

Appeal APP/J4423/W/20/3258555:

Land at Moorthorpe Way, Owlthorpe

Proof of Evidence for Rule 6 Party Case:

Dr Nicola Rivers

15 December 2020

1. Summary of Evidence

- 1.1 Owlthorpe Fields – sites C, D and E – have been left to naturally regenerate for more than 20 years. Site E, as well as Sites C and D, individually and collectively now meet the Sheffield Local Wildlife Site (LWS) designation criteria. Planning policies offer Local Wildlife Sites protection from development.
- 1.2 It is the grassland habitats on the sites that currently meet the LWS criteria. The appeal scheme would cause almost total loss of the grassland habitat on site E.
- 1.3 The scheme would also result in loss of an ancient hedgerow whose continuity has been largely protected in the previous phase of development at Woodland Heights.
- 1.4 The scheme includes measures to protect the existing LWS woodland along Ochre Dyke, but most of the newer, regenerating woodland would be lost.
- 1.5 The scheme proposes compensatory planting of hedgerows, and habitat creation around the attenuation basin, but this does not accord with the principle that harm to biodiversity should be first avoided, then mitigated, then – as a last resort – compensated for. This is especially true for the grassland, for which neither clear mitigation nor compensation are proposed.
- 1.6 The approach to biodiversity net gain is incomplete, as it does not identify where and how compensation habitat would be delivered so we cannot be sure that the BNG principles – including ‘like for like’ or better, would be implemented.
- 1.7 The value of the Site as part of an ecological network in the context of current biodiversity plans and policies has grown substantially, though its full potential has not yet been fully realised. The harm that would result from the appeal scheme would go against current planning policies and cause a major setback to the implementation of nature recovery in the area.
- 1.8 I therefore consider that there are more than sufficient grounds to refusal the appeal scheme on ecological grounds alone.

2 **Introduction**

- 2.1 My name is Dr Nicola Rivers. I am a full member of the Chartered Institute of Ecology and Environmental Managers (CIEEM).
- 2.2 I have a BSc in Applied Environmental Biology, and undertook zoological research for six years, culminating in a PhD in British Bat Ecology. Post PhD, I worked as a Professional Ecological Consultant, before moving to the not-for profit sector – initially for a small environmental charity. Since then, I have been working as a professional in nature conservation for 13 years, first employed as South Yorkshire Biodiversity Coordinator, hosted by the Sheffield and Rotherham Wildlife Trust from 2007-2012. My work included Biodiversity training for Planning Officers and raising awareness of the NERC Biodiversity Duty.
- 2.3 Since 2012, I have been employed by the Sheffield and Rotherham Wildlife Trust as a Programme Manager – my job title is Living Landscape Development Manager. As part of my role, I represent the Trust on both the Sheffield and Rotherham Local Wildlife Site Panels/Partnerships and have lead responsibility for the Trust’s responses to planning applications and input into planning policy. I oversaw the Nature Counts Project which culminated in the ‘State of Nature in Sheffield’ report in 2018. My current work includes Biodiversity Net Gain, Nature Recovery Network development and landscape-scale project development.
- 2.4 I have been involved in the Owlthorpe case since April 2019 and have prepared the Trust’s submissions. I have attended meetings about the site with Owlthorpe Action Group and CPRE South Yorkshire, and with the above groups and Sheffield City Council, prior to planning committee. I was unable to speak at Planning Committee due to being on furlough for three weeks, and the Trust was represented by their CEO Liz Ballard. I commissioned Wildscapes to assess Site E and the wider site against the Sheffield LWS criteria, which forms the basis of my evidence to the Inquiry.

3 Points of Evidence

3.1 Owlthorpe Fields are now of Local Wildlife Site designation value.

3.2 Owlthorpe Fields, consisting of Sites C, D and E, along with Sites A & B were arable fields that were earmarked for housing and a district centre in the 1970's and the sites were allocated as such in the Sheffield 1998 UDP. The Woodland Heights housing estate was built around 1999 on Sites A & B, along with the medical centre in 2002.

3.3 *However*, Sites C, D and E have been left for the past 20-plus years, largely unmanaged. Satellite images show how the site has naturally regenerated since it was earmarked and then allocated for development.

