Sheffield & Rotherham Wildlife Trust
37 Stafford Road
Sheffield, S2 2SF
0114 263 4335
mail@wildsheffield.com
wildsheffield.com

General Comments

Priority habitat definitions and notes on policy GS5 & GS6

As of writing this representation, we have been unable to make comments on the above ecology policies as they have not yet been supplied to us for comments as agreed at the hearing on the 16th October 2025. We also note that the SCC priority habitat definitions, which were implied to be a local derivative, have also not been shared as was also discussed at the same hearing. Unfortunately without these, our comments as follows are prepared without the correct information and definitions necessary to fully evaluate the ecological soundness.

Exam 130B - Proposed Additional Site Allocations: Selection of Sites for Green Belt Release Topic Paper – Addendum (November 2025)

During the hearings it was unfortunately implied that the Nature Recovery Network (NRN) and SY Natural Capital and Biodiversity mapping was of "limited value". There is no doubt that this data is credible and valid material evidence that could and should have been used to inform the site selection process despite having not been adopted as formal policy, therefore the following information is given as background.

The NRN completely aligns with the SY Natural Capital and Biodiversity mapping and Natural England's Priority Habitat Inventory (PHI). It is the most up to date and widely accepted data.

A full explanation of the SY Natural Capital and Biodiversity can be found here, but summarised below:

- Uses the PHI as the primary data source to identify and map priority habitats, this provides a national baseline showing the extent and distribution of all Section 41 habitats of principal importance - this data is updated biannually.

Broad habitat	Specific habitats included
Mire	Bogs and upland flushes, fens and swamps.
Semi-natural grassland	Acid, neutral, calcareous, rough and semi-improved grasslands.
Heathland	Includes all heathland types (including wet and dry heaths) and grass-heath mosaics.
Broadleaved and mixed woodland	Broadleaved and mixed woodland types (excludes coniferous woodland, parkland or individual trees).
Wet grassland and wetlands	Marshy grassland, floodplain grazing marsh, lowland fen and swamp (reedbed)

- The PHI was supplemented and checked against Local datasets, Local Authority ecological records, Sheffield and Rotherham Wildlife Trust, Ordinance Survey, Environment Agency and others to improve local accuracy and fill gaps in national data.

- The data was given a confidence level reflecting the certainty of the priority habitat's condition by NE - this resulted in some areas being defined as 'unknown' conditions which are the areas we are requesting should be groundtruthed prior to allocation to determine the condition. These areas could be in good condition or nearing good condition for nature ("core" on our NRN mapping).

- Where possible local survey evidence and aerial imagery was used to refine boundaries. Ground truthing works occurred on our reserves and some other accessible areas.

This document was published mid 2021 and the GIS data shared with LA's. By the time the SCC was preparing the original draft version of the Sheffield Plan, that data had been available for around 18 months. Similarly the NRN, which used this data as a base before developing it further, has been available from SYMCA since 2023 via the SY LNRS development process, of which SCC have been fully involved. This data is being used to inform the emerging LNRS.

We are concerned that SCC have not used either of these data sets to inform both their policy and their additional Green Belt site selection processes, by not using the most up to date information available and by potentially using non-standard classifications of priority habitat (as implied at the hearing on the 16th Oct 2025), we feel that the Council could be creating a direct policy conflict between the *Sheffield Plan*, the emerging *Local Nature Recovery Strategy (LNRS)*, and the *Environment Act 2021*. Under the Act, and in line with Section 41 of the NERC Act 2006, priority habitats are nationally defined.

The priority habitats, shown as green (core or good/great condition) and yellow (in need of restoration) on the maps in our original representation, exist at present and are being threatened by many of the proposed site allocations either directly (within the site allocation) or via edge effects due to insufficient buffers. As we raised in our original written response, less than 5% of land in Sheffield is currently a priority habitat in good condition for nature, thus some of the allocations to build on or around priority habitats is not in line with SCCs declaration of a Nature Emergency as this percentage will surely decrease with the current proposals. It is fundamental to nature recovery that these areas of land are correctly identified and appropriate mitigations are put in place within the site boundary - where ecological damage would be too great to mitigate within the site boundary - these ecological constraints should have informed the site selection as discovery at the planning stage would be too late for the Green Belt release.

The ecology department confirmed on Thursday 16th October that they were now retrospectively using this data to identify opportunities to create or enhance ecological corridors and stepping stones. The opportunity areas are from the same dataset as the priority habitats, but these are shown in blue and referred to as "Creation opportunities" on the NRN and in our representations.

We are also concerned that there may have been a misunderstanding between the existing priority habitats and the creation opportunities. Without correctly identifying the priority habitats, their existing buffers and stepping stones and having an effective policy to preserve or enhance them, any ecological corridors created within site allocations will be isolated and ineffective - these must be strategically placed to benefit the priority habitats they are designed to enhance to ensure the priority habitat and opportunity areas function as a network, not retrospectively implemented where it is convenient with minimal disruption to the development. Ultimately, the aim must be to create an

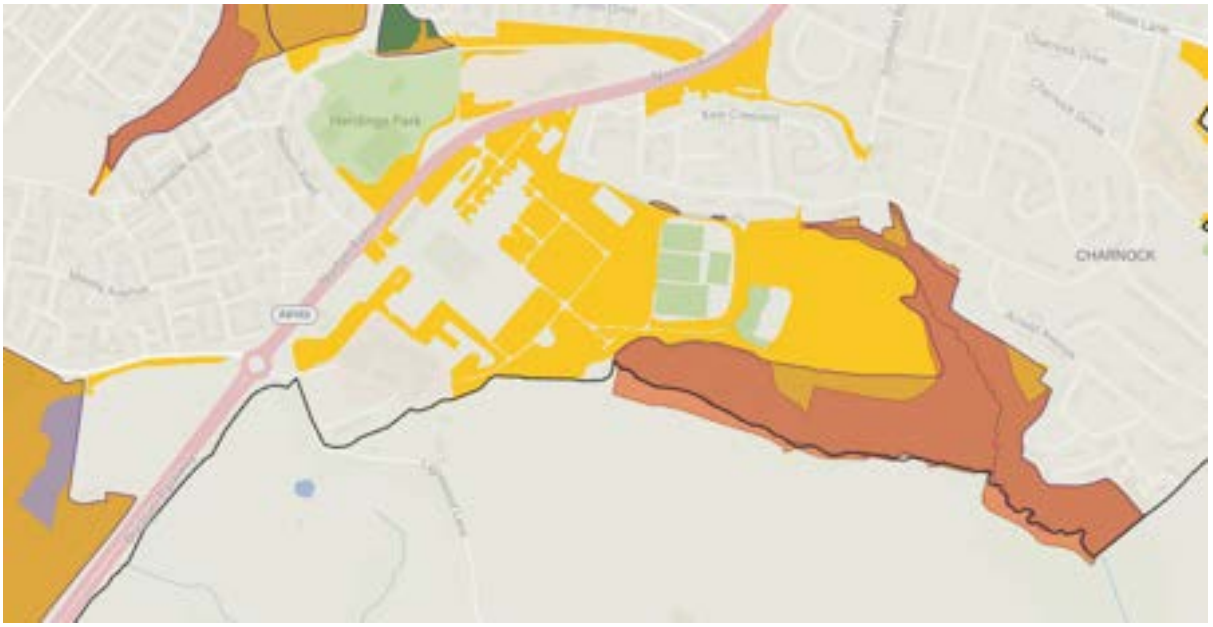
ecological network with sufficient resilience to survive and combat the biodiversity crisis and climate change whilst still allowing important development – this plan unfortunately fails to do this.

Furthermore, there is evidence that the priority data was used during the original site submission stage as demonstrated in the Sheffield Plan Site Allocation Schedule (Oct 2022) when the NRN/SY Natural Capital and Biodiversity data was used to not only identify priority habitats but also remove them and their buffers from the developable area - a good example of this would be **Norton Aerodrome (SS17)**:

Allocated site from Sheffield Plan Policies Map - ArcGIS

*Site mapped on Google Earth indicates the allocated site is around **18Ha***

The site shows decades of nature regeneration with areas of woodland and grassland, this is reflected in the SY Natural Capital and Biodiversity Maps as priority habitat in restoration condition with a small section (south-east) adjoining ancient woodland which is also a local wildlife site:



Felt map to show NRN Priority Habitat (yellow) within the Norton Aerodrome site

The Site Allocation Schedule (Oct 2022) states as a condition of development on this and many of the sites – "*Connective ecological corridors/areas (including buffers) shown on the Local Nature Recovery Strategy and combined natural capital opportunity maps are to be maintained on site and removed from the developable area. Biodiversity Net Gain should be delivered on site within the connective ecological corridor/area*."

This condition is reflected in the developable area of Norton Aerodrome which has been drastically reduced from around 18Ha to only 8.4Ha (which is approximately the same as the remaining area once the priority habitats have been removed).

Unfortunately, in the subsequent document for the Proposed Additional Site Allocation (May 2025) none of the additional sites contained this condition despite some of the allocations having a perceived negative impact on ancient woodland and the wider network, core, restoration and areas of priority habitats that are in unknown condition and local wildlife sites. At the hearing on the 30th Sept 2025, the Council expressed a desire that this condition be replicated within these additional sites, however, we have not been able to find this addition within any of the recently released documents.

The Council's own Topic Paper demonstrates that ecological value was used as a decisive reason to exclude multiple Green Belt sites from allocation, with several rejected on the explicit basis that they were either "known to have significant ecological value" or "likely to have significant ecological value." However, the same ecological appraisal wording appears on a number of sites that were nonetheless allocated, including Forge Lane (NWS30), Storth Lane / School Lane (NWS31) and particularly South of M1 J35 (NES36), which shares the identical ecological assessment as Oakes Park — a site rejected on that very ground. Furthermore, in the Norton Aerodrome area, the Council rejected S02897 due to its ecological sensitivity while simultaneously allocating SS17 immediately adjacent, within the same ecological network, habitat unit, and corridor structure. This selective and inconsistent application of identical appraisal criteria indicates that ecological evidence was not applied uniformly across the site selection process and there is no evidence in any of the released documentation that the NRN or Natural Capital data was used to inform this later stage. As a result, the methodology underpinning allocation decisions is not transparent, objective, or consistently evidence-led, thereby undermining the defensibility and soundness of the Plan's site selection process.

We strongly object to the inconsistent use of the ecological assessment and request that the inspectors consider directing the Council to (i) re-evaluate the priority habitats using the most up to date information and the nationally recognised definitions (SYMCA as the responsible authority for LNRS will undoubtedly be able to advise which data is most suitable), (ii) create a local plan to protect and enhance these existing habitats when they are within or adjacent to site allocations (this requires the consideration of more than minimum root protection zones, but also must consider the impact of noise, air and light pollution and the proposed use and scale of the site), and (iii) create policy which allows for identification of the proportionate opportunities to maintain and improve connectivity of these habitats, thereby creating valuable corridors and stepping stones and function of the network. It could be that this then impacts on the numbers of units the sites can realistically accommodate, but we hope that the council is committed to the adherence to national environmental policy and legislation by aligning to LNRS principles and bring forward a plan which both protects our most vulnerable and important habitats whilst allowing for necessary development.

Examples of Sites Rejected Due to Ecological Constraint				
Site Ref	**Site Name**	**Ecology Assessment**	**Ecological Severity**	**Allocation Outcome**
S01220	Oakes Park	Site is known to have significant ecological value.	Very High	REJECTED
S03006	Totley Brook	Site is likely to have a significant ecological value.	High	REJECTED
S01833	Cross Lane	Likely to have significant ecological value; requires further ecology assessment.	High	REJECTED
S03012	Ryecroft Farm	Likely to have a significant ecological value.	High	REJECTED
S04242	Birley Wood	Likely to have a significant ecological value.	High	REJECTED
S02503	Charnock Park	Likely to have a significant ecological value.	High	REJECTED
S02897	Adjacent Norton Aerodrome	Likely to have a significant ecological value.	High	REJECTED

Examples of Sites Allocated Despite Similar or Greater Ecological Constraint				
Site Ref	**Site Name**	**Ecology Assessment**	**Ecological Severity**	**Allocation Outcome**
S03032 (NWS30)	Forge Lane	Site is likely to have a significant ecological value. Requires further ecology assessment.	High	ALLOCATED
S03483 (NWS31)	Storth Lane / School Lane	Site is likely to have a significant ecological value. Requires further ecology assessment.	High	ALLOCATED
S04101 (NES36)	South of M1 J35	Site is known to have significant ecological value.	Very High	ALLOCATED
SS17	Former Norton Aerodrome	Ecology significance by adjacency to S02897.	High	ALLOCATED

Ancient Woodland, ancient trees & hedgerows - multiple ecological documents

Given that a number of the site specific documents result in an impact on ancient woodland, we feel it necessary to include this general comment to support our site specific comments below:

Ancient woodland is not simply a stand of old trees, it is a living ecological archive. Continuously wooded since at least 1600, these areas have developed over centuries through undisturbed soil formation, complex fungal networks, ancient seed banks, and species assemblages that cannot exist in recently planted or disturbed woodland. While trees can be planted, a centuries-old habitat cannot be recreated within any meaningful human timescale; ancient woodland is irreplaceable.

They provide greater resilience to climate change, typically storing between 3-5 times more carbon than younger woodlands in the same area, this is largely due to the carbon stored in the unique soil formation within our ancient woodlands as well as the size and age of the trees, in some cases, soil carbon alone can be 10 times greater in an area of ancient woodland.

Its presence and continuity are evidenced through ancient woodland indicator species, old boundary banks, coppice stools, and other historic woodland features that reflect long-standing continuity of habitat and traditional woodland management. These are not only ecological signatures, but cultural ones, evidence of a deep, layered relationship between local people and their landscape.

This irreplaceable character and importance in combating climate change is recognised in national legislation and planning policy. The National Planning Policy Framework (para. 180c) clearly states:

> “Development resulting in the loss or deterioration of irreplaceable habitats such as ancient woodland should be refused unless there are wholly exceptional reasons.”

The threat to ancient woodland is not limited to outright removal, equally serious is incremental deterioration through encroachment, fragmentation and isolation. Development too close to ancient

woodland introduces edge effects: increased light intrusion, noise, airborne pollutants, invasive species pressure, and microclimatic alteration. Fragmentation weakens ecological resilience by cutting off the wildlife corridors and habitat connectivity that sustain biodiversity.

Natural England and the Forestry Commission are clear: ancient woodland requires robust buffer zones to avoid deterioration. While a minimum of 15 metres is needed to protect root structures from direct disturbance, significantly wider buffers are necessary to mitigate air, light, and noise pollution and to retain the broader functional ecological environment. This plan unfortunately places HGV heavy employment land adjacent to ancient woodland without any consideration for light, air or noise pollution, instead only removing the minimum 15m buffer from the developable area making the site look more viable than realistically possible if Natural England standing advice were to be actually followed at the plan stage.

To illustrate how inadequate the current minimum buffer is: applying a 15 metre protection zone to ancient woodland is equivalent to giving the same level of protection to a single mature tree. A solitary veteran tree may indeed require a 15m root protection zone, but an ancient woodland is not a single organism; it is a *complex ecological network* spread across soils, fungi, insects, flora, birds, mammals and hydrological systems that extend far beyond that radius. Treating a 400-year-old functioning woodland ecosystem with the same spatial allowance as one isolated tree is not just scientifically flawed — it fundamentally misunderstands what ancient woodland is. The current approach collapses complex habitat into a generic unit of “a bit of green open space” and in doing so, fails to account for edge effects, pollution dispersal gradients, species movement patterns, and habitat-dependent biodiversity.

Where ancient woodland lies adjacent to or becomes isolated by land zoned for HGV-heavy employment uses, the ecological risk is substantially greater than in residential or low-intensity development scenarios. HGV-dominated employment sites introduce significantly increased air pollution (including NOx, SO_2 and particulate matter), high-intensity vibration and mechanical disturbance, elevated noise levels, prolonged artificial lighting, and frequent human and operational intrusion, all of which intensify edge effects and accelerate ecological deterioration of ancient woodland.

Ancient woodland ecosystems are particularly sensitive to airborne pollution and ground disturbance because their soils carry ancient fungal networks, fragile seedbanks, and slow-cycling nutrient chains that take centuries to establish. Exposure to continuous HGV emissions and heavy-vehicle vibrations can alter soil chemistry, disrupt root systems, and affect sensitive symbiotic mycorrhizae, leading to species decline and habitat erosion within 100m. Over time, increased noise and illumination disrupt nocturnal species and impair breeding behaviours, while physical fragmentation limits wildlife movement and gene flow.

Therefore, if the Sheffield Plan is to align with Natural England guidance, the NPPF, and statutory protections for irreplaceable habitats, it must apply *stricter policy controls* and *greater minimum separation distances* when ancient woodland sits adjacent to HGV-intensive land allocations. This means not merely preserving a nominal root protection distance, but implementing pollution-mitigating buffers, acoustic and visual screening, ecological dark corridors, and guaranteed habitat connectivity. Failing to apply heightened protections in these high-impact contexts risks accelerating long-term decline and functional collapse of ancient woodland ecosystems and would be contrary to the NPPF requirement to avoid deterioration of irreplaceable habitat, against the Environment Act 2021 and to the spirit of the LNRS objectives.

It is essential that buffer distances around ancient woodland are set clearly and robustly at the Local Plan stage rather than being left to negotiation during individual planning applications. Deferring this decision risks enabling developers to rely on the minimum standard of 15m, which is wholly

inadequate (some already arguing that this is too prescriptive - Statements of Common Ground for NES36 & NES39), equivalent to giving the same root zone protection to a single tree as to an entire ancient woodland ecosystem and makes it difficult for the Council to later justify stronger protections. Planning-stage negotiation consistently leads to buffers being reduced to accommodate road layouts, HGV turning radii, and built-footprints, with ecological safeguards squeezed out once development expectations are established.

Other planning authorities, including Waverley, Wealden and East Devon, have embedded higher buffers in their Plans (ranging from 30 to 50m, and up to 100m beside high-pollution or industrial sites), recognising that ancient woodland requires protection from air, noise, light, footfall and dog impacts as well as root disturbance. Without a firmer policy in the Sheffield Plan (we recommend 50-100m around ancient woodland depending on land use and based on sound research - see below), the application of ecological safeguards will be inconsistent, reactive, and developer-led, leaving ancient woodland vulnerable to fragmentation, edge erosion and long-term deterioration. Setting a stronger buffer requirement within the Plan is therefore necessary to provide clarity, ensure policy consistency, protect irreplaceable habitats, comply with Natural England's guidance and uphold Sheffield's obligations under the NPPF, Section 41 and the emerging LNRS framework.

When indicative development layouts are included or accepted at the Plan-making stage, they implicitly establish a development form and footprint that becomes difficult to challenge later. Even though described as "illustrative," these plans begin to frame expectations of building zones, access points, buffer distances and developable areas. Developers will inevitably argue at application stage that their submitted proposals simply "conform to the indicative layout previously accepted by the Council," shifting the presumption of compliance in their favour. Moreover, planning officers tend to give weight to indicative site plans as evidence of prior acceptance of key parameters, meaning objectors (including council ecology units and wildlife trusts which are overstretched) are left arguing against a development template that has already been tacitly endorsed. For ecological issues, this is critical: if an indicative plan already shows a 15m minimum buffer to an ancient woodland or wildlife site boundary, it becomes far harder to later insist on a 50–100m ecologically appropriate buffer, because the developer will assert that such adjustments are "not viable within the previously agreed plan form." In short, accepting indicative layouts prematurely constrains future decision-making, embeds suboptimal design principles, and weakens the ability of the planning authority and the public, to demand higher ecological or spatial protections at the detailed application stage.

We have consistently raised the need for sufficient buffers to be set at the Local Plan stage to safeguard local wildlife sites, hedgerows, and associated habitat corridors. Instead, even the minimum protections previously included in the draft Plan have been progressively weakened through altered wording at the hearing stage, that makes it easier to justify the reduction or removal of key and historic habitats.

Therefore, we respectfully request that the Plan reinstates and strengthens provisions for meaningful buffer distances based on recognised ecological standards, and ensures that habitat corridors remain intact.

Limitations of Ecological Surveys Conducted During Drought and Late-Season Windows

Several of the Preliminary Ecological Appraisals have been undertaken during periods of significant, prolonged drought and outside optimal recording windows. These conditions materially affect survey accuracy, for example, drought conditions are known to significantly reduce detectability of ancient woodland and ancient hedgerow indicators. Many key indicator species associated with ancient habitat continuity, such as shade-tolerant ground flora, spring ephemerals and moisture-dependent woodland plants, either die back, remain dormant, or fail to flower during dry or late-season conditions. Under such stressed conditions, vegetation communities present as artificially

impoverished, and the absence of visible indicator species cannot be taken as evidence of ecological absence. This results in an inevitable under-reporting of habitat value, giving a misleading impression of ecological scarcity in areas that, under normal hydrological conditions and appropriate seasonal timing, would support species richness consistent with ancient semi-natural habitat. The appropriate time to undertake meaningful ancient woodland and ancient hedgerow assessment is during spring, under normal moisture conditions, when indicator species are in active growth and detectable.

Another example, pertaining to individual species, many of the proposed sites contain or are adjacent to waterbodies and watercourses therefore the PEAs considered aquatic and semi-aquatic species. In many cases signs of these species were not identified despite the habitat being suitable. We feel in many cases that habitats within the survey areas across sites are very likely to be inhabited by a range of protected species under usual and suitable conditions. This year, the region experienced the driest combined February, March and April for almost 90 years with the Sheffield central weather station (Weston Park) having recorded the lowest rainfall during these months since 1938. Therefore, the drought that was announced in June 2025 was an extreme drought and will have resulted in any watercourses surveyed presenting very different characteristics, becoming both inhabitable temporarily and potentially more difficult to identify signs of certain species. Further, PEAs by nature are not targeted and their purpose is as an initial assessment to determine the potential for protected species to be present, then calling for further targeted and in-depth surveys. Our concern here is that signs of protected species will have been missed due to the environmental conditions, therefore no further surveys were recommended and vital species will be missed and not offered adequate mitigation. Where signs of protected species/ habitat were noted, these further surveys should be completed *prior to allocation*, not deferred to the planning stage, because once land is removed from the Green Belt and allocated for development, the burden of proof shifts and ecological protections are significantly weakened. Also, buffers should be considered at each site independently and determined by what is present. Without proper spring-window surveys, the ecological assessments supporting these allocations remain incomplete and unsound.

Buffer zones to protect Irreplaceable Habitat (Ancient Woodland, Trees & Hedgerows)

Current Natural England / Forestry Commission standing advice treats 15 m as a **minimum** root protection buffer around ancient woodland, trees and hedgerows, with a clear expectation that larger buffers will be required where other impacts (air pollution, noise, light, trampling, hydrology) extend further than this distance.Natural England Guidance Evidence from the Woodland Trust and others shows that “edge effects” from nearby development can penetrate well beyond 15 m and can seriously degrade the ecological value of ancient woodland, especially where access and lighting are poorly controlled. Impacts of nearby development on the ecology of ancient woodland

Natural England’s guidance makes clear that air pollution presents a direct risk to sensitive ecological receptors, with the SSSI Impact Risk Zone User Guidance (Natural England, 2 April 2025) identifying particulate deposition and nitrogen enrichment as mechanisms that smother vegetation, alter respiration and degrade woodland edge environments through soil nutrient imbalance, particularly in ancient woodland systems which rely on stable low-nutrient conditions. The guidance explicitly states that **“***emissions from combustion can cause air pollution affecting the habitats and species on SSSIs. More than 500m away from a SSSI, only combustion processes over a certain minimum size are likely to have an impact. A very large project could cause air pollution on SSSIs up to 10km away.***”** This establishes a clear recognition that even developments that are not physically adjacent to sensitive ecological sites can still cause air-quality-driven habitat harm over considerable distances. Although the Air Pollution and Development Advice for Local Authorities (UK Government, 16 October 2025) instructs planning authorities to consider cumulative and indirect emissions from vehicle traffic and to assess whether critical pollutant thresholds would be exceeded, the Air Quality Assessment prepared for these allocations focuses exclusively on human health receptor compliance and does not assess airborne impacts on ancient woodland, veteran trees or priority habitats. This omission is

environmentally material, because ancient woodland ecosystems are significantly more sensitive to nitrogen loading and particulate deposition than human exposure thresholds would indicate, meaning a site can appear compliant for human health while still causing ecological damage and makes the Air Quality Assessment out of date. Taken together, this demonstrates that development proposals generating substantial HGV traffic adjacent to ancient woodland pose a foreseeable risk of habitat deterioration, and the failure to evaluate ecological receptor impacts represents a critical evidential gap in the assessment of environmental harm. This especially applies when clusters of multiple proposed and existing sites risk these habitats eg CH04 & NES36 which are adjacent to the existing Smithy Wood Business Park (very heavy existing HGV traffic plus a proposed HGV refuelling station) and the urbanisation of the surrounding natural green space thus reducing the environment's ability to absorb carbon, these cumulative impacts must be considered when deciding appropriate land use based buffers.

