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26/02374/EIA - EIA (Environmental Impact Assessment) request for a scoping opinion request - Land at Orgreave Lane

Overall approach to the EIA

Sheffield & Rotherham Wildlife Trust welcomes the applicant's recognition that, given the size and nature of the proposed development and the likelihood of significant environmental effects, an Environmental Impact Assessment is required.

Our comments therefore relate principally to ensuring that the scope of the EIA is sufficiently comprehensive to provide a robust and complete environmental evidence base, and that potentially significant effects are not prematurely scoped out.

This is particularly important given the scale of existing, consented and proposed development within the wider Handsworth/Waverley area. The EIA provides an important opportunity to assess cumulative and inter-related effects which may not be adequately understood through a series of standalone technical assessments.

Ecological baseline

We have significant concerns regarding the accuracy and completeness of the ecological baseline presented within the Scoping Report.

The Preliminary Ecological Appraisal (PEA) referred to within the report has not been provided. We are therefore unable to verify the evidence underpinning a number of statements made within the Scoping Report or determine whether the ecological value and function of habitats within and surrounding the site have been adequately identified.

In particular, the information currently available does not allow us to establish whether the site's hedgerows have been adequately assessed, including whether any are species-rich or potentially ancient, or their importance in maintaining ecological connectivity across the site and wider landscape.

These concerns are reinforced by the Ecology Scoping Summary. Paragraph 9.5.2 states that a “robust baseline” has been established, yet paragraph 9.5.3 does not identify the adjacent Ancient Woodland or the site's hedgerows amongst the Important Ecological Features proposed to be taken forward for assessment. Great crested newt is also absent from this list despite eDNA sampling being identified at paragraph 9.2.6 as part of the detailed survey programme. In the absence of the PEA and subsequent survey results, the basis for these omissions cannot be verified. We therefore do not consider that the ecological baseline can presently be described as robust, and ecological features should not be excluded from detailed assessment until sufficient evidence has been provided to justify their exclusion.

Ancient Woodland

Paragraph 2.2.16 states:

> "No mapped Ancient woodland lies within or directly adjacent to the Site's boundaries. The closest areas of ancient woodland are associated with Tinsley Golf Club circa 600m north of the Site."

This is incorrect. The Natural England Ancient Woodland Inventory identifies Ancient Woodland adjacent to the site.

This error is also relevant to consultation on the EIA. The development lies well within 500m of, and is likely to affect, Ancient Woodland, engaging the Forestry Commission's consultation role and the Natural England/Forestry Commission Ancient Woodland Standing Advice. The correct location and relationship of the Ancient Woodland to the development should therefore be clearly identified in the EIA documentation provided to consultees.