3.4 The effect of this natural regeneration is that habitats and species that have been constrained to the LWS for the period whilst the Fields were in arable use, have been able to recolonise the undeveloped Fields over the last twenty years. The series of satellite images (Figs OAG_14 to 20) and recent drone images (Figs OAG_21 and 22) support this.

3.5 As a result, the Fields now support a very different natural environment than they did over 20 years ago. This can also be shown the series of photo montages compiled by OAG (Figs OAG_23 to 26) – I asked them to put these together as a reflection of wildlife on the site through the year, which cannot be seen in one visit in the winter months.

3.5 In addition, the environmental and planning policy climate has changed in the past 20 years which I will come back to.

- 3.6 I am not suggesting that the Fields are as high in value as an ancient unimproved meadow, which may be designated for nature conservation at a national level. However, the natural regeneration of the Fields has allowed biodiversity to return to such an extent that they now meet the criteria to be designated for their importance to nature conservation at a Local Level. Local in this case, meaning Sheffield and the level of designation is Local Wildlife Site.
- 3.8 BWB, the Ecologists employed by the Appellant, undertook appropriate levels of survey for a planning application and I am not suggesting that they did not. However, from conversations with Owlthorpe Fields Action Group – OAG – who have been both gathering historical and biological information about the Fields plus recording a current wealth of wildlife on the Fields, it was felt that the surveys undertaken by BWB did not fully capture the true ecological value of the Fields.
- 3.9 So, after the planning application was refused, OAG decided to commission their own Preliminary Ecological Assessment (PEA), undertaken by Wildscapes, which was carried without the Ecologist first reviewing the BWB surveys.
- 3.10 For transparency, Wildscapes are an Ecological and Land Management commercial consultancy Community Interest Company, owned by Sheffield and Rotherham Wildlife Trust.
- 3.11 I then asked Wildscapes to bring together all the available ecological data from the fields to assess the site against the Sheffield Local Wildlife Site criteria (documents CD4.8.16 and CD4.8.17). Wildscapes compiled ecological data over the last 10 years from: BWB surveys; the Wildscapes PEA (document CD4.8.5); data from the Sheffield Biological Records Centre; and OAG’s own data, which had been entered into the Sheffield and Rotherham Wildlife Trust’s database, Nature Counts.
- 3.12 The ‘Selection of Sheffield Local Wildlife Sites’ document (CD4.8.15) says

“There are three main methods by which a potential site may be assessed and proposed to the Local Wildlife Sites Partnership for selection as a Local wildlife Site:

- *The principles set out in the Sheffield 1991 nature Conservation Strategy*
- *The Sheffield Local Red Data List*
- *The use of criteria based on indicator species and assemblages of species*

In each case the Sheffield Local Wildlife Sites Partnership will have reviewed and approved the use of the methodology for the assessment of potential sites and the reassessment of existing sites.

A potential Local Wildlife Site may be assessed and proposed using just one of these methodologies, or any combination of them. The cumulative value of a site across 2 or more methodologies may also be considered. The same is true of sites which for example contain more than one habitat type and/or faunal interest which are assessed using different indicator species and assemblages.”

3.13 This assessment, which we are submitting as evidence (document CD4.8.7), shows that Site E - the main area covered by this planning application, Site C and Site D individually and collectively all meet the Sheffield Local Wildlife Site Criteria for grasslands.

3.14 The Sheffield Local Wildlife Site Criteria for grassland (document CD4.8.17) say that Areas to be considered for selection must cover an area of at least 0.25 hectares, or be more than 50 metres in length, if a linear feature. The Wildscapes’ LWS assessment report says *“All the sub-sites C, D and E contain areas of grassland that meet the size criteria, as does the site as a whole.”*

3.15 For neutral/calcareous/mixed grassland to be considered, as well as meeting the size criteria, there must be a total of **10 or more botanical indicator species present, including at least 5 strong positive indicators**. When all the data is taken together, The Wildscapes’ LWS assessment report shows that: **Site E alone supports 34 positive indicator species and 5 strong positive indicator species. Site C, D and E**

together support 43 positive indicator species and 12 strong positive indicator species. So Sites C, D and E on their own meet the grassland criteria and they do so collectively. From the proposed layout almost of all of this qualifying grassland habitat will be lost.