The Local Plan must therefore go beyond the national minimum and set minimum land-use specific buffer distances, recognising that different adjacent uses generate very different levels of air, noise and light pollution in addition to providing appropriate Air Quality Assessments which assess the impact on any sensitive and ecologically important habitats within 500m of an allocation prior to the site being released from the Green Belt for the employment land and strategic housing land allocations.

Protecting connectivity – no isolating access corridors

Irreplaceable habitats typically sit within a wider network of woodland, hedgerows, ponds, scrub, secondary woodland and other "stepping stone" habitats that are critical for bats, birds, dormice, hedgehogs and invertebrates. Research for the Woodland Trust shows that fragmentation and loss of surrounding semi-natural habitats can be as damaging as direct loss, and that access routes can exacerbate disturbance, trampling and edge effects if they sever these ecological connections.

The Plan should therefore include a clear policy that:

> **New access roads, estate roads or service corridors that would isolate irreplaceable habitat from adjoining semi-natural habitats, stepping-stones or ecological corridors will not be supported.**

HGV-intensive industry or warehousing – minimum 100 m buffer

Heavy industry, warehouses and logistics depots generate continuous HGV traffic, idling emissions, low-frequency noise and extensive night-time lighting. National and international evidence on near-source air pollution shows that concentrations of NO_2 and other traffic-related pollutants are **highest within the first 50–100 m** of the emission source, with a clear decay only beyond this distance, see (Proximity to roads, NO2, other air pollutants and their mixtures)

Recent sectoral advice to the government from Wildlife & Countryside Link therefore recommends extending buffer zones around irreplaceable habitats to **at least 100 m** in order to address not just root protection but also air quality and other edge effects (Wildlife and Countryside Link). Local plan and inquiry evidence elsewhere in England has similarly recognised that the 15 m buffer distance does not provide an effective functional buffer where large-scale development is proposed.

Given this, the Local Plan should require that:

> **Where an irreplaceable habitat adjoins HGV-intensive industry, logistics or warehousing, a minimum 100 m undeveloped, unlit and largely semi-natural buffer must be provided.**

This would give effect to current scientific understanding of pollution gradients while aligning with emerging best practice that calls for 100 m buffers around irreplaceable habitats.

Lower-intensity employment / offices – minimum 50 m buffer

For less vehicle-intensive employment uses such as offices or light industry with limited HGV activity and lower external lighting, impacts are reduced but still significant. Historic Natural England wording and professional commentary on the standing advice have previously referenced **50 m** as an appropriate buffer for managing pollution and trampling where development is less intense.

The Plan could reasonably adopt this as a land-use-specific standard:

> **Where an irreplaceable habitat adjoins low-intensity employment or office development, a minimum 50 m buffer of natural or semi-natural habitat should be retained or created.**

This 50 m should be free of built development and car parking, and managed to enhance habitat edge structure and connectivity to the wider ecological network.Woodland Trust - Planning for Ancient Woodland

Housing allocations – minimum 50 m buffer with design controls

Residential development creates a different suite of pressures: cat and dog predation, informal paths, garden dumping, domestic lighting and recreational disturbance. Woodland Trust and inquiry evidence has consistently argued that **50 m** buffers are required to meaningfully reduce these effects, not just protect tree roots.Impacts of nearby development on the ecology of ancient woodland

At the same time, recent lighting guidance for bats and the UK Bat Mitigation Guidelines emphasise the need for **dark buffer zones** and avoidance or strict control of artificial lighting along key habitats such as woodland edges and commuting corridors.Bats and artificial lighting in the UK

To reflect this evidence, the Local Plan should set out that:

- **A minimum 50 m buffer** between any housing allocation and an irreplaceable habitat must be secured through the allocation and later masterplanning;

- **The first 15 m from the woodland edge** (the root protection area) should not form part of private gardens: rear garden boundaries should be set back at least 15 m from the ancient woodland, with this strip managed as communal semi-natural habitat to reduce trampling, dog access and garden encroachment;Ancient woodland, ancient trees and veteran trees: advice for making planning decisions
- **No external lighting** (including security lighting, street lighting and garden lights) should be permitted within 50 m of the irreplaceable habitat edge where bats are present or likely to be present, in line with current bat lighting guidance;

- Boundaries should be designed to discourage direct access into the habitat (for example, solid or close-board fencing, with any access points strictly controlled and routed via recognised paths).

Similarly, priority habitats such as acid grassland, species-rich hedgerows and non-ancient woodland in good/great condition should also be given the greatest weight and mirror these more appropriate minimum buffers as these habitats have attained the 30 by 30 target (less than 5% of land has achieved this target in Sheffield).

Weakening of Ecological Protections Through Policy Wording

Although we are yet to see the published ecology policy documents, a further concern relates to the policy wording amendments discussed during the hearings, where requirements for ecological safeguards, such as the retention and protection of hedgerows, trees, and priority habitat, were qualified with conditional language such as “where possible” or “where appropriate.” This shift from a position of requirement to one of discretion significantly weakens ecological protection. Such qualifiers have a well-known effect: they allow developers to justify removal of habitat on grounds of convenience, viability, design preference, or engineering practicality, rather than requiring proof of ecological necessity.

For example, where previous iterations of policy required hedgerows to be retained as integral ecological infrastructure, the amended phrasing merely suggests retention “where possible,” placing the burden of proof not on the developer to demonstrate that removal is unavoidable, but on objectors to demonstrate that retention is essential. This invites habitat loss by default and pre-emptively undermines enforcement. In ecological protection, wording matters: “must retain” offers a safeguard; “should retain” offers a suggestion; “retain where possible” offers an escape clause.

Given the previously raised uncertainty around the presence of ancient hedgerows and potential woodland fragments at a number of the sites and the lack of published ecological datasets, this dilution of language is unacceptable. Under conditions of ecological uncertainty, the policy mechanism must enforce precaution, not weaken it. The site should therefore be evaluated under the stricter interpretation of hedgerow retention, requiring demonstrated avoidance of removal rather than permissive language that enables removal to occur unchallenged.

A relevant local precedent can be seen in the recent approach taken by SCC and the developer for the Holme Lane Farm site (NES38), where it was agreed in the Statement of Common Ground that development could take place within a Local Wildlife Site simply because it was considered a “nice to have” that two halves of the development should be linked by a footpath. In that case, the area proposed for intrusion also happened to be identified as priority habitat within the Nature Recovery Network, but this has been overlooked by SCC because the most up-to-date ecological information was not consulted during site selection nor during the acceptance of illustrative master plans. This demonstrates a worrying pattern where habitat protection is treated as optional or negotiable, ecologically significant areas, including designated sites and mapped priority habitats are diminished or dismissed due to convenience.

We therefore respectfully ask the Inspectors to consider restoring strong, unambiguous ecological protection wording within site policy and development conditions, wording that clearly prioritises the retention and safeguarding of ancient hedgerows, potential ancient woodland features, and priority habitats as a default position, while still allowing development to proceed where it can genuinely demonstrate avoidance of ecological harm or where compensation is an appropriate alternative. This would not create an absolute barrier to development, it would establish a robust framework where ecological constraints are properly recognised, verified, and respected. Clear, directive phrasing ensures that the burden of proof rests with developers to demonstrate compatibility with ecological preservation, rather than placing communities and conservation bodies in the position of having to defend threatened habitats reactively. Such wording would help deliver both ecological integrity and sound planning outcomes which are in line with Natural England, the Environment Act 2021 and LNRS principles.

Why Green Belt release cannot be treated like normal site allocations (Statement of Common Ground between SCC and Natural England)

Unlike ordinary land allocations in the Local Plan, Green Belt release is not a casual or reversible planning step. Once land is taken out of the Green Belt, it is highly unlikely it will ever return to protection status, even if subsequent ecological surveys later reveal that the site is unsuitable for development.

This is fundamentally different from standard allocations elsewhere in the city, where ecological issues can legitimately be addressed at the planning-application stage. In those cases, if problems emerge, the development can be refused and no status has been lost. But in the case of Green Belt land, once it is released, the protective designation is gone permanently.

This is why relying on later ecological assessment is entirely inappropriate for Green Belt sites. It effectively allows the Council to release first, check impact later.

That approach does not meet the necessary evidential threshold.

To justify Green Belt release, the Council must demonstrate exceptional circumstances before the boundary is altered, not afterwards. And critically — it is not enough for the Council to argue that there are exceptional circumstances in general across the city. Each site must independently meet the exceptional circumstances test.

Just because Sheffield argues there is a housing need that warrants considering Green Belt does not automatically mean that *every specific site* in the Green Belt is suitable or acceptable. Several of the release sites include ancient woodland, priority habitats, and irreplaceable ecological features that would already fail the basic policy tests if subjected to assessment upfront.

Section 40 of the Natural Environment and Rural Communities (NERC) Act 2006 requires public bodies in England to have regard for conserving biodiversity, which includes priority species and habitats, not just at the planning stage but also at the local plan development stage. We feel this is particularly important when involving Green Belt release, having regard for these statutory considerations at the planning stage is a fundamental error, potentially making many of the site allocations unable to realistically meet the proposed units or square meterage of employment land and the plan unsound.

Where the Council has responded that ecological concerns “can be dealt with at the planning stage”, that may be acceptable for ordinary land allocations, but it is wholly inadequate for Green Belt release. If development is later found to harm ancient woodland or irreplaceable habitat, refusing the planning application would leave the land removed from the Green Belt, but undeliverable. Thus, the damage to policy protection has already occurred.

This demonstrates that the site-level exceptional circumstances have not been properly evidenced, and that the necessary ecological assessments (as well as other assessments) have not been completed at the point of allocation. As such, the Green Belt release for these sites cannot be considered sound.

It must also be noted that Natural England have not commented on many of the released sites, despite there being a clear remit to do so being adjoining or containing ancient woodland etc – although it cannot be implied that this is as a result of an inability to reach ‘common ground’ on this sites – we feel it would be important for the inspectors to seek clarification on their position.

The Planning and Infrastructure Bill, Environmental Delivery Plans and the Incompatibility of the “Allocate Now, Evidence Later” Approach

The Sheffield Plan currently relies on the assumption that ecological constraints, habitat sensitivities and species considerations can be addressed during the planning application phase after land has already been allocated. However, the direction of national planning reform under the Planning and Infrastructure Bill establishes a different policy and legal expectation. The Bill introduces Environmental Delivery Plans (EDPs) and environmental outcome requirements that necessitate ecological certainty and defensible environmental evidence at the plan-making stage, not retrospectively at the planning stage.

Under the emerging framework, local authorities must demonstrate that site allocations are environmentally deliverable before they are confirmed within the Local Plan. EDPs will require that the ecological baseline, species presence, habitat condition, connectivity function and potential environmental impacts are understood and quantified before allocation. Any uncertainty in ecological data, any seasonal suppression of species visibility, any limited-access surveying, or any ambiguity in habitat mapping will weigh against allocation rather than being dismissed or deferred for later examination.

This has wide implications for all greenfield or semi-natural allocations within the Sheffield Plan. Where surveys were constrained by drought, suboptimal seasonal timing or access limitations, the resulting ecological assessments cannot be considered sufficiently reliable to support strategic land release. Where BNG calculations or PEA assessments have incorporated land outside of the actual developable boundary, or mischaracterised ecological adjacency, their conclusions cannot be relied upon for strategic policy-making. Under the EDP regime, such deficiencies would necessitate either repeat survey work or a reevaluation of the ecological viability of allocation.

The emerging policy framework shifts responsibility from the application stage to the allocation stage. Strategic sites will need to demonstrate ecological feasibility in advance, and Local Plans will need to show compliance with environmental outcomes for habitat recovery, species protection and connectivity. The traditional approach of allocating land first and resolving ecological conflicts later is structurally incompatible with these requirements.

Thus if the evidence base is incomplete, seasonally biased, spatially inaccurate or ecologically uncertain, then allocation must be paused until data integrity is restored and compliance with environmental outcomes can be demonstrated.

The Planning and Infrastructure Bill represents a transition from reactive assessment to pre-emptive ecological assurance. The Sheffield Plan should align with this shift by ensuring that environmental evidence is fully compiled, ground-truthed and defensible at the point of allocation, rather than continuing with an “allocate now, evidence later” practice that is rapidly being rendered outdated and non-compliant within the evolving national planning framework.

Site Specific Comments

CH03

Reliability of PEA, Ecological Underassessment & Site Constraints

The Preliminary Ecological Appraisal (PEA) submitted for CH03 is incomplete and does not represent the true ecological character or sensitivity of the site. The survey area did not cover the full proposed allocation boundary, omitting:

- the central “tunnel corridor”
- priority habitat woodland to the north

Because significant sections of the proposed allocation were not surveyed, the PEA cannot be used as a reliable basis for ecological evaluation or decision-making, nor can it sustain the conclusion of “moderate ecological value with no major constraints.”

The PEA itself acknowledges that woodland within the site boundary was not fully surveyed, and that these unsurveyed patches could contain ancient or veteran trees, or ancient woodland indicator flora. Historical mapping suggests that this woodland may be a remnant of Hood Hill Plantation (approx. 200 years old) or part of the Rough Warren woodland compartment, which may be significantly older, potentially originating from the Parkin Wood woodland network. Woodland of this age or continuity requires stronger protections and larger buffer zones, particularly given the HGV-heavy industrial land use proposed, with associated air, noise and light pollution.

Ordinance Survey Map 1855

If these woodlands are ancient or semi-ancient remnants, they would very likely contain suitable bat roosts, especially in older trees. The PEA also neglects consideration of the tunnel and mine shafts, which are likely to provide ideal bat refuge and roosting structures and should have been explicitly surveyed rather than ignored.

The desktop bird records for the site show the presence of Skylark, Lapwing and Grey Partridge, all ground-nesting species. These cannot be mitigated with nest boxes or urban “wildlife enhancements.” Likewise, other priority species noted in the desk study - Tree Pipit, Cuckoo, Reed Bunting, Bullfinch, Yellowhammer, and Lesser Spotted Woodpecker do not reliably use nest boxes, meaning the suggested mitigation measures fail to address the ecological impact.

The PEA enhancement suggestions are broadly reasonable, but they fail to account for the unassessed plot south of the A6135, and do not acknowledge that protecting and improving woodland requires avoidance of severance rather than simply adding boxes or soft landscaping.

The Phase 1 Geoenvironmental Report identified surface water and active hydrological features not identified in the PEA, meaning the PEA failed to consider the potential suitability for Great Crested Newt (GCN). Even if the likelihood of GCN is low, the legal threshold requires that habitat suitability is assessed where aquatic or wetland features exist, and this was not done.

The geo report also states that large areas of the site must be left undeveloped due to mining constraints, tunnel protection zones, and land stability issues. These undevelopable areas do not necessarily align with the areas of highest ecological importance or potential connectivity, contradicting the PEA suggestion that connectivity enhancements can be delivered through retained green space.

The cumulative impact of the undevelopable areas due to geological and ecological constraints when correctly assessed could seriously impact the viability of the site.

Proposed Access Impact

The proposed access route would result in the fragmentation and likely isolation of woodland, directly conflicting with the PEA recommendation to “retain and enhance” woodland features. In particular, Rough Warren requires a full assessment due to its age, likely continuity and possible ancient characteristics. If ancient then this access cannot be accepted and the development should then be reassessed allowing for appropriate buffers (see above section on ancient woodland).

Statement of Common Ground & BNG Validity

The Statement of Common Ground states that Fitzwilliam Estates have commissioned both a PEA and a Biodiversity Net Gain calculation. However, a valid BNG calculation requires a full Phase 1 Habitat survey with exhaustive habitat mapping and condition scoring. If the BNG has been produced from this flawed PEA, it is invalid. If the BNG has been produced from a more complete Phase 1 Habitat survey, then:

- that survey must be made available
- that evidence should have been incorporated into allocation assessment
- and the fact that SCC has not published or referenced such a report suggests it does not exist

Although we are not objecting to this site being allocated, until full habitat mapping and species-level assessment has been completed, the site cannot be considered ecologically understood and therefore cannot be considered developable.

CH04

Until such time that it is fully demonstrated through surveys that the risk to public health outweighs the direct damage to the local wildlife site and ancient woodland edges we continue to object to this site being allocated for development.

Impact on Local Wildlife Site and Ancient Woodland During Remediation

We acknowledge that this is a highly complex site and accept that, for public health reasons, substantial remediation is required. We further accept that some direct loss of Local Wildlife Site (LWS) habitat may be unavoidable in enabling that remediation, as stated in the Council’s note and

recognised in the Statement of Common Ground. However, it is not clear from either document how the adjacent Ancient Woodland is to be protected from indirect harm during this remediation period, particularly given that the proposed access is expected to be within approximately 35m of the ancient woodland boundary.

Natural England's standing guidance on ancient woodland makes clear that impacts from noise, light, air pollution, dust settling, soil compaction and vibration must be fully considered, especially where HGV traffic and heavy machinery movements are anticipated. In this context, 35 metres is unlikely to constitute meaningful protection or ecological stand-off, and a greater protective zone would normally be expected where deep remediation and major ground disturbance are proposed.

We note that a Preliminary Ecological Appraisal (PEA) has been referred to as supporting evidence, yet it has not been made available for public examination. Without access to the PEA, it is not possible to independently verify assertions regarding ecological risk, habitat condition or proposed mitigation. This lack of transparency makes it difficult to assess whether the Ancient Woodland can realistically be protected during remediation and whether LWS compensation can be ecologically justified.

Likewise, the Statement of Common Ground confirms that geo-environmental investigations and site assessments have already been undertaken, yet these have also not been made publicly available. Without access to the geo-environmental findings, including contamination characterisation, spoil-chemistry, void mapping and subsurface risk analysis, it is impossible for stakeholders to evaluate the scale of remediation required or the likelihood of indirect ecological impacts on surrounding woodland, hydrology and soil systems. Essential technical evidence is therefore being withheld until after allocation, preventing meaningful scrutiny at the plan-making stage.

We concede that the risk to public health arising from contamination and instability may, in the final assessment, outweigh the indirect damage to a small portion of Ancient Woodland and that loss of LWS habitat might be compensated. But at this point in time it is not possible to make that judgement without further evidence. It cannot be considered reasonable or sound to remove this extremely complex site from the Green Belt and allocate it for development and remediation without first knowing that the necessary works can be carried out without unacceptable harm. Yet once again the Council appears to be deferring these essential ecological and environmental determinations to the planning application stage.

Ideally, the remediation should be undertaken without the development, in order to eliminate risks to public health and prevent further environmental harm from the existing contamination, and then the LWS should be restored and enhanced as core habitat, contributing to an improved ecological corridor running from Chapeltown to Grenoside and beyond, as originally intended in 2012. In that context, remediation should be seen not as an enabler of development, but as a means of returning a damaged landscape to a strong and resilient ecological network, but given the scale of contamination, the proximity of irreplaceable Ancient Woodland, the loss of ancient woodland edge habitat and a considerable section of LWS, a full Environmental Impact Assessment should be undertaken now, at the allocation stage, accompanied by a fully developed Ancient Woodland protection and management strategy, and supported by the publication of the PEA. Without this information, there is no basis on which to conclude that the allocation of CH04 is ecologically sound, deliverable, or consistent with national policy regarding the protection of irreplaceable habitats. For this reason we are continuing to object to this site allocation at this time.

Consequential Deletion of Ancient Woodland from the Green Belt

We would also like to reiterate our previous objection regarding the consequential deletion of Ancient Woodland and adjacent woodland from the Green Belt. At the Stage 4 hearings, the representative

from Rula Developments themselves expressed disagreement with this area of land being removed from the Green Belt, confirming that even the promoter does not consider its exclusion necessary. The proposed alteration appears to be arbitrary and is unsupported by any clear or defensible physical boundary. The former road alignment cited as a boundary marker no longer exists as an identifiable feature on the ground, and the resulting shape would not constitute a “small parcel of poorly performing Green Belt” as defined in Green Belt assessment criteria. On the contrary, the woodland in question forms part of a continuous ecological and landscape corridor and continues to perform multiple Green Belt purposes: preventing sprawl, preventing settlement coalescence, safeguarding the countryside from encroachment, and preserving a strong green edge to Chapeltown. There is therefore no evidential basis for its removal from the Green Belt, and the absence of a defensible boundary renders the proposed de-designation inconsistent with Green Belt policy and precedent.

CH05

Suggested Condition Change

“Planning applications must include a comprehensive assessment of the development’s impacts on the environment. Where appropriate, adverse impacts should be offset through compensatory improvements to the environmental quality and accessibility of remaining areas of Green Belt.”

Replaced with:

“The impact of removing land from the Green Belt should be offset through the creation of on-site public open space and landscaping that enhances the setting and improves the accessibility of the remaining Green Belt land.”

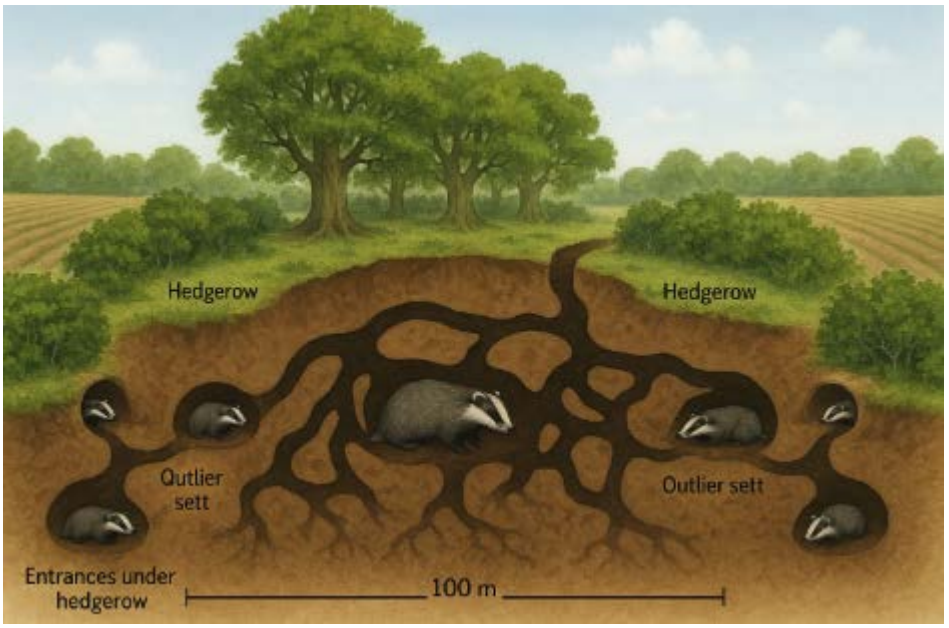
Lime’s suggested condition removes the SCC condition that it be a necessity to improve the *remaining* GB which is in line with the NPPF and on-site public open space does not equal natural open space. We would support compensatory improvements to remaining GB and on site as natural open spaces - there are creation opportunities onsite which would enhance connectivity to priority habitats. There are no priority habitats of core or good condition close to the site, this includes Blackburn Brook LWS, so improvements/enhancements to these priority habitats and opportunity areas could contribute to the LNRS and NRN aims to make 30% of land good for nature by 2030.

Felt map to show priority habitats in need of restoration (yellow) and creation opportunities (blue)

Potential Priority Species Requiring Statutory Mitigation

It is unfortunate that the PEA referred to in the SoCG has not been shared publicly. We have received reports of protected species on this site so it is essential that the necessary surveys are undertaken prior to release from the Green Belt to ensure that this site remains viable or can deliver the expected number of units after any necessary buffers or mitigations have been removed from the developable area.

Natural green space would need to be created around any badger setts on site which require a minimum 30m radius around the outer most sett, this would need to be natural space removing a considerable amount of land from the developable area - a large sett can cover 100m and up to 40 entrances with each entrance requiring a 30m radius buffer.



For Skylarks - suitable onsite mitigation measures must be considered before off-site compensation as stated in the SCC Ecology Local Planning requirements - this could be achieved on a site this large but would require an area of land 16 - 100 square metres, a common standard is often 2 smaller plots per hectare.

Again, section 40 of the Natural Environment and Rural Communities (NERC) Act 2006 requires public bodies in England to have regard for conserving biodiversity, which includes priority species and habitats, not just at the planning stage but also at the local plan development stage.

Potentially Ancient Hedgerows

The field boundaries within CH05 follow historic alignments that predate the modern urban form and are consistent with early post-medieval agricultural field systems. The Heritage Assessment indicates that these hedgerows correspond to historic enclosure patterns shown on mid-19th century mapping and earlier tithe records, demonstrating continuity of landscape structure over several centuries. This strongly supports our assumption that they are likely ancient hedgerows, which function not only as ecological corridors but as surviving elements of the historic rural landscape character. Their removal, fragmentation or domestication through garden boundary alteration could constitute loss of irreplaceable habitat and given the significant size and location of these hedgerows, a full and timely survey should be undertaken ideally after normal rainfall conditions.

