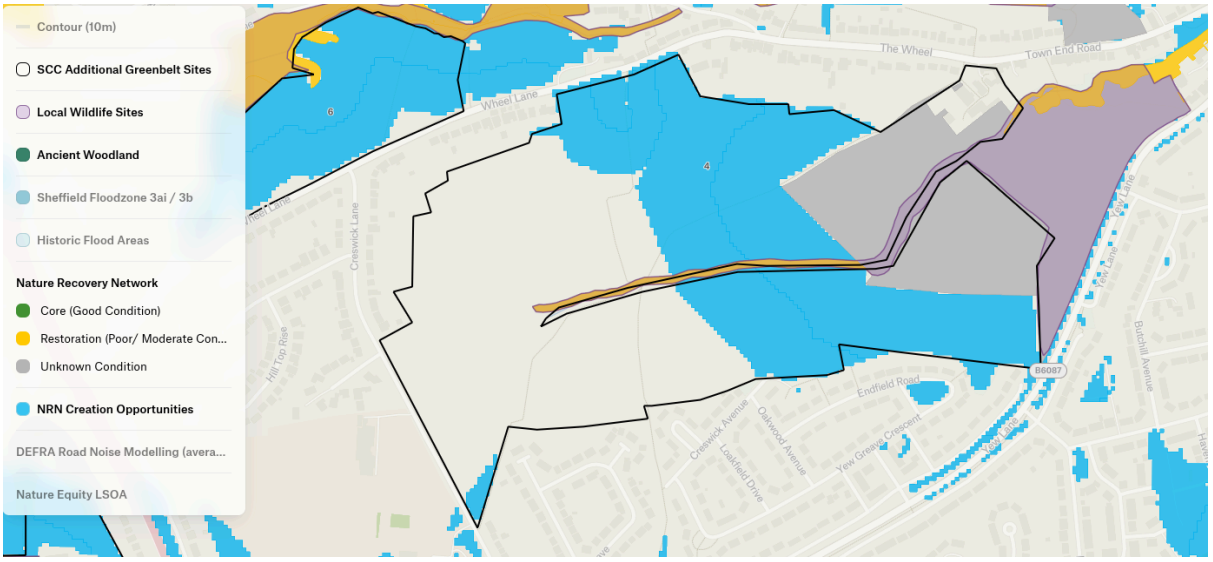
We feel that even with extended buffers, development on many of these sites will negatively impact priority habitats that sit within Local Wildlife Sites, and those that sit outside of LWS will be destroyed, as will crucial buffer and stepping stone areas which will further fragment remaining habitats and connectivity of biodiversity across the city. This will be detrimental to the goal for 30% of land and water to be great for nature by 2030.

Specific Sites

SRWT are opposing inclusion of the following sites, in their entirety, in the Sheffield Plan:

NES37 - Land between Creswick Avenue and Yew Lane, S35 8QN





We feel that the extent to which part of the Local Wildlife Site is enveloped by this proposed development site boundary means the LWS would be completely isolated thus removing its ability to function as a significant habitat (see above map), or to be home to significant species. Further, this proposed site borders more Local Wildlife Site, thus development here would fragment the existing habitat and connectivity of the wider surrounding habitats. The site contains priority habitats identified via Nature Recovery Network mapping, both of poor or moderate condition (needing restoration) and of unknown condition - which could be great for nature. Development on this site would mean these priority habitats are lost or fragmented. Further, this site contains areas of creation opportunities (both buffer and stepping stone areas) meaning that development would result in loss of ability to expand existing priority habitats, and connectivity between priority habitats.

We have accessed records of and received photographic and video evidence of multiple protected species inhabiting this whole site in addition to the designated Local Wildlife Sites it borders. Thus, suggesting that the entire site is being utilised by local wildlife and can

become great for nature as our Nature Recovery Network mapping supports, and that isolating the Local Wildlife Site will degrade the habitat.

SRWT do not believe that drawing the boundary to exclude Local Wildlife Site from the development or offering the narrow 10m buffer is sufficient mitigation for the additional reasons listed in the general comments. Under the Site Selection Methodology, this site should have been excluded from the Site Selection.

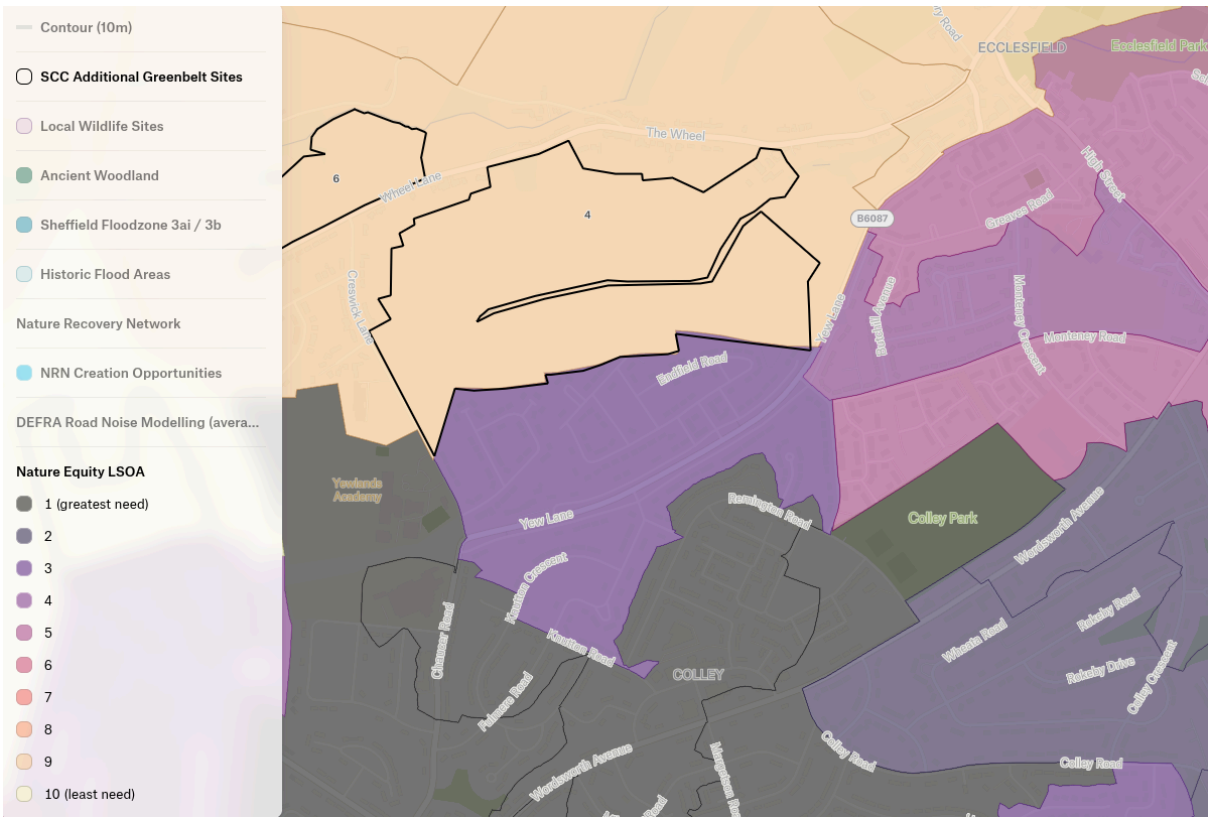
Development of this site can only have negative impacts on the biodiversity in this area. Sections 180(d) and 180(e) of the NPPF state that new developments should provide net gains for biodiversity and not put the local environment "at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans". SRWT consider that any development at this site would not meet this requirement.

The deletion of the Green Belt covering the local wildlife site offers much less protection from future development and weakens the protections of other Green Belt Wildlife sites.

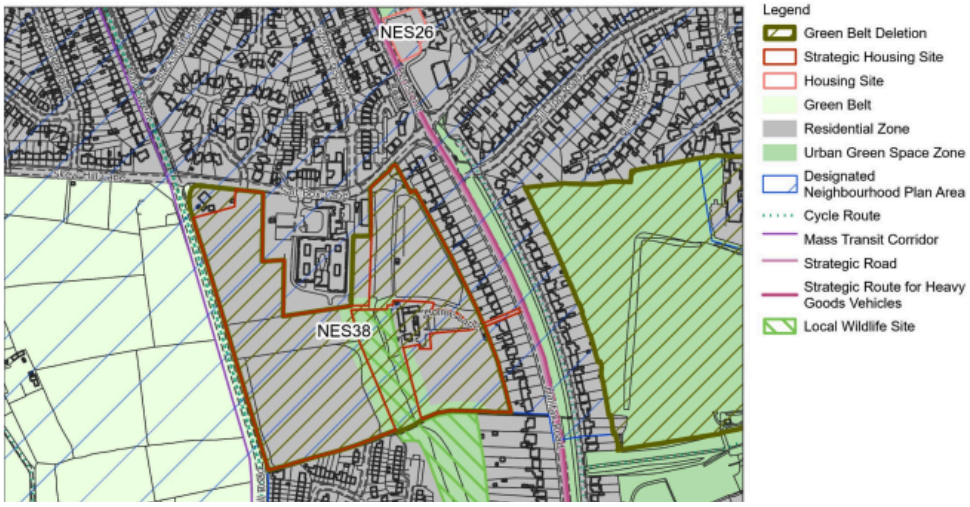
As highlighted in general comments, flood risk appears to have only been assessed for impact on people. The mixed hedgerow and watercourse part of the Local Wildlife Site currently sits within an extreme hazard zone for flooding as groundwater levels are very near to the ground surface. Groundwater may emerge at significant rates and has the capacity to flow overland and/or to pool within low spots, impacting neighbouring houses if natural porous ground is removed and putting the local wildlife site at extreme risk of flooding.