3.16 In my view, since the sites meet these criteria, they should be designated as Local Wildlife Site, and indeed I have now submitted the data to the Local Wildlife Site Panel for inclusion. Logically this would take the form of an extension of the boundary of the existing Owlthorpe LWS.

3.17 Government planning guidance¹ (Paragraph: 013 Reference ID: 8-013-20190721) says: *“Locally designated ‘Local Wildlife Sites’ and ‘Local Geological Sites’ are areas of substantive nature conservation value and make an important contribution to ecological networks and nature’s recovery. They can also provide wider benefits including public access (where agreed), climate mitigation and helping to tackle air pollution. They can be in rural, urban or coastal locations, can vary considerably in size, and may comprise a number of separate sites.*

National planning policy expects plans to identify and map these sites, and to include policies that not only secure their protection from harm or loss but also help to enhance them and their connection to wider ecological networks.”

Therefore, the emerging new Sheffield Local Plan should be informed by an up-to-date map of Local Wildlife Sites. In my view, in light of the evidence that sites C, D and E are eligible to Local Wildlife Sites, they should be designated as such in the new Local Plan.

3.18 To examine the weight that LWS status would carry for these sites, I have identified the relevant elements of the UDP and NPPF. In Sheffield Local Wildlife Sites have protection from development through the UDP policies:

¹ <https://www.gov.uk/guidance/natural-environment#biodiversity-geodiversity-and-ecosystems>

- GE13 (document CD5.2-04) talks about Areas of Natural History Interest, which are equivalent to today's terminology of Local Wildlife Site and it says *"Development which would damage Areas of Natural History Interest will not normally be permitted." "Exceptionally, economic or recreational requirements may mean that development is permitted which causes damage to an Area of Natural History Interest. Such development is only environmentally sustainable if it includes measures to **minimise the damage** and the developer compensates for any losses to wildlife habitats or valuable natural history features."*
- GE11 (document CD5.2) says *"The natural environment will be protected and enhanced. The design, siting and landscaping of development should respect and promote nature conservation and include measures to reduce any potential harmful effects of development on natural features of value."*
- The NPPF paragraph 170 says *"Planning policies and decisions should contribute to and enhance the natural and local environment by: d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures."*
- The NPPF paragraph 174 says *"To protect and enhance biodiversity and geodiversity, plans should: a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity⁵⁶; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation⁵⁷."*
- The NPPF paragraph 175 says *"When determining planning application, local planning authorities should apply the following principles:
a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts),*

adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;”

3.20 I interpret the effect of these policies as follows:

- Designated Local Wildlife Sites are protected from development by UDP GE13;
- NPPF 174 requires that the emerging new Local Plan should map the up-to-date ecological assets and would pick up sites C, D and E within the evidence base;
- But NPPF 170 and 175 mean that the ecological status of the sites carries weight now anyway, in advance of their designation as LWS, because all decisions should provide net gain, and should be refused if harm cannot be avoided, mitigated or – as a last resort – compensated. This applies to all the ecological features of the site, irrespective of LWS status.

3.21 In my opinion, the appeal scheme has not attempted to avoid loss of the grassland habitat on the site, that meets the LWS criteria. And it has not attempted to mitigate the loss, and the potential compensation has not been made clear, as I will come back to in Section 5 on Biodiversity Net Gain.

3.22 The loss of grassland resulting from the development is a major issue. Sheffield has lost most of its quality grassland². For example, it lost 75.5% of its unimproved grasslands between 1980 and 1998-2001³. The Sheffield Grassland Habitat Action Plan⁴ Objectives include *‘Maintain and increase the conservation value of existing grassland habitat through appropriate management and site protection’* and *‘Increase the extent of the grassland habitat resource through the creation, enhancement and restoration of grassland sites’*.

² www.wildsheffield.com/wildlife/wildlife-conservation/sheffield-state-of-nature/

³ www.sheffield.gov.uk/home/parks-sport-recreation/biodiversity-conservations

3.23 Therefore, it is my opinion, in order to comply with these policies, the decision to refuse the application should be upheld, and instead the site should be managed for nature conservation.

4 In addition to the loss of grassland, other ecological features on and surrounding Site E are not adequately protected by the current application.