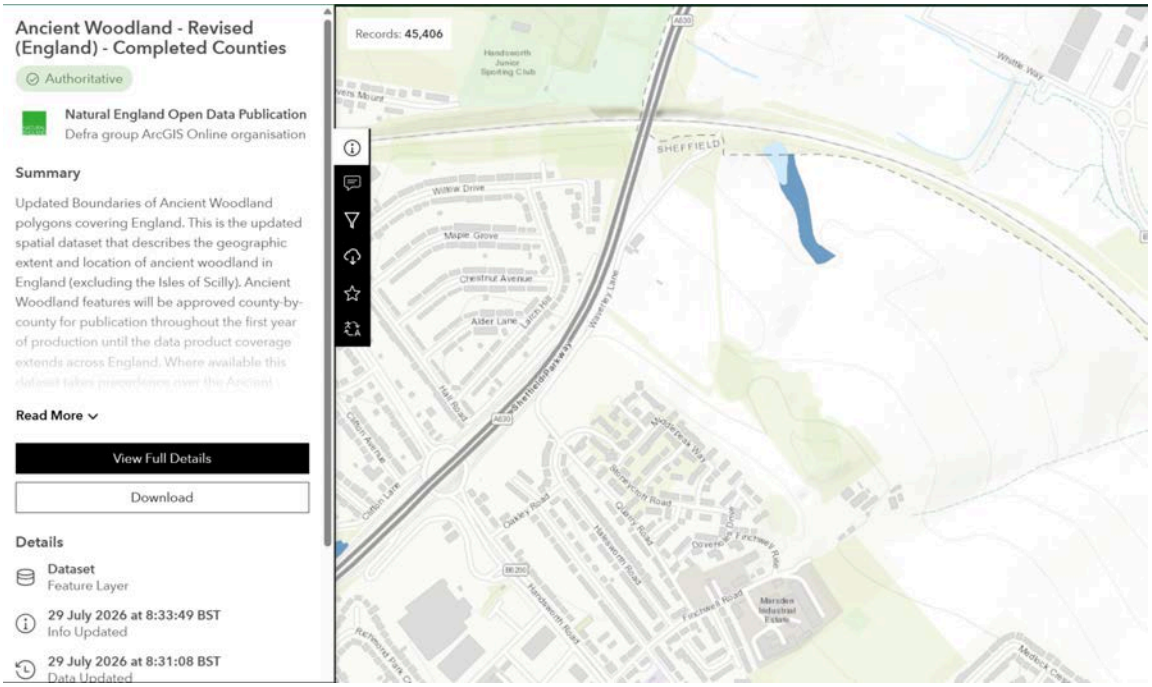

Image from Ancient Woodland Inventory

Furthermore, the fact that the Ancient Woodland falls outside the stated site boundary should not be interpreted as demonstrating that it is spatially remote from the proposed development. The site has a highly unusual and irregular boundary which is effectively drawn around the Ancient Woodland, excluding it from the site whilst bringing development into close proximity to it.

The assessment must therefore consider the actual spatial and functional relationship between the proposed development and the Ancient Woodland rather than relying simply upon whether the woodland falls within or outside the site boundary.

Ancient Woodland is an irreplaceable habitat. Of particular concern is the potential for development, together with other existing, consented and proposed development in the surrounding area, to progressively isolate the woodland from the wider ecological network and affect its long-term ecological function.

The EIA should therefore consider all relevant pathways of effect upon the Ancient Woodland, including habitat fragmentation and loss of ecological connectivity, air pollution and deposition, artificial lighting, noise and disturbance, surface water flood risk and other relevant indirect effects. These should be considered both individually and cumulatively.

This requirement does not depend upon the weight currently afforded to emerging Sheffield Plan Policy GS5. However, GS5 provides further support for this approach through the high level of protection proposed for irreplaceable habitats. Given that this site is itself being brought forward in anticipation of its proposed release from the Green Belt through the Sheffield Plan, the EIA should also have regard to the ecological policy framework within which the allocation is intended to be delivered.

Veteran trees

The Scoping Report states that:

> "No veteran trees are located in the Site or immediately adjacent to the Site."

No evidence has been provided to substantiate this conclusion.

Given that the immediately preceding statement concerning the location of Ancient Woodland appears to be factually incorrect, the Trust does not consider that the absence of veteran trees should simply be assumed without supporting evidence.

The EIA should establish an appropriate baseline through survey and assessment of trees within and immediately adjoining the site, including identification of any ancient or veteran trees.

This concern is compounded by the fact that the PEA referred to within the Scoping Report has not been provided and consequently the evidence underpinning these conclusions cannot be verified.

Other Irreplaceable Habitats – Hedgerows

We consider that the ecological and heritage value of the site's hedgerows has not been adequately established. The 2015 Archaeological Scoping Study records the site as arable fields enclosed by hedgerows but does not assess the age or significance of the surviving boundaries. Historic mapping, including the first edition Ordnance Survey, demonstrates a long-established field-boundary network across the site, with a number of boundaries potentially corresponding with those surviving today.

The PEA referred to in the Scoping Report has not been provided, and it is therefore unclear whether the surviving hedgerows have been assessed for their ecological value or potential status as ancient or species-rich hedgerows.

The surviving hedgerows should therefore be assessed together for both their ecological and historic landscape value, including comparison with historic mapping, species composition, age, connectivity and their relationship to the historic field pattern to determine if they might be ancient hedgerows and/or qualify as irreplaceable habitats.