NES36

SRWT are objecting to the release of this site from the Green Belt for development

We are now changing our original opinion of this site and now wish to **object to the proposed allocation** and development of NES36 on the grounds that the site is of high ecological sensitivity and its development would cause irreversible harm to Smithy Wood (Ancient Woodland), surrounding priority habitats, and protected species. The PEA submitted for NES36 appears to contain methodological limitations and omissions which would affect the reliability of the conclusions, resulting in an inaccurate ecological baseline from which BNG, planning decisions and impact assessments cannot reasonably proceed.

Isolation and deterioration of Smithy Wood (Ancient Woodland)

The proposed development, including its required access infrastructure, would effectively isolate Smithy Wood from surrounding habitat networks. Given the woodland's established role as part of the Smithy Wood–Blackburn Brook ecological corridor, its severance would constitute fragmentation of a recognised biodiversity network of local to county importance.

Ancient Woodland is an irreplaceable habitat whose ecological functioning depends upon permeability and connectivity at the landscape level. The complete encirclement of Smithy Wood by industrial hardstanding would convert currently green-connected boundaries into impermeable barriers. Such fragmentation cannot be meaningfully mitigated by hypothetical structures such as "wildlife bridges," which are ineffective in this spatial scale and habitat context.

This outcome is incompatible with Natural England's Standing Advice, the mitigation hierarchy under BS 42020, and the emerging LNRS, which explicitly positions Smithy Wood as a priority connectivity node.

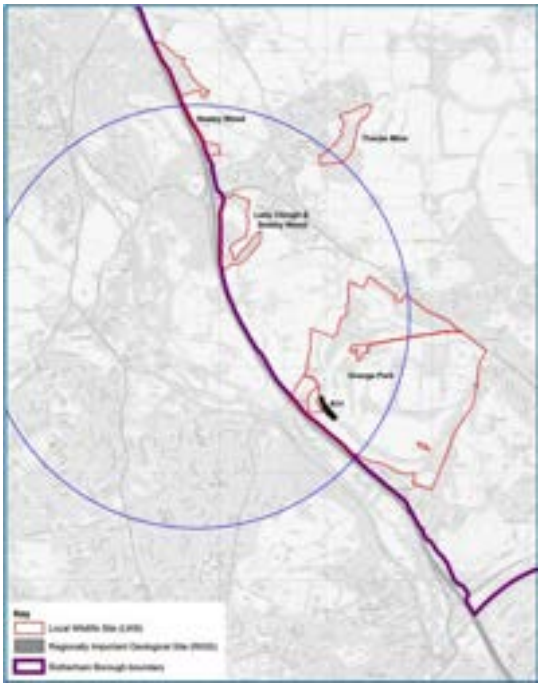
Illustration above to show the existing ecological connectivity of Smith Wood ancient woodland (image on the left) - despite the numerous existing employment sites, the ecologically important corridor between Smithy Wood and Blackburn Brook is clear and functioning well as evidenced by the abundance of wildlife recorded. The image on the right is an illustration of the impact 'Phase 2' creating a totally urbanised surrounding of the ancient woodland surrounded by M1, Cowley Hill, phase 1 & 2 of the business park. The suggested future 'Phase 3' (JEH Planning Representations in May 25) would compound this greater still. There is no doubt that this development would directly cause deterioration of the irreplaceable habitat and that there are no mitigation measures which would be sufficient to allow the land to function as an ecological corridor.

Erroneous Classification of Habitat Proximity and Sensitivity

The PEA incorrectly identifies Smithy Wood as being approximately 400 m from the survey site, whereas in reality it is directly adjacent along the northern boundary. This miscalculation has serious implications:

- it artificially reduces the sensitivity classification
- it alters the zone of influence used in species assessment
- it understates edge effects and likely deterioration
- it permits conclusions based on reduced risk assumptions

This error is compounded by the contradiction between PEA sections 5.1.6 and 5.1.7, in which the woodland is simultaneously described as adjoining and spatially distant. Such inconsistency undermines the reliability of all subsequent conclusions.



As previously stated, Natural England has not commented on this site in the Statement of Common Ground, however, it is entirely feasible that Natural England were either not consulted with accurate site information, or were provided with an ecological assessment that materially misrepresented

woodland proximity and sensitivity. Had the true adjacency to Ancient Woodland, ancient hedgerows, and priority grassland been correctly presented, Natural England could reasonably have objected or required further surveys and protections. The silence of the statutory nature body should not be interpreted as endorsement, but rather as a reflection that incomplete or misleading data may have prevented an informed response.

Incorrect Survey Boundary and Its Implications

A fundamental flaw in the NES36 PEA is the use of an incorrect ecological survey boundary. The assessment incorporated land parcels that are either not part of the allocation or have since been formally excluded, specifically the Rhodes agricultural fields (pumpkin fields) and the previously developed land to the northwest. By expanding the survey extent beyond the legitimate NES36 allocation boundary, the PEA generates a distorted ecological baseline.

This has several significant consequences:

1. **Depressed Habitat Distinctiveness:**
   Including lower-quality, previously developed or intensively cultivated land in the survey artificially reduces the overall distinctiveness value of the site, giving the misleading impression that high-value habitats form only a minority of the area.

2. **Deflated Condition Scores:**
   By averaging condition metrics across an artificially enlarged plot, ecologically rich areas, particularly those immediately adjoining Smithy Wood are statistically diluted and thus undervalued.

3. **Downplaying of Irreplaceable Features:**
   The hedgerows, priority habitats and potential veteran trees at the northern edge of NES36 are proportionally diminished when considered against a falsely enlarged site area. This downplaying is amplified because the excluded land is disproportionately lower in ecological sensitivity.

4. **Invalid BNG Calculations:**
   BNG assessment relies on accurate baseline quantification, a requirement emphasised in both statutory and technical guidance. A baseline built on false spatial assumptions cannot yield a lawful or meaningful net gain value. In this case, inclusion of non-developable land results in inflated mitigation potential and exaggerated “improvability” of the site.

5. **Misrepresentation of Ecological Connectivity and Risk:**
   Had only the legitimate NES36 boundary been used, the proportion of land adjacent to Ancient Woodland would be substantially higher. Under correct geometry, Smithy Wood would not be a remote feature “within 400m” but rather a directly adjoining habitat interface representing a high-risk sensitivity zone. The incorrect boundary therefore materially understates edge effects, species flow dynamics and the zone of ecological influence.

6. **Conflict with the Mitigation Hierarchy:**
   Under BS 42020 and NPPF 180, avoidance of impact is the first obligation. An artificially depreciated baseline enables premature conclusions that impacts can be mitigated when, correctly framed, the site’s sensitivity would justify removal from allocation rather than mitigation after-the-fact.

In summary, the use of an incorrect survey boundary invalidates several core findings of the PEA. It reduces the perceived proportion of priority habitat and irreplaceable features, attenuates species sensitivity ratings, and produces an ecological baseline that is neither scientifically defensible nor compliant with accepted professional and regulatory standards. Correcting the boundary would demonstrate that NES36 is far more constrained than the PEA asserts, likely to the point of being undevelopable without unacceptable ecological harm.

Seasonal Mis-timing and Drought Suppression of Indicator Species

Another major limitation of the NES36 PEA is that botanical recording occurred during an ecologically inappropriate season (late summer) and during a period of severe regional drought. These conditions inevitably suppress the visibility of diagnostic flora, leading to under-recording of indicator species and consequent underestimation of habitat quality. The absence of key species in these conditions does not reflect ecological absence, but observational limitation.

This has several significant consequences:

1. **Seasonal Non-Detection:**
   Many priority-habitat indicator species flower in spring and early summer and senesce before autumn. By the time the survey took place, species such as heath bedstraw, tormentil, pignut, wood anemone and primrose would have already withered or become indistinguishable. Their non-recording is therefore an artefact of survey timing rather than true scarcity.
2. **Drought-Induced Decline:**
   The survey coincided with a historically dry season in Yorkshire, marked by prolonged water stress and early foliage drop. Drought accelerates plant dormancy and reduces above-ground biomass, meaning indicator species were likely dormant, non-flowering, or visually suppressed at the time of observation.
3. **Microclimate-Dependent Indicator Presence:**
   Where ancient-indicator species were recorded (e.g., dog's mercury and greater stitchwort), this was only in sheltered hedgerow microhabitats retaining moisture. In more exposed areas, these species would have disappeared from view earlier due to higher evapotranspirative stress. Their absence there reflects climatic suppression rather than ecological insignificance.
4. **False Negative Ecological Interpretation:**
   Failure to detect indicator species due to drought and seasonal timing increases the risk of false negatives, which can lead to misclassification of habitat type, inappropriate condition scoring, and flawed conservation assessment. The PEA does not acknowledge or correct for this methodological vulnerability.
5. **Habitat Value Under-Representation:**
   Where the site remained moist and buffered, indicator species persisted; where it dried, they vanished. This pattern strongly suggests under-recording rather than genuine ecological scarcity. Consequently, the PEA's characterisation of the habitat as predominantly low-value is not biologically defensible.
6. **Invalidity of Habitat Conclusions:**
   Because the survey occurred when diagnostic species were least detectable, any resulting claims about low habitat distinctiveness or limited ecological value are scientifically unsound. Correct methodology would have required spring/summer surveying or re-surveying during peak phenological visibility.

In summary, the timing and drought conditions of the NES36 PEA created conditions in which priority habitat indicators would predictably be undetectable. The resulting under-recording has led to a misleadingly low appraisal of habitat value. Until a correctly-timed resurvey is undertaken, the ecological conclusions of the PEA cannot be considered reliable or adequate for planning reliance

Priority Habitats & Strategic NRN Significance

The presence of good-condition Lowland Dry Acid Grassland at NES36 (as confirmed in the PEA) elevates the ecological importance of the site within both the NRN and LNRS frameworks, placing it among the very small percentage of priority habitats in Sheffield that are currently reaching the 30% by 30 target. Its loss or deteriorations would represent not merely localised habitat damage, but a strategic setback to the city's legal and ecological obligations under the Environment Act 2021.

This has several significant implications:

- **Core Habitat Status:** Good-condition acid grassland is core NRN habitat under the Environment Act 2021 and must be protected as part of the nature recovery backbone.

- **Extreme Rarity:** Less than 5% of Sheffield's priority habitats are in good/great condition; NES36 grassland is therefore a valuable and scarce ecological asset.

- **Contradicts National Targets:** Development of this site would undermine the 30% habitat restoration target required by law by 2030.

- **Functional Buffer to Ancient Woodland:** Serves as stepping stone habitat facilitating ecological exchange between woodland and field environments.

- **Obligations Under Biodiversity Duty:** Removal or degradation conflicts with Section 40 of the NERC Act and Section 102 of the Environment Act.

- **NRN and LNRS Priority:** Should be protected and connected, not fragmented and isolated.

The PEA recommends the retention and enhancement of the priority habitats, however this would be impossible to achieve given the shape and the nature of the development (warehouses & HGV intensive usage). Even without air pollution being considered, under the LNRS connections to these priority habitats should be improved not isolate them.

We also note that this valuable grassland is described within the PEA as being found on an "earth mound feature, potential a colliery shale mound" and within the Heritage Impact Assessments: Additional Sites (May 2025) it states under section 13.3 Earthworks and Buried Remains of Archaeological Interest, that "The woodland to the north of the site contains significant evidence of early mining activity, including substantial annular spoil heaps (marked 'A' on the plan) that are believed to have been worked during the medieval and early post-medieval periods. Further associated buried remains relating to processing, transportation and occupation can be expected to survive. The land to the south, deriving from piecemeal enclosure of medieval to early postmedieval date, includes two annular spoil heaps (marked 'B' on the plan) and it is highly likely that further evidence survives as buried remains. This evidence of early mining activity is considered to be of at least regional importance." When comparing both of these documents, it is likely that the area of grassland is located on the historical medieval/ early postmedieval buried remains of significant archeological value. Giving more importance to the protection of this site.

Hedgerow Significance and Historical Continuity

The hedgerows at NES36 represent long-established ecological corridors with documented historical continuity and recognised ancient-indicator flora. Their degradation or removal would constitute a loss

of irreplaceable habitat structure, with consequences extending beyond the site to the functional ecology of Smithy Wood and the wider LNRS network**.**

This has several significant implications:

- **Ancient Woodland Indicator Species:** Presence of dog's mercury and greater stitchwort confirms hedgerow antiquity and woodland association in one of the hedgerows.

- **Historic Boundary Evidence:** Mapping data (1637 Harrison Survey & 1855 Ordinance Survey Map) confirms continuity of these boundaries over centuries and the Heritage Impact assessment mentioned above also indicates that the hedgerows date back to medieval/ early postmedieval periods.

- **Ecological Corridor Function:** Provides essential movement pathways for bats, hedgehogs, birds, and pollinators.

- **Concealed Indicators:** More exposed hedgerows likely had indicator species suppressed by drought and senescence.

- **Irreplaceability:** Ancient hedgerows cannot be recreated or mitigated — their value derives from centuries of ecological development.

- **Connectivity Role in LNRS:** Central to the integrity of the Smithy Wood corridor and wider landscape-scale habitat network.

Other trees/woodland on the site could also be ancient given the timing and prolonged drought conditions prior to the survey. Drought can hide, distort, or temporarily eliminate several of the

indicators used to assess whether a tree is ancient - early foliage drop can mask the crown detail, lichen and mosses may have been killed and broken away, dead wood may have fallen and under vegetation indicators may have been vulnerable to conditions as discussed above.

The suggested improvements to the hedgerows would be insufficient given the scale and usage of the land. It is likely that the PEA is not accurate in respect to ancient trees and hedgerows and should be re-assessed. If this is so, ancient trees and hedgerows are irreplaceable and development which damages or causes deterioration should be refused.

Summary of Faunal and Species-Related Concerns

The NES36 site supports or facilitates movement for a range of priority and protected species, many of which have been insufficiently assessed in the PEA. The ecology of the site cannot be understood in isolation from Smithy Wood, which forms a critical core habitat and faunal reservoir. The following concerns apply:

1. **Badgers:**
   The sett found onsite is likely an outlier of a main sett within Smithy Wood, indicating that NES36 is used as core foraging territory. Isolation of the woodland would disrupt clan movement patterns and commuting routes, and any development would risk unlawful disturbance under the Protection of Badgers Act 1992. Badger setts require a minimum 30m radius around the outermost sett, this would need to be natural space removing a considerable amount of land from the developable area - a large sett can cover 100m and up to 40 entrances with each entrance requiring a 30m radius buffer.
2. **Bats:**
   The adjacent EcIA for the refuelling site recorded significant bat activity of local to county-level importance. The hedgerows and ecotone between grassland and woodland provide dark commuting corridors. Industrial lighting would sever these routes and degrade feeding areas.

3. **Great Crested Newts (GCN):**
   The PEA relied on outdated desk-based information, despite the nearby presence of known ponds within 250m identified by the adjoining EcIA. A seasonal ditch along the Trans-Pennine Trail may also function as breeding and dispersal habitat. Full GCN survey effort is required but was not undertaken or even recommended.

4. **Birds, including species of conservation concern:**
   The adjoining EcIA recorded skylark (a ground-nesting species highly sensitive to disturbance), dunnock, and ten red/amber-listed species. The NES36 grassland and open field margins provide nesting and foraging habitat that would be lost to development.

5. **Hedgehogs:**
   The site provides valuable breeding and foraging territory supporting hedgehog movement between woodland edge and grassland. Mitigation via perimeter fence holes is not credible within a high-traffic HGV estate and would not prevent population decline through habitat fragmentation.

6. **Woodland Edge Specialists:**
   Many small mammals, invertebrates, and ground-nesting species rely on the transitional habitat between grassland and Ancient Woodland. These species are not captured in generalised survey outcomes but are ecologically significant in woodland–pasture

landscapes.

Hydrological Risks to Smithy Wood

The proposed development would alter the hydrology of the site in ways that are incompatible with Ancient Woodland ecology. SuDS, drainage modifications, and hardstanding runoff will inevitably change how water infiltrates, flows, and carries nutrients into woodland soils.

Key concerns include:

1. **Redirection of natural water flows**, causing areas of artificial waterlogging or drought at the woodland edge.

2. **Nutrient and pollutant enrichment** from road runoff, oils, metals, tyre particulates, road salt and nitrogen, adversely impacting nutrient-sensitive woodland flora.

3. **Disturbance of soil fungal networks and microbiota**, which underpin Ancient Woodland stability and resilience.

4. **Disruption of seed banks and woodland floor ecology**, leading to long-term biodiversity loss.

5. **Potential weakening of veteran tree root systems** due to changed water availability and fluctuating soil moisture.

Ancient Woodland soil systems are highly evolved and irreplaceable; hydrological disturbance cannot be “mitigated” after the fact. Crucially, the PEA does not address hydrological impacts at all, and no modelling or analysis has been undertaken. This omission leaves a serious gap in ecological assessment and undermines any conclusion suggesting that impacts can be minimised or offset.

Regeneration Potential from Adjoining Site

The ecological recovery observed on the adjoining former industrial site demonstrates that land in this landscape naturally regenerates into high-value semi-natural habitat when left undisturbed. NES36, with a higher-quality baseline and direct proximity to Ancient Woodland, has greater untapped ecological potential. Development would interrupt ongoing natural succession and eliminate future habitat gains that would otherwise contribute to LNRS and Nature Recovery Network objectives.

Change in designation

The drawn boundary separating the land on the south west from the main NES36 allocation does not follow a logical or defensible physical feature such as a hedgerow and there is no Green Belt reasoning by which reducing the Green Belt portion to a fragmented 5 ha parcel would “improve” its performance. In reality, retaining the full 10 ha in the Green Belt, following the historic hedgerow boundary would strengthen openness, ecological continuity, and landscape containment, thereby bolstering rather than weakening the Green Belt function in this location. Although the land is now proposed to be redesignated as Urban Green Space, UGS is a local, community-amenity designation, not an ecological or habitat-protection designation. As such, it does not carry the same presumption

against development as Green Belt nor does it automatically recognise or protect underlying habitat integrity. Given the proximity of this land to the ancient and species-rich hedgerows on the northern site boundary, along with documented priority habitats and species in adjacent Smithy Wood, it is ecologically inappropriate to downgrade its status from agricultural Green Belt to UGS. This change would materially weaken ecological safeguards and increase the risk of future development pressure. We feel a more suitable course would be to retain this land as Green Belt agricultural land, providing continued habitat connectivity, hedgerow preservation, and ecological buffering to Smithy Wood.

NES37

We continue to object to this site being allocated for development within the Sheffield Plan

Preliminary Ecology Appraisal & BNG assessment

The PEA only assessed within the red line boundary and 10 metres around it, given this proposed site encapsulates part of the Field at Yew Lane Local Wildlife Site and this area was not fully assessed, there is still limited information on the impact of development around the LWS both in situ on the watercourse and surrounding habitats, and therefore the wider ecological network. However the PEA does note on this area of the LWS that there are areas of lowland mixed deciduous woodland including alongside the watercourse banks and extending into the proposed site.

The BNG assessment that has been released with the consultation states that the condition assessment is provided in a separate spreadsheet, which has not been provided. The BNG also has not assessed the entirety of the section of LWS (including woodland and watercourse) that runs through the centre of the site. In this case, despite the red line boundary being drawn around this part of the LWS, we feel this part of the watercourse and LWS should have been included in any calculation as it is effectively part of the site given it is completely surrounded and cut off from the wider network.

Trees

A line of ecologically valuable trees (including mature and veteran trees) extends out from the associated strip of LWS woodland into the proposed site boundary, suggesting that this area of the LWS itself contains ecologically valuable trees which will be cut off from the wider network. (Refer to points on mature, veteran and ecologically valuable trees) - this will effectively degrade this habitat and restrict movement of wildlife of which ecologically valuable trees support, thus preventing it from fulfilling its purpose as a LWS.

There are two areas of Other Lowland Mixed Deciduous Woodland within the site (WC1 to centre/west, & North by the farm) - these are listed as Habitats of principal importance under section 41 of the NERC Act and covered in the LBAP Woodland Habitat action plan. The PEA states it is rare for Aspen to form extensive, old-growth strands in areas subject to intensive land management. Thus, in this context and the context of the site given the direct and indirect connectivity of the woodland on site with Yew Lane Field LWS, the wider riparian corridor associated with WC1 (and the unassessed continuation into the LWS), and the wider network of semi-natural and Ancient Woodland within the surrounding landscape, the areas of woodland are of **county level importance**.
These areas appear to have been left intact on the concept plan provided, though SCC have stated that the concept plan is “for illustration only and detailed plans would need to be produced at the planning application stage”. Thus, as the only ecological protections considered by SCC at this stage are minimal buffers to the LWS, these areas of woodland within the site could easily be lost. The note in the PEA as stated above outlining how different habitats and ecologically valuable trees interconnect across the site further supports that development here will severely affect the ecological

network and negatively impact biodiversity. Further, the PEA findings show rare species in these patches of woodland.

The northern woodland is considered to be of county importance due to the unusual formation of aspen - this is a major ecological constraint and needs buffers larger than root protection zone. Considering the timing of the survey, which took place during a period of suppressed vegetation growth and drought conditions, it is entirely reasonable to conclude that the northern woodland containing the rare aspen assemblage could in fact meet the criteria for ancient woodland, even if standard ground flora indicator species were not visibly present at the time of recording. Drought conditions are well documented to suppress the expression of ancient woodland indicator species and distort condition assessments, masking species that would otherwise appear in typical spring or early summer conditions. When combined with the presence of long lived aspen clones and veteran trees in and around the woodland, both of which indicate ecological continuity over multiple centuries, the assumption that this woodland is not ancient becomes scientifically unsound. Accordingly, precautionary assessment would require that the woodland be treated as potentially ancient until a seasonally appropriate botanical survey is carried out following normal rainfall conditions.

On the assessment, 16 trees, 10 of which are within hedgerows, are listed as irreplaceable.

Cropland

Weight has been given to Other Cereal Crop habitat as local value for nature conservation due to its role in maintaining open spaces which support certain wildlife, and through sensitive farming practices conserves the value of higher quality associated habitats (hedgerows and field margins), and we can assume the bordering LWS, thus again we perceive loss of this habitat will have an impact on the remaining LWS and Nature Recovery Network connectivity.
Further, the Arable Field Margins to the north and south-east of the site have been found to be botanically diverse and supporting local fauna via providing foraging, shelter and nesting opportunities. They also provide a buffer between neighbouring habitats and intensive farming practices and thus are locally valuable for conservation.

Hedgerows

As some of the ancient/irreplaceable trees on site are located within hedgerows, the hedgerows themselves are potentially ancient which could have been missed due to the drought conditions and timing of the survey. The field boundaries within NES37 follow historic alignments that long predate surrounding modern development and are characteristic of early post-medieval or earlier agricultural enclosure patterns. The documentary and cartographic evidence suggests that these hedgerows align with historic field structures shown on 19th century mapping and potentially earlier estate or tithe layouts, indicating continuity of land division over several centuries. This strongly reinforces the position that they are likely to qualify as ancient hedgerows, functioning both as important ecological corridors and as surviving components of the historic rural landscape character. Any removal, fragmentation or incorporation into domestic garden boundaries would risk the loss of irreplaceable habitat and sever ecological connectivity. Given their extent, age potential and landscape significance, a full hedgerow survey should be conducted under seasonally appropriate conditions following normal rainfall in order to accurately assess their status and ecological function.

Even if this is found by appropriate surveys to be incorrect, the PEA has identified a network of 17 sections of species-rich native hedgerows between fields, with 10 sections including mature and/or veteran trees. Localised sections of which include rare white poplar, white willow, goat willow & cotoneaster spp.. The hedgerows on site are considered as HPI as they comprise 80% of at least one native woody species, they are considered locally important for conservation and listed in the LBAP.

At NES37 there is no explicit condition requiring the retention of historic hedgerows as wildlife corridors, in contrast to other allocations within the same document where specific protection measures are clearly mandated. For example, at NES38 the policy conditions explicitly require the retention of hedgerows as wildlife corridors as part of masterplanning and subsequent planning applications, ensuring that linear habitat networks are preserved as functioning ecological features systematically protected throughout the development process. The omission of such a condition for NES37 is particularly concerning given that the hedgerow network here forms part of a continuous habitat system linking woodland, watercourse and field boundaries and provides essential structure for species movement. Without a requirement for retention and appropriate buffers so as to not isolate them from the ecological network at the Local Plan stage, these hedgerows are at risk of piecemeal removal, fragmentation or domestication at the planning application phase, resulting in permanent ecological severance and undermining the intended consistency of biodiversity safeguards across Green Belt release sites.