4.1 Woodland and Local Wildlife Sites

The woodland currently within the existing LWS, along the corridor of Ochre Dyke (Local Wildlife Site no. 296) has been protected and strengthened by the adjacent area of natural regeneration. Most of this natural regeneration would be lost. The application did propose to protect the woodland with a 15m buffer, although there were some incursions into the buffer. The applicant has recently proposed to remove two dwellings and the associated car parking, which was one of the intrusions, in the Revision B scheme (document CD1.10B).

4.2 Natural England have now confirmed that Ochre Dyke Wood is Ancient Woodland (document CD4.9.4). This was confirmed by email on 14th December 2020 and OAG have supplied it to the Inquiry.

4.3 Government Guidance⁴ on Ancient Woodland buffer zones states:

“A buffer zone around an ancient or veteran tree should be at least 15 times larger than the diameter of the tree. The buffer zone should be 5m from the edge of the tree’s canopy if that area is larger than 15 times the tree’s diameter.”

4.4 OAG have mapped a number of Ancient and Veteran Trees in Ochre Dyke, which have been verified by the Woodland Trust. It was not previously made clear whether the applicant had mapped the buffers around these individual trees, but the

⁴ www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences

drawings submitted with the Revision A and B schemes now do so (if these are to be used in the inquiry).

4.5 However, the guidance also says “*For ancient woodlands, you should have a buffer zone of at least 15 metres to avoid root damage*”. In Revision A and B drawings, the edge of the woodland with a 15m buffer zone (without incursions) is missing – so it is not clear if this meets the guidance. That is to say, the revisions appear to give adequate root protection for individual veteran trees, but it is unclear whether they also give a 15m buffer zone to the woodland as a whole and whether there are incursions within this buffer. It is noted that the Appellant removed one such incursion (in the form of two car park places) in Revision B, but the buffer should be redrawn with any incursions clearly marked.

4.6 The guidance¹ also says “*You should avoid sustainable drainage schemes (in buffer zones) unless:*

- *they respect root protection areas*
- *any change to the water table does not adversely affect ancient woodland or ancient and veteran trees*”

4.7 However, the previous ‘Tree Protection Boundary Treatments Plan’ (document C1.10.B.1), which did include the buffer, shows the proposed Surface Water Attenuation Basin does intrude into the buffer. I have not seen evidence to demonstrate that there would not be any adverse effects on the ancient woodland or ancient and veteran trees.

4.8 Therefore, whilst woodland hydrology is not my area of expertise, I cannot conclude that the appeal scheme, either as submitted or with the Revision A and B schemes have verified that the drainage scheme would not have an adverse impact on the water table of the existing LWS woodland.

4.9 In addition, no buffer is proposed between the development footprint and the LWS to the West of Site E named Owlthorpe (no 266). I would expect to see a buffer for

all LWS and in my SRWT representations I repeatedly asked for clear maps showing both current LWS boundaries in relation to the proposed development and buffer. Document CD2.6 was provided post-submission, which shows the red line boundary in relation to the LWSs, but it does not show any buffers.

4.10 Hedgerows

The Hedgerow between Moorthorpe Rise and Ochre Dyke (~100m) would be lost if the Appeal is upheld and the proposed layout implemented.

- 4.11 OAG have located evidence in the County Records Office that the hedgerow features on field enclosure maps from 1790 and therefore meets at least one of the criteria of an ‘important hedgerow’ under the Hedgerow Regulations 1997.⁵ See figures OAG_27 and OAG_28.

“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.”

- 4.12 I cannot see evidence to demonstrate the Hedgerow Regulations have not been breached. I also cannot see evidence that the mitigation hierarchy (Avoidance, then Mitigation, then Compensation – see below for details) has been followed in order to avoid this hedgerow being lost. The correspondence between the Council Ecology Officer, the Officer and BWB show that the Ecology Unit shared the concerns about the mitigation hierarchy.

