



Sheffield &
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For nature, for everyone

12th March 2020

19/03143/FUL Erection of 72no. dwellings, formation of access road, associated landscaping works and open space works | Land Off Moorthorpe Way Sheffield S20 6PD

Dear Mr Baxter

This submission is a response to the additional documents uploaded 28th February and should be read in conjunction with our previous submissions of 1/10/19 and 12/02/20 which still stand.

Objection

We are currently still conditionally objecting to this application as not all our previous reasons for objecting have been addressed. However, if our concerns can be adequately addressed, we will consider removing our objection.

One of our previous reasons for objecting was the lack of a comprehensive **Biodiversity Net Gain** assessment. As you may recall, we requested a suite of ecological surveys, Ecological Impact Assessment and Biodiversity Net Gain assessment for the whole wider site. This has not been forthcoming, although a Biodiversity Net Gain calculation for site E has now been submitted and our comments on this follow.

We are unclear why the Warwickshire Biodiversity calculator has been used, rather than the Defra 2.0 metric^{1,2} tool. Although the Defra Metric Tool version 2.0 is still a Beta test version, the User Guide³ says *"Rule 6: Deviations from the published methodology of Biodiversity Metric 2.0 need to be ecologically justified, while the methodology is expected to be suitable in the majority of circumstances, it is recognised that there may be exceptions. Any local or project specific adaptation of the metric must be transparent and fully justified"*. Warwickshire County Council developed their calculator following on from the original Defra pilot and before the Defra 2.0 metric was available, and it is tailored for Warwickshire and no assessment has been made yet for whether it is suitable for South Yorkshire.

¹ <http://publications.naturalengland.org.uk/publication/5850908674228224>

² <https://www.gov.uk/guidance/natural-environment>

³ <http://nepubprod.appspot.com/publication/5850908674228224>





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The calculation (spreadsheet based) has been uploaded onto the planning portal in such a way that it makes it very difficult to read the model, sheet by sheet. Could there be a clearer upload please – including in landscape orientation (and perhaps you Case Officer could email the spreadsheet to us directly). There is also no methodology or guidance uploaded for people (like us) to assess this model and how it was used on this occasion.

The connectivity impact assessment part of the calculator has not been completed. The model says it is optional, but given the discussions about the importance of this site to connect others, we feel it should have been included in the assessment.

However, our main criticism is that the calculator comes up with a total loss of 8.5 Biodiversity Units, and the accompanying letter to BioBank suggests ‘banking’ these credits to use elsewhere. However, if the development were to be granted, this would only result in a **no net loss** of biodiversity and *not* a biodiversity **net gain** - there should be at least a 10% gain in line with Government recommendations^{4,5}. The calculation should be accompanied with a further analysis to consider if more biodiversity units could be retained or enhanced on-site and then where the 8.4units+10% (min) could potentially be delivered. In this case, there are adjacent sites (including the plots in the wider site) that could be considered. As we stated previously, Chapter 8 of the EclA makes suggestions of how Biodiversity Net Gain could be achieved on-site but it is unclear which of these options were chosen and how this has fed into the biodiversity calculation.

The Hedgerow between Moorthorpe Rise and Ochre Dyke (~100m). Following on from our comments on this subject in our February, the Owlthorpe Fields Action Group have located evidence in the County Records Office that the hedgerow (see their maps) features on maps from 1790 and therefore meets at least one of the criteria of an ‘important hedgerow’ under the Hedgerow Regulations 1997.

“A hedgerow is important, and is protected, if it’s at least 30 years old and meets at least one of these criteria: - is part of a field system or looks to be related to any building or other feature associated with the field system that existed before 1845 - you can check the County Records Office for this information”

www.gov.uk/guidance/countryside-hedgerows-regulation-and-management

⁴ <https://www.gov.uk/government/consultations/biodiversity-net-gain-updating-planning-requirements>

⁵ <https://www.gov.uk/government/news/environment-bill-sets-out-vision-for-a-greener-future>





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We strongly suggest that the SCC Tree Manager and Ecology Manager are consulted about this to avoid any breach of the regulations. We also reiterate our request in our February response that clarity on the issues of all the hedgerows, LWS boundaries and buffers be published on the planning portal.

This concluded our comments at this stage. We reserve the right to comment on further revisions or plans submitted in relation to this application and are happy to be further consulted on this scheme.

Yours sincerely

[Redacted signature]

[Redacted name]

Living Landscape Development Manager

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