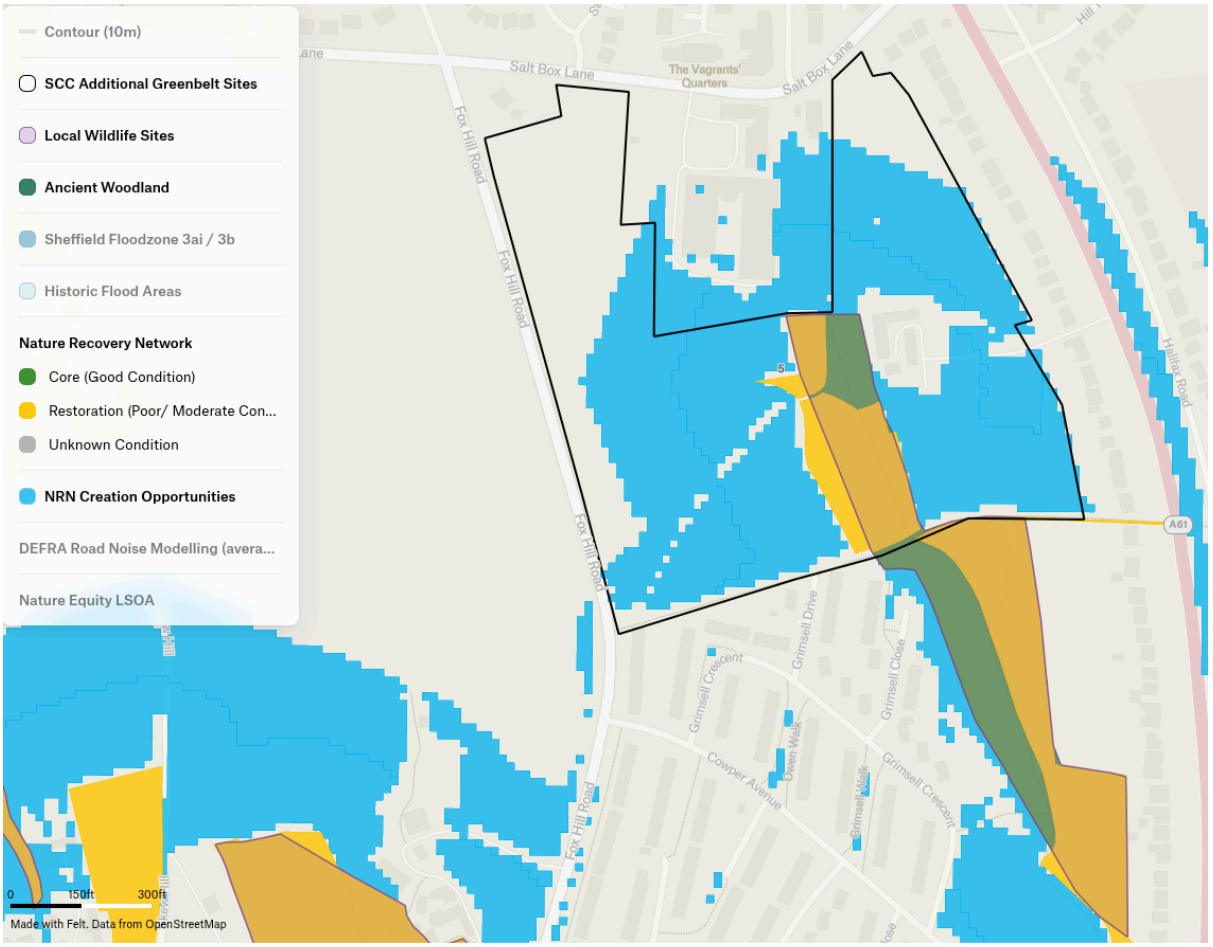
The recommended SuDS to mitigate this risk would need to cover almost 3 hectares of land at a minimum depth of 1.5m,

The human inhabited areas directly adjacent to this site to the south (Parson Cross and Colley) are some of the lowest scoring areas in Sheffield for Nature Equity (see map below), suggesting this site with its public rights of way and abundance of wildlife is crucial for nature connection and the nature equity of those people that live nearby. We feel that development here would further lower the nature equity ranking of surrounding areas making them more deprived, particularly as development would result in loss of green belt, restrict access to Local Wildlife Sites and the entire site would lose ecological value as described above.



NES38 - Holme Lane Farm and land to the west of Grenoside Grange, Fox Hill Road, S35 8QS





The proposed boundary of this site envelopes part of a Local Wildlife Site and borders further Local Wildlife Site and woodland. Further, both the area of Local Wildlife Site within and outside of the development boundary contain both core and restoration priority habitats as identified by our Nature Recovery Network Mapping (see above map). As above, we feel development on this site would isolate the Local Wildlife Site thus removing its ability to function as a significant habitat, or to be home to significant species. Further, development on this site would result in degradation of the habitat and loss of the 'core' status of the priority habitat which is currently in great condition for nature. Most of the remainder of the site has been identified as buffer or stepping stone areas within the Nature Recovery Network, thus development here would further fragment connectivity of the network. We have accessed records of and received photographic and video evidence of multiple protected species inhabiting this whole site in addition to the designated Local Wildlife Sites it borders. Thus, suggesting that the entire site is being utilised by local wildlife and can become great for nature as our Nature Recovery Network mapping supports, and that isolating the Local Wildlife Site will degrade the habitat.

SRWT do not believe that drawing the boundary to exclude these from the development or offering the narrow 15m buffer is sufficient mitigation for the reasons listed in the general comments. Under the Site Selection Methodology, this site should have been excluded from the Site Selection.

Development of this site can only have negative impacts on the biodiversity in this area. Sections 180(d) and 180(e) of the NPPF state that new developments should

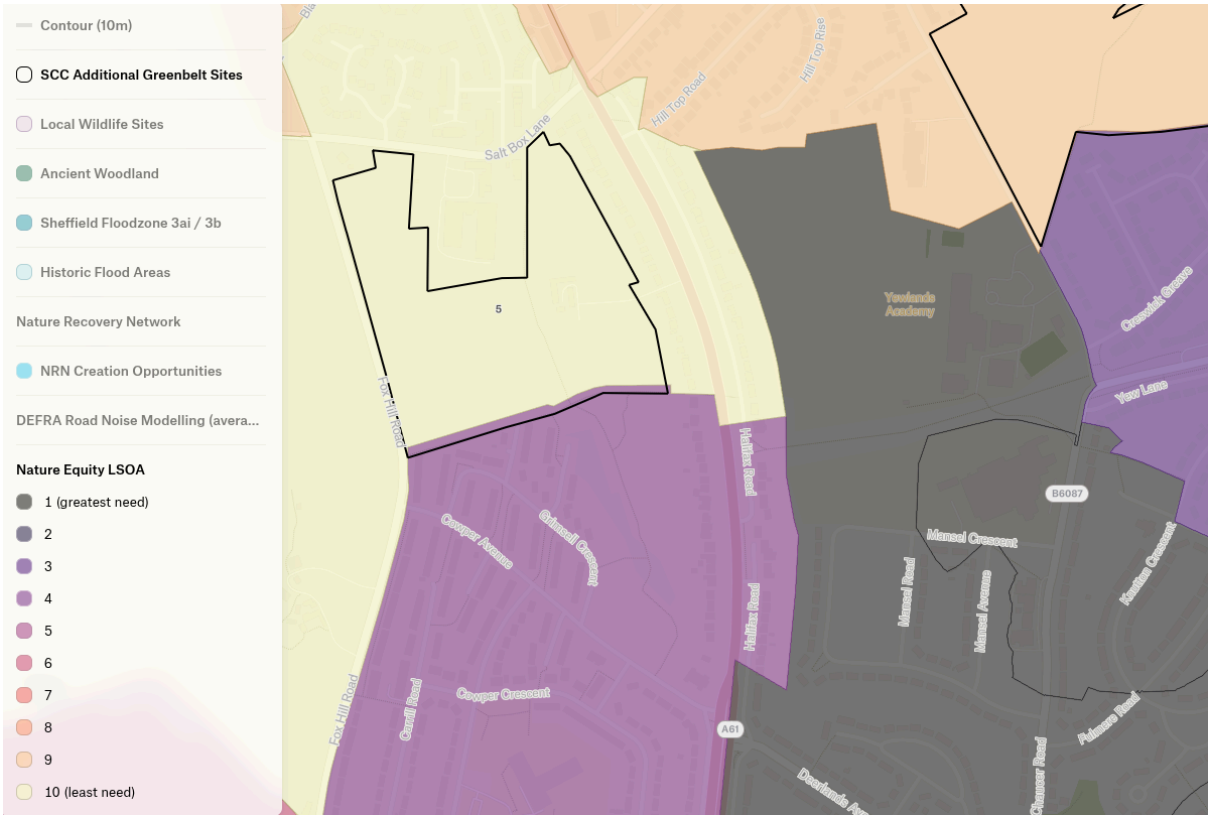
provide net gains for biodiversity and not put the local environment “at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans”. SRWT considers that any development at this site would not meet this requirement.