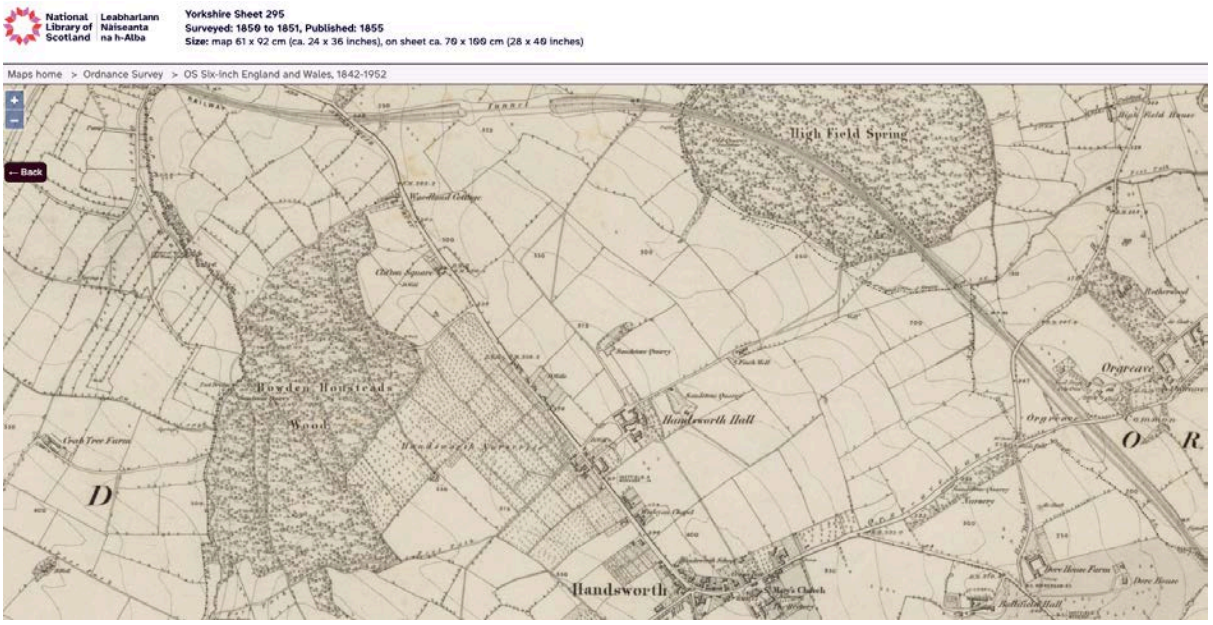

Image from OS Map surveyed 1850-1851 showing existing field boundaries

Operational air-quality effects on ecological receptors

We are particularly concerned by the proposal to scope out operational air-quality effects on ecological receptors.

The Scoping Report itself identifies the potential for nitrogen deposition and acid deposition from vehicle exhaust emissions, but subsequently concludes that there are no relevant ecological receptors because there are no SACs, SPAs, Ramsar sites or SSSIs within the relevant screening distances. It consequently proposes that operational air-quality effects on ecological receptors are scoped out.

We do not consider that this conclusion is adequately evidenced. The ecological baseline incorrectly identifies the location of the nearest Ancient Woodland. The absence of an SAC, SPA, Ramsar site or SSSI does not in itself demonstrate the absence of sensitive ecological receptors.

Table 6.3 identifies locations with international or national ecological designations as having High sensitivity to dust effects. Emerging Sheffield Plan Policy GS5 places irreplaceable habitats, including Ancient Woodland, within the highest tier of ecological protection alongside internationally designated sites. Given that the proposal is being brought forward through an allocation in that same emerging Plan, the EIA should explain how the Ancient Woodland has been treated within the ecological receptor sensitivity assessment and demonstrate that potential dust and air-quality effects have been appropriately assessed.

Table 6.6 then determines sensitivity to ecological impacts according to both receptor sensitivity and proximity to the source, with a High-sensitivity receptor within 20m categorised as High sensitivity. The Ancient Woodland in question lies within 20m of the proposed development. Its incorrect omission from the ecological baseline therefore

has direct implications for the application of the methodology set out in Tables 6.3 and 6.6.

Furthermore, the assessment of operational air-quality effects should not be limited to SACs, SPAs, Ramsar sites and SSSIs. Natural England's published guidance on assessing air-quality impacts recognises Ancient Woodland as an ecological receptor requiring consideration where relevant pollution pathways exist. The EIA should therefore assess the effects of operational traffic emissions on the Ancient Woodland, including NOx and relevant nitrogen and acid deposition, and should consider cumulative effects with existing, consented and proposed development and associated traffic.

This is particularly relevant given that the site lies within the Sheffield Citywide Air Quality Management Area and the proposed development is anticipated to generate substantial additional vehicle movements, including HGV traffic.

We therefore consider that operational air-quality effects upon ecological receptors should not be scoped out. The EIA should use the correct Ancient Woodland baseline and assess both construction-related effects in accordance with the methodology in Tables 6.3 and 6.6 and operational traffic-related air-quality and deposition effects, including cumulative effects.