Watercourses

The treatment of the watercourse in both the PEA and BNGA is incomplete, as it is unclear whether the downstream section within the LWS has been properly surveyed and assessed, and no River Condition Assessment or water quality testing was carried out. As a result, **no Water Units were included within the BNG metric**, meaning the ecological value of the watercourse and its function as a riparian corridor supporting protected and notable species has been omitted from baseline calculations. This omission, combined with the lack of a secure buffer and the weakened policy wording to retain features only “where possible”, risks severing and degrading an ecologically connected water system and results in a materially deficient foundation for any assessment of net gain or ecological impact.The watercourse has potential to support protected and notable species and forms part of wider riparian corridor of woodland leading downstream off-site to LWS.

Key recommendations regarding protected species

Badgers:
SCC provided no records of badger within 2km of the site, though we have received reports of badger activity within this distance, including in the gardens immediately adjacent to the site boundary and further afield on and adjacent to NES39 (Land at Wheel Ln and Middleton Ln) which is just across the road from NES37, and at Strawberry fields and Grenoside Woods. The PEA states that only accessible areas were assessed for signs of badgers but that there is considered to be potential for badger setts on or within 30m of the site site and that all habitats on site provide suitability for foraging and commuting badgers. Therefore, we support that the site is suitable for badgers and strongly suggest that species specific surveys are carried out prior to release of the site from the Green Belt, as outlined above, to determine existence of setts and assess the areas inaccessible during the PEA.. Further, the PEA states that the site is considered to be of importance for badgers up to site level only, though considering the high likelihood of presence of badgers around the site and both the LWSs and NRN Priority Habitats which were not assessed as part of the red line boundary, we would argue this importance may be greater.

Great Crested Newts:
The PEA found suitable terrestrial habitats on site and potential for GCN within 500m of the site but noted that the central watercourse is not suitable for breeding as it consists of running water, and that there are no suitable waterbodies on site according to OS mapping. However, we would argue that as the PEA states areas were not assessed as they were inaccessible, and also due to lack of clarity on how much of the central watercourse within the LWS outside of the red line boundary was assessed - we cannot be certain that there are no suitable still and/or low flow pools or ditches that have formed around the watercourse. Further, due to the drought conditions the site was subject to over Spring/ Summer 2025 (and at the time the PEA was carried out) we are concerned that suitable GCN breeding habitats would usually be present but were missed in this instance due to conditions.

Bats:
SCC provided 85 records - Pipistrellus spp., common pipistrelle, soprano pipistrelle Pipistrellus pygmaeus, noctule bat Nyctalus noctula, Myotis species Myotis spp., whiskered bat Myotis mystacinus and unidentified bat Chrioptera spp. The closest record was of a foraging common pipistrelle bat located 0.56 km north west of the Site

Roosting - only assessed Town end and trees within 10m of the site boundary - no consideration of buildings immediately adjacent to site, or trees in adjacent gardens, or trees in LWS. Did note mature and veteran trees within 10m of site boundary (assume within LWS) with roosting characteristics Foraging suitability of the site is supported by weight being given to adjacent Other Cereal Crop habitat as local value for nature conservation due to its role in maintaining open spaces, and Arable Field Margins to the north and south-east of the site have been found to be botanically diverse and supporting local fauna via providing foraging opportunities.

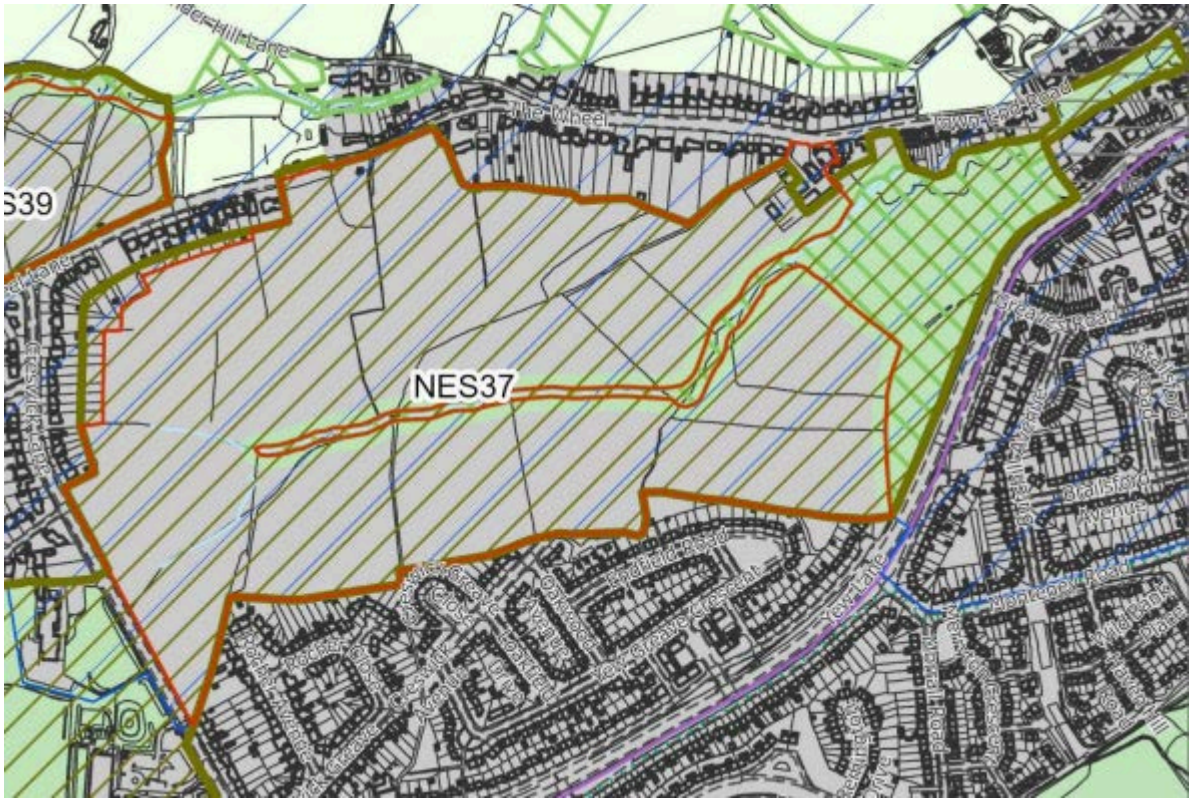
Other Surveys:
The PEA recommendations explicitly call for multiple full ecological surveys, including targeted protected species surveys, seasonal botanical assessments and a full River Condition Assessment, to be undertaken prior to the decision to release it from the Green Belt. It also repeatedly states that areas were inaccessible thus not assessed. This directly supports our position that sites proposed for Green Belt release must be fully ecologically assessed before allocation, not deferred to the planning application stage. Once land is removed from the Green Belt it is highly unlikely to ever be reinstated, therefore ecological safeguards must be guaranteed at allocation stage, not treated as a conditional afterthought. It is inappropriate and unsound to release land from Green Belt protection based on incomplete ecological data, especially where the survey itself acknowledges missing baselines and the need for further investigations before reliable conclusions can be reached.

Other Potential Issues

Since the PEA was carried out the boundary of this proposed site has altered, thus the assumptions of the PEA and the BNG metric are now inaccurate as they assessed the old site proposal.

The evidence base is internally inconsistent, since the Statement of Common Ground asserts that the entire NES37 site is available and deliverable, while the capacity Note acknowledges that part of the land, specifically the area containing farm buildings, is not available for development and has therefore required a reduction in unit numbers. These positions cannot both be correct. If the site is fully available as the SoCG claims, no capacity reduction would have been necessary, and conversely, if part of the site is unavailable, then the assertion of full deliverability in the SoCG is demonstrably inaccurate. This inconsistency undermines confidence in the robustness of the allocation and raises concern that key constraints are being selectively recognised or discounted depending on which document is being referenced.

Consequential Deletion of Green Belt outside of Development Boundary



The consequential deletion of the additional area of Green Belt land east of NES37 is highly inappropriate as it encompasses both a Local Wildlife Site and priority habitat whose condition is presently unknown and may in fact be of high ecological value. This parcel does not have a defensible boundary in landscape terms, and instead, the proposed development itself would artificially create such a boundary, a reversal of correct Green Belt logic. The justification provided, referring to the land as a small, poorly performing segment, is not supported by the functional role this land plays in separating Grenoside from Ecclesfield, nor by its value as the only remaining ecological corridor connecting to the watercourse (LWS). Moreover, as acknowledged within Examination Document 124 on the Proposed Additional Site Allocations, adverse impacts of Green Belt release should be offset through compensatory improvements to the environmental quality and accessibility of the remaining Green Belt, yet the parcel most capable of providing such compensatory ecological enhancement,

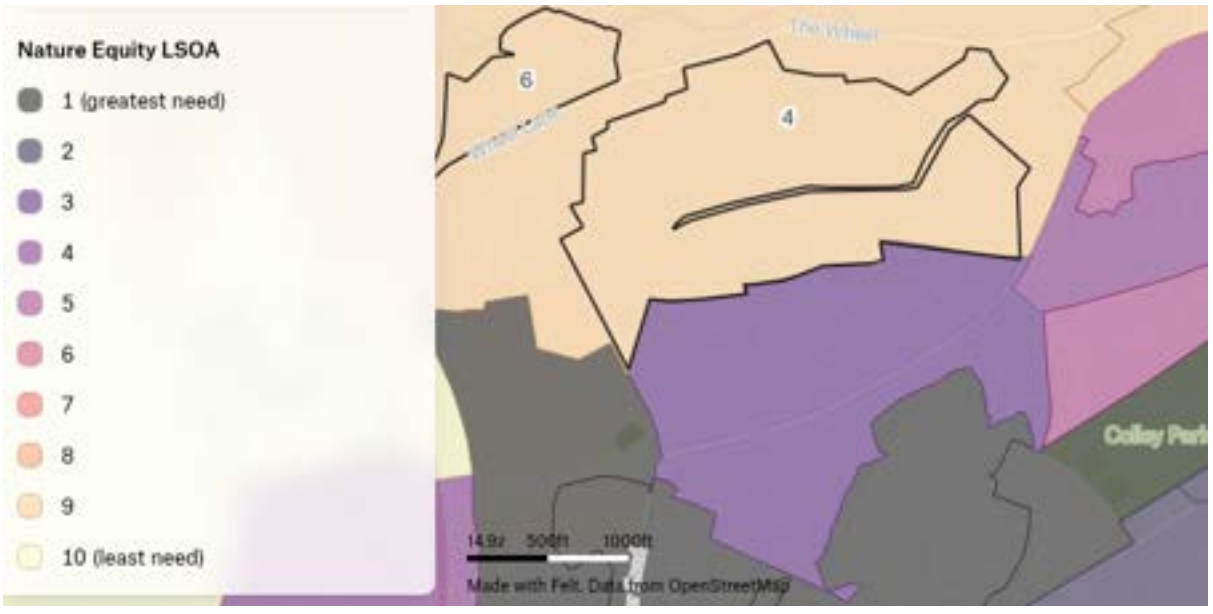
namely the LWS and associated riparian habitat to the east, is instead being proposed for deletion. This approach contradicts both the stated mitigation principle and the broader intention of Green Belt policy, which seeks to prevent coalescence of settlements and preserve ecological networks, rather than dismantling them.

Additional proposed conditions - Note on Impact of Vehicular Access from Yew Lane on the Local Wildlife Site

The proposed access from Yew Lane would require intrusion into the Local Wildlife Site, with two routing options presented, each resulting in the removal of trees within the LWS. Although one option removes a smaller area of LWS habitat, it would impact a greater number of trees, and there is no information provided on the condition or ecological status of these trees, meaning the true impact cannot be properly evaluated. The condition of the affected habitat is also unknown, yet it is identified as priority habitat within the Nature Recovery Network, and may therefore be of high ecological value. On this basis, we object to any access route through the LWS in its entirety, as it is neither justified nor supported by adequate ecological assessment.

Nature Equity

We included our Nature Equity Mapping in our first representation and had particular concerns around NES37 given that it is directly adjacent to some of the most nature deprived areas and therefore likely offers the only accessible natural greenspace for a large number of people. The conclusions drawn in the PEA for this site, namely the high of biodiversity and range of ecologically important habitats, confirm that the site does comprise good quality natural greenspace. Therefore, development here and subsequent degradation of biodiversity and habitats will push the areas to the South into further nature deprivation and cannot be mitigated for with smaller area of urban green space.



Nature equity map showing most nature deprived areas in dark grey (have greatest need for access to good quality, natural greenspace) in relation to NES37

NES38

We are objecting to the allocation of this site - in addition to the points raised in our original objection, the following also applies.

Proposed Cycle Path Condition

We object in the strongest possible terms to the retained condition permitting a cycle/pedestrian route through the Cowper Avenue LWS. The following points summarise our grounds of objection:

- **The affected land is designated as core priority habitat within the National Nature Recovery Network (NRN).** NRN Priority Habitat represents less than 5% of the total national land area. The Defra guidance on LNRS makes clear that these habitat areas must be *protected, restored, and expanded* and are essential to meeting biodiversity recovery targets. This is not surplus grassland, it is land *explicitly identified for nature recovery and long-term ecological connectivity.* The PEA referenced in the SoCG has not been made public, was commissioned by the site promoter and will not have used the most up to date data on priority habitats which is currently available to SCC Ecology unit and SRWT. Being denied access to this information makes it impossible for us to scrutinise the conflicting information regarding the current condition of this important habitat. Even if the situation has arisen that the condition of the area has been degraded or neglected and is now in need of restoration, it is unlikely to have changed its priority habitat status in such a short space of time.

- **The proposed condition conflicts with legally binding duties under the Environment Act 2021.**

    - Section 1 places a duty on Government to set long-term environmental targets.

    - Section 45 requires local planning authorities to prepare Local Nature Recovery Strategies with statutory weight.

    - The LNRS framework demands avoidance of habitat loss, particularly within designated ecological networks.

  A local planning policy cannot legitimately override a statutory recovery strategy, nor can a site allocation invite habitat destruction in an NRN priority area. The fact that the LNRS has not yet been formally adopted does not remove the Council's statutory obligation to operate in alignment with the direction of environmental law, national biodiversity policy. Planning decisions should not pre-emptively undermine the very nature-recovery objectives the LNRS is being designed to implement.

- **The proposal conflicts with the national 30x30 commitment** (protecting 30% of land for nature by 2030), which has been reaffirmed by Government in 2022 and 2023. Allowing non-essential development infrastructure within protected habitat actively *moves Sheffield backwards*, reducing protected habitat extent rather than increasing it.

- **The cycle path is not essential infrastructure.** During consultation, the planning officer openly stated that the cycle route is a *"want" rather than a "need."* Under planning logic and legal interpretation, "essential infrastructure" means that which is *indispensable* to enable development. Here it is confirmed on record that:

- the development can proceed without it

- the development can be accessed independently on both sides
- and no severance condition exists that makes the route necessary

Therefore the “essential infrastructure” justification collapses entirely.

5. **The development can proceed without intrusion into the LWS.** The Statement of Common Ground affirms that the site can be accessed from both Fox Hill Road and Salt Box Lane, with no impediment to servicing or constructing both halves. There is therefore no planning necessity to breach the LWS, and thus *no compliance with the mitigation hierarchy*, as required by NPPF paragraphs 180–182.

6. **Contravention of the mitigation hierarchy (NPPF).** NPPF para 180 requires planning decisions to:

    - **Avoid** significant harm to biodiversity first
    - then **Mitigate**, only if avoidance is impossible
    - then **Compensate**, only if mitigation is impossible

Here, avoidance is clearly possible.
Alternative access options exist.
The development can proceed without the connection.

Therefore **any harm is avoidable harm** – meaning it is *not legally or policy-justifiable*.

7. **Policy GS5 must protect priority habitats, not weaken them.** To be compliant with:

- The Environment Act
- LNRS statutory framework
- NPPF biodiversity protection
- DEFRA biodiversity net gain guidance
- UK obligations under the Convention on Biological Diversity

Policy GS5 must treat priority habitat as *non-negotiable protected land*. However, the proposed condition explicitly authorises intrusion and habitat removal, which reverses the principle of environmental preference and creates a dangerous policy weakness.

8. **This risks establishing a critical precedent** whereby developers:

    - mischaracterise habitat value using private, unpublished ecological reports
    - reclassify priority habitats as expendable

- define “essential infrastructure” so loosely that any convenience-driven route or utility corridor qualifies
- gradually erode protected habitat across Sheffield

This would undermine the integrity of LNRS implementation and Sheffield’s ability to meet statutory nature recovery obligations.

9. **The precautionary principle applies.** Where environmental uncertainty exists, particularly in designated habitat sites, the precautionary approach dictates that development must err on the side of environmental protection. That principle is embedded in UK environmental law and reflected in the Environment Act framework.

For all the reasons stated above, statutory conflict, policy inconsistency, ecological status, plan deliverability without intrusion, precautionary obligations, and legal hierarchy, we reiterate our strong objection.

The cycle route cannot be considered essential infrastructure, and cannot justify the destruction of core priority habitat within a Local Wildlife Site.

As previously discussed in our original comments, this site is important for nature equity in the area, being extremely close to some of the most areas of nature deprivation, without access to the PEA, we must refer to the most up to date data we have access to which informs us that this site contains priority habitat in good/great condition, this then implies that it becomes even more important for nature equity.

NES39

SRWT are objecting to the release of this site from the Green Belt for development until it has been established that no irreplaceable habitats will be destroyed or damaged as a result.

Ecological Risk to Ancient Woodland, Hedgerows and the Riparian Corridor

The proposed allocation and development at NES39 presents a serious risk to irreplaceable ecological features potentially present within and adjoining the site. During the Local Plan hearings, the representative for Limes Developments openly stated that their Preliminary Ecological Appraisal (PEA) had identified ancient woodland features on the site, a matter that we raised as a significant ecological concern. Yet, despite this acknowledgement, the PEA itself has not been released for scrutiny. This omission is deeply concerning given the sensitivity of the habitats involved and the recognised irreplaceable nature of ancient woodland features under planning guidance.

Additionally, reliance on the Ancient Woodland Inventory as definitive proof of absence is scientifically inappropriate. This inventory does not reliably record woodland areas under approximately 2 hectares in size. Therefore, smaller ancient woodland fragments, woodland edge remnants, old tree lines, or singular ancient/veteran trees and hedgerows associated with ancient woodland soil ecology may exist but remain unmapped. In this context, the statement that “there are no significant ecological constraints identified” is not evidence-based, but rather an assertion made without transparency of supporting data.

The physical character of the site is also relevant. It consists of four fields, used as paddocks and bounded by hedgerows. Such hedgerows are not simply territorial boundaries. They often represent historically continuous ecological structures that support bat movement, pollinator travel routes, small mammal mobility, and genetic connectivity between habitat nodes. Many hedgerows in this region are several centuries old and potentially qualify as ancient hedgerows under recognised assessment criteria. Yet, no hedgerow dating or condition survey has been disclosed publicly.

Of central ecological importance is the relationship between NES39 and the Cinder Hill Brook Local Wildlife Site, which forms the northern boundary of the proposed development. This adjacency is critically significant. Riparian corridors form stable, moisture-governed ecological environments characterised by distinctive species compositions and soil conditions. Even if this strip of land has not been formally mapped as ancient woodland, it may contain features such as veteran trees, ancient woodland indicator plant species, undisturbed soil structure, or moss/bryophyte assemblages which represent remnants of ancient habitat. The absence of official designation does not equate to absence of ecological value.

The currently proposed 15m buffer between development and the wildlife corridor must also be challenged. While this may meet basic administrative compliance, it does not align with ecological reality. Numerous studies have shown that the ecological disturbance effects associated with residential development, including light pollution, temperature shifts, soil drying, nutrient drift, noise intrusion, increased footfall and pressure from domestic cats and dogs can extend well beyond 15m, often reaching 20–50m or more into adjacent habitat. A 15m margin is thus insufficient to preserve the microclimate, stability, and continuity of species composition that riparian and woodland-adjacent habitats require. As described in the general comments, setting a more realistic range for buffers should be done at the local plan stage rather than the planning application stage in order to prevent the release of a non viable site from the Green Belt, to set clear targets to the developers and give more guidance to planning officers and objectors when responding to applications.

In conclusion, the ecological risks associated with NES39 are not hypothetical, they are real, likely, and presently unquantified due to the withholding of ecological evidence. The site's proximity to a Local Wildlife Site, the acknowledged (but undisclosed) evidence of ancient woodland features in the PEA, the possibility of ancient hedgerows and veteran trees, and the well-documented limitations of national woodland datasets collectively establish a clear case for precaution. Development at NES39 should not proceed nor should it be considered environmentally acceptable until all ecological evidence has been transparently released, independently examined, and verified to demonstrate that irreplaceable habitat will not be damaged or lost.

We again note that Natural England have not commented on this site within the Statement of Common Ground, however given that the PEA has not been shared, we are again concerned that they may not have been given the information that the site contains ancient woodland.

Ecological Constraints as Grounds for Capacity Reduction on NES39

The site capacity modelling already presented by the Council shows that NES39 cannot be assumed to support 148 homes. Within the Council's own capacity assessment, the site is divided into three parcels - A, B and C, with alternative development options. These options demonstrate that a reduced development footprint is entirely feasible. Specifically, Option A (developing parcels A & B) would result in 129 units, a reduction of 19 dwellings, while Option B (developing only Parcel A) would reduce capacity to just 66 units, representing a reduction of 82 dwellings from the original assumption. These figures are directly drawn from the Council's technical modelling.

Parcel C, at 1.1 ha, is the smallest but also sits in closer relationship to the ecological corridor adjoining the Local Wildlife Site, where ground conditions, ecological connectivity, and species

movement are most vulnerable to edge effects. Excluding Parcel C from development would have a meaningful ecological benefit by reducing habitat intrusion and maintaining the ecological permeability of the hedgerow and riparian corridor boundary along Cinder Hill Brook.

Likewise, the exclusion of Parcel B or at minimum, significant downscaling would maintain greater separation between residential development and those areas of potential irreplaceable habitat features identified but not disclosed in the PEA. Given that ecological risk increases with proximity to sensitive features, the areas of development should be restricted to the parcel(s) with the least ecological adjacency and minimal hedgerow disruption.

Concern Regarding Proposed Access and Potential Woodland Removal

A further ecological concern arises from the emerging indication that the development may require the removal of woodland to create vehicular or pedestrian access into the site from the north. Given the site's boundary with the Local Wildlife Site and the likely presence of woodland or wooded riparian growth adjacent to Cinder Hill Brook, any proposal to clear trees or vegetation to make space for an access route could result in direct loss of woodland habitat. Without full ecological surveys detailing the age, species composition, soil condition, fungal networks, and historical continuity of the trees and shrubs present, such removal risks damaging irreplaceable ancient habitat features that may not be formally recorded or mapped but nonetheless are functionally ancient in ecological terms. Making alterations to the woodland edge, even if perceived as minor in area, can have disproportionate effects on habitat integrity, light levels, moisture regimes, and ground flora stability. For these reasons, any access design that necessitates intrusion into established woodland — particularly woodland connected to the Local Wildlife Site — should not proceed without full disclosure and independent scrutiny of the PEA and all related ecological assessments.

NWS30

Ecological Buffer & Proposed Cycle Path

SRWT is satisfied that the proposed allocation is an appropriate distance from the ancient woodland within the adjacent LWS as it exceeds 100m to the north of the site. However, the LWS which is adjacent to the proposed site is designated priority habitat within the NRN, is itself an ecological buffer for the ancient woodland and is in need of restoration. The 15m distance that has been referenced to date reflects the minimum root protection zone, and is being designated and presented as ecological land, as such it should function as a natural, undisturbed habitat corridor rather than a multifunctional recreational or access route. Introducing hard infrastructure, even a permeable footpath/cycle route, compromises the purpose of the buffer, which is to minimise disturbance, edge effects, and anthropogenic intrusion into the sensitive LWS margin.

Due to this priority habitat, we recommend that a larger functional ecological buffer is secured as a allocation condition. While the developer's housing layout may limit the capacity for additional ecological set-back through exclusion of built development, part of the wider buffering distance could be achieved through use of rear gardens of adjacent housing. Where this occurs, the gardens should be subject to ecological design measures such as low or no external lighting, permeable fencing, and wildlife-friendly planting, as set out in the Ancient Woodland guidance referenced earlier.

We disagree with the developer's comments within the Statement of Common Ground that the buffer is not necessary to be conditioned at the allocation stage, for reasons mentioned above, we feel strongly that buffers should be agreed at the local plan stage to prevent dilution during the planning stage. However we were reassured by our conversation with the developer at the hearings, where they indicated their willingness to work collaboratively with SRWT during the masterplanning stage, and we welcome this commitment. SRWT looks forward to ensuring that the ecological buffer is

reserved for nature conservation purposes only, and that the footpath is appropriately located outside of this zone in the final masterplan.

