

**Duty to Co-operate
Statement of Common Ground with
Natural England
September 2025 Update**



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1. Introduction

- 1.1. Sheffield City Council ('the Council') has prepared and submitted the Publication (Pre- Submission) Draft Sheffield Local Plan ('Draft Sheffield Plan') in accordance with the Planning and Compulsory Purchase Act 2004 (as amended) and the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).
- 1.2. The purpose of this document is to confirm the position regarding the approach taken, and agreements reached, between Sheffield City Council and Natural England in relation to meeting their obligations under the Duty to Co-operate.
- 1.3. This document updates the Statement of Common Ground that was published in April 2024. Its purpose is to set out the agreed position in relation to the proposed additional site allocations that were published by the Council for public consultation in May 2025.

2. Natural England's comments on the Publication Draft Sheffield Plan

- 2.1 The purpose of the SoCG is to document the strategic matters being addressed and the outcome of the ongoing Duty to Cooperate between both organisations. It focusses on areas of agreement or disagreement between Sheffield City Council and Natural England.
- 2.2 The Council and Natural England have had ongoing dialogue throughout development of the Sheffield Plan regarding specific aspects of the Plan including the Habitats Regulations Assessment Appropriate Assessment (HRAAA). Liaison meetings have taken place in addition to formal comments received on both the Publication Draft Sheffield Plan and HRAAA.
- 2.3 Appendix 1 of this Statement of Common Ground sets out the comments that Natural England made on the HRAAA and Publication Draft Sheffield Plan, and the actions taken by the Council to respond to these. Against each comment it is noted whether there is now a position of agreement between the two organisations or whether there remains a position of disagreement.
- 2.4 Appendix 2 sets out the agreed position in relation to the proposed additional sites allocations.

Name	Role	Organisation	Signature & Date
Michael Johnson	Head of Planning	Sheffield City Council	 11.09.25
Kate Wheeler	Green Infrastructure and Local Plans Senior Adviser	Natural England	K. Wheeler 16.09.25

Appendix 1: Sheffield City Council responses to Natural England's Comments on the HRAAA and Publication Draft Sheffield Plan

Habitats Regulations Assessment Appropriate Assessment (HRAAA)

Sufficiently Rigorous & Robust	NE Comments	SCC Consideration/Common Ground	Is matter agreed?
No	No traffic modelling has been carried out. We advise that traffic modelling is required to determine whether the delivery of the plan would result in adverse effects on the integrity of European sites, and whether mitigation would be required. We advise that Natural England's published guidance NEA001 should be consulted when undertaking the assessment. Natural England also advises that ammonia sourced from traffic emissions should be included for assessment within the local plan HRA. For further information please see this report from Air Quality Consultants (AQC) that looks at ammonia emissions from roads for assessing impacts on nitrogen-sensitive habitats. Natural England notes the commitment to carry out traffic modelling (para 2.4.5). We will work with the council to provide further guidance on the traffic assessment. <u>NE comments Dec 23</u> Natural England note and welcome that the modelling of air pollution from traffic has now been included within the HRAAA. It has been determined that there are potential significant effects due to air pollution from traffic to South Pennine Moors SAC and SPA. The proposed mitigation relies on the implementation of the Sheffield Transport Strategy (2019). However, it should be clearly demonstrated how each of the measures stated in paragraph 3.3.25 will mitigate the contribution of the Sheffield Local Plan to pollution at South Pennine Moors SAC and SPA. It should also be stated whether all measures stated in paragraph 3.3.25 are still committed, and how delivery of the measures will be secured. As the Transport Strategy is dated 2019, it should be clarified whether measures stated in the Transport Strategy have already been accounted for in the modelling of the traffic contribution from the Local Plan. Before and after scenarios should be presented to demonstrate how much the pollution contribution of the Plan will be reduced due to implementation of the Strategy.	An addendum to the HRAAA has been carried out by the consultants ECUS, part of which includes additional traffic modelling generating baseline and future Average Annual Daily Traffic (AADT) data for roads that intersect or are within 200m of the South Pennine Moors SAC and Peak District Moors SPA. Increases in traffic are predicted to cause Likely Significant Effects (LSE's) from increased Nitrogen and NOx on most roads, and Ammonia on all roads assessed. However, measures delivered through policies in the Sheffield Plan relating to transport and managing air quality (especially policies SP2, ES5, T1, CO1 and CO2), together with Sheffield's Transport Strategy (2019) that aim to reduce the need to travel and create improved, sustainable and safe public transport and active travel networks, will help to mitigate predicted traffic related LSE's in relation to air quality. <u>NE/SCC position March 24</u> It has been confirmed by the City Council that the modelled traffic levels do not represent a 'double counting' of mitigation scenario, as the modelling is based on levels of traffic without implementation of the Transport Strategy. It is Natural England's view that the HRA should include further clarification to demonstrate how the measures within the Transport Strategy will work to reduce traffic numbers, and so pollution impacts, on the designated sites specifically. Natural England's view is that as traffic composition transitions toward more petrol and electric cars (i.e. fewer diesel cars on the road) – catalytic converters may aid in reducing NOx emissions but result in increased ammonia emissions. The transition to electric cars is also not guaranteed and therefore should not be relied upon solely, however NE agree that long-term trend data can be considered as part of an assessment of impacts. <u>NE/SCC position September 2024</u> None of the changes within the Affected Road Network (ARN) trigger the threshold value as set out by Natural England and their advice as set out in the Statement of Common Ground 2024 indicates that NE are content that the plan alone, or in combination with other plans, will not give rise to significant effects and can be screened out of further assessment.	Yes
No	NE advise that further information on the approach to recreational pressure on the South Pennine Moors SAC and Peak District Moors (Pennine Moors Phase 1) SPA is required to assess how it will provide adequate mitigation to conclude no adverse effects on the integrity of the SAC/SPA. NE also advise that further information is required on how the 15km zone of influence (Zol) for recreational pressure on the relevant designated sites has been determined, including what evidence has informed this screening criterion. We advise that visitor surveys at the Peak District Moors (Pennine Moors Phase 1) SPA would be beneficial to inform the assessment and proposed charging schedule. We would welcome further discussion on the strategy as it progresses.	An addendum to the HRAAA has been carried out by the consultants ECUS, part of which considers further assessment of recreational pressure. The appraisal of other local planning authority HRAAA's has informed the establishment of a 7km Zone of Influence, which has led to a strategic approach similar to Bradford's based on 400m, 2.5km and 7km zones where exclusions on development and mitigation will be required. This will be applied through Local Plan policies GS5, NC1 and NC15 which relate to the expansion of green infrastructure and the creation of new accessible natural green space, as part of requirements to provide new open space in new residential developments (drawing visitor pressure away from the SAC and SPA). A minor addition to the wording of the explanatory text is proposed for Policy NC15 in response to the HRAAA addendum to make it clear that for sites within 7km of the SPA/SAC, priority should be given to the creation/enhancement of accessible natural greenspace within the relevant catchment that would help deflect visitors away from the SPA/SAC (see CD31, proposed modifications SV37, SV38 and SV41).	Yes