The deletion of the Green Belt covering the local wildlife site offers much less protection from future development and weakens the protections of other Green Belt Wildlife sites as demonstrated by the plans submitted by JEH Planning with development (roads and play area) being proposed across the priority habitats identified via Nature Recovery Network mapping

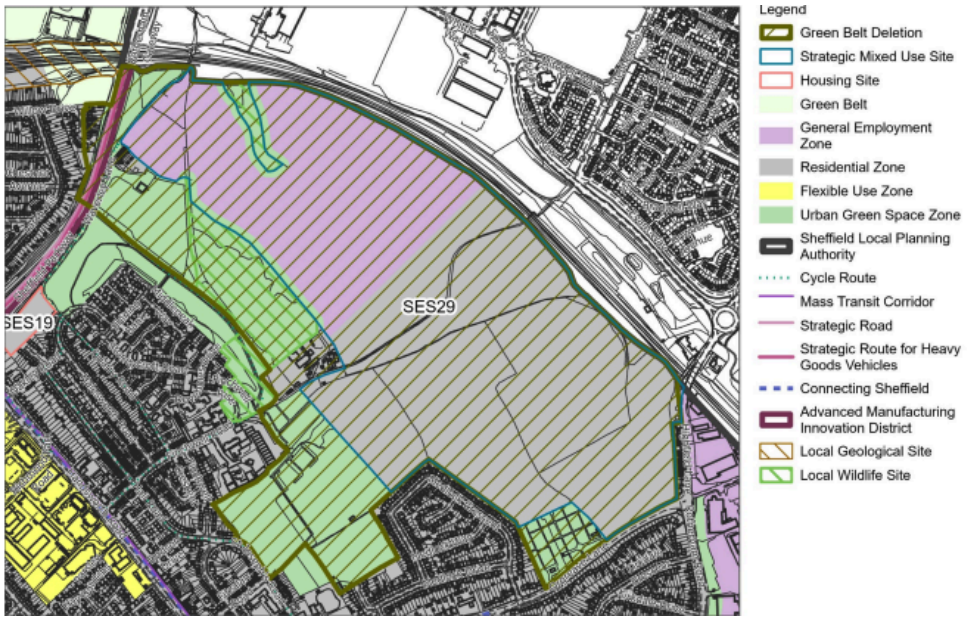
[Representations from JEH Planning]

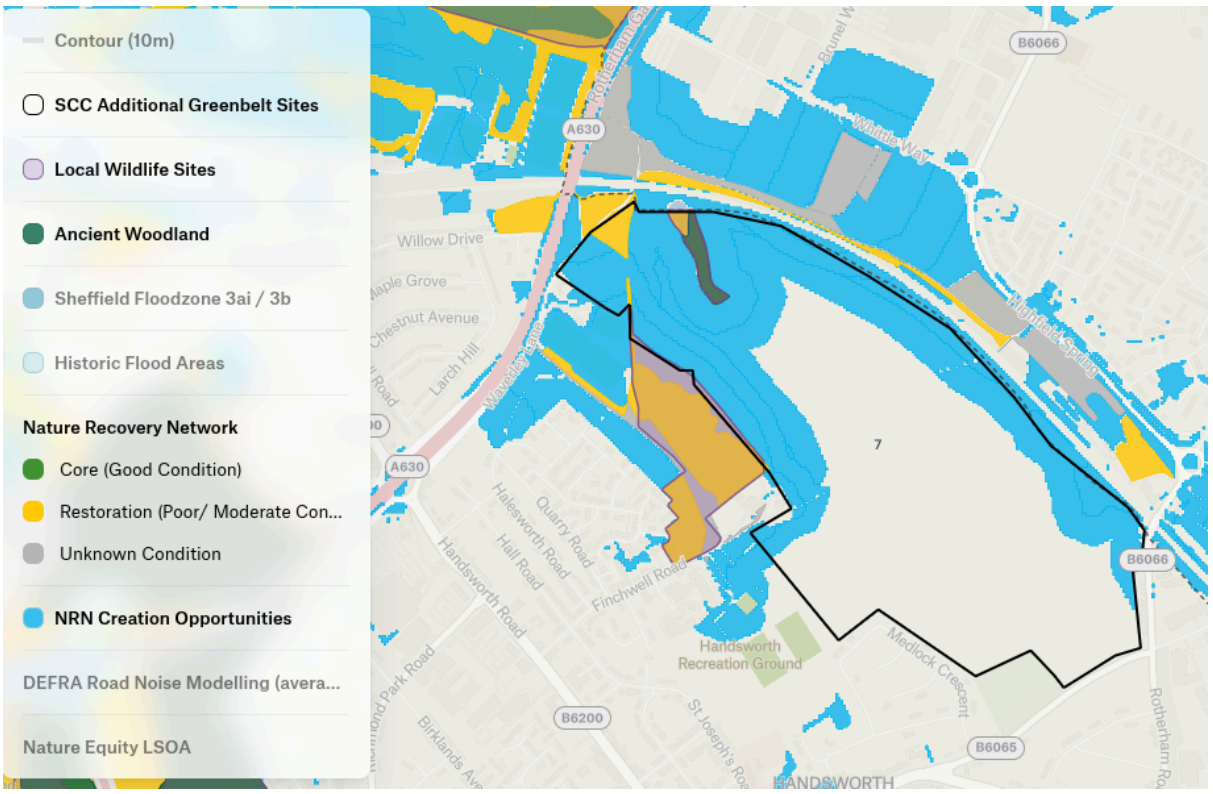
The human inhabited areas directly adjacent to this site to the South and East (Fox Hill and Parson Cross) are some of the lowest scoring areas in Sheffield for Nature Equity, suggesting this site with its public rights of way and abundance of wildlife is crucial for nature connection and the nature equity of those people that live nearby. We feel that development here would further lower the nature equity ranking of surrounding areas making them more deprived, particularly as development would

result in loss of green belt, restrict access to Local Wildlife Sites and the entire site would lose ecological value as described above (see map below).



SES29 - Handsworth Hall Farm, Land at Finchwell Road, S13 9AS





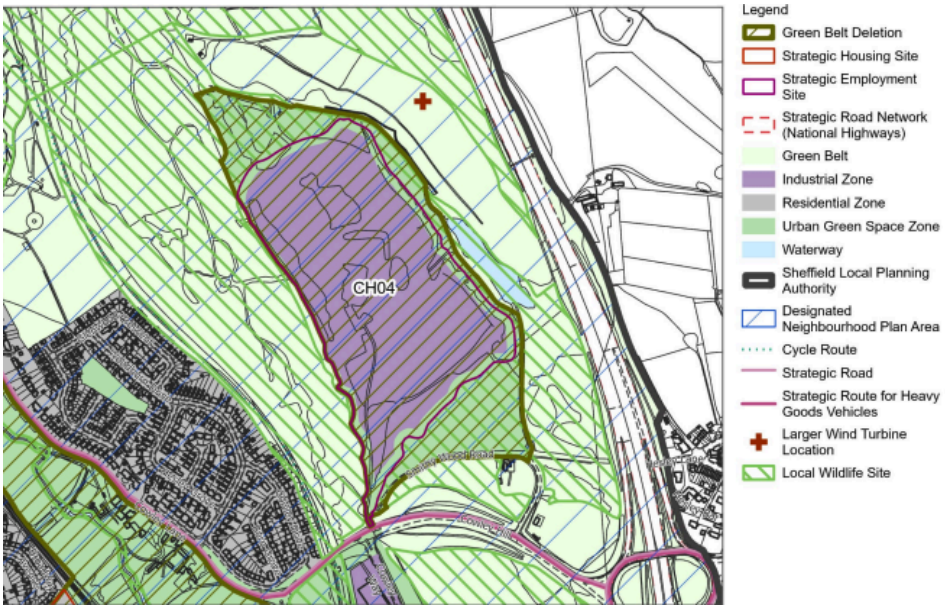
This site boundary envelopes a Local Wildlife Site, ancient woodland and areas which have been identified as priority habitat within our Nature Recovery Network and are therefore of significant ecological value (see above map). It also borders further Local Wildlife Site and priority habitats within the Nature Recovery Network. Much of the North and West of the site have been identified as buffer or stepping stone areas to expand the current habitat and contribute to connectivity of habitats. We have accessed records of and received photographic and video evidence of multiple protected species inhabiting this whole site in addition to the designated Local Wildlife Sites it borders. Thus, suggesting that the entire site is being utilised by local wildlife and can become great for nature as our Nature Recovery Network mapping supports, and that isolating the Local Wildlife Site will degrade the habitat. SRWT do not believe that drawing the boundary to exclude these from the development or offering the narrow 15m buffer is sufficient mitigation for the reasons listed in the general comments. Under the Site Selection Methodology, this site should have been excluded from the Site Selection.

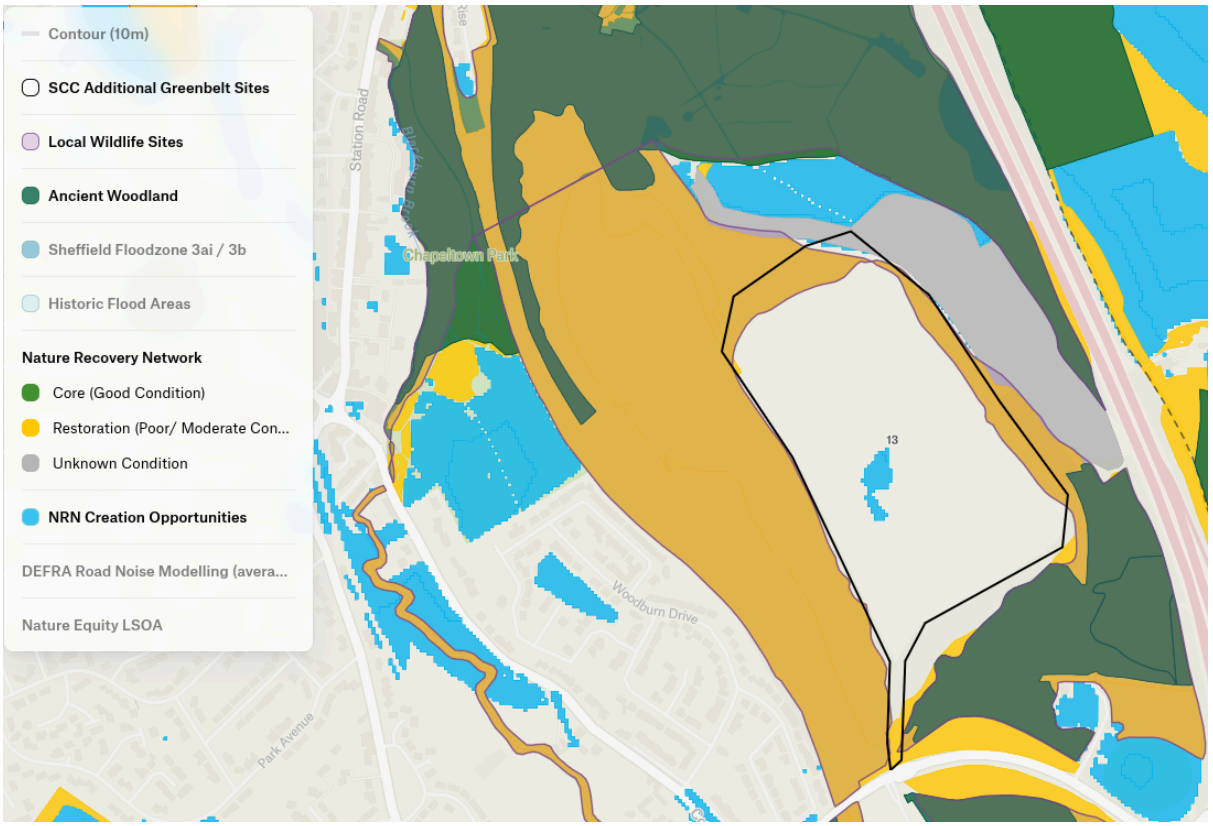
Development of this site can only have negative impacts on the biodiversity in this area. Sections 180(d) and 180(e) of the NPPF state that new developments should provide net gains for biodiversity and not put the local environment “at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans”. SRWT considers that any development at this site would not meet this requirement.