⁵ www.gov.uk/guidance/countryside-hedgerows-regulation-and-management

- 4.13 The applicant has argued that the hedgerow is ‘defunct’ and can be replaced with 120% of new native hedgerow. BWB Ecologists used a Phase 1 methodology and defunct hedgerow is a term used, but its definition is about how intact the hedge is, not about how species- rich. *"J2.2.1 Defunct hedge: Native species-rich - Hedges in which there are gaps and which are no longer stock-proof fall into this category."*⁶
- 4.14 The ancient hedgerow - whilst it has breaks in it, is evidently part of a longer ancient hedgerow whose integrity has been previously protected by virtue of the conditions on the Woodland Heights development and subsequent buffer scheme (00/01355/FUL)(document CD4.10.53).
- 4.15 Although new native hedgerow planting is welcome, it is our opinion that as the hedgerow is ‘important’, efforts should have first been made to ‘avoid’ the hedgerow, before moving to ‘mitigation’ and only then ‘compensation’ in line with NPPF para 175a as previously quoted (and in Government planning guidance⁷ 019 Reference ID: 8-019-2019072), especially as the new hedgerow proposed would form part of the proposed buffer, where a linear natural corridor already exists. Removing this hedgerow would result in the loss of a NW to SE linear natural feature.

5 Biodiversity Net Gain

- 5.1 The NPPF⁸, Policy 170 says *“Planning policies and decisions should contribute to and enhance the nature and local environment by..... d) Minimising impacts on and **providing net gains for biodiversity**”* and Policy 175 says *“When determining planning applications, local planning authorities should apply the following principles:.....d) opportunities to incorporate biodiversity improvements in and*

⁶ <https://data.jncc.gov.uk/data/9578d07b-e018-4c66-9c1b-47110f14df2a/Handbook-Phase1-HabitatSurvey-Revised-2016.pdf>

⁷ <https://www.gov.uk/guidance/natural-environment#biodiversity-geodiversity-and-ecosystems>

⁸ www.gov.uk/government/publications/national-planning-policy-framework--2

around developments should be encouraged, especially where this can secure measurable net gains for biodiversity.”

- 5.2 In order to show measurable net gain, a biodiversity net gain metric is used to measure the impacts of a development on a site, including any habitat retention. It should then measure the units of on and off-site compensation.
- 5.3 Biodiversity Net Gain compensation should be ‘like for like or better’
- Metric Principle 5⁹: The metric design aims to encourage enhancement, not transformation, of the natural environment.** Where possible, habitat created to compensate for loss of a natural or semi-natural habitat should be of the same broad habitat (e.g. new woodland to replace lost woodland) unless there is a good ecological reason to do so)

And

Metric Rule 3³: ‘Trading down’ must be avoided Losses of habitat are to be compensated on ‘a like for like’ or ‘like for better’ basis. Ideally, new or restored habitats should aim to achieve a higher distinctiveness and/or condition than habitats lost.

- 5.4 The appeal scheme causes substantial loss of grassland - 6.36 units as calculated by the applicant using the Warwickshire BNG metric, however the last part of the process, identifying a site and detail of measurable compensation, has not been carried out.
- 5.5 Whether working with Environment Bank, or directly with the Council or any other partners, the compensation location and habitat to be enhanced or created should be identified and also entered into metric to ensure the BNG follows the rules above. There appear to be discussions with the Council about enhancing nearby LWS. The existing Owlthorpe LWS is grassland is already in positive conservation management,

⁹ The Biodiversity Metric 2.0 auditing and accounting for biodiversity. User Guide. Natural England Joint Publication JP029 29/7/2019

but it has not been made clear if a measurable enhancement of this site would be possible to compensate for the loss of grassland on site E. Enhancement of Ochre Dyke Woodland would not be appropriate compensation for loss of grassland. Without this clarification, it is not clear whether the NPPF polices above have been fully met.

6 The Fields are greenfield sites, whose ecological value has been demonstrated. But it is also their position in the landscape that has value.

6.1 One of the reasons for refusal (CD3.27) is *“The proposal does not respond sufficiently to the area's prevailing character of abundant green infrastructure and open space, contrary to paragraphs 122 and 127 of the National Planning Policy Framework”*

I agree with this and in my opinion the area's prevailing character of abundant green infrastructure and open space means it currently forms an important ecological corridor as well as both Site E and the Fields being important in their own right.