Sufficiently Rigorous & Robust	NE Comments	SCC Consideration/Common Ground	Is matter agreed?
		Natural England agrees with this response to their comments.	
No	NE advise that further information should be provided in the main text regarding the assessment of functionally linked land, water quality and water supply impacts. NE will provide further comments on these issues once this becomes available. Overall, we advise that it is not possible to conclude no adverse effect on integrity on the relevant designated sites at this stage for all relevant impact pathways, based on the information provided. Further assessment will be required in the Appropriate Assessment, once information on allocations, policies etc becomes available. <u>NE comments Dec 23</u> Natural England highlight that loss of Functionally Linked Land can occur as a result of any development type, not just housing, and as such assessment of all allocations is required in the HRA. Whilst Natural England note that certain habitat types (as listed in 3.1.11) can be discounted as supporting habitat, we highlight that the entire site must fall into the relevant categories in order for this conclusion to be reached.	An addendum to the HRAAA has been carried out by the consultants ECUS, part of which considers further assessment of functionally linked land, water quality and water supply. Functionally linked land has been assessed in conjunction with the 2.5km Zone of Influence approach and has concluded that Sheffield's site allocations within this zone can either be discounted or would not result in any direct loss of functionally linked land. The proposed growth in Sheffield has already been considered by Yorkshire Water who have undertaken an HRAAA for both their emerging Water Resources Management Plan and Drainage and Wastewater Management Plan, which conclude that any potential threats to habitats can be mitigated against. Sheffield's HRAAA addendum has applied these findings. <u>NE/SCC Position at February 2024</u> SCC acknowledge that the text in the HRAAA Addendum could be interpreted to mean that only housing allocations have been considered; that is not the case. The HRAAA addendum has been amended to make it clear that 'all site allocations' have been considered for each of the city's future growth spatial options. Natural England agrees with this response to their comments.	Yes
No	In Combination Effects. NE advises that where avoidance or mitigation measures have been secured across multiple relevant plans or projects, the in-combination assessment should consider what residual effects may act together to produce a combined effect. Therefore, we advise that combined effects from plan allocations and other plan/projects should be considered in more detail.	An addendum to the HRAAA has been carried out by the consultants ECUS, part of which considers further assessment of in-combination effects. Findings conclude that there is the potential for in-combination effects arising in relation to air quality and recreational pressure, but the proposed policies and strategies identified in responses above will be able to suitably mitigate these effects. Natural England agrees with this response to their comments.	Yes

Part 1: Vision, Spatial Strategy, Sub-Area Policies and Site Allocations

Comment Reference	Page	Section	Sound/ Unsound	NE Comments	SCC Consideration/Common Ground	Is matter agreed?
PDSP.006.00 1	15	2. The Vision – Our City in 2039, para 2.12	Unsound	The clear aim should be for the implementation of the plan to significantly and demonstrably improve the environment, including air and water quality and wildlife interests during the plan period. The Plan should include policies to facilitate and support the restoration and enhancement of Sheffield's wildlife.	No change needed. The vision, aims and objectives should be read together. Aim 2 clearly includes reference to a sustainable city that encompasses the natural environment, while the following objectives set out the targets on how it will be achieved including reducing air, water and soil pollution. In addition, Aim 7 'a green city' includes enhancement of biodiversity and green and blue infrastructure. Proposed amendments to Policy BG1 reference the protection and enhancement of blue and green infrastructure and the Local Nature Recovery Strategy. The restoration and enhancement of Sheffield's wildlife is further supported by policies GS5 Development and Biodiversity and GS6 Biodiversity Net Gain. Natural England agrees with this response to their comments. (See CD31, proposed modification SV15).	Yes
PDSP.006.00 2	21	3. Growth Plan and Spatial Strategy, para 3.5	Unsound	The scope of the Vision should reflect the ecological emergency by committing to actively seek opportunities for the delivery of large-scale enhancements of the natural environment.	The Vision, Aims and Objectives should be read together. Aim 7 'a green city' clearly refers to enhancement of biodiversity and green and blue infrastructure. In addition, amendments are proposed to Policy BG1 that clarifies requirements to extend blue and green infrastructure as well as protecting and enhancing it. An additional paragraph is proposed after paragraph 5.24 in Part 1 that highlights the role of the Local Nature Recovery Strategy and opportunities to improve connectivity between habitats. The protection and enhancement of the Local Nature Recovery Strategy is covered further in Policies GS5 Development and Biodiversity and GS6 Biodiversity Net Gain. Natural England agrees with this response to their comments. (See CD31, proposed modifications SV9 and SV15).	Yes
PDSP.006.00 3	24	3: Growth Plan and Spatial Strategy, Policy SP1: Overall Growth Plan (e)	Unsound	The local plan needs to be mindful of the potential wildlife and recreational value of some brownfield sites.	No change needed. The wildlife and recreational value of the Site Allocations has been considered as part of the site selection process. Where an issue has been identified, conditions have been attached to the Site Allocations. The proposed development management policies provide sufficient protection for sites of ecological and recreational importance. Natural England agrees with this response to their comments.	Yes
PDSP.006.00 4	34	4. Sheffield's Sub-Area Strategy, Policy SA1: Central Sub-Area (a)	Unsound	Sufficient evidence should be provided through the sustainability appraisal and Habitat Regulations Assessment to justify the site selection process and to ensure sites of least environmental value are selected. Supportive of approach for Broad Locations for Growth. However, more adjustments are needed to policy criteria to ensure policy is compliant with NPPF and recreational/heritage value of sites is retained.	It is considered the Integrated Impact Assessment Report, Habitat Regulations Assessment, and Site Selection Methodology are consistent with national policy and provide a robust basis to determine the most sustainable sites to meet the identified development needs. The proposed development management policies will provide protection for sites of ecological and recreational importance within the Broad Locations for Growth (as well as all other areas of the city) but some minor amendments to Policy GS5 are proposed to clarify the need to protect designated sites and priority habitats. Natural England agrees with this response to their comments.	Yes