The deletion of the Green Belt covering the local wildlife site offers much less protection from future development and weakens the protections of other Green Belt Wildlife sites.

Current flood risk assessment is insufficient to adequately assess the negative impact flooding would have on the ancient woodland and wildlife site which would be put in extreme danger from flooding.

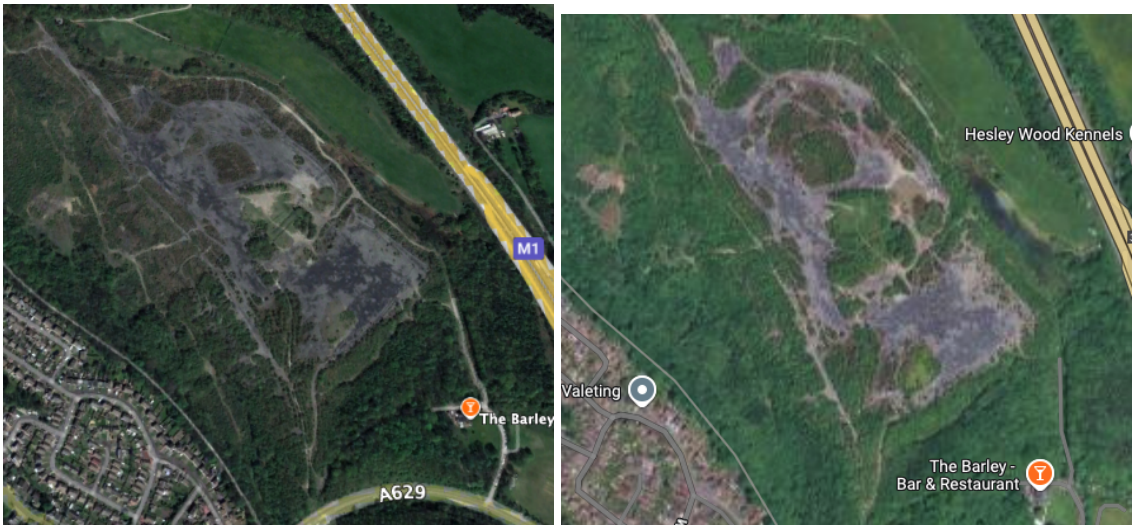
CH04 - Hesley Wood, north of Cowley Hill, S35 2YH





This site is completely surrounded and bordered by Local Wildlife Site, ancient woodland and priority habitats within our Nature Recovery Network and are therefore of significant ecological value. Further, it contains buffer and stepping stone areas within our Nature Recovery Network (see above map). Over the last 10 years, the

site has shown significant nature recovery and has begun to be reclaimed by nature (see below images), we feel that development on this site will not only result in loss of habitat, but degradation and fragmentation of the surrounding habitats from pollution, increased footfall, and need for increased access in and out of the site.



SRWT do not believe that offering the narrow 15m buffer is sufficient mitigation for the reasons listed in the general comments. Under the Site Selection Methodology, this site should have been excluded from the Site Selection. We have accessed records of and received photographic and video evidence of multiple protected species inhabiting this whole site in addition to the designated Local Wildlife Sites it borders. Thus, suggesting that the entire site is being utilised by local wildlife and can become great for nature as our Nature Recovery Network mapping supports, and that isolating the Local Wildlife Site will degrade the habitat.

Development of this site can only have significant negative impacts on the biodiversity in this area. Sections 180(d) and 180(e) of the NPPF state that new developments should provide net gains for biodiversity and not put the local environment “at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans”. SRWT considers that any development at this site would not meet this requirement.

The deletion of the Green Belt covering the local wildlife site offers much less protection from future development and weakens the protections of other Green Belt Wildlife sites. This concern is evidenced by Rula Developments advertising this development on the website. Elevate, Sheffield, J35 M1, a 56 acre site (7 hectares more than the SCC proposed site). Their site illustration clearly shows their intention to utilise land beyond the SCC proposed site, beyond the Green Belt deletion and even into the ancient woodland.

In addition, new Green Belt boundaries have not been drawn to any particular defensible boundary highlighting the inconsistent approach referred to in the general comments.

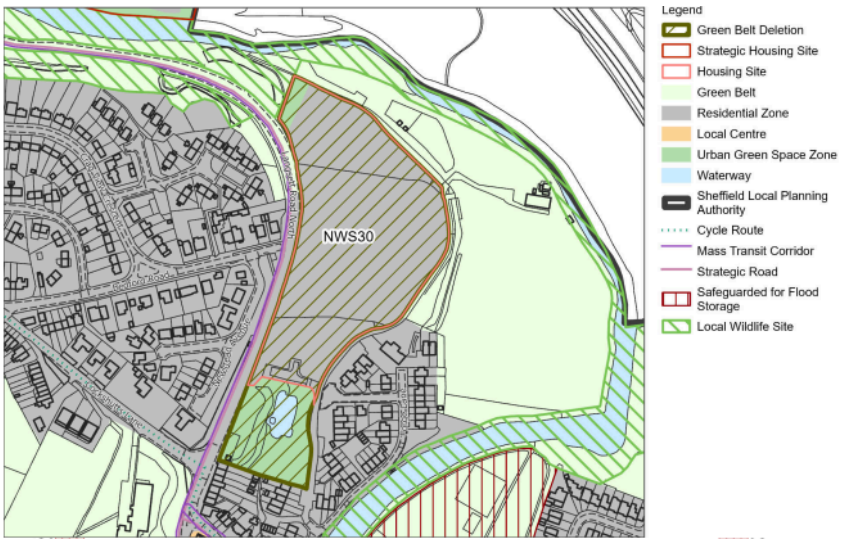
https://www.ruladevelopments.co.uk/sales/hesley-wood-junction-35-m1-motorway/

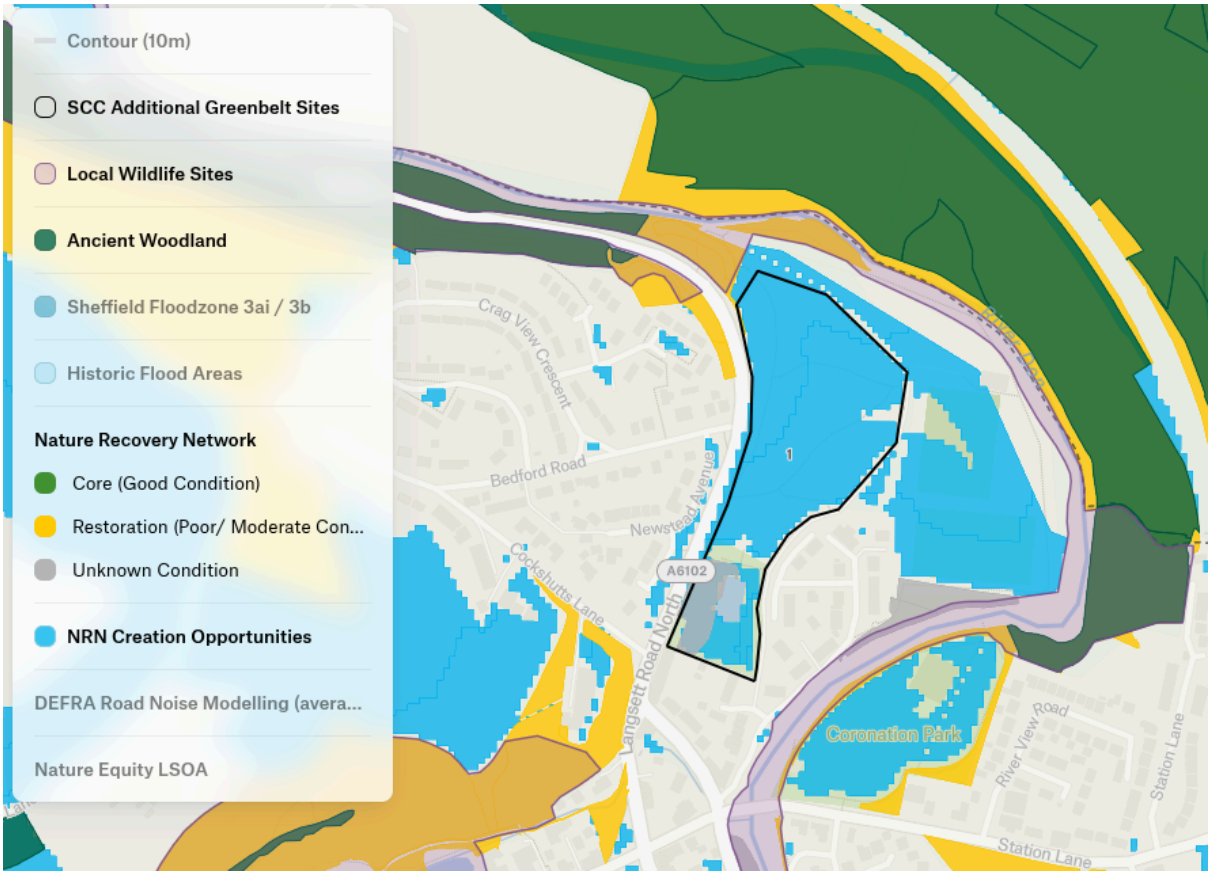
https://www.sheffield.gov.uk/sites/default/files/2023-10/pdsp071_rula_developments_redacted.pdf

Development of this site would put the nature recovery site which is located in the valley at extreme risk of deep (more than 1.2m) flooding and the wildlife site to the east of the site at significant risk of deep flooding.