Lack of Ecological Information from Yorkshire Water as Adjacent Landowner

SRWT also notes that a portion of the wider site area is under the ownership of Yorkshire Water, comprising operational infrastructure and associated land to the south of the proposed allocation. At present, there is no available ecological data, habitat assessment, or landowner position relating to the ecological management of this portion of land, despite it being:

- prone to episodic and seasonal flooding
- directly hydrologically connected to the wider landscape
- identified as containing priority habitat of unknown condition
- proposed for designation as Urban Green Space

This creates a current evidence gap. While the developer and SCC have proposed a general treatment of this land as non-developable, this does not substitute for formal assessment of its ecological value or potential function as part of the habitat network especially as it could potentially form part of the SuDS, be negatively impacted by hydrological changes or require further ecological buffers around the priority habitat.

Given that this land may serve as a wetland, transitional habitat, amphibian movement corridor, or flood-adapted landscape, the absence of ecological input or confirmation from Yorkshire Water is a material concern. As an adjacent and hydrologically relevant landowner, Yorkshire Water should provide information on:

- any ecological surveys undertaken
- management practices of vegetated areas
- any drainage or flood mitigation interventions
- intended use and accessibility of the land
- safeguarding measures to protect priority habitat

SRWT recommends that prior to final allocation wording, the Council seek and publish clarification from Yorkshire Water regarding the ecological status and planned management of this land. This is important to determine whether:

- ecological restoration or enhancement is required,
- whether the land can contribute positively to biodiversity net gain,
- whether the flooding dynamics create wetland habitat opportunities, and

- whether any of the existing vegetation constitutes functioning priority habitat.

In the absence of this information, we cannot be confident that ecological considerations relating to this portion of the site have been properly and fully assessed. We therefore request that the final allocation be accompanied by a clear ecological position statement from Yorkshire Water, or alternatively that the Council undertake or commission a baseline ecological appraisal of this area before masterplanning proceeds.

Lack of Ecological Evidence

SRWT notes that no Preliminary Ecological Appraisal (PEA) has been carried out or presented in support of this allocation. The absence of a PEA means that there is currently no systematic baseline data for habitats, flora, fauna, priority features, protected species presence or absence, or ecological functionality of the land either within the developable area or within the adjacent Yorkshire Water landholding. Without a PEA, ecological assumptions are being made without evidence, and potential sensitivities may go unidentified until after the land is allocated at which point mitigation options are more limited and ecological protections are harder to secure. A PEA is the minimum accepted first-stage ecological assessment for any land entering the planning process, and its absence at this stage undermines confidence in the statement that “no significant ecological constraints” exist. SRWT therefore recommends that a full PEA and species surveys be undertaken at allocation stage, ensuring that ecological conditions inform the design and layout of development rather than being retrofitted at a later stage.

NWS31

Drought conditions

As discussed in previous sections, the PEA was conducted in late July during drought conditions, when many moisture-dependent flora and invertebrates would have been dormant or entirely absent above ground. As a result, the recorded habitat condition likely underrepresents true ecological value. The PEA does not recognise the drought as a limiting factor during the process.

Neutral grassland may have appeared coarse and species-poor due to drought stress rather than ecological degradation. Similarly, the scarcity of herbaceous woodland flora does not rule out the presence of ancient woodland indicator species, many of which emerge and flower in spring (e.g., bluebell, wood anemone, wood sorrel) and are undetectable in midsummer drought.

This means that the PEA possibly missed diagnostic species associated with semi-ancient woodland and species-rich meadow habitats. Under-recording of woodland indicator plants, fungi, bryophytes and invertebrates leads to artificially low ecological scoring, which in turn sets a depressed baseline for Biodiversity Net Gain, making it appear easier to achieve a 10% uplift.

Because the survey timing was not seasonally representative and did not account for drought-induced suppression of biodiversity expression, the ecological conclusions cannot be considered reliable for allocation decisions. A spring survey under normal moisture conditions would likely reveal significantly higher biodiversity and connectivity value than currently reported.

Similarly, the PEA reports that the site has reduced suitability for ground nesting birds due to neglect and human disturbance, it does not appear to consider that this could also have been due to the drought conditions, although it does recommend a list of full surveys which should be undertaken. Given the importance of priority species and habitats and any mitigations or buffers that must be

condsidered, again it is essential to determine these through thorough, timely surveys prior to allocation otherwise the site might be totally or partially incompatible with development.

Unassessed Flood Impacts on Sensitive Habitats

The council's analysis of flooding considers only property risk and drainage, and does not assess the ecological consequences of periodic inundation on the adjacent Glen Howe Local Wildlife Site and woodland-edge habitats. No modelling has been undertaken for effects such as soil erosion, silt loading into Tinker Brook and the Don Catchment, aquatic contamination from run-off, or the mortality of woodland edge trees due to root waterlogging. This omission is significant because flooding of root systems and woodland soils can cause irreversible damage to veteran and semi-mature trees, degrade invertebrate communities, and disrupt amphibian and riparian ecosystems. Without a hydrological-ecological impact assessment, the risk to irreplaceable habitats remains completely unquantified, and allocation of this site in such circumstances is premature and scientifically unsupported.

Ancient Indicators

If as discussed above, the drought and timing of the survey potentially missed ancient indicators then it is feasible that some of the trees, hedgerow and adjacent woodland could be classed as irreplaceable. Historic mapping does indicate that the field boundaries and at least some of the hedgrows and woodland have been on site since at least the 1850's.

We do not feel that the PEA has investigated these sufficiently and therefore the buffer zones may need to be increased, again knowing this before allocation is essential as it is very unlikely that this relatively small site would accommodate the larger buffer zones require to cater for irreplaceable habitat.

Other surveys

The PEA quite rightly suggests numerous other surveys which need to be undertaken in details before planning decisions are taken, throughout this process we have advocated for these to be undertaken prior to the allocation (see previous section).

Bats

The bat assemblage identified includes scarce species such as Leisler's bat and whiskered bat, and declining species such as noctule. These species are highly sensitive to lighting and habitat

fragmentation. Their presence greatly elevates the ecological importance of the site and increases the risk of legal and planning non-compliance if development proceeds without extensive bat-specific survey and mitigation at allocation stage.

Great Crested Newts

The site contains suitable terrestrial habitat for Great Crested Newts, and waterbodies exist within 250–500m. However, no eDNA, DLL or field surveys were conducted, leaving the presence of this European Protected Species unknown. Given the timing of the survey during drought conditions, when GCN may have been entirely terrestrial and undetectable in ponds, this omission makes the ecological assessment incomplete and unsuitable for informed allocation.

Other protected species

Hedgehog (UK Priority Species)
Needs moist soil for invertebrate prey
Drought drives worms and beetles deeper underground
Hedgehogs become less active and harder to detect
Likely present but under-recorded due to dryness

Reptiles (slow worm, common lizard)
Present habitat is suitable (scrub–grassland–edge)
In drought, reptiles:

- retreat into cracks and shaded roots
- reduce above-ground basking
- become less visible

Casual surveys therefore risk under-detection

Riparian mammals (water vole, otter)
Likely to use Tinker Brook and River Don corridor
In drought:

- latrines dry out
- paw prints disappear
- feeding signs vanish
- individuals shift temporarily to deeper water elsewhere

Reduces observable field evidence

Invertebrates (pollinators & meadow specialists)
Drought:

- reduces nectar
- reduces wildflower bloom
- reduces visible insect activity

Butterflies, bees, hoverflies and specialist beetles less detectable

SS19

Drought Conditions

During the period in which the ecological survey was undertaken, the site was experiencing severe drought conditions, resulting in atypically dry soils, suppressed vegetation growth, and reduced ecological activity. Species that would normally be detectable, particularly amphibians, invertebrates, and small mammals, are known to retreat into deeper cover or dormancy during prolonged dryness, while many plant species display minimal surface growth or enter stress-induced dieback. As the PEA field survey took place on 28th August 2025, at the height of these drought impacts, it is highly likely that ecological presence, habitat suitability, and species usage were significantly underestimated, meaning the survey did not capture a true baseline of the site's ecological value.

Ancient Trees or Hedgerows

The PEA does not include any assessment for ancient woodland indicator species, nor does it appear to have actively tested whether the woodland or hedgerow assemblages meet ancient or semi-natural woodland criteria. Instead, the report simply describes the woodland as containing "mature and over-mature trees" with bat roost features such as knotholes and rot sites along Robin Brook (indicating long-standing undisturbed woodland structure), without investigating whether these may in fact be ancient or veteran specimens. Given that the site survey occurred during drought-affected conditions, which as previously discussed can reduce visible ground flora, epiphytes, lichen communities, bryophytes and other ancient woodland indicator species, it is entirely possible that the absence of indicators reflects seasonal suppression rather than true ecological composition.

If the riverside woodland is shown to be ancient or host ancient/veteran trees and old maps indicate this is also a possibility, this would constitute irreplaceable habitat requiring significantly greater protective buffers than are currently allowed for, and we are particularly concerned that the indicative masterplan places internal road infrastructure and development parcels well within what would normally be a mandatory exclusion or buffering zone for such habitat types.

We acknowledge that a housing development would have less pollution impacts than a HGV heavy land use, however, we would object to road and other development being planned within the root protection zone of potentially ancient but definitely mature trees highly likely to be home to bats - as previously discussed, the presence of irreplaceable or priority habitat it should be determined prior to allocation and conditions set to ensure the protection of these features such as using garden space with low level/no lighting to ensure that suitable dark buffer zones can be accommodated. If these cannot be accommodated within the design then the site would be unsuitable for allocation.

Adjoining field

The Access Appraisal clearly proposes using the adjoining field to the east to facilitate a secondary or emergency access point for the development, yet the PEA did not include this land within its survey area and carried out no ecological assessment of it. While habitats adjacent to the site were merely "viewed from the Site boundaries," this limited observational approach cannot substitute for a detailed survey of species, ground flora, hedgerow composition, soil condition, or faunal movement across the adjoining land. By excluding this field from baseline ecological analysis, the developer has failed to assess the true ecological impact of the secondary access proposal, particularly where it may affect boundary hedgerows, mature trees, species commuting corridors and drainage into Robin Brook and therefore the ecological evidence presented is incomplete and insufficient for determining full environmental effects of the scheme.

Priority Species

The PEA confirms that the riparian woodland and hedgerows provide high-quality commuting and foraging routes for bats and offer suitable habitat for badgers, hedgehogs and other mammals, as well as low-potential habitat for reptiles. However, because the adjoining field proposed for secondary/emergency access was not surveyed, merely visually inspected from the boundary, no assessment was made of whether these species use that neighbouring land as a movement corridor or connective habitat. This gap is significant because boundary features such as mature trees, scrub and hedgerows may be used by bats for night navigation, by badgers for foraging, and by reptiles for thermal refuge. Any disruption, lighting, vegetation clearance or soil compaction associated with constructing an access road through the adjoining field could therefore sever ecological movement routes and harm protected species, none of which has been meaningfully assessed within the submitted ecological evidence.

SWS18

Boundary issues

The PEA for the site appears to be incomplete as the survey area does not cover the full proposed site allocation boundary, omitting a large area to the West. Therefore, we cannot assess the impact of development on the ecology of the site nor on the surrounding ecological network.

Figure from Exam 124 showing the area of the proposed development site

Figure from Whitcher Wildlife's PEA showing the limits of the survey area

The statement of common ground outlines that there are two land owners as this site (Ackroyd & Abbott and Fanshawes), both of which have confirmed the site is available and support the allocation of SWS18 as identified in Exam 124 - Proposed additional site allocations (the entire site as shown in the first figure above). This boundary is confirmed by SCC as the entirety of SWS18 as proposed under 4.1 in the Statement, yet the area of land within SWS18 owned by Fanshawes was not included in the PEA. This is a large area of land and needs to be properly assessed for ecological value before the site is released.

Area of land at SWS18 owned by Fanshawes and not assessed on the PEA

Nature Recovery Network

The entire site is listed as a priority habitat on the NRN, in unknown condition. The PEA is not adequate to fully assess the condition, particularly as it does not cover the entire proposed site. Thus further ecological surveys covering the whole site would be required to determine its condition and importance as a habitat in its own right and to the wider ecological network.

Further, we initially missed this point but the bordering LWS (Redmires conduit) contains multiple areas of priority habitat on the NRN, both in unknown condition and in core condition (good for nature), thus further detailed ecological surveys are required to assess the conduit in situ, and determine how these areas of priority habitat on the NRN within both the proposed site and LWS are connected. This is required to fully understand and properly mitigate any potential impact on the areas of core priority habitat.

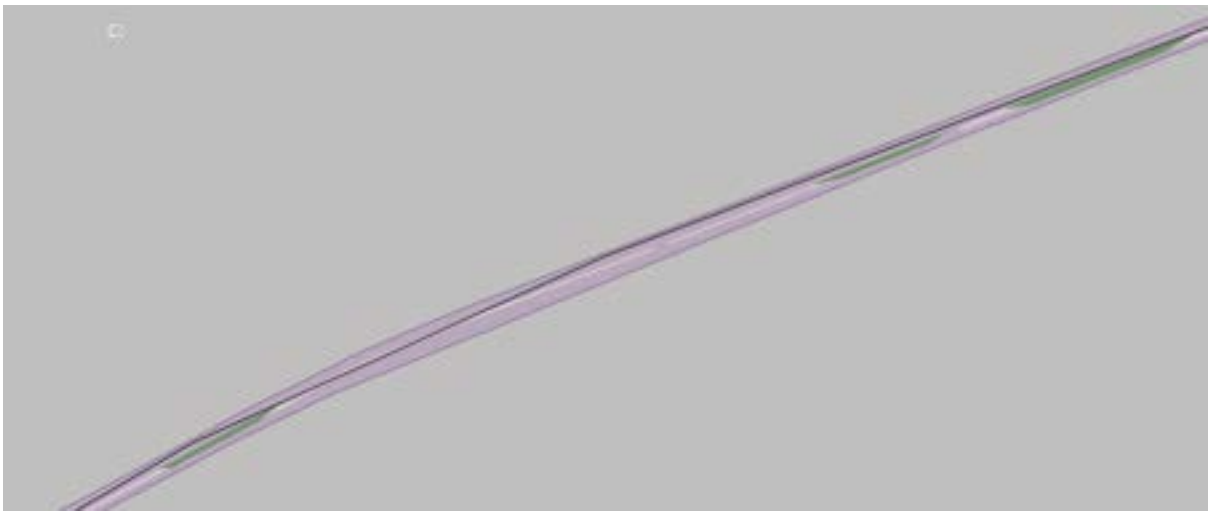


Image of mapping showing estimated site boundary to the South (black), LWS (lilac), NRN priority habitats of “core”/ good condition (green), (3 of 5 present adjacent to the site)

This also raises a concern due to the topography of the surrounding area being that the field to the south is uphill to the proposed development site; we predict that water will run off down this gradient and disperses into SWS18. If this is developed without an adequate buffer, there is a potential for excess water to gather in the LWS and risk of causing changes to the habitat and impacting its ecology, this is particularly concerning given the existence of core priority habitats.

PEA

The PEA for the site also assessed adjacent Redmires Conduit LWS and was carried out in May 2025. The PEA reached conclusions around the ecology of the conduit watercourse based on its condition at the time of the survey, which we feel are likely inaccurate as the PEA did not consider the environmental conditions at the time of the survey. This year, the region experienced the driest combined February, March and April for almost 90 years as noted above. Further, Yorkshire Water resource reports showed water levels lower than average in dry spells, with water levels extremely low at Redmires Reservoirs which the conduit joins.

The PEA states the LWS containing the conduit is unlikely to support numerous species, including water vole and white clawed cray fish, as it is expected to dry frequently. As at the time of surveying there had been an exceptionally dry winter and spring, and soon after a drought was declared, so we are concerned that resulting conditions influenced this conclusion and are not representative of the usual conditions of the conduit. It is possible species that usually inhabit the conduit were not present during this time.

Further, the PEA outlines that length of vegetation along the conduit could be a limitation when assessing signs of water voles thus our concern is that signs of water voles and other species could have been missed and thus the ecological value of the conduit is under-represented.

Notable species

Water vole -

Landowner states during the hearing meetings pertaining to this site that there is no evidence of water voles in the conduit, but as outlined by the limitations noted above and in the PEA, signs of water vole may have been missed and the state of the conduit at the time of surveying may have been unsuitable but is likely not representative due to the unusually dry conditions. In addition, the close proximity and connectivity of the conduit to confirmed populations of water vole at adjoining Redmires reservoirs, and the existence of old records suggest it is reasonable to assume there is a possibility of presence of water voles on the conduit and this should be assessed with further targeted surveys. Particularly as there are known populations within 2km of the survey site.

Badgers -

It is noted in the PEA that 22 records of badger within 2km of the survey area were returned, with 2 records from 2021 and 2022 notably close to the survey area, but that no signs of badgers were recorded on the survey area. As outlined above, the full proposed site area needs to be assessed as it is likely there are badgers in the area to the West that was not part of the PEA survey area, particularly given the large number of records returned nearby.

Toads -

The PEA states no recent records of toads on Redmires conduit. There is a strong population of toads in the area that migrate to Redmires reservoirs to breed during the Spring. The toads are seen travelling from surrounding habitats to the reservoirs from all directions, and this is an annual event to the extent that a team of volunteers monitor Redmires road with the aim to prevent fatalities. As toads are known to migrate up to 5km to breed and as the conduit directly links to the reservoirs it is reasonable to assume that they may use the conduit and surrounding habitats either for breeding, migration, or hibernating nearby and presence should be determined via further surveys.

Given the known ecology of the site and adjacent LWS; the existence of priority habitats on the NRN both on and adjacent to the site, especially areas of core; and the ecology of the surrounding area, we do not feel the 10m buffer to the watercourse (Redmires conduit) is adequate. We would like to see further ecology surveys as outlined above to fully assess the ecology of the conduit and how the LWS functions in connection to the proposed site, so that an adequate buffer can be determined and mitigation implemented prior to the sites release for development.

We would also like to see plans for enhancement of the site as a priority habitat, including plans to maintain and improve connectivity to the wider network, for example via wildlife corridors. This should be deemed deliverable prior to release of the site.

SWS19

Impact of the PEA Assessing Land Outside of the Developable Area

We support the assessment of the LWS and Lowland Meadow being undertaken, as this information is valuable for understanding the broader ecological context of the site and for informing buffer requirements and potential ecological management conditions. However, it must be clearly and explicitly acknowledged that these areas are not part of the developable land and are not directly subject to construction or land-take.

The PEA treated the entire 5.28ha landholding as a single ecological unit, rather than distinguishing between the developable SWS19 housing footprint and the adjoining LWS land to the east. As a result, habitats and species relating to the eastern LWS portion were implicitly linked to the western modified grassland area. This conflation artificially elevates the perceived ecological value of the developable land and misrepresents the actual ecological constraints associated with the housing allocation.

The purpose of surveying the LWS portion should be solely to:

- inform appropriate minimum buffer distances,
- guide protection measures for the priority meadow and riparian corridor, and
- ensure that recreational or indirect effects on the LWS are appropriately mitigated.

Impact of the BNG Assessment Counting Habitat Outside of the Developable Area

The BNG Feasibility Assessment also incorporates habitat beyond the developable allocation into its "on-site" measurement area, including sections of priority Lowland Meadow, LWS grassland, riparian corridors, and associated tree habitats that are physically and legally outside the development envelope. This practice inflates the pre-development ecological baseline by adding high-distinctive habitat that will not be affected by construction, resulting in a misleadingly elevated baseline against which biodiversity change is calculated.

Furthermore, by classifying the eastern sensitive habitats as "on-site," the BNG falsely credits the development with retaining, safeguarding, or improving these habitats, when in reality they benefit from no interaction with the proposed housing, no direct risk, and no required mitigation. This creates the illusion of successful ecological retention where none was necessary, and it results in a superficially favourable biodiversity accounting outcome. The BNG's modelling therefore benefits from ecological value that the development neither delivers nor threatens.

The consequence of this error is that the BNG conclusions cannot be relied upon as evidence of compliance with statutory biodiversity net gain requirements. An accurate BNG assessment must be recalculated using only habitats within the true developable boundary, with excluded eastern LWS land separately categorised as off-site land not at risk from development. Until then, the BNG conclusions remain fundamentally compromised.

Drought Conditions and Survey Limitations on Ecological Reliability

While the survey documentation acknowledges that drought affected watercourse flow, it does not adequately consider the far more significant botanical limitations caused by assessing flora at a time of year, and under conditions, when many diagnostic species are least visible. The absence of recorded indicator species must therefore be regarded as inconclusive rather than substantive ecological evidence.

Additionally, portions of the site, particularly areas of scrub and denser vegetation, were inaccessible to surveyors, increasing the risk of under-recording the assemblage of flora and associated fauna, including bat movement potential, ground invertebrates, and soil-based ecological communities. These inaccessible zones may contain features of heightened ecological importance that were not captured by the restricted survey.

As a result, the PEA and BNG outputs must be considered incomplete and potentially under-representative of the site's ecological value. A repeat botanical and habitat survey should be undertaken during normal spring conditions, ideally April to June, when indicator species are reliably detectable. Until such seasonally appropriate assessment work is carried out, the existing ecology submissions cannot be considered sufficiently robust to inform allocation or development decisions.

Watercourse Assessment, Seasonal Suppression, and Implications for Protected Species

The site contains two small watercourses feeding into Limb Brook, forming an important ecological corridor for wildlife movement and species dispersal. However, the ecological assessment of these streams was carried out during prolonged drought, resulting in atypically low water levels and altered riparian conditions. Under these conditions, hydrology-dependent species may be absent or undetectable, leading to an underestimation of ecological value.

Streams and riparian corridors on sites of this type often support, or provide pathways for, protected species including amphibians such as smooth newt and potentially great crested newt, water-dependent invertebrates, foraging bats commuting along dark linear features, and mammals including hedgehog and occasionally otter in downstream catchment areas. Drought conditions can force these species into deeper refuge habitats or entirely suppress their movement patterns, resulting in lower observed presence. Where species identification relies on signs such as wet prints, feeding traces, tracks, water-edge burrows, or aquatic larvae development stages, these indicators are unlikely to be detectable under drought stress.

Furthermore, sections of the watercourses were inaccessible due to dense vegetation and scrub, preventing a full inspection of the banks and shallows. These inaccessible areas may contain undetected amphibian egg masses, damp-soil refuges for indicator flora, insect breeding niches, bat foraging concentrations, or small mammal activity. Limited spatial visibility reduces the evidential confidence in concluding absence of protected species or determining the functional ecological role of the stream network.

Because the survey conditions do not represent a normal hydrological state, and because full physical access was not achieved, the existing watercourse assessment cannot be relied upon as an accurate indicator of the ecological value of these features or the species that may ordinarily be associated with them. To ensure compliance with ecological standards and legislative requirements relating to protected species presence, a repeat survey should be undertaken under typical seasonal flow conditions, ensuring full channel access and species detection capability.

Only a complete and seasonally appropriate assessment can accurately determine the watercourses' ecological significance and inform appropriate buffer distances, species-specific mitigation, and any potential planning conditions.

Priority Species, Foraging Value of the Site and Need for Further Survey and Mitigation

We agree with the surveyor's assessment that the site is likely to be important for foraging and commuting for a range of priority and protected species. The species data presented within the ecological reports includes a high concentration of bat records within the surrounding 2 km radius, with confirmed activity of common pipistrelle, soprano pipistrelle, noctule, brown long-eared bat and Myotis species. These records strongly indicate that the site is part of an active nocturnal movement corridor for bats, which are known to use hedgerows, tree lines and stream courses for navigation and feeding. The presence of dark linear routes and sheltered flight channels significantly increases the likelihood that the watercourses and boundary vegetation form a functional bat commuting network.

In addition, the data presented identifies 41 local records of hedgehog, which is a Priority Species under Section 41 of the Natural Environment and Rural Communities Act, and numerous bird species of conservation concern including skylark, bullfinch, lapwing and song thrush. The site's grassland structure, edge habitats and small woodland elements provide suitable conditions for invertebrate abundance, which in turn supports bat foraging, insectivorous birds and small mammal presence. With these species present locally, and with the habitat on site offering high suitability for their use, it is reasonable to conclude that the site may represent an ecologically valuable component of a wider habitat network.

However, the presence of drought-suppressed habitat conditions and the acknowledged gaps in physical access during the survey period create uncertainty about the extent to which species presence may have been underestimated. In particular, bat activity can be significantly underestimated when surveys are undertaken during periods of stress-driven prey scarcity, and ground-level evidence of hedgehog or small mammal traversal may be absent when soil conditions are desiccated. Given these limitations, further targeted protected species surveys should be

undertaken at appropriate times of year, ensuring that bat detection, ground mammal presence and breeding bird activity are accurately represented.

Any future principle of development on the site should be accompanied by conditions that include bat-sensitive lighting strategies, habitat connectivity retention, hedgerow and buffer maintenance, protection of dark corridors, and, where necessary, provision of compensatory habitat. These measures will ensure that ecological connectivity and species use are maintained and that the site continues to support protected species consistent with statutory obligations and policy requirements.