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					(See CD31, modifications DH28 and DH29).	
PDSP.006.00 5	65	4: Northwest Sheffield Sub-Area, Policy SA2: Northwest Sheffield	Unsound	In terms of the Sub Area Strategy. The SA and HRA should provide sufficient evidence to justify the site selection process and that sites of least environmental value are selected.	It is considered the Integrated Impact Assessment Report, Habitat Regulations Assessment, and Site Selection Methodology are consistent with national policy and provide a robust basis to determine the most sustainable sites to meet the identified development needs. The proposed development management policies will provide protection for sites of ecological and recreational importance within the Broad Locations for Growth (as well as all other areas of the city) but some minor amendments to Policy GS5 are proposed to clarify the need to protect designated sites and priority habitats. Natural England agrees with this response to their comments. (See CD31, modifications DH28 and DH29).	Yes
PDSP.006.00 6	76	4: Southeast Sheffield Sub-Area, Policy SA5: Southeast Sheffield	Unsound	Object to a number of site allocations within the Southeast sub-area, to which policy SA5 relates.	No change needed. The ecological value of the proposed allocations has been carefully assessed as part of the site selection process. Several of the allocations listed in detail in Annex C include conditions which require the protection of ecological corridors/site and/or assessment of the agricultural land value (where the allocation is on agricultural land). Natural England agrees with this response to their comments.	Yes For detailed comments regarding specific allocations, please see <i>Annex A: Site Allocations</i> below.
PDSP.006.00 7	102	5. Topic Policies, Policy BG1: Blue Green Infrastructure	Unsound	Policy is supported but reference could be made to Natural England's Green Infrastructure Framework. <u>NE comments Dec 23</u> <u>Natural England's Green Infrastructure Framework</u> <u>NE comments Dec 23</u> <u>Natural England's Green Infrastructure Framework</u> Natural England launched the <u>Green Infrastructure Framework</u> in January 2023. The Green Infrastructure Framework comprises: • <u>Green Infrastructure Principles</u>: the why, what and how of good green infrastructure. • <u>Green Infrastructure Standards</u>: guidance on national standards for green infrastructure quantity and quality. • <u>Green Infrastructure Maps</u>: mapped environmental, socio-economic datasets to support the standards. • <u>Green Infrastructure Planning and Design Guide</u>: practical, evidence-based advice on how to design good quality green infrastructure.	Support noted and welcomed. A reference to Natural England's Green Infrastructure Framework should be added to the Policy. <u>NE/SCC Position at February 2024</u> NE notes that there are several modifications proposed in the draft Sheffield Plan following consultation, <u>for example, requiring development to comply with the NE GIF principles and standards where new GI is created</u>. These, if taken forward, would be welcomed by Natural England. (See CD31, proposed modification SV15). Natural England agrees with this response to their comments.	Yes

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				• <u>Green Infrastructure Process Journeys</u>: guides on how to apply all the products in the Green Infrastructure Framework. Natural England strongly suggests that policies included within the Local Plan should be underpinned by a Green Infrastructure Strategy. The strategy can be used to help embed green infrastructure informed decision making across local authority departments and for sharing with external stakeholders. This can guide wider thinking and planning for green infrastructure outside of the planning system and may include retrofitting, delivery mechanisms, management, funding, monitoring and evaluation. <u>Evidence</u> GI strategy and policy should be informed by available evidence and tailored to be locally relevant where possible. The Local Plan evidence base should include an understanding of the existing GI network and future needs by: • Assessing quality, quantity and connectivity of current GI assets. Analysing how GI is delivering benefits to meet needs and priorities including • understanding what people want, and what is most important to them. • Identifying gaps in provision, inequalities in distribution and opportunities for new or enhanced GI provision. • Noting the pressures and drivers of change. Existing evidence that sets out local needs and priorities could include, for example, strategic flood risk assessments, open space assessments, and walking and cycling strategies. Once the evidence has been collated it may be possible to define: • Areas identified for strategic green infrastructure. • Focus areas for green infrastructure intervention based on needs. • Areas of green infrastructure opportunity <i>Spatial Mapping</i> Spatial data can be particularly important in understanding GI networks. The <u>Natural England Green Infrastructure Mapping Database</u> includes digitally accessible maps providing open data on GI across England to help develop appropriate proposals for new and /or enhanced GI. The maps show the distribution of different types of green and blue infrastructure, including those		

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				areas that are accessible and an assessment against the Accessible Greenspace Standards. The maps include socio economic data such as the Index of Multiple Deprivation. This means it is possible to look at where associated factors coincide, such as those locations that have low levels of greenspace and high levels of deprivation. Such analysis can help with targeting green infrastructure. It should be noted that the Natural England Green Infrastructure maps should be supplemented with up-to-date local evidence. Policies Policies should signpost to the national <u>Green Infrastructure Framework</u> Standards can provide output measures so that developers have certainty over what green infrastructure is needed on site. The <u>Green Infrastructure Standards</u> set out the recommended levels of achievement for major new developments and for area wide application. We advise the Local Plan integrates the recommended Standards, and where appropriate, defines additional targets informed by a locally defined baseline, taking into account local needs, opportunities and constraints. Natural England advises that the Local Plan should make clear how the national <u>Green Infrastructure Standards</u> should be applied locally. The five Headline Green Infrastructure Standards should be used as a starting point and can be supplemented by local knowledge and evidence. For example, Headline Standard S2 states, regarding capacity criteria, that: <i>'Local authorities have at least 3 hectares of publicly accessible greenspace per 1,000 population at an area-wide scale'</i> and <i>'Local authorities specify capacity targets for all major residential development'</i>. We advise that your authority adopts the recommended standards where relevant, and provides further detail to local standards where required. Site allocations Natural England advises that site-specific requirements for GI are included in site allocation policies. The Local Plan can also identify strategic GI delivery sites that provide benefits to meet identified needs associated with new development. <u>Integrating green infrastructure policies</u> Consideration should be given to how the Local Plan, GI strategies, Local Nature Recovery Strategies (LNRS),		