Great Crested Newt

Paragraph 2.2.11 states that Great Crested Newt (GCN) have been ruled out, while paragraph 9.2.6 confirms that GCN eDNA sampling formed part of the detailed survey programme. However, neither the PEA nor the results of the eDNA survey have been provided, and the evidence supporting the exclusion of GCN from the Important Ecological Features identified at paragraph 9.5.3 cannot therefore be analysed and understood.

This is particularly relevant because the PEA desktop study considers protected and notable species records within a 2km radius, within which there is a known GCN population at Woodhouse Washlands Nature Reserve.

The survey results and supporting assessment should therefore be provided to demonstrate that GCN can reasonably be excluded from further assessment. If the existing evidence is insufficient to establish this, appropriate further survey should be undertaken before GCN are scoped out of the EIA.

Cumulative and inter-related ecological effects

Another serious concern is the need for a comprehensive assessment of the cumulative ecological effects of this development alongside the substantial existing, consented and proposed development within the surrounding Handsworth/Waverley area.

The assessment should not simply consider individual habitats and environmental pathways in isolation.

For example, the same ecological receptor may simultaneously be affected by habitat fragmentation, loss of connectivity, artificial lighting, noise and disturbance, traffic-related air pollution and other development pressures. The EIA should consider how these effects interact and what their combined effect may be upon the ecological integrity and long-term function of the receptor.

This is particularly important where the cumulative pattern of development has the potential to increasingly isolate Ancient Woodland and other important habitats from the wider ecological network.

Access, Major Accidents and Disasters

The Scoping Report describes access from Orgreave Lane as the "primary access" to the development. However, Sheffield City Council has recently confirmed through the Sheffield Plan examination that Orgreave Lane would be the *sole* vehicular access to the allocation. The EIA should therefore be based upon this correct access assumption, including in its assessment of transport, air quality, noise and vibration and associated ecological effects.

The Trust also questions whether it is appropriate to scope Major Accidents and Disasters out on the evidence currently presented. For a development of this scale, reliance upon a single vehicular access raises questions of resilience and emergency access and egress should that route become obstructed or unavailable. The site also immediately adjoins a railway corridor, the potential reinstatement of which is acknowledged in table 6.13 of the Scoping Report.

These matters require consideration from the perspective of both public and environmental safety. A major accident or emergency event could affect the ability of residents, employees and emergency services to enter or leave the development, while also having significant environmental consequences.

This is particularly relevant given the proximity of Ancient Woodland, an irreplaceable habitat. An incident involving fire, pollution or the release of hazardous substances could result in significant and potentially irreversible effects upon sensitive ecological receptors, potentially exacerbated by reliance upon a single point of vehicular access for emergency response.

The combination of the scale of development, sole vehicular access, proximity to the railway and presence of sensitive and irreplaceable ecological receptors should therefore be properly considered before Major Accidents and Disasters are scoped out of the EIA.

Local Nature Recovery Strategy

The South Yorkshire Local Nature Recovery Strategy mapping provides important additional context for the ecological assessment of the site. The LNRS identifies areas within and immediately adjoining the site as areas of existing importance for nature,

encompassing the Ancient Woodland, Waverley Pond Local Wildlife Site and Handsworth Tip Local Wildlife Site, together with associated priority habitat.