In addition to our above concerns with the whole plan, SRWT would like **more adequate protection** to be implemented for bordering Local Wildlife Sites and ancient woodland, in the form of further evidencing at each site and larger buffers for the following sites:

NWS30 - Land at Forge Lane, S35 0GG





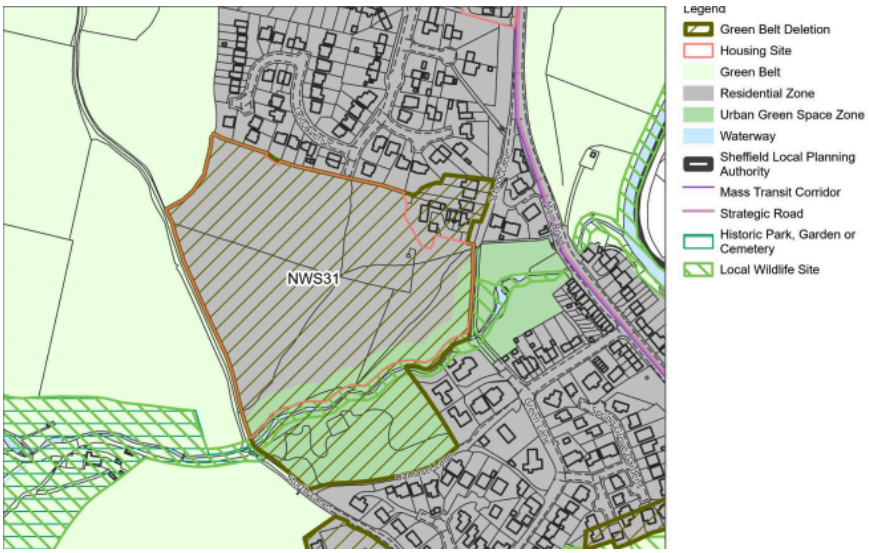
With the addition of the Green Belt deletion to the North West, this site borders a local wildlife site which contains both Ancient Woodland and has been identified as containing priority habitats within our Nature Recovery Network. The plan indicates no set buffer, which we feel is a discrepancy in the plan as all other sites bordering a Local Wildlife Site with Ancient Woodland/ woodland have been allocated a 15m buffer. It appears that any buffer will consist of mixed use urban green space. SRWT would like to see a set buffer of 50m - 100m implemented, the buffer widened for the reasons given in the general comments, and that it should be a natural green space as described in the Natural England guidance, with physical boundaries to prevent degradation of the LWS. Further, the area designated as green space and much of

the rest of the site is a buffer/ stepping stone area within our Nature Recovery Network (see above map), thus has the potential to expand the existing habitat within the LWS and priority habitat within the NRN so should be improved as a habitat.

Representations made by Lichfields on behalf of Commercial Estates Group (CEG) have indicated the intention to develop within the allocated urban green space with a cycle path.

https://www.sheffield.gov.uk/sites/default/files/2023-10/pdsp026_ceg_redacted.pdf

NWS31 - Land between Storth Lane and School Lane, S35 0DT

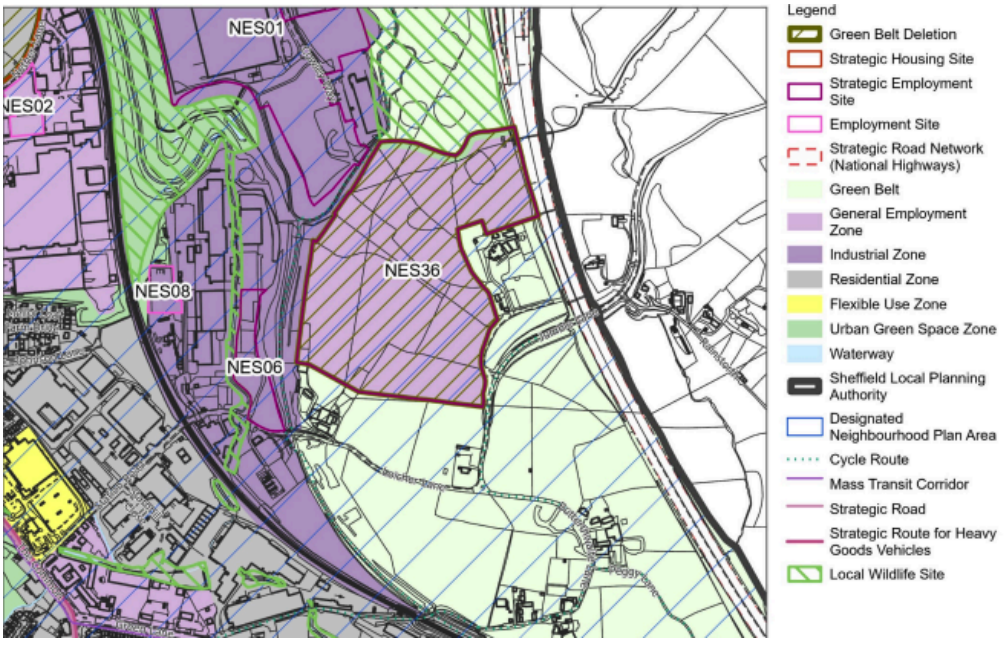


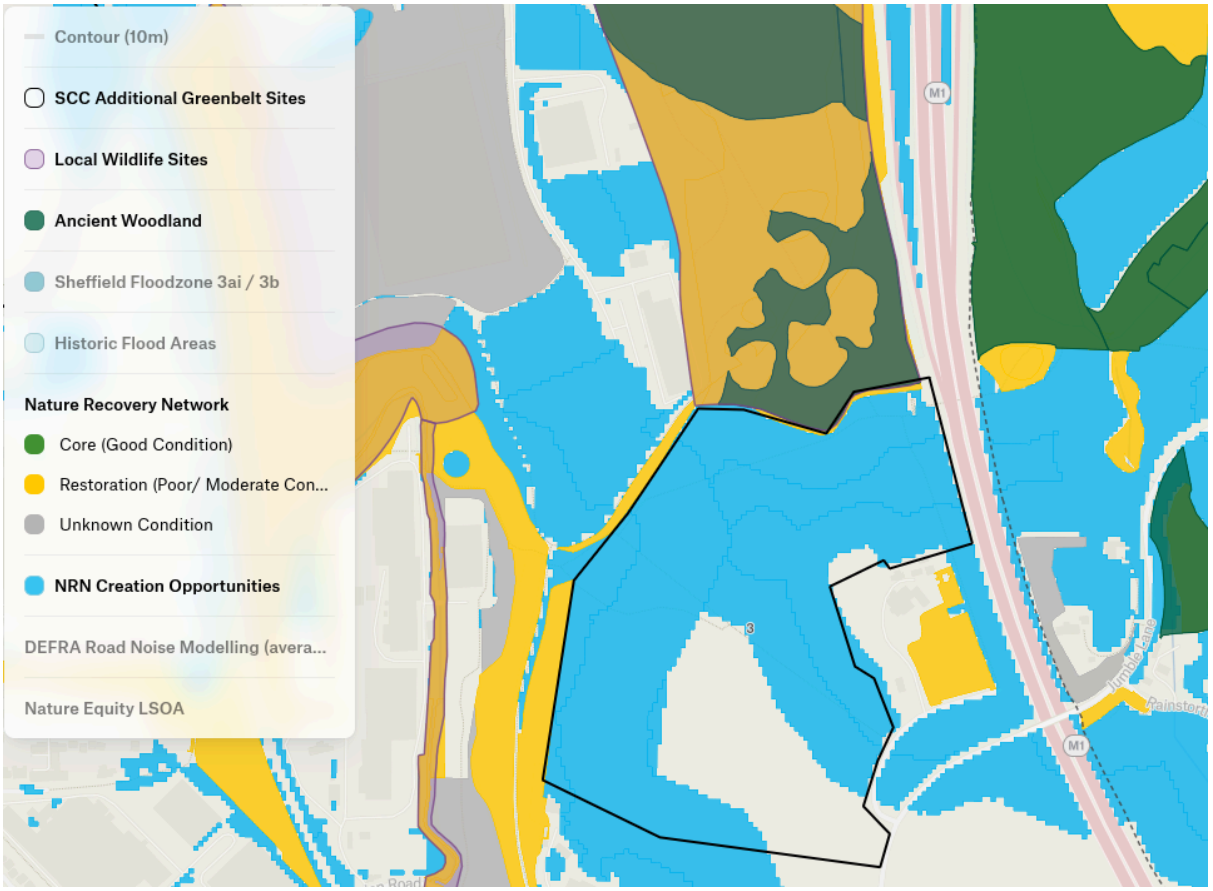
This site borders a Local Wildlife Site containing a watercourse and woodland, and the whole site has been identified as containing priority habitat within our Nature Recovery Network (see above map). The plan indicates that a buffer of just 15m will be included. SRWT would like to see the buffer widened to 50m - 100m for the reasons given in the general comments. We would also like to see plans to improve the area for nature and wildlife, as the site is currently identified as a priority habitat of poor/ moderate condition.

SWRT are also concerned that the deletion of Green Belt beyond the development site will give much less protection from future development and this weakens the protections of other Green Belt Wildlife sites.