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				Biodiversity Net Gain (BNG), Tree and Woodland strategies etc. all work together. The Local Plan should make clear that each requirement doesn't load on top of one another but can be achieved in combination. For example, areas of BNG can form part of GI and habitat created or improved through LNRs will contribute to GI. Due to the broad nature of GI the Local Plan should also make reference to GI in chapters which are not environment based, to ensure join up across, health, transport and employment programmes and projects.		

Part 2: Development Management Policies and Implementation

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PDSP.006.008	12	3. An Environmentally Sustainable City - Responding to the Climate Emergency, Policy ES2 Renewable Energy Generation	Unsound	NE suggest strengthening policy.	Suggest additional wording to lessen impact on birds.	Support is welcomed. Clause (c) is considered to provide adequate protection. Any further detailed clarification/guidance would best be delivered via an SPD. Natural England agrees with this response to their comments.	Yes
PDSP.006.009	17	3. An Environmentally Sustainable City - Responding to the Climate Emergency, Policy ES5 Managing Air Quality, para. 3.19	Unsound	Policy does not recognise the impacts of aerial emissions on the natural environment and biodiversity. Further evidence needs to be collected and the Habitats Regulation Assessment should assess potential air quality impacts.		Revise introductory wording to the policy to recognise the impacts of aerial emissions on the natural environment and biodiversity. Natural England agrees with this response to their comments. (See CD31, modification CH10).	Yes
PDSP.006.010	48	4. Thriving Neighbourhoods and Communities, Policy NC15 Creating Open Space in Residential Developments	Comment	Natural England would like to see the incorporation of GI information provided in the Annex to their submission to be included within policies BG1, NC15 and GS1 in order to strengthen these policies. They do not suggest how this might be done. NE comments Dec 23 It does not appear that GI has been incorporated into policies and we do recommend this happens in order to strengthen GI in the plan. Please note Natural England's Green Infrastructure Framework can be used to develop GI policy and we recommend that plans refer to the 15 GI principles which set out the why, what and how to do good GI. The principles in conjunction with the mapping database and can be used to assist in planning GI strategically and inform policy. Development should be based on the Green Infrastructure Principle What 4 - GI should create and maintain green liveable places that enable people to experience and connect with nature, and that offer everyone, wherever they live, access to good quality parks, greenspaces, recreational, walking and cycling routes that are inclusive, safe, welcoming, well-managed and accessible for all. The plan should reflect the Green Infrastructure Principle Why 2 Active and healthy places to achieve - green neighbourhoods, green / blue spaces and green routes that support active lifestyles, community cohesion and nature connections that benefit physical and mental health and wellbeing, and quality of life. GI also helps to mitigate		Policy BG1 has been strengthened with further reference to the Local Nature Recovery Strategy and Urban Green Space Zones, which will help in delivery of Green & Blue Infrastructure requirements set out in Annex A. NE/SCC Position at March 2024 NE notes that there are several modifications proposed in the draft Sheffield Plan following consultation, <u>for example, requiring development to comply with the NE GIF principles and standards where new GI is created</u>. These if taken forward would be welcomed by Natural England. (See CD31, modification SV15). Natural England agrees with this response to their comments.	Yes

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				health risks such as urban heat stress, noise pollution, flooding, and poor air quality.			
PDSP.006 .011	85	8. A Green City – responding to the Biodiversity Emergency, Policy GS1: Development in Urban Green Spaces	Unsound	Welcome the reference to Natural England Accessible Greenspace Standards (ANGST) and a minimum size requirement for the provision of green infrastructure in new development. Policy and supporting text should set minimum accessibility, quantitative and quality requirements for new green infrastructure. The Plan should also reference the following green infrastructure policy standards: Green Flag Award scheme; The Sensory Trust 'By All reasonable Means' good practice guidance; The Forestry Commission guidelines for tree canopy cover; The Woodland Trust woodland access standards. Welcome the inclusion of a specific GI Policy BG1 and Policy NC15: Creating Open, Space in Residential Developments, Policy GS1: Development in Urban Green Space Zones. The information, in Annex A, on GI will be helpful to incorporate into these policies and to help strengthen them and then ultimately help in the deliverability when the plan is ultimately adopted.		Green Flag Award & The Sensory Trust - No change. The Green Flag awards lie outside of the Local Plan process as the Council and other organisations may submit parks, woodland and other greenspaces to be assessed against criteria, managed by Keep Britain Tidy. In relation to accessibility the draft policies propose to adopt Natural England's Green Infrastructure Framework principles and standards including the 'Accessible Greenspace Standards'. 20% Tree Canopy – Reference will be made in the supporting text of Policy GS7 regarding setting a target of 20% tree canopy cover across the city. Will retain proposed tree planting requirements as set out in policy GS7, that will help contribute towards meeting the overall 20% canopy cover target. Woodland access standards – Not feasible to adopt the standard due to the nature of the city's proposed growth strategy focusing 20,000 new homes in the Central Area of which a large part would lie outside of the Forestry Commission's minimum distance of 500m to 2ha of woodland. Natural England agrees with this response to their comments.	Yes
PDSP.006 .012	89	8. A Green City – responding to the Biodiversity Emergency, Policy GS3: Landscape Character, para, 8.15	Unsound	Proposals that affect the setting off the National Park should require Landscape and Visual Impact Assessment. Include reference to the Peak District National Park Management Plan. Include requirement to consult Peak District National Park Authority on relevant applications. Refer to major development exceptional circumstances text within National Parks. NE comments Dec 23 The emphasis in paragraph 8.15 is on the 'scale and nature' of the development. Instead, it is considered that it is the likely effects that should be the determining factor as to what type of LVA/LVIA is undertaken. A single dwelling, poorly designed and sited, and located within the setting of a national park, can have potential significant adverse effects. It is		No change needed. We acknowledge the importance of the valued landscapes within the Peak District National Park. Policy GS3 requires development to reflect the characteristics of different landscape typologies, including in the areas bordering the National Park within its fringe landscape. The policy also requires consideration of views into and out of different character areas. Paragraph 8.13 makes it clear that development within Sheffield but impacting the National Park is covered by the policy. Requirements for planning proposals to be subject to Landscape and Visual Impact Assessment (LVIA) are dependent on scale and context and it is not appropriate to make a blanket requirement within the policy. Similarly, there is no need to specify that the Peak District National Park Authority are consulted on all proposals likely to impact on its special qualities as this is dependent on scale and context and the PDNPA would be consulted as appropriate. <u>To improve the effectiveness of the Plan, the Council agrees that a further modification to paragraph 8.15 should be made. Both parties agree that the wording should read as follows:</u> <i>'A landscape and visual appraisal/impact assessment, proportionate to the scale/ nature of the development and its potential landscape and visual effects should be submitted. The developer should appoint a suitably qualified person to undertake this assessment, which should identify the likely scale of effects.'</i>	Yes