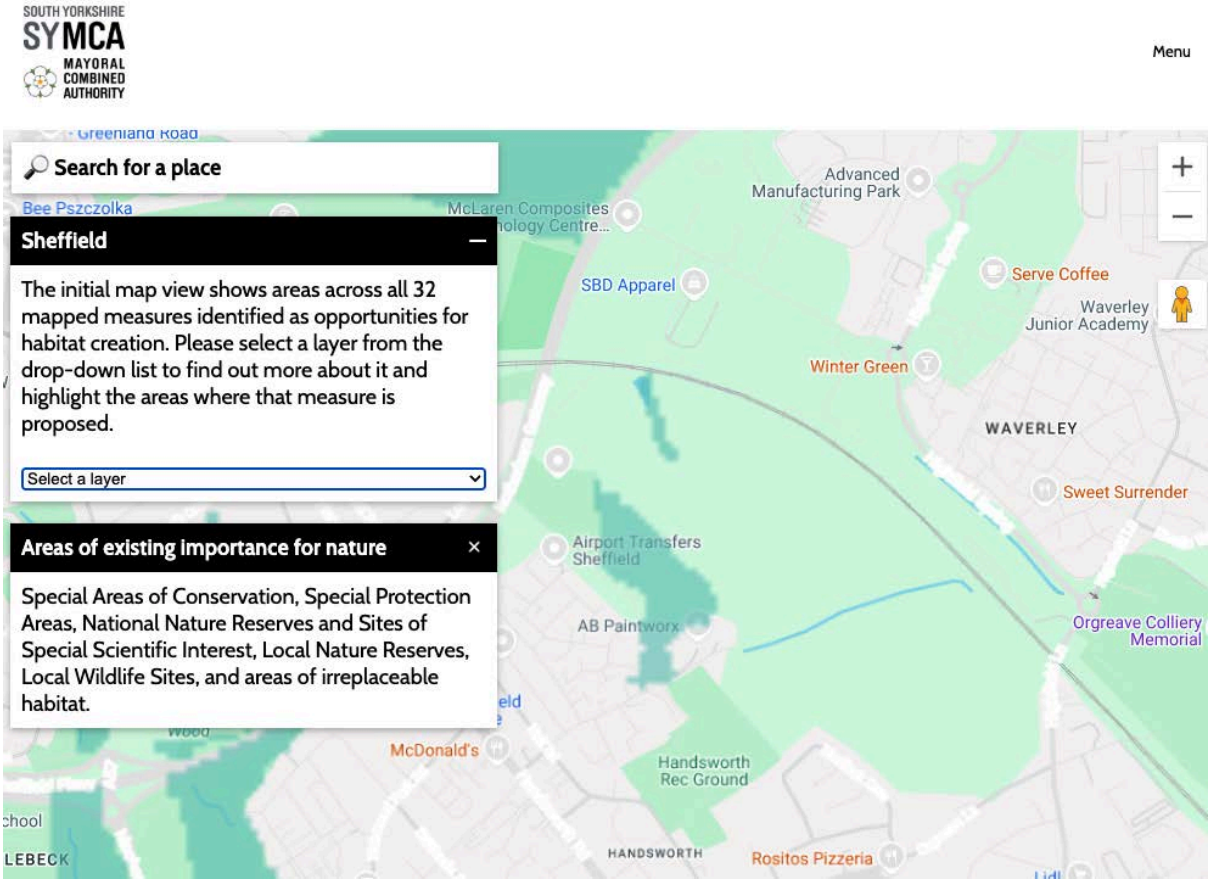

Image from SYMCA LNRS Map - Areas of existing importance for nature

The LNRS mapping also identifies much of the remaining site as an opportunity area for habitat creation. This is particularly significant because it demonstrates that these ecological assets should not be considered as isolated receptors. They form part of a wider ecological network for which the intervening land has been identified as providing opportunities for habitat creation and improved connectivity.