Current flood risk assessment has not taken into account the extreme risk of deep flooding in the local wildlife site to the south of the development site and the recommended SuDS is only a standard calculation and does not take into account soil type or practicalities of implementation on this particular site (see above map). SRWT would request that a detailed flood assessment is completed before releasing this site for allocation to prevent any unnecessary negative impact on the biodiversity within this local wildlife site.

NES36 - Land to the south of the M1 Motorway Junction 35, S35 1QP



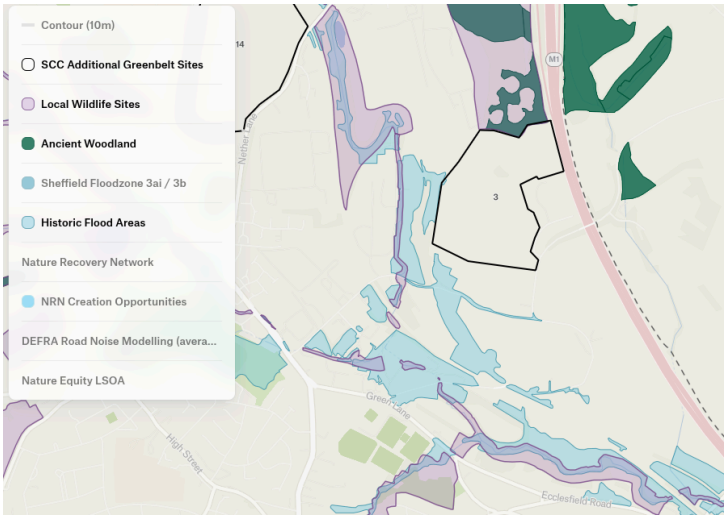


This site borders a local wildlife site and the ancient woodland known as Smithy Wood, also containing priority habitats within our Nature Recovery Network to the North and an area which has been identified as being important for Nature Recovery bordering to the left (see above map). The plan indicates that a buffer of just 15m will be included to protect the ancient woodland. SRWT would like to see the buffer widened to 50m - 100m for the reasons given in the general comments and a buffer added to the border at the left which forms part of a nature corridor. Further, this would protect more of the buffer/ stepping stone areas to enhance existing habitats and help nature recovery.

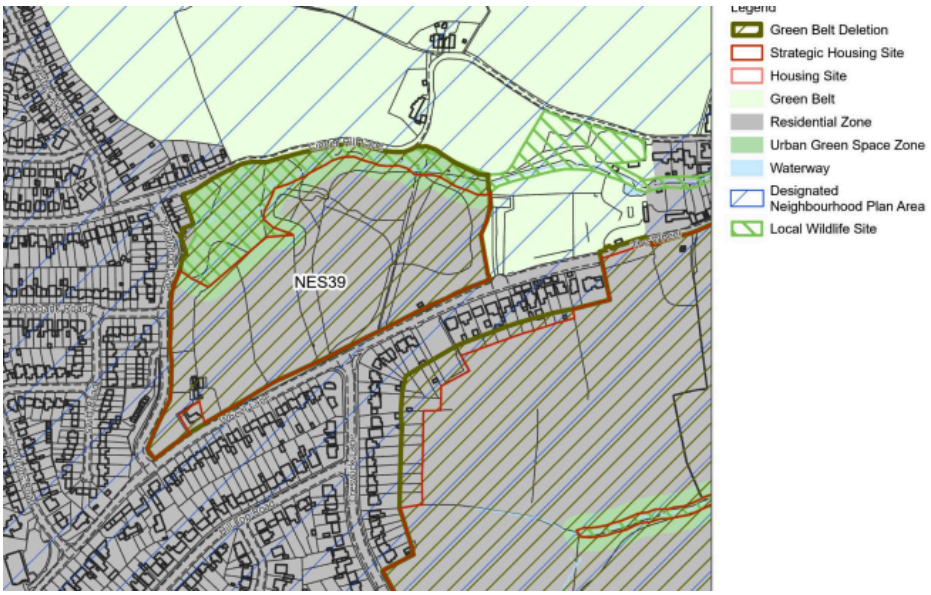
SWRT are aware that JEH Planning has suggested that access to this site would be via an extension from the existing Smithy Wood Industrial Estate, which would cut across the area identified as priority habitat and important for nature recovery, fragmenting the nature corridor.

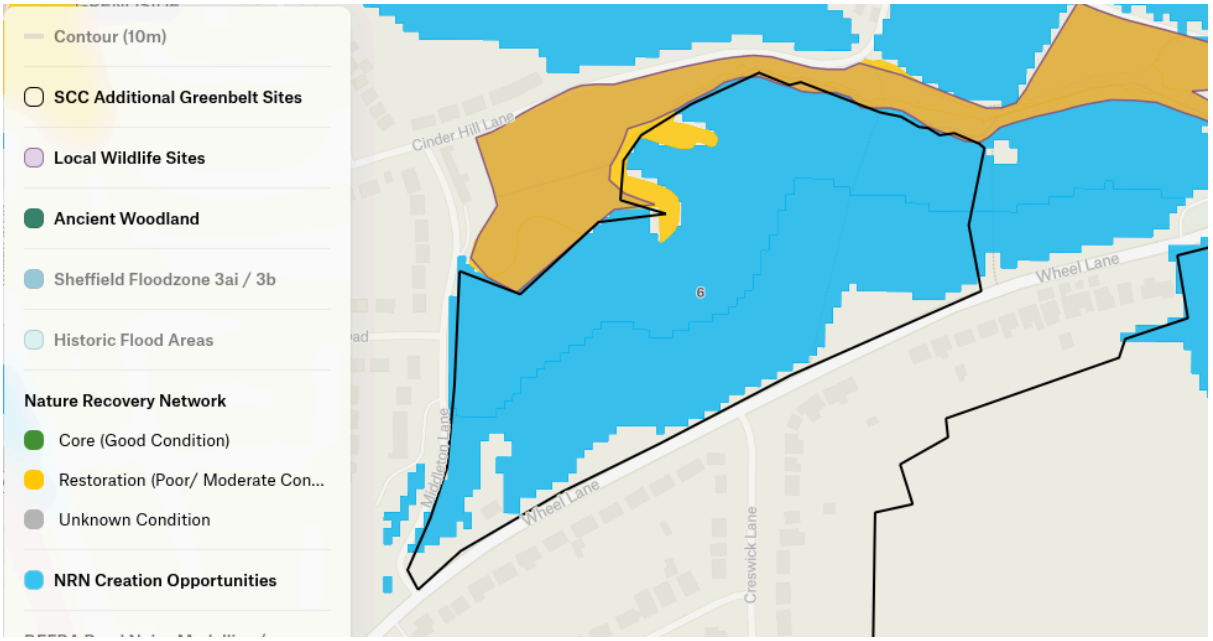
https://www.sheffield.gov.uk/sites/default/files/2023-10/pdsp078_st_pauls_developments_and_smithywood_business_parks_redacted.pdf

This site is currently greenfield, therefore a detailed drainage strategy would be required to ensure there is no increase in surface water flood risk the local wildlife site (Blackburn Brook near Butterthwaite Wheel) to the south of the development which is currently a level 3 flood zone and has suffered significant historical flooding (see map below).



NES39 - Land at Wheel Lane and Middleton Lane, S35 8PU



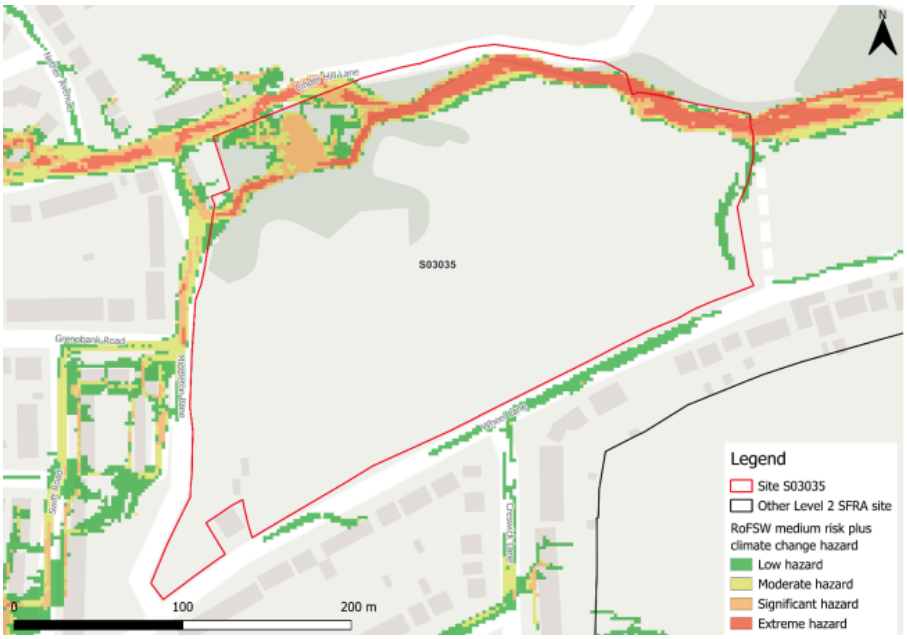


This site borders a local wildlife site which also contains priority habitats within our Nature Recovery Network (see above map). The plan indicates that a buffer of just 15m will be included. SRWT would like to see the buffer widened to 50m - 100m for the reasons given in the general comments. This will also protect more of the buffer/ stepping stone areas within the NRN resulting in less negative impact on the LWS and nature's recovery.