Designated Landscapes and Requirement to Prevent Ecological Deterioration

The Statement of Common Ground recognises SWS19 as one of only two additional site allocations with potential relevance to the setting of the Peak District National Park. Although the site lies approximately 910 metres from the Park boundary, its ecological function extends beyond visual context to include biodiversity connectivity, habitat continuity, and species movement networks that link the urban fringe of Sheffield to the wider ecological fabric of the National Park landscape.

This is significant because the semi-natural grassland, hedgerow boundaries, riparian corridors and scattered trees present on SWS19 form a continuous transitional habitat zone between urban Dore and the green hinterland extending toward open countryside. Such zones are acknowledged as crucial stepping stones for protected species and priority species, allowing safe movement between habitat clusters and enabling genetic exchange within species populations. The site's ecological value is not isolated to its own boundaries but is materially connected to the larger landscape system.

The Statement of Common Ground explicitly establishes the principle that development must not result in the deterioration of the natural character and wildlife value associated with the wider National Park setting. This condition applies not only to visual and landscape character but also to safeguarding biodiversity function and ecological integrity. Accordingly, any development on SWS19 must be carefully controlled to prevent fragmentation of habitat corridors, disruption of dark commuting routes, or interference with hydrological pathways feeding downstream ecosystems.

Given the acknowledged landscape sensitivities, site-specific conditions should include enforceable, measurable, long-term habitat protections and buffers, and not merely aspirational or permissive statements. A development approach that safeguards the ecological role of SWS19 is necessary to meet both the letter and the intent of the Protected Landscapes duty and to ensure that the site does not become a barrier, severance point or ecological dead-end within the wildlife corridor system extending toward the Peak District.

SES29

We maintain our objection to the allocation of SES29 on the grounds that the ecological evidence base is materially deficient, out of date, incomplete, and non-transparent.

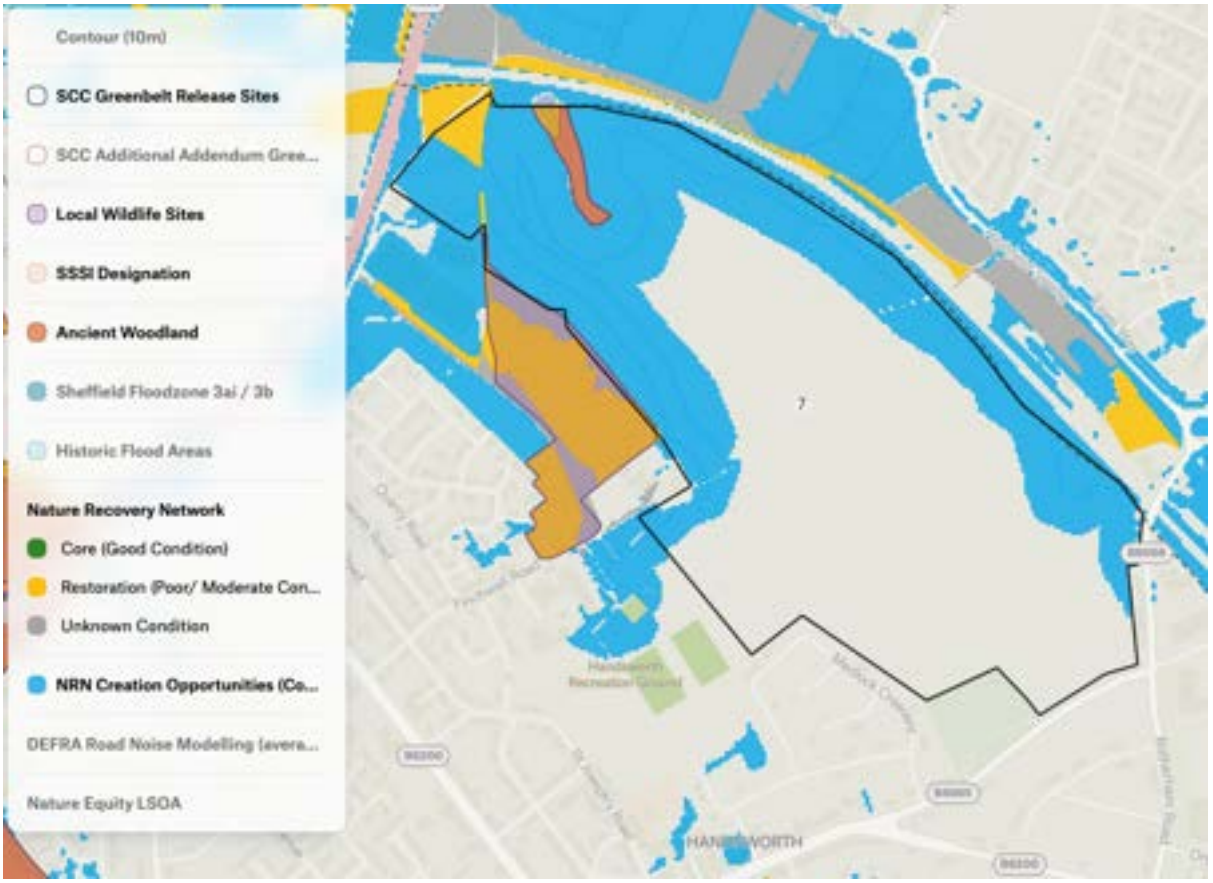
Ecological Isolation of the Ancient Woodland

The proposed employment-led land use places HGV heavy industrial and commercial development immediately adjacent to the woodland, surrounding it on several sides and severing its ecological connectivity. This would result in the ancient and semi-natural woodland becoming a biologically isolated pocket, detached from wider natural habitats and unable to function as part of the broader ecological network. Ecological corridors that would normally facilitate movement of bats, birds, small mammals and invertebrates between woodland, hedgerows, open land and watercourses would be blocked or narrowed by built infrastructure, vehicle movement and artificial lighting.

We are encouraged that the developer has indicated a willingness to consider the ecological importance of the woodland and explore the incorporation of ecological corridors as part of the masterplanning process. That intention demonstrates an understanding of the value of connectivity and habitat resilience. However, this aspiration is not reflected in the illustrative layout currently available, which does not demonstrate corridor continuity or genuinely permeable green infrastructure.

In addition, placing employment land on the northern and eastern edges of the woodland would create constant pressure from roadways, building mass, loading bays and illuminated operational areas. This introduces particulate deposition, nitrogen emissions, mechanical noise, vibration and night lighting. These impacts are known to degrade woodland edge conditions, suppress ground flora, alter bat movement patterns and reduce breeding success for priority species thus necessitating a minimum 100 m buffer for the woodland to act as a connected landscape feature insteading become a fenced-in ecological remnant, squeezed by urbanised boundaries on all sides.

In contrast, a land use configuration that does not encircle the woodland, and places it instead adjacent to other natural or low intensity uses, preserves ecological permeability across site boundaries. The current illustrative layout does not appear to accommodate this principle and risks trapping the woodland within an impermeable development matrix. Isolation of ancient or potentially ancient woodland in this manner is inconsistent with appropriate ecological planning and fails to provide the conditions required for species movement, genetic exchange and long-term woodland resilience.



Withholding of the PEA and Lack of Verified Woodland and Hedgerow Data

A key concern remains the lack of transparency regarding the Preliminary Ecological Appraisal. The original PEA, which informed the BNG assessment, has not been made publicly available for scrutiny, and neither has any updated PEA or supplementary ecological reporting. Without access to the underlying survey data, we are unable to verify whether ancient woodland indicators were present within the woodland or whether hedgerow age and composition were assessed in accordance with accepted ancient boundary methodologies.

Both the original PEA from 2021 and the updated site visit of November 2023 are now out of date based on the stated 18-month validity period. This means the ecological baseline upon which planning judgment is being made is no longer current. The absence of up-to-date flora assessments, particularly ground flora surveys conducted in spring, raises a reasonable possibility that ancient woodland indicators or other evidence of historic woodland continuity may have been missed.

Similarly, there is insufficient detail published regarding hedgerow and treeline classification. Without species lists and structure analysis, it is unclear whether any hedgerows on site qualify as ancient or important under the Hedgerow Regulations. The potential presence of veteran trees, long-established woodland fragments and species-rich boundary networks cannot be evaluated without access to the original survey data.

This lack of verifiable ecological evidence leaves a material uncertainty in respect of irreplaceable habitat. We are not asking for assumptions or reassurances. We are requesting the primary ecological evidence that should underpin site allocation. Until the PEA and supporting surveys are published in full, and until those surveys are refreshed to current standards and seasonal timing, it is not possible to conclude that all ancient indicators and other ecological constraints have been properly identified or assessed.

Absence of Priority Species Data and Non-Compliance with Requirements for Evidence

There is a fundamental absence of data regarding priority and protected species across the site, including bats, badgers, Great Crested Newts, breeding birds, reptiles, amphibians and invertebrate communities. The BNG assessment captures only habitat classifications and does not present any species-level assessments. No bat activity surveys or roost inspections have been provided, no GCN suitability or eDNA surveys have been disclosed, no hedgehog or badger surveys have been undertaken, and no breeding bird surveys have been published. This lack of evidence is not a procedural gap, but a substantive one that goes to the legality and appropriateness of allocating the site.

The relevant legislation includes the Wildlife and Countryside Act 1981, the Conservation of Habitats and Species Regulations 2017 and the Protection of Badgers Act 1992. These require that any activity which may impact protected species must be informed by appropriate survey data demonstrating whether protected species are present, and if so, that mitigation and licensing routes are established. In addition, NPPF paragraph 179 requires plan-making bodies to ensure sites are grounded in an understanding of their ecological constraints, with specific reference to protected species and habitats.

Without published and current species data, the allocation process does not meet these standards. The legal protections for badgers, bats, Great Crested Newts and certain bird species impose specific obligations on developers and local authorities to determine presence or likely presence before land allocation, not retrospectively at planning application stage. Proceeding without this data risks endorsing a site where protected species could later be proven to be present, triggering licensing requirements, legal restrictions, potential delays or legal challenge.

In short, the absence of species-level ecological evidence means the statutory duties relating to protected wildlife have not been adequately discharged. Until the necessary surveys are completed, updated and published in full, there is no lawful or evidential basis to state that SES29 can proceed without risk to protected species or conflict with statutory environmental protections.

Other Waterbodies and Aquatic Habitat Considerations

In addition to the main stream and primary pond, the site contains a network of smaller waterbodies including shallow ditches, ephemeral pools, wet hollows and waterlogged margins. These features contribute to a varied hydrological mosaic and collectively create habitat opportunities for amphibians, aquatic invertebrates and wetland-associated bird species. Even minor waterbodies can serve as stepping-stone habitats, enabling dispersal between larger ponds and streams, and supporting species such as common frog, common toad, smooth newt and a range of dragonflies and damselflies.

There is no published assessment of water quality, hydroperiod, shading, or connectivity for these features. Their suitability as breeding, resting or foraging resources has not been documented, and there is no indication that any targeted aquatic surveys, macroinvertebrate sampling or amphibian field assessments have been carried out. Without this information, these habitats have been treated only as mapped polygons within the BNG habitat classification, rather than as dynamic ecological components with species-supporting value.

These smaller waterbodies are particularly relevant because they may function as secondary or satellite breeding areas for Great Crested Newts, if present, or as refugia for amphibians during hot or dry periods. Their condition and ecological role must be properly understood before any development footprint or drainage intervention is planned. The current lack of analysis means these features have been under-represented in ecological constraint mapping, despite their potential importance as part of a broader wetland habitat network within the site.

Inability of the Statement of Common Ground to Conclude Absence of Ecological Constraints

The Statement of Common Ground asserts that both SCC and Norfolk Estates believe there are no ecological constraints that would undermine the site's suitability. However, this conclusion cannot be supported in the absence of accessible and current ecological data. Without publication of the original PEA, without confirmation of the survey methods used, without species lists, without spring ground flora data, without hedgerow age assessments and without updated faunal surveys, there is no objective evidential basis to claim that ecological constraints have been fully assessed or discounted.

A belief or opinion of "no constraint" is not itself evidence. That position must be underpinned by documented and verifiable ecological findings that have been disclosed for scrutiny. At present, the ecological baseline is incomplete, the woodland classification remains unverified, the potential presence of ancient indicators has not been ruled out, and protected species have not been adequately surveyed or assessed. Under these conditions, it is not possible to state that the site is free from ecological constraints.

Any conclusion within the Statement of Common Ground must be based on transparent, auditable ecological evidence rather than assumption or inference. Until the necessary assessments are disclosed and updated to current standards, statements regarding the absence of ecological constraints remain unsubstantiated and cannot be relied upon for the purposes of site allocation or land-use planning.

SES30

Ancient Woodland, Veteran Trees and Potential Ancient Hedgerows

The allocation of SES30 immediately adjoins three Local Wildlife Sites that contain ancient woodland and high quality priority habitat, namely Smelter Wood LWS, Shirtcliffe Valley Grasslands LWS and Shirtcliffe Woods and Fields LWS. The Heritage Assessment notes that the current landscape results from post medieval piecemeal enclosure and identifies the site of the former 18th to 19th century Myrtle Bank farmstead, with archaeological remains likely surviving, indicating long term continuity of land use patterns and historic boundary structures.

These historic enclosures strongly suggest that many of the hedgerows across SES30 are likely to be ancient or Important Hedgerows under the Hedgerows Regulations 1997, even where the above ground vegetation appears younger or self seeded. The PEA recognises multiple species rich native hedgerows with trees but only assesses them as ecological features and does not determine their age, origin or potential ancient status.

Within the site itself, the BNG records nine veteran trees classified as irreplaceable habitat. These are embedded within other broadleaved woodland described as self seeded around these trees. However, the PEA and BNG do not analyse whether this woodland contains ancient woodland indicator flora or ancient soils, mycorrhizal communities, or boundary structures, which are required to distinguish ancient woodland remnants from secondary woodland. The BNG also acknowledges that its analysis excludes watercourse units and relies on incomplete baseline data.

Ancient woodland, veteran trees and ancient hedgerow networks are irreplaceable habitats which require avoidance, protection and adequate buffering, not post allocation mitigation or trading through BNG. The current evidence base does not demonstrate that ancient woodland appropriate buffers, typically 15 to 50 metres or greater where lighting, hydrology, air quality and recreational intrusion are relevant, can be achieved within the proposed development envelope. This represents a significant evidential gap, particularly given that heritage derived boundaries and ecological continuity are acknowledged in the heritage assessment but not examined or integrated into the ecological assessments.

Accordingly, the classification of internal woodland as merely self seeded secondary woodland is unproven, and the omission of hedgerows as heritage features is a material deficiency. Until appropriate surveys are undertaken to identify ancient woodland indicators, soil continuity, hedgerow provenance and historic boundary age, the site cannot be considered ecologically or historically suitable for allocation.

Identification of Local Wildlife Sites in the PEA

The PEA lists Smelter Wood LWS, Shirtcliffe Valley Grasslands LWS, Shirtcliffe Woods and Fields LWS and Lower Shirtcliffe Valley LWS as being directly adjacent to or bounding the site. However, there is an inconsistency within the document. While the general description implies that all four LWSs directly adjoin the allocation area, the detailed text and habitat descriptions demonstrate that only three of these sites actually share a boundary with SES30, namely Smelter Wood, Shirtcliffe Valley Grasslands and Shirtcliffe Woods and Fields. The Lower Shirtcliffe Valley LWS appears to be located slightly further downstream within the wider valley corridor and does not share a physical boundary with the site.

This matters because the proximity of each LWS informs potential direct or indirect impacts. Misidentifying the adjacency status results in failures to apply appropriate habitat protection considerations, buffering distances, hydrological connection assessments and disturbance risk evaluations. For example, Smelter Wood and Shirtcliffe Woods contain ancient woodland, yet the PEA provides no mapping of root protection zones, ancient woodland buffers or air quality risk modelling at allocation stage. Similarly, Shirtcliffe Valley Grasslands contains good condition priority grassland habitat and is correctly identified as adjoining the site, but there is no corresponding assessment of recreational pressure, trampling risk, nitrogen deposition from development or displacement of ecological networks.

By contrast, Lower Shirtcliffe Valley contains good condition priority wet woodland habitat, but because it does not physically adjoin the allocation boundary, impacts will be primarily hydrological and cumulative rather than boundary based. These require atmospheric, water quality and flow pathway analysis rather than simple interface distances. The PEA does not distinguish this difference and instead presents all four LWSs homogeneously in adjacency terms. This is inaccurate and materially affects the ecological sensitivity assessment.

The PEA therefore only partially identifies the relationship between the allocation and the Local Wildlife Sites. While it correctly names each designated site, it fails to precisely define which ones are physically connected to SES30 and which are connected through downstream hydrological continuity. This reduces the reliability of the ecological baseline and weakens the validity of conclusions regarding likelihood of impact, mitigation potential and achievable BNG outcomes. Until accurate adjacency and connectivity mapping is undertaken for each LWS, the assessment of ecological constraint remains incomplete.

Priority Habitat Within the Site Boundary and Need for Restoration

Within the SES30 site boundary there is existing woodland that is classified as priority habitat, including broadleaved woodland associated with the veteran trees and connecting woodland belts that form part of the Shirtcliffe ecological network. Although currently described as self seeded or secondary in places, these woodland areas represent a significant opportunity for restoration, enhancement and reconnection to nearby ancient woodland and good quality habitats in adjacent Local Wildlife Sites.

Under national environmental commitments to restore nature, including the target for 30 percent of land to be in healthy ecological condition by 2030, existing priority habitat within development allocations should be a focus of active retention and restoration. In the case of SES30, the internal woodland areas should be identified as contributing to this target through improvement to favourable condition, structural diversity, ground flora recovery, improvement of connectivity with the adjoining woodland blocks and protection of veteran trees as core biodiverse features.

However, neither the PEA nor the BNGA provide any condition assessment of the woodland within the site, nor do they outline any restoration measures needed to uplift its ecological quality. There is also no modelling of how development would interface with this habitat, or whether any of the existing woodland areas would be retained, buffered and enhanced rather than simply encroached upon or fragmented by access, lighting or recreational use.

The internal woodland should be treated not as a constraint to be mitigated, but as an existing priority asset to be restored and strengthened in line with the 2030 ecological condition target. Without a clear restoration strategy and evidence that this woodland can be brought into good ecological condition as

part of the allocation, the proposal does not support national biodiversity aims and fails to demonstrate environmental net gain in practical terms.

Watercourses and Potential Flooding Impacts on Biodiversity

A watercourse runs through the centre of the SES30 site and connects directly to Shirtcliffe Brook, which forms part of the wider Shirtcliffe Valley riparian system. These watercourses support hydrologically dependent habitats and provide commuting and foraging corridors for protected and priority species such as otter, water vole, amphibians, bats and invertebrates. Their ecological function is particularly sensitive to changes in water quality, flow rate and sedimentation.

The PEA notes that future proposals are likely to affect these watercourses, yet no River Condition Assessment or detailed hydrological study has been undertaken at this stage. Without an understanding of the current ecological condition of these water bodies, as well as their role in dispersal, migration and habitat connectivity, the ecological consequences of additional surface water runoff or altered hydrological behaviour remain unknown.

The SES30 site is already known to flood, and water frequently accumulates on parts of the land during heavy rainfall events. Development would increase impermeable surfaces, create artificial drainage networks and concentrate water flows into the central channel. This raises the risk of exacerbated flooding downstream, particularly into the LWS woodland and grassland habitats. Despite this fact, there has been no flood risk analysis of ecological impacts, nor any assessment of how increased surface water flow or flooding could affect biological communities and habitat function. This omission represents a failure in the assessment process and a significant mistake in the evaluation of ecological risk.

Flooding of ancient woodland can create changes in soil moisture conditions, oxygenation levels and nutrient retention within the woodland's ancient soil profile. These hydrological alterations can damage the delicate fungal and microbial communities that define ancient woodland character and lead to long term deterioration of ground flora, including the loss of ancient woodland indicator species and shifts in ecological composition.

More broadly, flooding can smother ground vegetation, displace fauna, increase pollutant loading and push sediment and nitrate rich water into sensitive habitats. These changes can result in ecological degradation and deterioration of the ancient woodland's natural resilience and community structure.

Without baseline river condition data, flood risk analysis specifically addressing ecological impacts and ecological flood impact modelling, there is no reliable understanding of how development would affect the site's watercourses or the priority habitats and species that depend on them. For a site connecting multiple Local Wildlife Sites and downstream priority habitats, watercourse impacts must be examined at allocation stage to ensure that known existing flood behaviour and additional development driven runoff do not compromise riparian and woodland systems through hydrological degradation and habitat deterioration.

Limitations of the PEA

The Preliminary Ecological Appraisal for SES30 is an initial high level assessment and does not provide the level of detail required to determine ecological suitability for allocation. The PEA is based primarily on a single walkover survey and a desk based review of existing ecological records rather than comprehensive field verification. The survey took place during late summer when vegetation was dry and visibility was restricted, which increases the likelihood of species being missed and obscures seasonal indicators such as early flowering ground flora often associated with ancient woodland and historic hedgerows.

The PEA acknowledges that dense vegetation may have concealed evidence of protected species presence and confirms that no intrusive inspection of potential bat roost features, no systematic search for badger setts and no aquatic surveys for water vole or otter were conducted. In addition, there is no breeding bird survey, no reptile survey, no amphibian survey, no ground flora survey for ancient woodland indicators and no soil based investigation of woodland continuity.

Crucially, the PEA itself states that further detailed species surveys will be required once development proposals are progressed, and that it is not a definitive ecological assessment. This means that the current ecological baseline is incomplete and should not be relied upon to draw conclusions regarding ecological impact, habitat sensitivity or species protection requirements.

The limitations of the PEA result in under reporting of potential ecological constraints and the possibility that priority habitats, protected species and ancient ecological features have not yet been identified. As such, the PEA cannot be considered adequate evidence to support the allocation of SES30, and further seasonal and species specific surveys are necessary before the ecological implications of development can be understood.

Case Study

NES36 – Demonstrating Why Appropriate Ecological Buffers Must Be Applied at Allocation Stage

The following visual case studies use NES36 to demonstrate how the application of appropriate habitat buffers, reflecting Natural England guidance and LNRS policy requirements around taking air, light and noise pollution into account, materially affects the developable area of a proposed site. These examples illustrate why ecological constraints must be fully accounted for at the local plan stage rather than being deferred to planning application stage because incorrect assumptions at allocation can result in unsound land-use planning downstream.

For this purpose we are **ignoring the isolation caused by the proposed access** and only taking the developmental area and the ecological features present at the site.

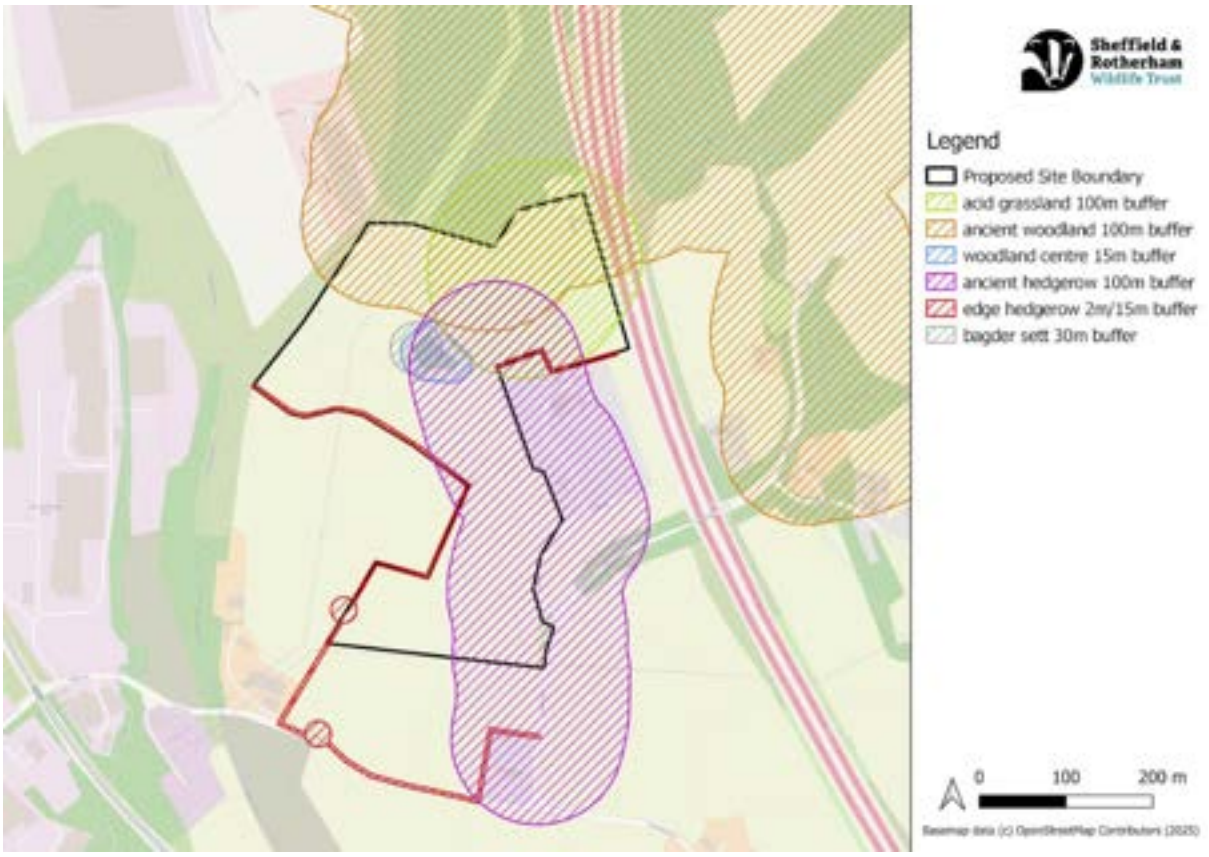
1 - Worse Case Scenario - HGV Heavy + Ancient Hedgerows

In the first scenario, we are assuming HGV-heavy employment land, appropriate 100 m buffers are applied to the core priority habitat acid grassland, the Ancient Woodland interface, the species-rich hedgerows (which have been assumed ancient - as per the evidence provided in this document), with a 30 m exclusion zone around the badger sett (**placed randomly as the location of this is not known**). This is consistent with:

- Natural England's advice on pollution dispersal and nitrogen deposition
- DMRB guidance on air quality impacts up to 200 m from vehicle corridors
- LNRS obligations to protect and expand core habitat and ecological connectivity
- the precautionary principle required where survey timing and drought conditions may have under-reported ancient indicators.