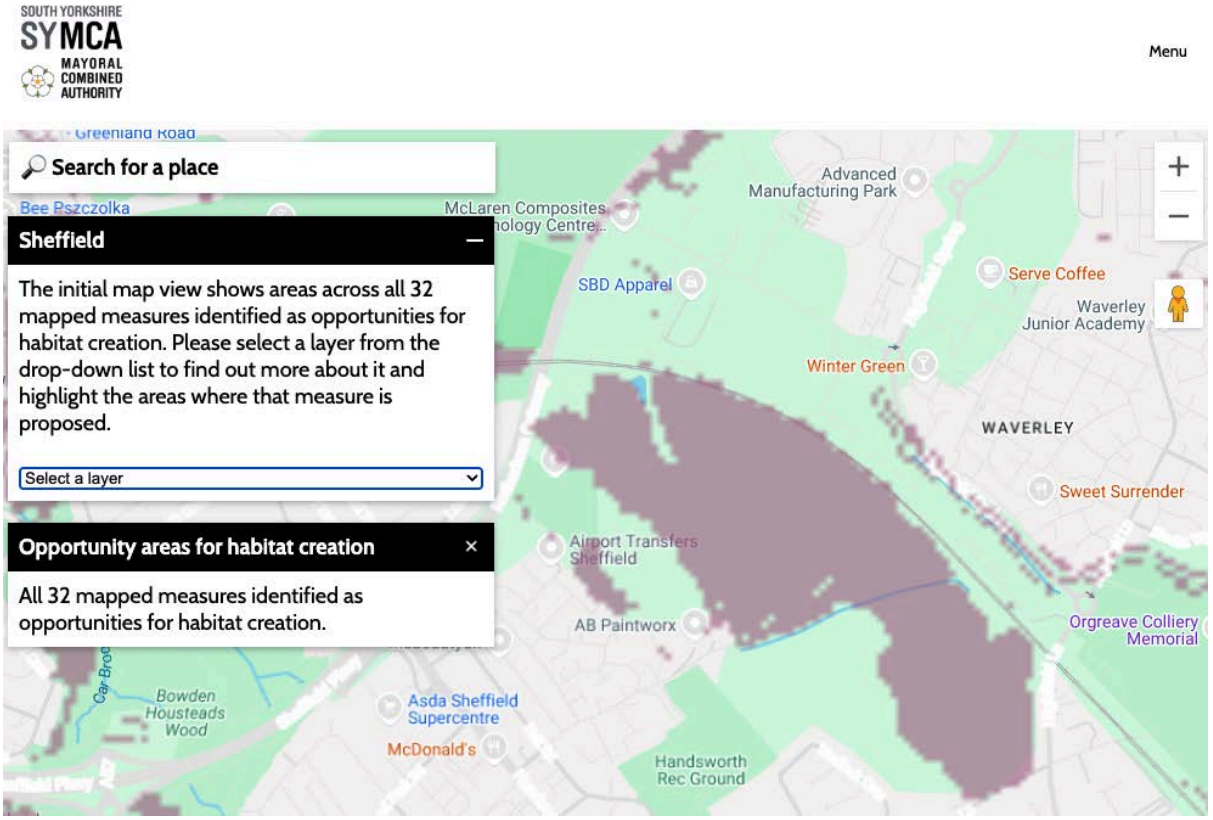

Image from SYMCA LNRS map - Opportunity areas for habitat creation

The EIA should therefore have regard to the LNRS mapping when establishing the ecological baseline and assessing habitat fragmentation, connectivity and cumulative effects, including the relationship between the Ancient Woodland, Waverley Pond LWS, Handsworth Tip LWS and the wider network of existing and potential habitat. It should also consider how the proposed development could affect the identified opportunity to restore, enhance and connect these habitats.

Access to Nature

The Socio-economics assessment proposes to consider impacts upon residents using or seeking access to open space. However, it is unclear whether this will include access to nature and good quality natural and semi-natural greenspace, rather than simply quantitative open-space provision and capacity.

This distinction is important in the context of both national policy and Sheffield's own planning policy framework, which recognises the importance of accessible green infrastructure and green space to healthy and sustainable communities. The emerging Sheffield Plan specifically seeks to maintain good access to green space as the city grows.

Given the scale of existing, consented and proposed development across the wider Handsworth/Waverley area, the EIA should therefore assess the cumulative effect of development and associated population growth upon access to nature, including the quantity, quality, accessibility and capacity of natural and semi-natural greenspace.

Conclusion

Our concern is not with the principle of undertaking an EIA, which the applicant has already accepted, but with ensuring that decisions about its scope are based upon a complete, accurate and up-to-date environmental baseline.

We have identified a number of matters where information within the Scoping Report is incorrect, incomplete, unavailable for scrutiny or has subsequently been superseded. These include the incorrect identification of the location of Ancient Woodland; the omission of the Ancient Woodland and hedgerows from the Important Ecological Features proposed for assessment at paragraph 9.5.3; unsupported conclusions regarding veteran trees; the absence of the PEA and other ecological survey evidence, including the evidence relied upon to rule out GCN; insufficient consideration of the wider ecological network and opportunities identified through the South Yorkshire LNRS; and the description of Orgreave Lane as the “primary” rather than sole vehicular access. These deficiencies have implications for conclusions reached elsewhere in the Scoping Report, including the proposal to scope out operational air-quality effects on ecological receptors and Major Accidents and Disasters.

We therefore consider that **potentially significant environmental effects should not be scoped out** where the baseline is incomplete or inaccurate, or where the evidence relied upon to justify their exclusion has not been provided and cannot therefore be scrutinised. The EIA should be based upon a corrected and complete ecological baseline and should assess relevant effects both individually and cumulatively, including their implications for ecological connectivity and the long-term function of irreplaceable and other important habitats.