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				suggested that 8.15 is re-worded to ‘A landscape and visual appraisal/impact assessment, proportionate to the scale/ nature of the development and its potential landscape and visual effects should be submitted’. The remainder of Paragraph 8.15 should thereafter be amended to include a statement as to who makes this initial assessment as to likely scale of effects and how this decision is determined. The Peak District National Park should be consulted during that initial assessment stage. Section 245 (Protected Landscapes) of the Levelling Up and Regeneration Act 2023 places a duty on relevant authorities in exercising or performing any functions in relation to, or so as to affect, land in a National Park, the Broads or an Area of Outstanding Natural Beauty (“National Landscape”) in England, to seek to further the statutory purposes of the area. The duty applies to local planning authorities and other decision makers in making planning decisions on development and infrastructure proposals, as well as to other public bodies and statutory undertakers. It is anticipated that the government will provide guidance on how the duty should be applied in due course. In the meantime, and without prejudicing that guidance, Natural England advises that: - the duty to ‘seek to further’ is an active duty, not a passive one. Any relevant authority must take all reasonable steps to explore how the statutory purposes of the protected landscape (A National Park, the Broads, or an AONB) can be furthered; - The new duty underlines the importance of avoiding harm to the statutory purposes of protected landscapes but also to seek to further the conservation and enhancement of a protected landscape. That goes beyond mitigation and like for like measures and replacement. A relevant authority must be able to demonstrate with reasoned evidence what measures can be taken to further the statutory purpose; The proposed measures to further the statutory purposes of a protected landscape, should explore what is possible <u>in addition</u> to avoiding and mitigating the effects of the development, and should be appropriate, proportionate to the type and scale of the		<i>Where a development is likely to impact on the National Park then the LPA will consult with the Peak District National Park Authority during the initial assessment stage, before making a decision once all likely effects have been considered.’</i> Natural England agrees with this response to their comments.	

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				development and its implications for the area and effectively secured. Natural England's view is that the proposed measures should align with and help to deliver the aims and objectives of the designated landscape's statutory management plan. The relevant protected landscape team/body should be consulted.			
PDSP.006 .013	90	8. A Green City – responding to the Biodiversity Emergency, Policy GS4: Safeguarding the Best and Most Versatile Agricultural Land	Comment	Support the policy but recommend specific approaches for Local Plan policies in relation to soils.		No change needed. Support welcome. Natural England agrees with this response to their comments.	Yes
PDSP.006 .014	92	8. A Green City – responding to the Biodiversity Emergency, Policy GS5: Development and Biodiversity	Unsound	Policy needs to include Ramsar site reference on designated site list. Needs to refer to ensuring development follows mitigation hierarchy, and if not, proposals will be refused. Need to provide further clarification on when harm to a local site is acceptable.		Accept suggested policy amendments in relation to Ramsar sites and where harm is acceptable. No change proposed in relation to the mitigation hierarchy as this is covered under policy GS6. Natural England agrees with this response to their comments. See CD31, modification DH28.	Yes
PDSP.006 .015	94	8. A Green City – responding to the Biodiversity Emergency, Policy GS6: Biodiversity Net Gain (a-f)	Unsound	Recommend further clarification is made on use of Small Sites Metric i.e. off-site habitat enhancement. Recommend wording strengthened to clarify that 10% BNG must be achieved in all types of biodiversity units (habitat, river & hedgerow). Policy needs greater reference to riverine habitats, metric & link to GS9 Managing Flood Risk. Need to reference habitats of strategic importance as a higher biodiversity unit score is applied to these in local area. Policy needs to refer to 30th Jan 2020 date regarding habitat degradation pre-Biodiversity Net Gain assessment. Recommend a clear approach for sites of low/nil biodiversity value is set out e.g. small target improvement of biodiversity units rather than %. Recommend a BNG SPD is developed to provide further detail. High biodiversity value locations have not been mapped on Site Allocations. The plan should clearly set out these areas to be protected on sites. Recommend extending monitoring to include indicators		Accept some suggested policy amendments. Rivers and habitat degradation will be covered in more detail in a future SPD. Aiming to adopt Natural England's Green Infrastructure Framework Principles and Standards, of which the Urban Greening Factor standard will help achieve BNG on sites of low/nil biodiversity value. A future BNG SPD will be produced providing further detail in support of the policy. Propose amendments to the conditions of relevant allocated sites to make it clear that where a site contains a designated ecological site, that part of the site should not be developed, and the ecological interest must be protected. It also offers potential to deliver on-site BNG. Natural England agrees with this response to their comments. (See CD31, modifications DH9, DH32, DH10, DH31, DH33).	Yes