Under these conditions, the ecological constraints cover virtually the entire site footprint, leaving no viable industrial land. This means that in a realistic, policy-compliant implementation of environmental buffers, the NES36 site becomes fundamentally undevelopable for HGV-intensive employment.

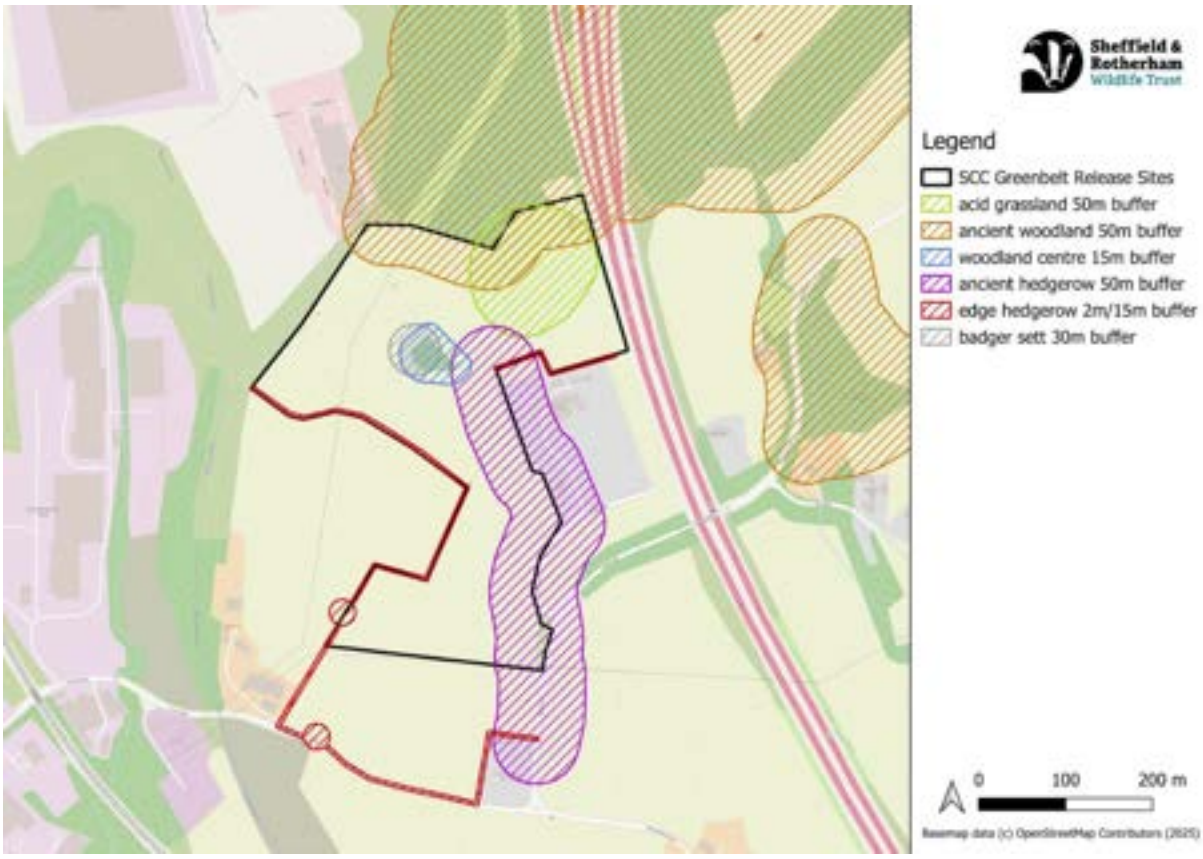
2 - HGV Heavy accepting the PEA assessment of all the hedgerows



As it can be seen, almost all of the upper and lower sections of the site are unviable for development of this type.

3 - Best Case Scenario - Lower-intensity vehicle movement accepting the PEA assessment of all the hedgerows

Here, the buffers are reduced accordingly (50 m for priority/irreplaceable habitats).



Even under this most conservative interpretation, the developable land is significantly restricted and fragmented, indicating a substantially lower site capacity than that stated by SCC or the site promoter. This illustrates that even under favourable ecological assumptions, NES36 could at best support a limited and tightly constrained built footprint and a very low polluting land use without resulting in significant ecological damage.

These case studies demonstrate that ecological buffers are not “optional considerations” to be resolved at planning stage, but determinative constraints that directly affect land deliverability and site capacity. Under the realistic HGV-intensive scenario consistent with the proposed site allocation, NES36 cannot be developed without irreparable ecological damage and conflict with Natural England guidance, LNRS core-habitat protections, and statutory biodiversity obligations. If SCC’s allocation relies on environmentally inaccurate or underestimated site sensitivity, the plan risks being unsound on the grounds of:

- failure to apply best-available ecological evidence
- failure to assess deliverability
- reliance on flawed or incomplete baseline data
- underestimation of environmental constraints.

NES36 therefore represents an allocation with fundamental viability barriers that cannot be mitigated post-allocation. When appropriate buffers are applied, the evidence strongly supports that this site should be withdrawn at this stage, or at minimum subject to Main Modification and new public consultation before any allocation is confirmed. Similar constraints could be applied to many of the sites and we hope that this case study sufficiently illustrates our arguments. If helpful for the process and given more time, we could produce a similar study for each of the proposed site allocations.

Additional Sites

Proposed Additional Site Allocations: Selection of Sites for Green Belt Release Topic Paper – Addendum (November 2025)

Understanding that these sites are not currently being allocated, they *are* being looked at again in more detail, therefore we felt it would be beneficial to offer the NRN information which would help inform our opinion of the sites. We would hope that if any of these sites were brought forward for consultation, they would be accompanied by the relevant ecological evidence to fully information the suitability of the allocation.

As previously explained, priority habitats are depicted on these maps as green (core - good or great condition), yellow (restoration - in need of improvement) and grey (unknown - in need of assessment or ground truthing). The areas of the map shown in blue are the opportunity areas, those areas which could be used to connect and enhance the priority habitats. Also shown on these maps in brown are the Ancient Woodland and SSSI's designations.

The Nature Equity Maps depict the scale of nature equity in the surrounding area to the sites. Nature equity refers to the fair distribution of access to, and benefits from, the natural environment, ensuring that all communities can experience not only green space but good-quality nature - places rich in biodiversity, clean air and water, and healthy ecosystems. It recognises that nature is a public good, yet its benefits are not currently shared evenly, with more affluent communities typically having greater access to thriving natural habitats while disadvantaged areas are more likely to face degraded environments, pollution and higher exposure to climate-related risks such as flooding. Nature inequity therefore captures both unequal exposure to environmental harm and unequal availability of high-quality nature that supports health, resilience and quality of life. Addressing these imbalances is essential to a fair approach to environmental policy and nature recovery.

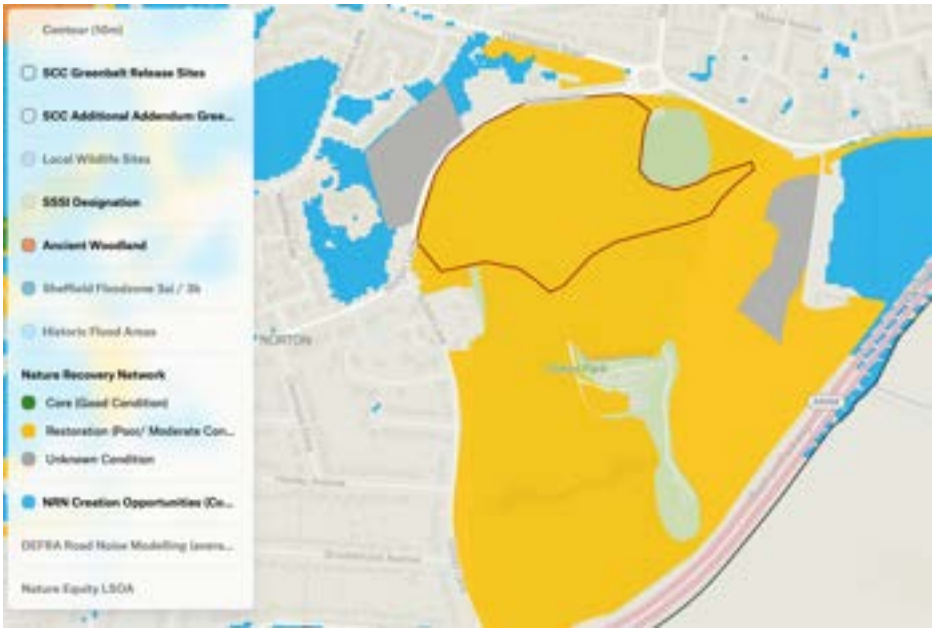
To reiterate our position, we would not object to building on sites which contain or adjoin priority habitats (including irreplaceable habitats and LWS) where these areas are protected with appropriate buffers, these must take land use, scale, light, air and noise pollution into account.

We would object to sites which would cause isolation, fragmentation or degradation resulting in the habitat no longer being able to function, this is particularly important around irreplaceable habitats such as ancient woodland, riparian areas and core priority habitat - that which has been assessed as having already reached the 30 x 30 target of being in good or great condition. Or sites where LWS or core priority habitats are removed for development.

Sections of priority habitat which are not irreplaceable or of good/great condition could still be used for development where absolutely unavoidable as long as BNG is delivered with like for like or greater which improves the connectivity and condition of nearby priority habitat.

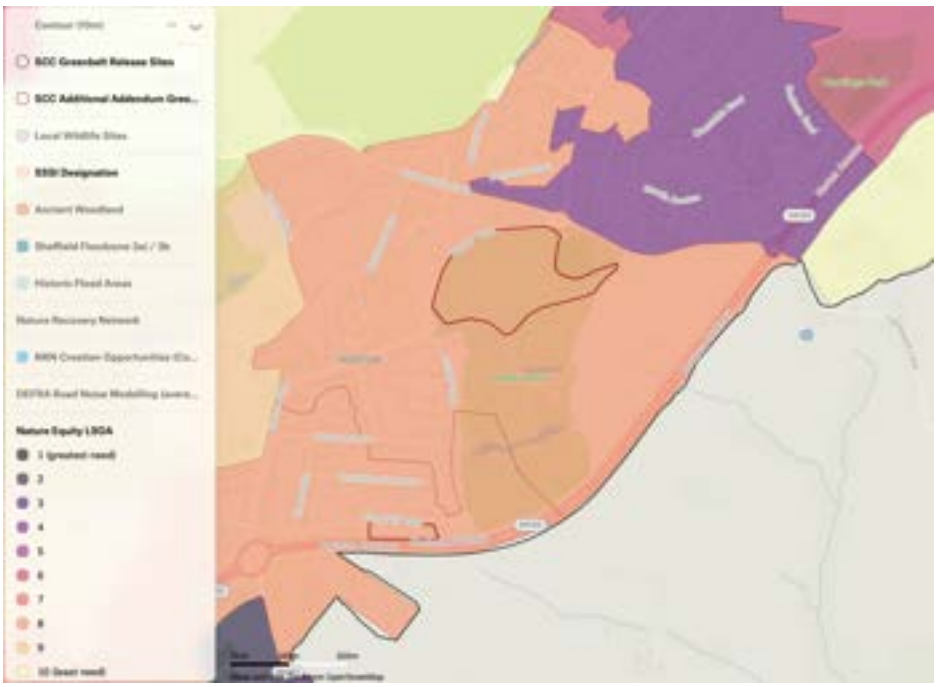
The creation opportunity areas have not formed part of our decision making when deciding to object to a site.

S01220 – Oakes Park



This site is a LWS and is classed entirely as priority habitat on the NRN maps.

Given only this information, we would object to this site being proposed for allocation due to it being a LWS

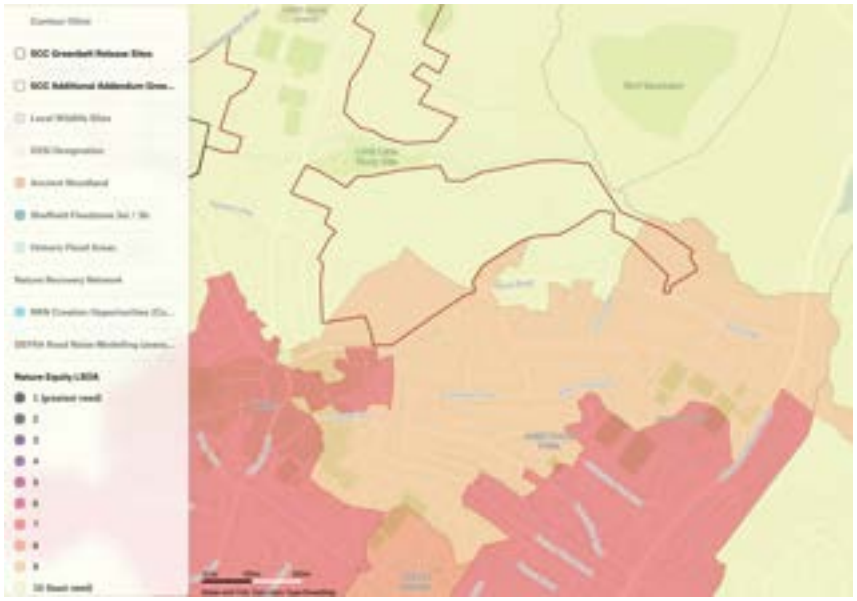


Nature Equity adjoining the park is shown to be quite low around the eastern section of the site.

S03012 – Ryecroft Farm

This site contains areas of priority habitat of both restoration and core condition, it also borders ancient woodland and is within 1Km of a designated SSSI (Ladies Spring Wood). The site contains considerable creation opportunities to connect and enhance the priority habitats.

We would hope that the priority habitat was excluded in the developable area and offered adequate buffers.

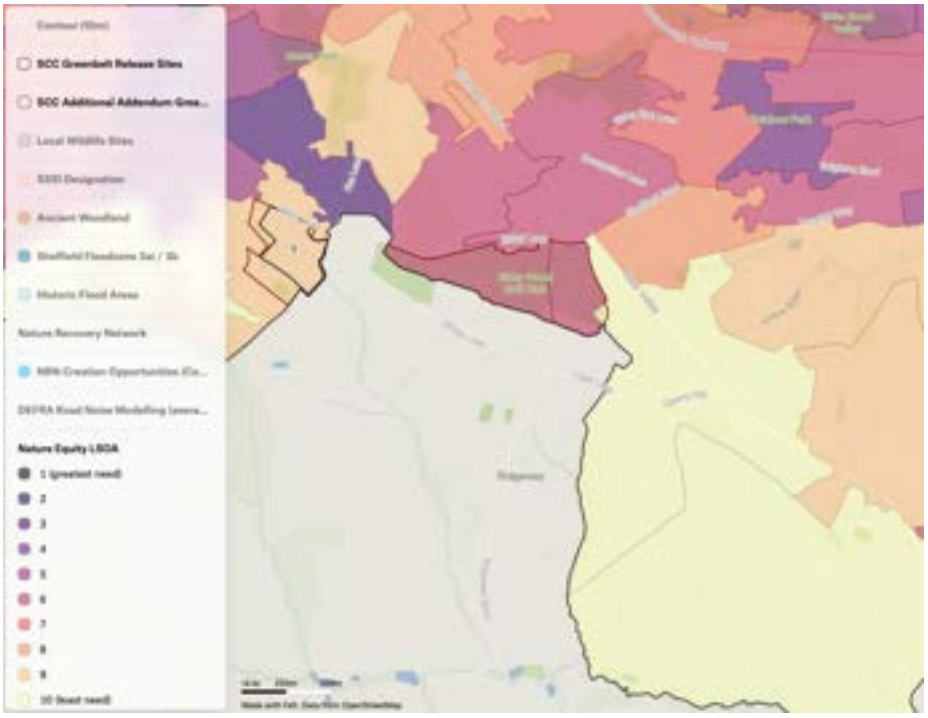


There is no nature inequity in the area.

S04242 – Birley Wood Golf Course

This site contains ancient woodland and priority habitats (restoration) it is also identified has having considerable creation opportunities to connect and enhance these priority/irreplaceable habitats.

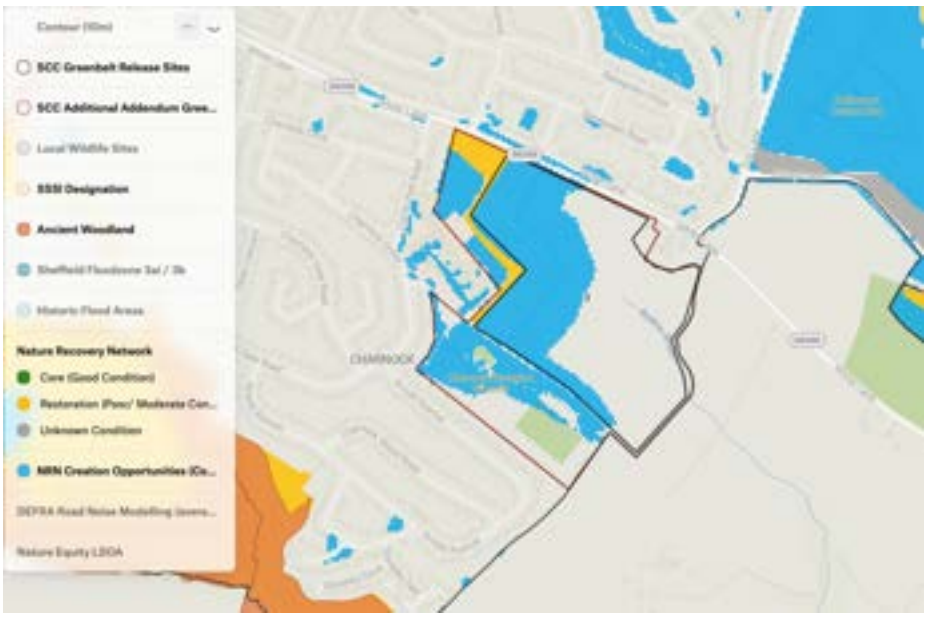
We would hope that the priority/irreplaceable habitat would be excluded from the developable area and offered adequate buffers.



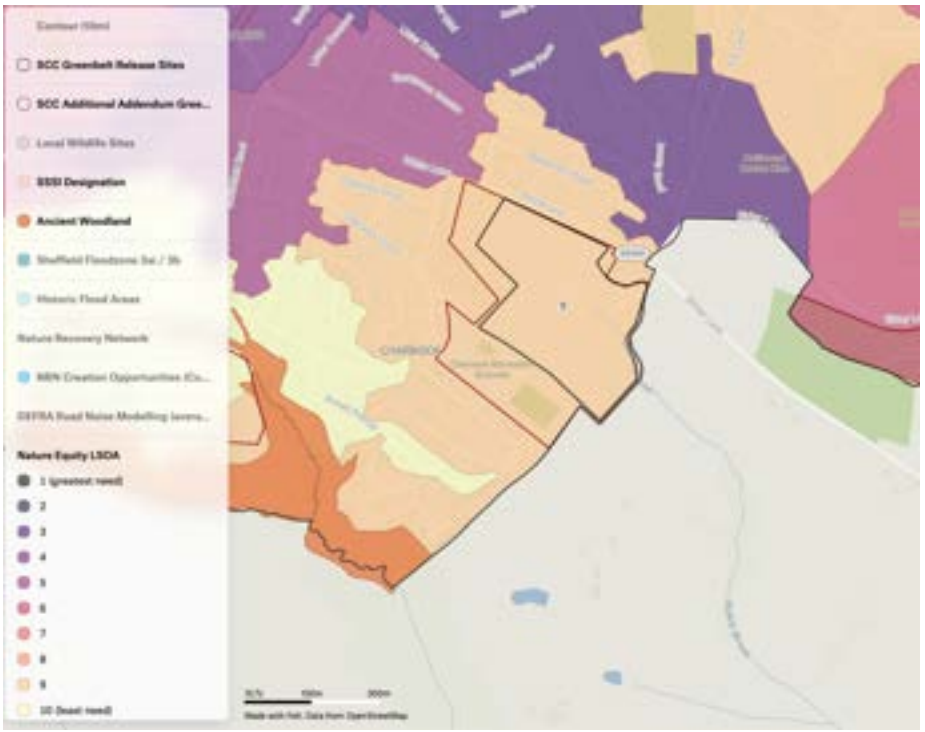
There is some nature inequity in the area.

S02503 – Charnock Park

Area marked red has been previously allocated (SS19)



This site contains priority habitat and some creation opportunities.

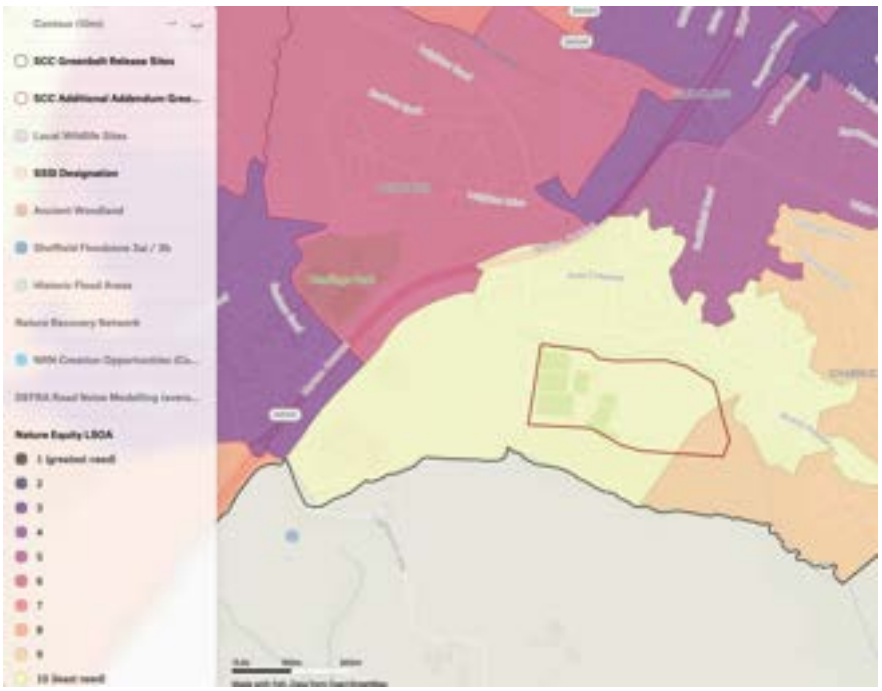


There is some nature inequity in this area.