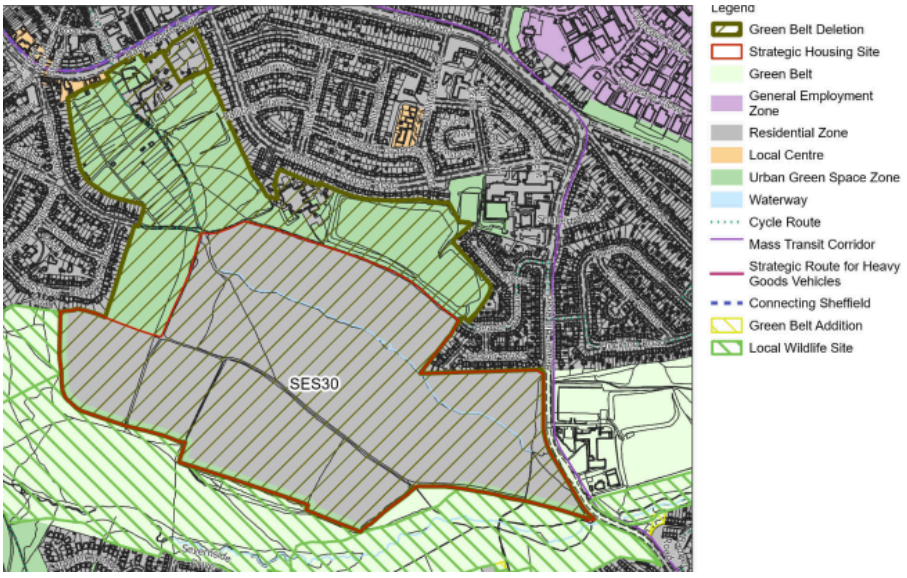
SRWT are also concerned that the deletion of Green Belt beyond the development site which contains the local wildlife site will give much less protection from future development and weakens the protections of other Green Belt Wildlife sites.

Current flood risk assessment has not taken into account the significant risk of deep flooding in the local wildlife site and ancient woodland to the north of the development site and the recommended SuDS is only a standard calculation and does not take into account soil type or practicalities of implementation on this particular site (see map below). SRWT would request that a detailed flood

assessment is completed before releasing this site for allocation to prevent any unnecessary negative impact on the biodiversity within this local wildlife site.

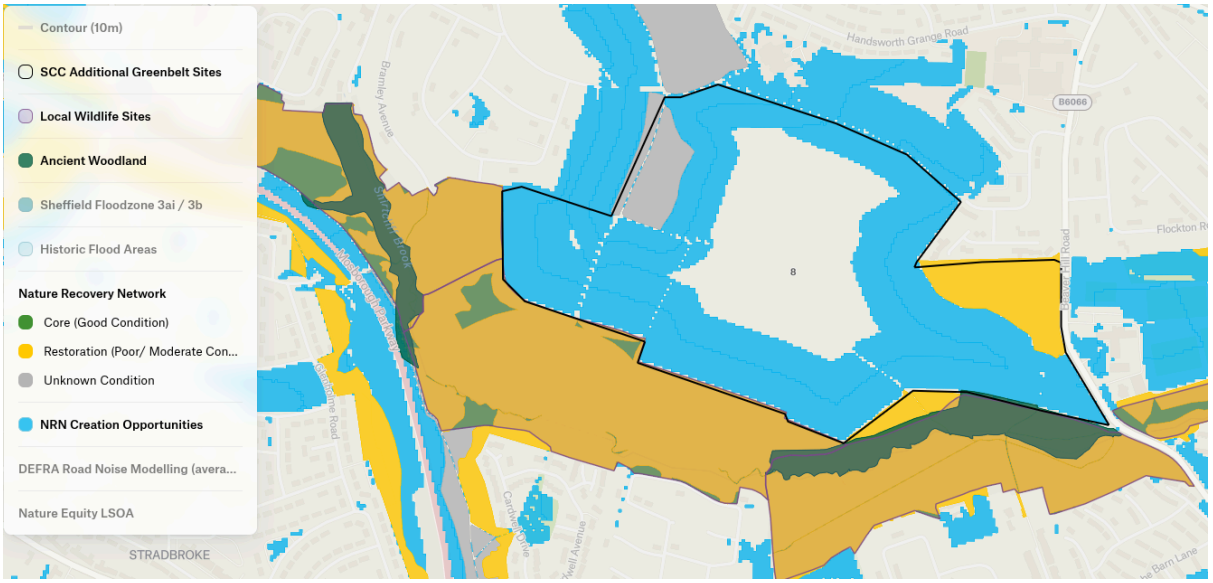


SES30 - Land between Bramley Lane and Beaver Hill Road, S13 7JH

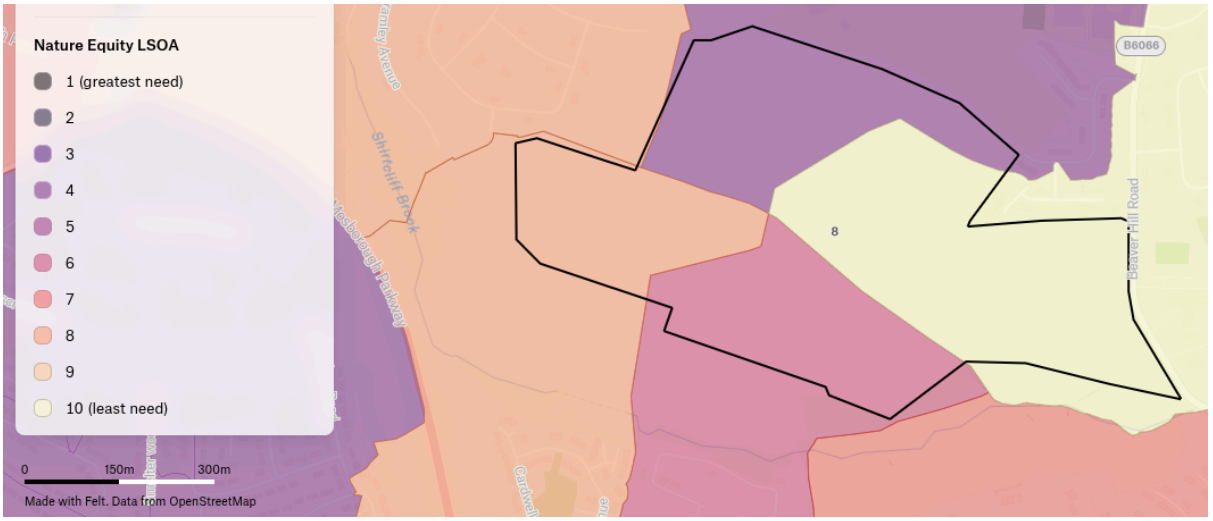


This site borders a Local Wildlife Site and Ancient Woodland, and borders both 'core' and 'restoration' priority habitats within our Nature Recovery Network (see map below). Further, the proposed site contains both 'restoration' and 'unknown condition' priority habitats, as well as creation opportunities. The plan indicates that a buffer of just 15m will be included. SRWT would like to see the buffer widened to 50m - 100m for the reasons given in the general comments to protect existing habitats and give

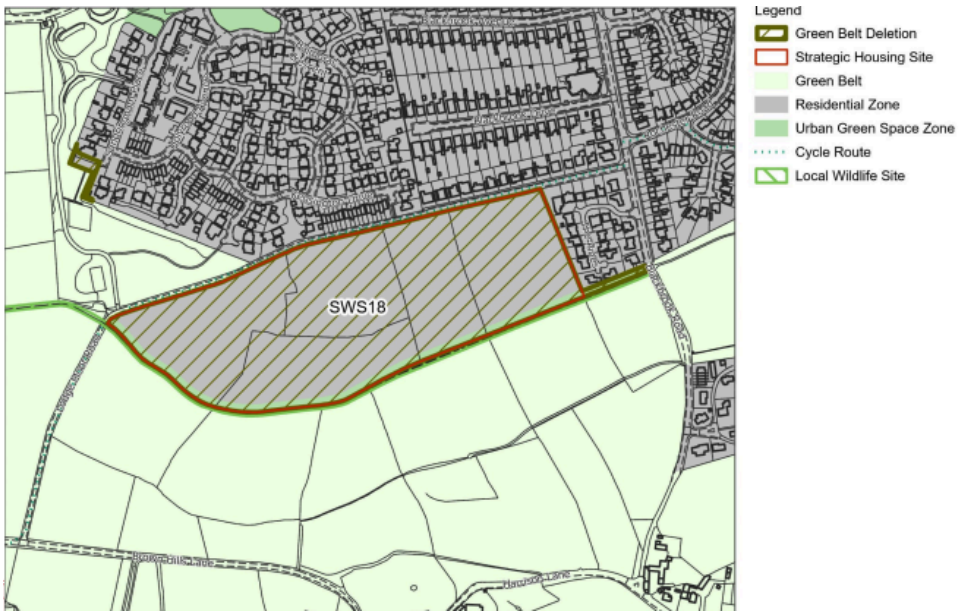
opportunity for their expansion and improvement.

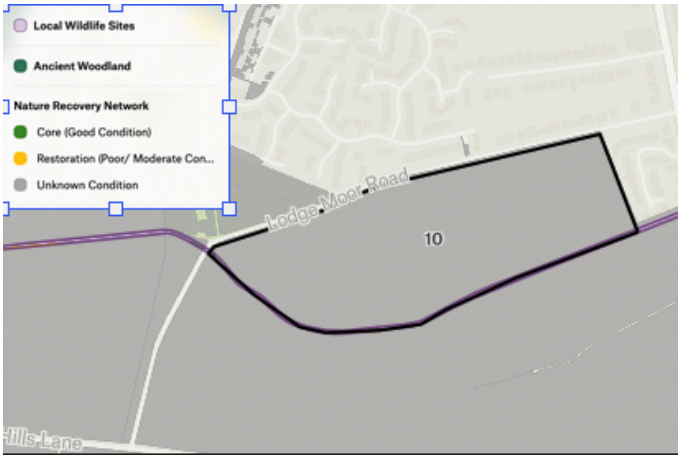


The human inhabited areas directly adjacent to this site to the North (Handsworth) are some of the lowest scoring areas in Sheffield for Nature Equity (see map below), suggesting this site with its public rights of way and abundance of wildlife is crucial for nature connection and the nature equity of those people that live nearby. We feel that development here would further lower the nature equity ranking of surrounding areas making them more deprived, particularly as development would result in loss of green belt, restrict access to Local Wildlife Sites and the entire site would lose ecological value as described above.