Comment Reference	Page	Section	Sound/ Unsound	NE Comments	NE Suggested Change	SCC Consideration/Common Ground	Is matter agreed?
				demonstrating amount & type of BNG provided by development.			
PDSP.006 .016	95	8. A Green City – responding to the Biodiversity Emergency, Policy GS7: Trees, Woodland and Hedgerows	Unsound	Need to refer to planning applications conforming with Natural England and Forestry Commissions guidance on protecting Ancient Trees and Woodland and Veteran Trees (AWTVT) from development. Suggest using Forestry Commissions guidelines for Tree Canopy Cover which sets 20% as a good aspiration. Recommend using Woodland Trust's 'Woodland Access Standard'. 2ha of woodland within 500m & 20ha within 4km.		Accept proposed change to reference the AWTVT guidance in supporting text. No change proposed to tree planting requirements (including street trees), but a reference in policy introduction will be added that tree planting will help contribute towards achieving a city-wide canopy cover target of 20%. No change proposed to incorporate the woodland access standard as not all city centre sites will be within proximity of woodland. Natural England agrees with this response to their comments. (See CD31, modification DH38).	Yes
PDSP.006 .017	101	8. A Green City – responding to the Biodiversity Emergency, Policy GS11: Sustainable Drainage Systems	Unsound	Where development drains to a protected site, additional treatment component may be required to ensure no impact on water quality. Sustainable Drainage Systems (SuDS) require appropriate resources to ensure long term monitoring, maintenance and funding.		Policy GS10 and GS11 have been amended to reference the Environment Agency's approach to groundwater protection. Detailed requirements are better suited to a supplementary planning document. Natural England agrees with this response to their comments. (See CD31, modification LM16).	Yes

Annex A: Site Allocations

Comment Reference	Page	Section	Sound/ Unsound	NE Comments	SCC Consideration/Common Ground	Is matter agreed?
PDSP.006.018	109	Policy SA2 - Northwest Sheffield Sub-Area Site Allocations <i>NWS01 Land and buildings at Penistone Road North</i>	Unsound	NWS01 is within close proximity to Wadsley Fossil Forest Site of Special Scientific Interest (SSSI). Natural England notes this allocation has planning permission, yet they have no record of consultation. Due to the potential for large non-residential developments to impact on water supply mechanisms to SSSIs Natural England advise further hydrological investigation is required.	The SSSI is approximately 1.7 km from the centre of the site. Given the distance and the amount of built development between the site and the SSSI, the development of the site is not felt to be relevant to the allocation. Natural England agrees with this response to their comments.	Yes
PDSP.006.019	110	Policy SA2 - Northwest Sheffield Sub-Area Site Allocations <i>NWS02 Land at Wallace Road</i>	Unsound	Objects to NWS02 due to lack of information provide in Site Allocation. An ecological assessment of the site should be completed prior to its allocation. NWS02 is close to Neepsend Railway cutting SSSI. To protect the site NE notes the inclusion of a 'staged archaeological evaluation' and advises this should be carried out prior to allocation. The allocation should require the protection and long-term management of the priority habitats on site, including lowland deciduous woodlands.	An archaeological assessment informed this allocation and resulted in a condition on development requiring the results of a staged archaeological evaluation and/or building appraisal to support the submission of any planning applications for the site's development. The allocation also requires on-site provision of Biodiversity Net Gain and maintenance of connective ecological corridors/areas (including buffers) shown on the Local Nature Recovery Strategy and combined natural capital opportunity maps and removing them from the developable area. Ecological assessment took place as part of the Site Selection process. Natural England agrees with this response to their comments.	Yes
PDSP.006.020	111	Policy SA2 - Northwest Sheffield Sub-Area Site Allocations <i>NWS04 Allotments to the south of Wardsend Road North</i>	Unsound	Objects to NWS04 due to lack of information provided in Site Allocation. NWS04 is close to Wadsley Fossil Forest Site of Special Scientific Interest (SSSI), which contains a number of 'in situ' fossil tree stumps, two of which have been exposed for many years. Potential for large non-residential developments to impact on water supply mechanisms to SSSIs. Further hydrological investigation is required to avoid significant harm to protected species/habitats in accordance with both national and local policy. NE comments Dec 2023 Natural England note that the water supply IRZ for Wadsley Fossil Forest SSSI may be triggered by this allocation. Where total net additional gross internal floorspace following development is 1,000m2 or more, further hydrological investigation is required in order to avoid impacts to the designated site.	The SSSI is approximately 1.7 km from the centre of the site. Given the distance and the amount of built development between the site and the SSSI, the development of the site is not felt to be relevant to the allocation. SCC response Jan 2024 Wadsley Fossil Forest Site SSSI is located halfway up a hillside on the west side of the valley with the nearest watercourse (Sough Dike) approx. 200 metres northwest of it higher up the hillside. The SSSI is approx. 600 metres west of the River Don located in the valley bottom. Site allocation NWS04 lies downstream of the SSSI approx. 1.7km away to the east in the valley bottom. Given the location of the SSSI in terms of its elevation and proximity to its nearest water source (Sough Dike) and that site NWS04 is a significant distance downstream and located in the valley bottom the Council considers that site NWS04 will not have a negative impact on the water supply mechanisms to the SSSI. Natural England agrees with this response to their comments.	Yes
CON	112	Policy SA2 - Northwest Sheffield Sub-	Unsound	Objects to NWS05 due to lack of information provided in Site Allocation. NWS05 is close to Wadsley Fossil Forest Site of Special Scientific Interest, which contains a number of 'in situ' fossil tree	The SSSI is approximately 1.74 km from the centre of the site. Given the distance and the amount of built development between the	Yes