6.2 The UDP GE10 (document CD5.2) and Core Strategy 73 (para 12.12) (document CD5.14) show Strategic Green Links and corridors east to west in this area – along Ochre Dike Valley and across the fields to the South of the Fields. With the increase of the ecological value of Site E – and especially cumulatively with Sites C and D – it is my opinion that the link should be widened to incorporate the Fields. Lawton (2010)¹⁰ emphasises the need for *more, bigger, better and joined-up* sites, to improve the ecological functionality of remaining wildlife sites and to address the fact that the remaining places were not sufficient to either halt the loss of biodiversity or to meet the needs that people have of our natural environment. The main conclusions of the report still stand¹¹ and have fed into current government policy and strategies, including the NPPF and the 25 year Environment Plan. Expanding the existing LWSs

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<https://webarchive.nationalarchives.gov.uk/20130402170324/http://archive.defra.gov.uk/environment/biodiversity/documents/201009space-for-nature.pdf>

¹¹ https://nbn.org.uk/wp-content/uploads/2020/09/MakingSpaceforNature_10years_final.pdf

here to make them bigger, better and more joined, is one place in Sheffield where this could be achieved.

6.3 As well as the physical environment changing over the last 20 years, the environmental policy context has too. Andrew Wood’s evidence deals with climate change, so I will limit my comments to saying that a vegetated site like this offers substantial climate change adaptation benefits in its undeveloped state which will help Sheffield respond to the Climate Emergency that it has declared.

6.4 There is now a widely held recognition that England and the UK has suffered massive biodiversity loss, particularly over the last 50 years ^{e.g.}¹². The 25 Year Environment Plan (2018)¹³ sets the policy context to address this through a range of interventions, including through the planning system – many of which will soon be statutory requirements in the forthcoming Environment Bill¹⁴. These include the forthcoming requirements for Local Nature Recovery Strategies and accompanying maps. Text from the Draft Bill section on Local Nature Recovery Strategies says that the responsible authority should identify:

“(c) other areas in the strategy area which in the opinion of the responsible authority—

(i) are, or could become, of particular importance for biodiversity, or

(ii) are areas where the recovery or enhancement of biodiversity could make a particular contribution to other environmental benefits.”

Owlthorpe Fields are excellent candidates for such areas due to their value and position.

6.5 But we do not have to wait for the Environment Bill as many requirements are already in place in the NPPF, in particular:

- Para 170. *“Planning policies and decisions should contribute to and enhance the natural and local environment by:*

¹² <https://nbn.org.uk/wp-content/uploads/2019/09/State-of-Nature-2019-UK-full-report.pdf>

¹³ www.gov.uk/government/publications/25-year-environment-plan

¹⁴ www.gov.uk/government/publications/environment-bill-2020 <https://services.parliament.uk/Bills/2019-21/environment/documents.html>

d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.”

And

- Para 174: *“To protect and enhance biodiversity and geodiversity, plans should:
a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation⁵⁷;
and
b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.”*

⁵⁷ Where areas that are part of the Nature Recovery Network are identified in plans, it may be appropriate to specify the types of development that may be suitable within them.

- 6.6 Sheffield has not yet mapped its ecological networks and/or Nature Recovery Network (NRN) and including the fields in the strategic network would make a lot of sense – as they are already 20 years into their recovery, yet there is still room for more.
- 6.7 There is a need for the Council and its partners to identify sites for habitat enhancement and creation for Biodiversity Net Gain (BNG) implementation over the next 30 years+ to align strategically with the ecological networks.
- 6.8 Instead of being a biodiversity net loss site, as proposed, Site E and Owlthorpe Fields as a whole are potentially excellent BNG off-set Sites because there remains room for improvement in the condition of the habitats which would further increase their biodiversity value. This could be achieved by undertaking conservation management of the Fields as highlighted in Wildscapes’ PEA produced for OAG.

- 6.9 Building over the Site E, that already meets LWS criteria also means one less site (more, if C and D are treated separately in planning) that SCC has available to implement BNG and Nature Recovery Networks.
- 6.10 In my opinion, a full EIA for the Fields would have given a much fuller account of the ecological baseline, its relation and potential to the wider NRN and the cumulative ecological impacts of this development on the LWSs and their related connectivity.
- 6.11 The local communities have already started developing a potential network project plan – called the S20 corridor, which could be taken forward to the delivery stage with partners.

7. Conclusion

- 7.1 My evidence shows that Site E alone has ecological value worthy of LWS designation. And taken together, the Fields have an even higher cumulative value and an important place in the ecological landscape as natural sites in recovery, as part of an ecological network. For these reasons I consider the appeal should be dismissed on ecological grounds.