S02897 – Land adjacent former Norton Aerodrome, Norton Avenue

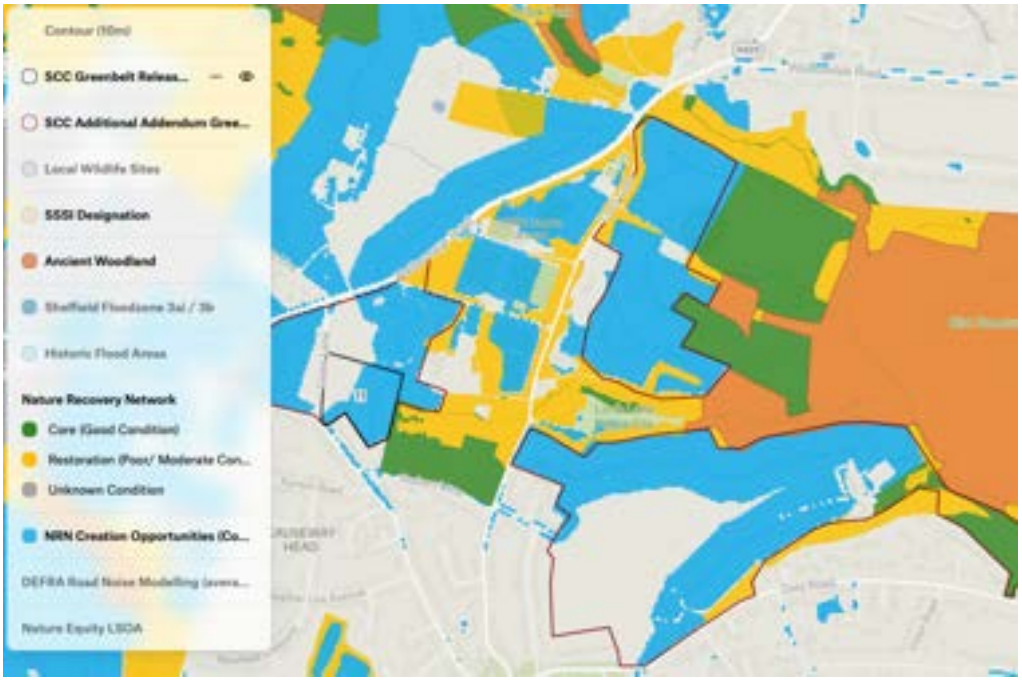
Part of this site has previously been allocated (Norton Aerodrome)

A large part of this site contains priority habitat (restoration condition) and is surrounded by the adjoining ancient woodland which also juts into the boundary for a small amount. The part of the site shown as creation opportunities are understood to be recreational facilities.

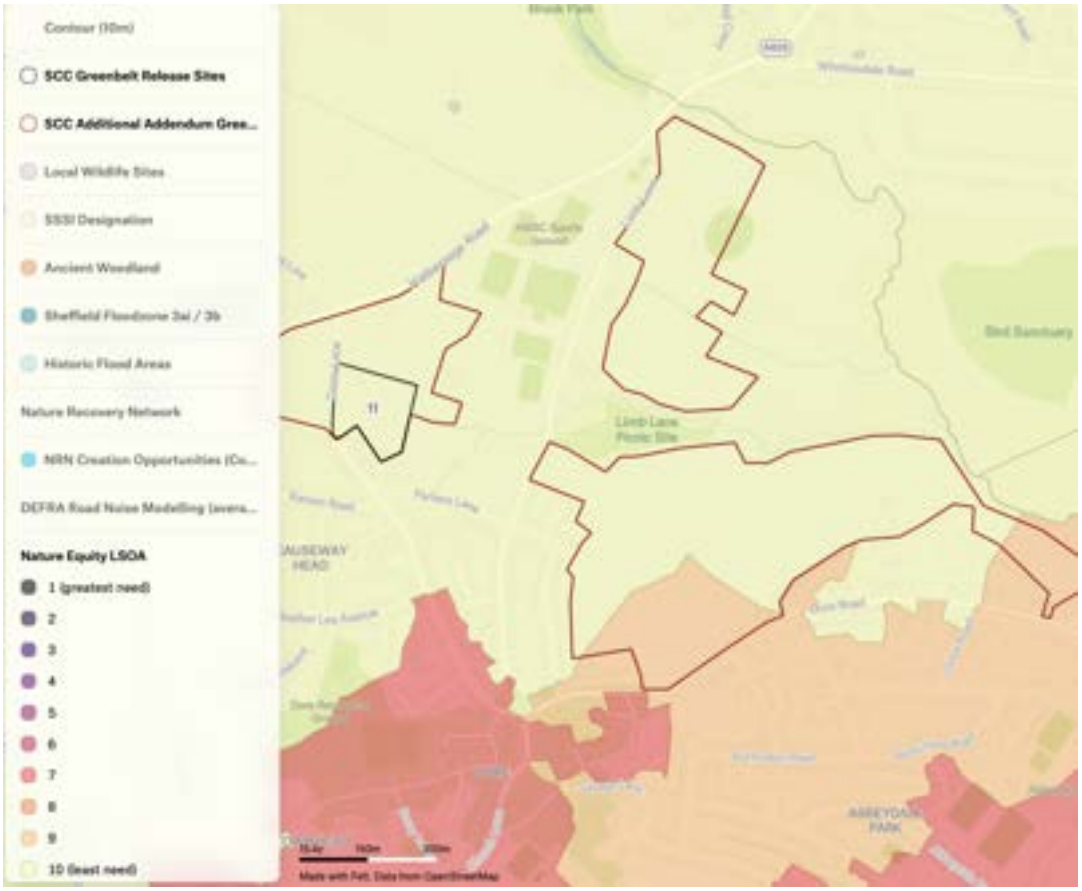


There is some nature inequity in this area

S03088 / S03064 – Land to the East of Limb Lane



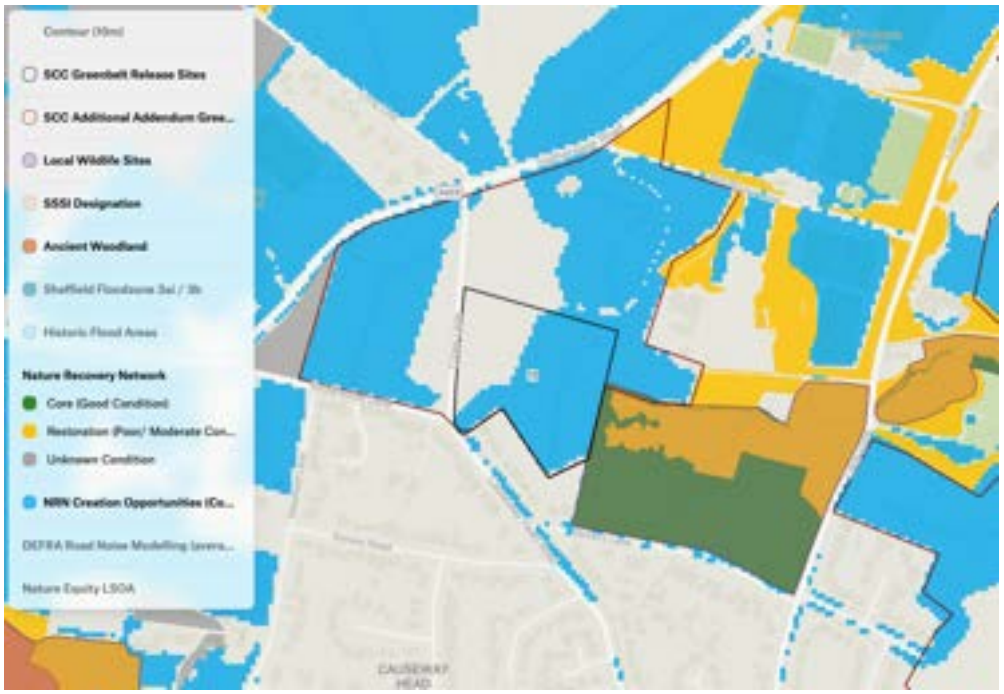
This site contains small parts of priority habitat in restoration condition and adjoins Ecclesfield Woods (LWS with areas of core and restoration priority habitat and signification ancient woodland) This site is also less than 2km from the SSSI Ladies Spring Wood



There is no nature inequity in this area

S01883 – Land to the East and West of Cross Lane

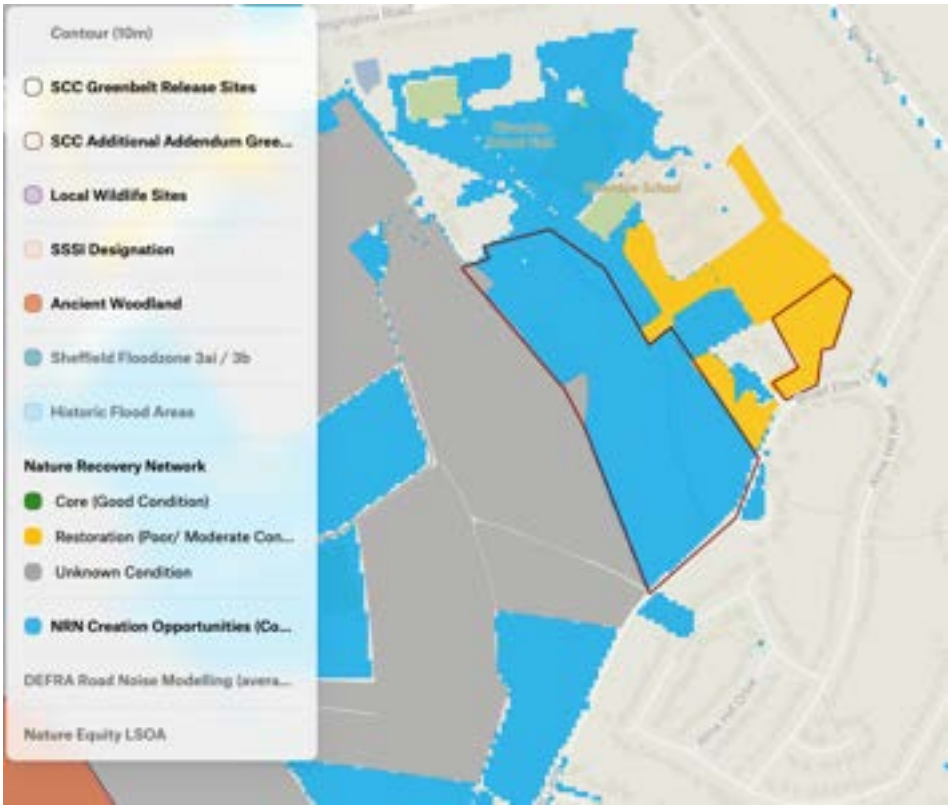
Adjoining land has been previously proposed for allocation (SWS19)



This site contains some priority habitat both of core and restoration condition. It adjoins a LWS with core priority habitat and adjoins further priority habitat of restoration and unknown condition. It is again within 2km of SSSI Ladies Spring Wood.

We would have significant concerns about the cumulative impact on highly sensitive habitats should all 3 sites around the Limb Lane be proposed for allocation.

S04236 – Broad Elms Lane

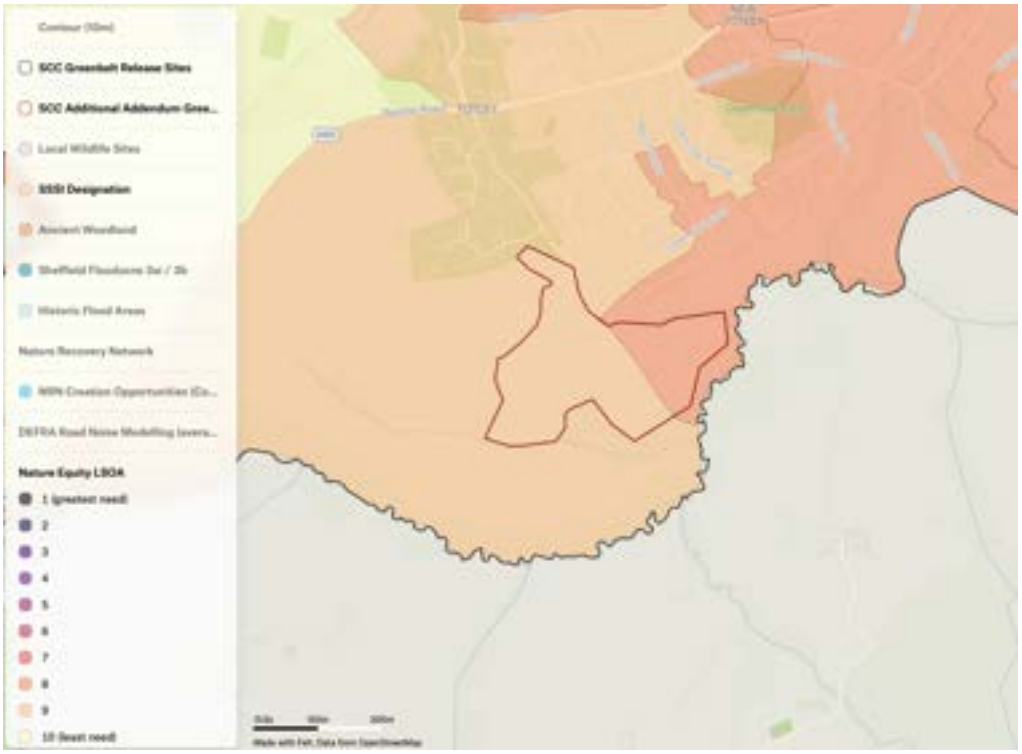


One entire section of this site fully contains priority habitat of restoration condition, the other section contains some priority habitat of unknown condition and adjoins priority habitat of restoration and unknown condition. There is significant amounts of creation opportunities within this site.

There is very little nature inequity in this area.

S03006 – Land to the north of Totley Brook

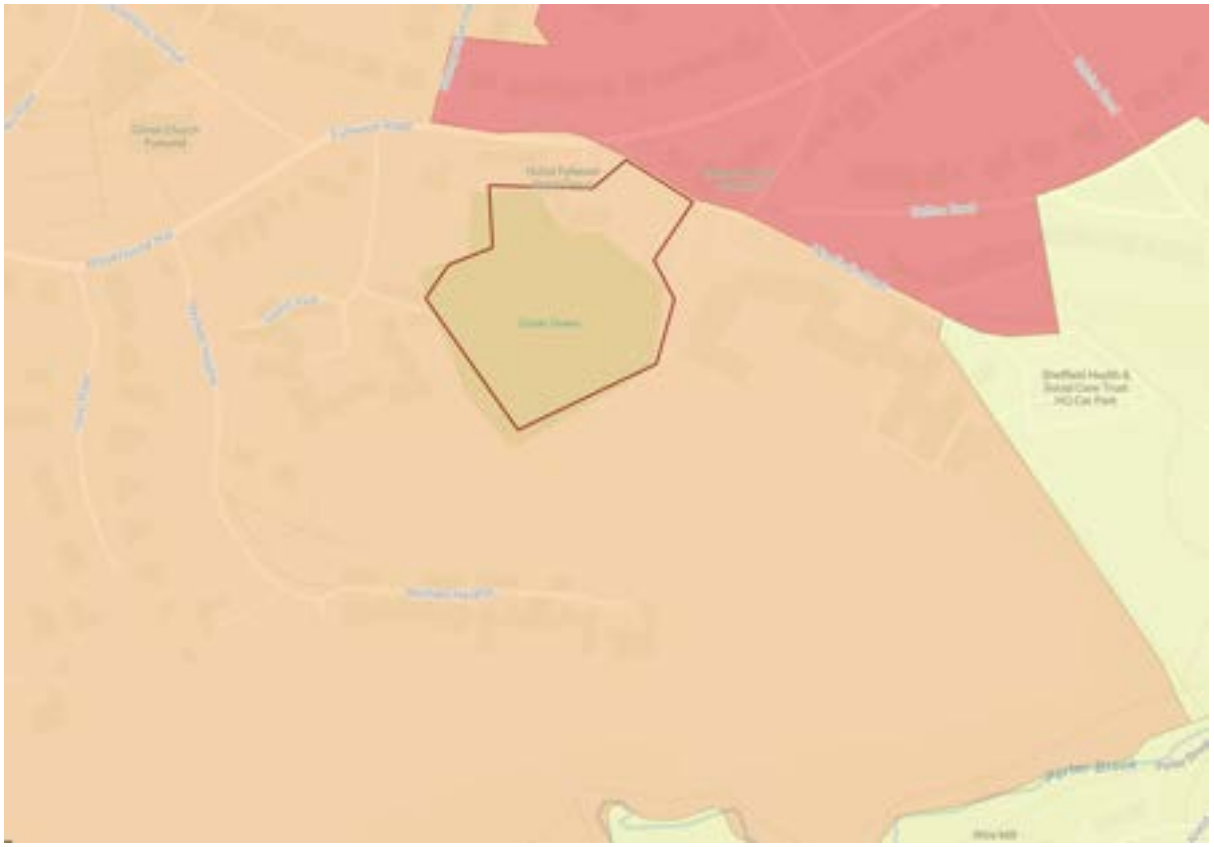
This site adjoins a LWS Gillfield Wood which contains ancient woodland and priority habitat of both core and restoration condition. The site contains considerable creation opportunities to improve connectivity and condition of these priority habitats.



There is no nature inequity in this area

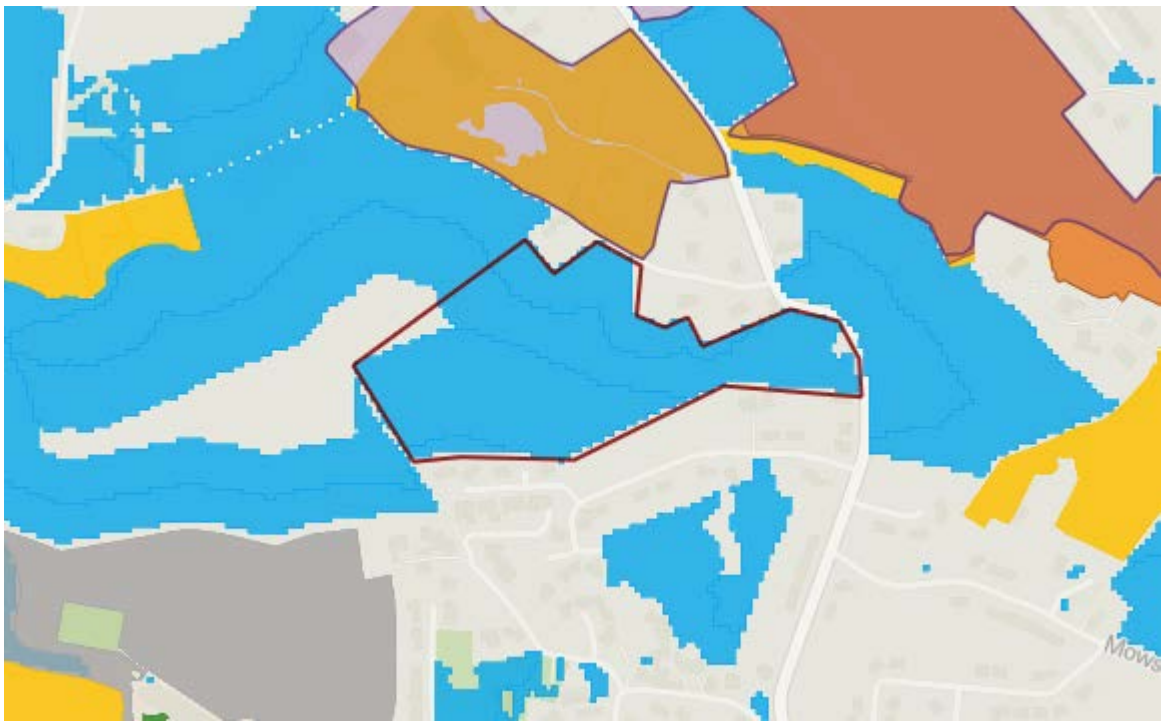
S02920 – Land southwest of Fulwood Road

There are no priority habitat or creation opportunities within this area.

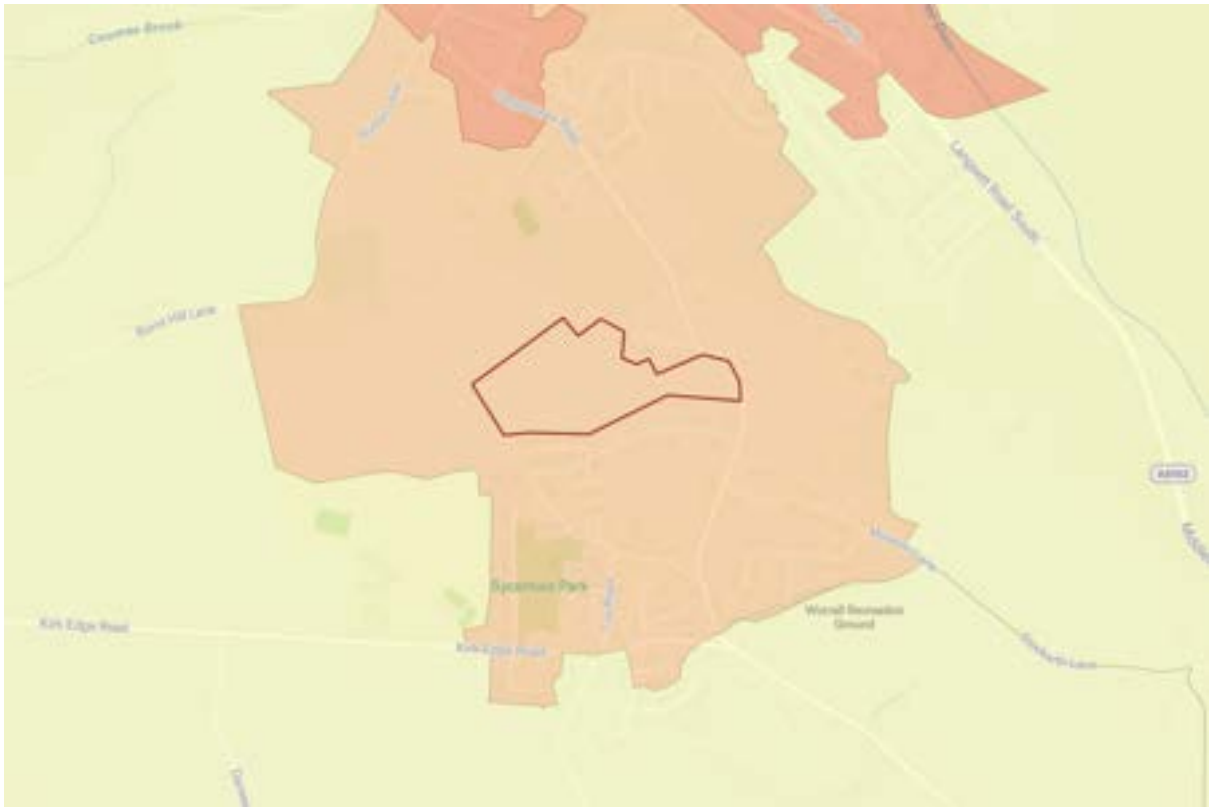


There is no nature inequity in this area.

S02391 – Land off Haggstones Road, Worrall



This site is separated by only a small road from priority habitat in restoration condition and LWS and has lots of creation opportunities within the site.



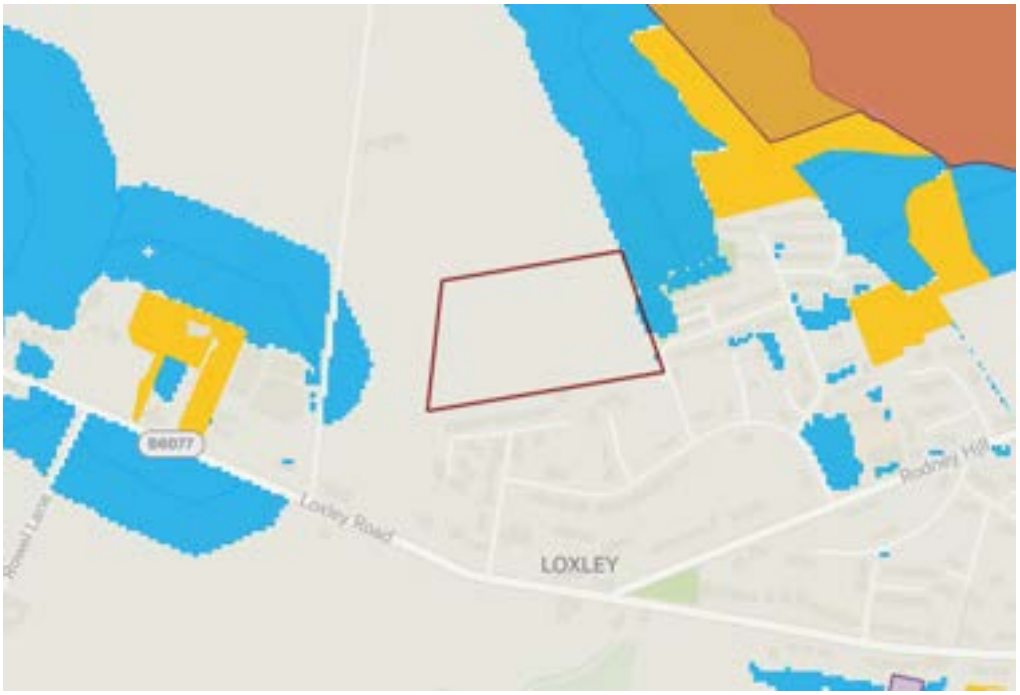
There is no nature inequity in this area

S02899 – Land off Cinderhill Lane, Norton

This site has lots of creation opportunities.

There is some nature inequity in the area.

S03059 (part) – Land at France Road, Loxley



This site is less than 5Km from an SSSI

There is no nature inequity in this area.