Comment Reference	Page	Section	Sound/ Unsound	NE Comments	SCC Consideration/Common Ground	Is matter agreed?
		Area Site Allocations <i>NWS05 Land to the northwest of Wardsend Road</i>		stumps, two of which have been exposed for many years. Potential for large non-residential developments to impact on water supply mechanisms to SSSIs. Further hydrological investigation is required to avoid significant harm to protected species/habitats in accordance with both national and local policy. <u>NE comments Dec 2023</u> Natural England note that the water supply IRZ for Wadsley Fossil Forest SSSI may be triggered by this allocation. Where total net additional gross internal floorspace following development is 1,000m² or more, further hydrological investigation is required in order to avoid impacts to the designated site.	site and the SSSI, the development of the site not felt to be relevant to the site allocation. <u>SCC response Jan 2024</u> Wadsley Fossil Forest Site SSSI is located halfway up a hillside on the west side of the valley with the nearest watercourse (Sough Dike) approx. 200 metres northwest of it higher up the hillside. The SSSI is approx. 600 metres west of the River Don located in the valley bottom. Site allocation NWS05 lies downstream of the SSSI approx. 1.74km away to the east in the valley bottom. Given the location of the SSSI in terms of its elevation and proximity to its nearest water source (Sough Dike) and that site NWS05 is a significant distance downstream and located in the valley bottom the Council considers that site NWS05 will not have a negative impact on the water supply mechanisms to the SSSI. Natural England agrees with this response to their comments.	
PDSP.006.032	112	Policy SA2 - Northwest Sheffield Sub-Area Site Allocations <i>NWS06 Land at Wardsend Road</i>	Unsound	Objects to NWS06 due to lack of information provided in Site Allocation. NWS06 is close to Wadsley Fossil Forest Site of Special Scientific Interest, which contains a number of 'in situ' fossil tree stumps, two of which have been exposed for many years. Potential for large non-residential developments to impact on water supply mechanisms to SSSIs. Further hydrological investigation is required to avoid significant harm to protected species/habitats in accordance with both national and local policy. <u>NE comments Dec 2023</u> Natural England note that the water supply IRZ for Wadsley Fossil Forest SSSI may be triggered by this allocation. Where total net additional gross internal floorspace following development is 1,000m² or more, further hydrological investigation is required in order to avoid impacts to the designated site.	No change needed. The SSSI is approximately 1.80 km from the centre of the site. Given the distance and the amount of built development between the site and the SSSI, the development of the site not felt to affect the SSSI. <u>SCC response Jan 2024</u> Wadsley Fossil Forest Site SSSI is located halfway up a hillside on the west side of the valley with the nearest watercourse (Sough Dike) approx. 200 metres northwest of it higher up the hillside. The SSSI is approx. 600 metres west of the River Don located in the valley bottom. Site allocation NWS06 lies downstream of the SSSI approx. 1.80km away to the east in the valley bottom. Given the location of the SSSI in terms of its elevation and proximity to its nearest water source (Sough Dike) and that site NWS06 is a significant distance downstream and located in the valley bottom the Council considers that site NWS06 will not have a negative impact on the water supply mechanisms to the SSSI. Natural England agrees with this response to their comments.	Yes
PDSP.006.022	113	Policy SA2 - Northwest Sheffield Sub-Area Site Allocations	Unsound	Objects to NWS07 due to lack of information provided in Site Allocation. NWS07 is close to Wadsley Fossil Forest Site of Special Scientific Interest, which contains a number of 'in situ' fossil tree stumps, two of which have been exposed for many years. Potential for large non-residential developments to impact on water supply	The SSSI is approximately 1.92 km from the centre of the site. Given the distance and the amount of built development between the site and the SSSI, the development of the site not felt to be relevant to the site allocation.	Yes

Comment Reference	Page	Section	Sound/ Unsound	NE Comments	SCC Consideration/Common Ground	Is matter agreed?
		<i>NWS07 Land adjacent to Elsworth House, Herries Road South</i>		mechanisms to SSSIs. Further hydrological investigation is required to avoid significant harm to protected species/habitats in accordance with both national and local policy. NE comments Dec 2023 Natural England note that the water supply IRZ for Wadsley Fossil Forest SSSI may be triggered by this allocation. Where total net additional gross internal floorspace following development is 1,000m² or more, further hydrological investigation is required in order to avoid impacts to the designated site.	SCC response Jan 2024 Wadsley Fossil Forest Site SSSI is located halfway up a hillside on the west side of the valley with the nearest watercourse (Sough Dike) approx. 200 metres northwest of it higher up the hillside. The SSSI is approx. 600 metres west of the River Don located in the valley bottom. Site allocation NWS07 lies downstream of the SSSI approx. 1.92km away to the southeast in the valley bottom. Given the location of the SSSI in terms of its elevation and proximity to its nearest water source (Sough Dike) and that site NWS07 is a significant distance downstream and located in the valley bottom the Council considers that site NWS07 will not have a negative impact on the water supply mechanisms to the SSSI. Natural England agrees with this response to their comments.	
PDSP.006.023	114	Policy SA2 - Northwest Sheffield Sub-Area Site Allocations <i>NWS09 Former Oughtibridge Paper Mill</i>	Unsound	Objects to NWS09 due to lack of information provided regarding existing biodiversity interests. An ecological assessment of the site is required to ensure harm to priority species and habitats is avoided. The scale and location of the development will result in adverse impacts on the adjacent area of Ancient Semi Natural woodland. Proposed development should be considered in the context of NPPF paragraph 180 (c). Allocation should require the protection and long-term management of the priority habitats on site, including lowland deciduous woodlands. Proposed developments should be considered as “major” in the context of NPPF paragraph 177 and should be required to meet the policy’s “exceptional circumstances” test. Exceptional circumstances will not exist unless all three national policy criteria can be satisfied. Further information is required to demonstrate that the necessary exceptional circumstances exist to justify the proposed allocations.	The site has planning permission and is under construction. Natural England agrees with this response to their comments.	Yes
PDSP.006.024	114	Policy SA2 - Northwest Sheffield Sub-Area Site Allocations <i>NWS10 Land at Oughtibridge Lane and Platts Lane</i>	Unsound	Objects to NWS10 due to lack of information provided in Site Allocation. An ecological assessment of the site is required to ensure harm to priority species and habitats is avoided. Advises the proposed development should be considered in the context of National Planning Policy Framework paragraph 180 (c). The scale and location of the development will inevitably result in adverse impacts on the adjacent Green Lane Spring which is an area of Ancient Semi Natural woodland. The allocation should require retention, long-term management and enhancement of Priority habitats and the delivery of a minimum 10% biodiversity net gain. NWS10 should be assessed in accordance with policy GS7.	No change needed. An ecological survey must now be submitted in support of a planning application. All applications are considered with due regard to relevant national and local planning policies. The development's impacts on Green Lane Spring Ancient Semi-natural Woodland will be considered at the planning application stage and the need to maintain habitat sites and provide BNG are already conditions on development imposed by the Allocation. Natural England agrees with this response to their comments.	Yes
PDSP.006.025	116	Policy SA2 - Northwest Sheffield Sub-Area Site Allocations <i>NWS12 Former</i>	Unsound	Objects to NWS12 due to lack of information provided in Site Allocation. Development should be considered in accordance with policy GS7.	No change needed. Development proposals for the site will be considered with due regard to relevant national and local planning policies. Natural England agrees with this response to their comments.	Yes