SWS18 - Land between Lodge Moor Road and Redmires Conduit, S10 4LZ

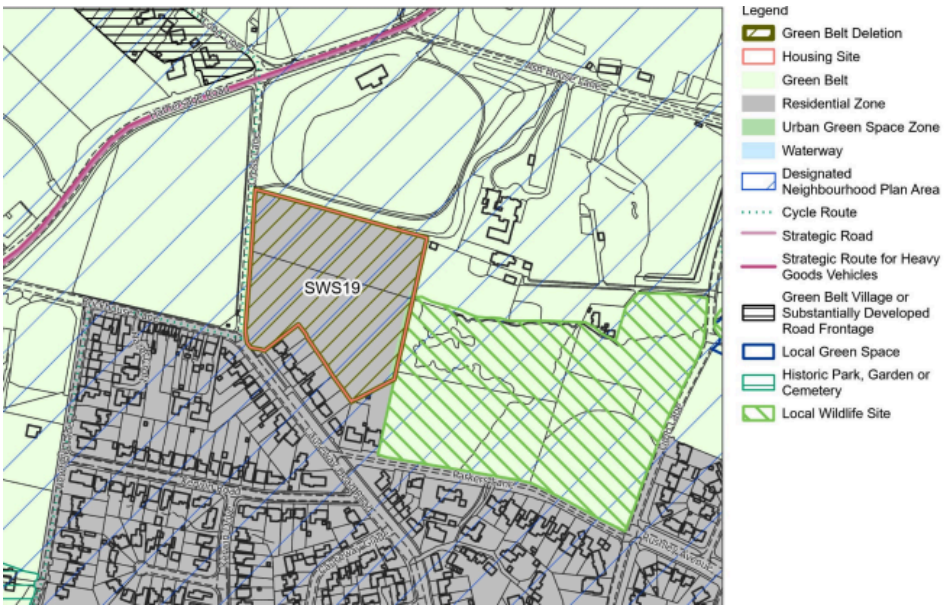


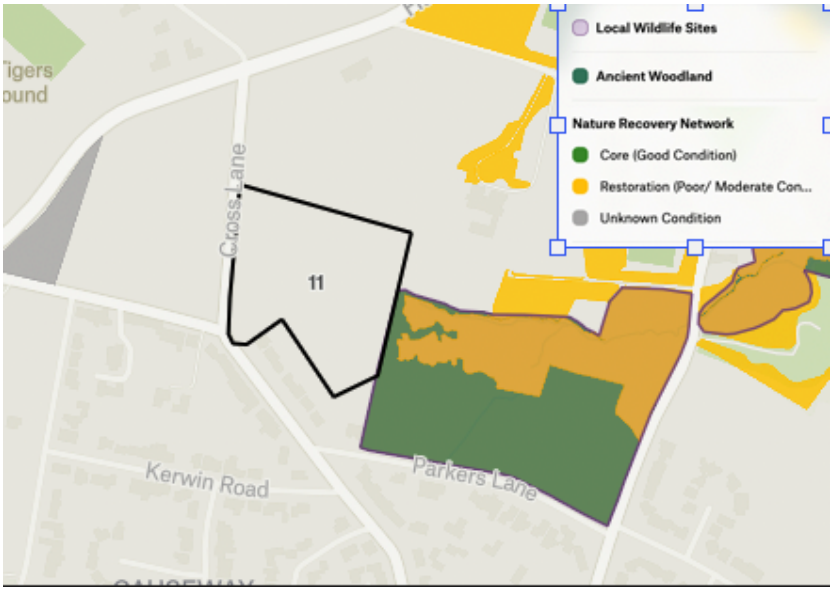


This site borders a local wildlife site. The plan indicates that a buffer of just 10m will be included. SRWT would like to see the buffer widened to 100m for the reasons given in the general comments. Further, the entire site has been identified as a priority habitat of unknown condition via our Nature Recovery Network (see above map). We would like to see ground-truthing works carried out via ecology surveys to determine the condition of this habitat, to ensure proper mitigation can be achieved.

We are aware that water voles have been recorded a short distance up the conduit, therefore SRWT would request that a detailed ecology report is undertaken on this site before it is released for allocation.

SWS19 - Land to the north of Parkers Lane, S17 3DP





This site borders a local wildlife site which also contains ‘core’ and ‘restoration’ priority habitats as identified via our Nature Recovery Network (see above map). The plan indicates that a buffer of just 6m will be included. SRWT would like to see the buffer widened for the reasons given in the general comments.

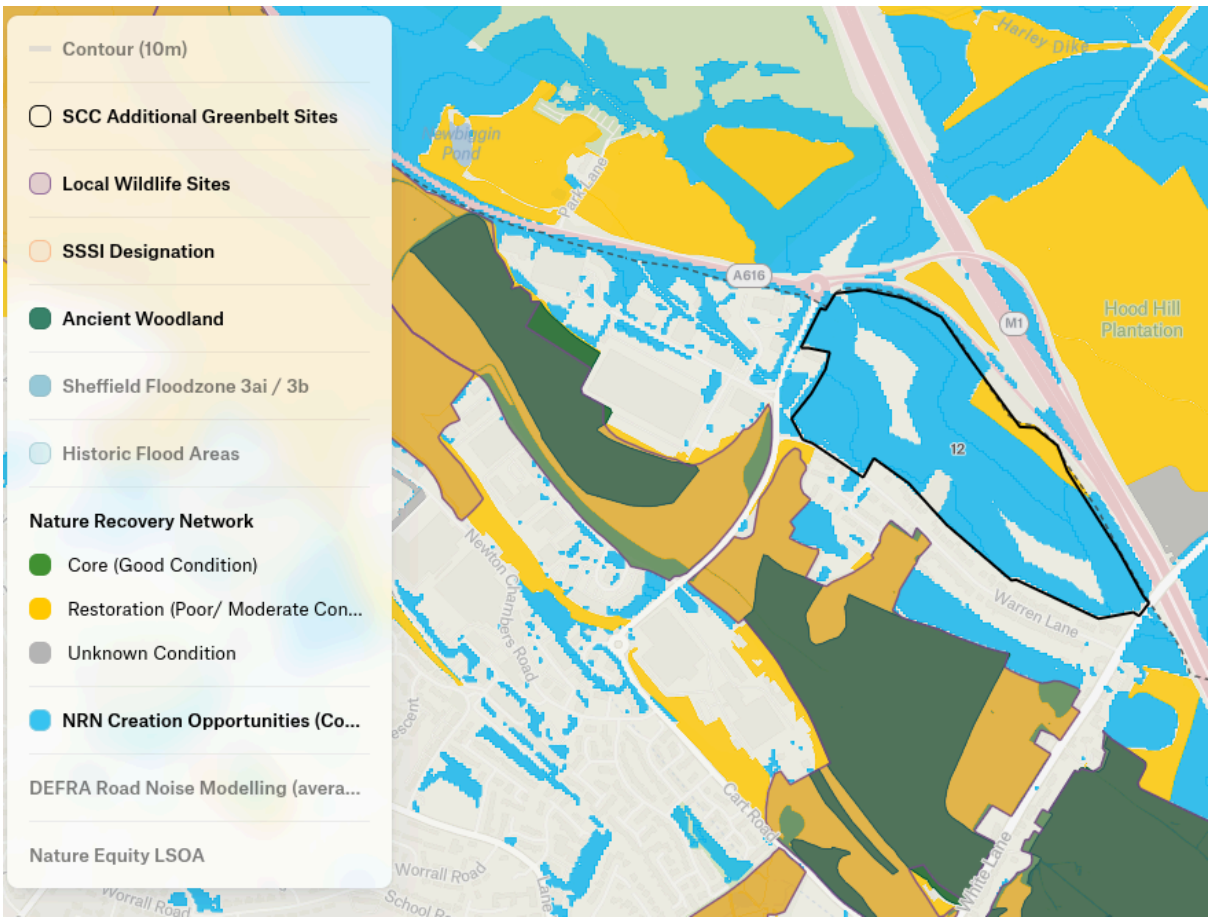
Current flood risk assessment has not taken into account the extreme risk of flooding in the local wildlife site to the east of the development site and the recommended SuDS is only a standard calculation and does not take into account soil type or practicalities of implementation on this particular site (see below map). SRWT would request that a detailed flood assessment is completed before releasing this site for allocation to prevent any unnecessary negative impact on the biodiversity within this local wildlife site.

Other sites

Our general comments pertaining to pollution, access to nature, and inadequate consideration of the natural environment as outlined in the NPPF across the plan apply to the remaining sites (*Land to the south of White Ln - SCC site ref SS19; Land bordered by M1, Thorncliffe Rd, Warren Ln and White Ln - SCC site ref CH03; Land to the east of Chapeltown Rd - SCC site ref CH05).*

We would like to see assurance of nature-friendly development, by way of increased habitats, Biodiversity Net Gain on site, surveys of protected species and proper mitigation of impacts, and implementation of quality green spaces both for nature and for peoples access to nature.

Site CH03 (Land bordered by M1, Thorncliffe Rd, Warren Ln and White Ln) contains an area of priority habitat ("restoration" - of poor/moderate condition) within our Nature Recovery Network, thus we would like to see plans in place to protect and improve this habitat to contribute to nature recovery.



Conclusion

We urge Sheffield City Council to:

1. **Remove sites NES37, NES38, SES29 and CH04**
2. **Implement evidence-based buffer zones** (50m - 100m) around sensitive sites to account for noise, light, and air pollution, and to ensure wildlife corridors remain intact. If these sites are to remain after considering the issues with the whole plan, as we have highlighted, conduct full ecological surveys on each area before and is released from the Green Belt.
3. **Conduct full ecological impact assessments** for all proposed sites that are within 100m of wildlife sites, wildlife corridors or ancient woodland.
4. **Invest in green infrastructure and wildlife-friendly planning** across all development zones, ensuring a net gain for biodiversity rather than net loss.

We remain open to working with the Council to find more sustainable solutions that align development goals with ecological responsibility and nature recovery.

Sheffield and Rotherham Wildlife Trust