Comment Reference	Page	Section	Sound/ Unsound	NE Comments	SCC Consideration/Common Ground	Is matter agreed?
		<i>British Glass Labs</i>				
PDSP.006.026	116	Policy SA2 - Northwest Sheffield Sub-Area Site Allocations <i>NWS13 Wiggan Farm</i>	Unsound	Objects to NWS13, due to lack of information provided in Site Allocation. This allocation is in close proximity to Peak District National Park. NE advise a Landscape and Visual Impact Assessment should be carried out prior to allocation in line with NPPF 176. Furthermore, the allocation should be considered in accordance with Policy GS3.	No change needed. The sites development will be considered with reference to relevant local and national policies. Natural England agrees with this response to their comments.	Yes
PDSP.006.027	117	Policy SA2 - Northwest Sheffield Sub-Area Site Allocations <i>NWS14 Hillsborough Hand Car Wash Centre</i>	Unsound	Objects to NWS14 due to lack of information provide in Site Allocation. An ecological assessment of the site should be completed prior to its allocation. The allocation should require delivery of a minimum 10% biodiversity net gain. Suggests the following amendment to allocation conditions: "Priority habitats including species rich grasslands, woodland, trees and hedgerows should be retained and enhanced. Opportunities for biodiversity enhancement on the site should also be considered at the earliest stage in order to deliver the minimum 10% net gain required".	No change needed. Submission of an ecological survey in support of a planning application is now required and the provision of Biodiversity Net Gain will be mandatory from January 2024. Natural England agrees with this response to their comments.	Yes
PDSP.006.028	117	Policy SA2 - Northwest Sheffield Sub-Area Site Allocations <i>NWS15 Bamburgh House & 110-136 Cuthbert Bank Road</i>	Unsound	Objects to NWS15 due to lack of information provided in Site Allocation. An ecological assessment of the site should be completed prior to its allocation. The allocation should require delivery of a minimum 10% biodiversity net gain. Suggests an amendment to allocation conditions.	No change needed. A condition exists on the allocation that requires maintenance of the sites ecological value and the provision of Biodiversity Net Gain on site. Natural England agrees with this response to their comments.	Yes
PDSP.006.029	119	Policy SA2 - Northwest Sheffield Sub-Area Site Allocations <i>NWS18 Sevenfields Lane Play Ground</i>	Unsound	Objects to NWS18 due to lack of information provided in Site Allocation. As site is in an Urban Green Space Zone, advises the allocation should be considered in accordance with policy GS1. <u>NE comments Dec 2023</u> Natural England notes that this allocation is in an Urban Green Space Zone. The allocation should therefore be considered in accordance with policy GS1.	No change needed. Submission of an ecological survey in support of a planning application is now required and the provision of Biodiversity Net Gain will be mandatory from January 2024. <u>SCC response Jan 2024</u> The site has existing planning permission and is therefore considered suitable for its assessed use. Natural England agrees with this response to their comments.	Yes
PDSP.006.030	121	Policy SA2 - Northwest Sheffield Sub-Area Site Allocations <i>NWS23 Former Oughtibridge Paper Mill</i>	Unsound	Objects to NWS23 due to lack of information provided in Site Allocation. Advises the proposed development should be considered in the context of NPPF paragraph 180 (c). Cumulative impacts on the PDNP with NWS09 should be considered.	No change needed. The acceptability of development has already been considered with due regard to relevant national and local planning policies. The site has planning permission and housing development is under construction. Natural England agrees with this response to their comments.	Yes
PDSP.006.031	124	Policy SA2 - Northwest Sheffield Sub-Area Site Allocations	Unsound	Objects to NWS29 due to lack of information provided in Site Allocation. The site is within Neepsend Brickworks SSSI, designated for its exposure of the Greenmoor Rock Formation. The allocation does not give the SSSI the appropriate weight afforded as a nationally designated site. However, we welcome the effort to survey	The SSSI boundary corresponds with the Local Geological Site, and both fall within the boundary of the Local Wildlife Site. Proposed additional conditions on development ensure those areas are safeguarded from development: "Connective ecological corridors/areas (including buffers) shown on the Local Nature	Yes

Comment Reference	Page	Section	Sound/ Unsound	NE Comments	SCC Consideration/Common Ground	Is matter agreed?
		<i>NWS29 Former Sheffield Ski Village</i>		the geological interest. Advises the allocation should be considered in accordance with NPPF 180 (b) and policy GS5. <u>NE comments Dec 2023</u> Natural England welcomes the condition for further survey work to be undertaken at the planning application stage to determine the impact of the development on the Local Geological Site, and what mitigation is necessary. We advise that assessment of the impacts of the development on Neepsend Brickworks SSSI, within which part of the allocation is located, are also undertaken at this stage.	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. Proposed additional conditions: - No development should take place within the Local Wildlife Site. - No development should take place within the Local Geological Site”. (See CD31, PG22). <u>SCC response Jan 2024</u> The following additional site condition to be added to site allocation NWS29: <i>‘Further survey work is required at the planning application stage to determine the impact of development on Neepsend Brickworks SSSI, and what mitigation is necessary.’</i> Natural England agrees with this response to their comments.	
PDSP.006.033	126	Policy SA3 - Northeast Sheffield Sub-Area Site Allocations <i>NES04 Gas Works, Newman Road</i>	Unsound	No information on NES04 has been provided regarding the existing biodiversity interests on site. An ecological assessment of the site should be completed prior to its allocation in order to ensure the requirement for avoiding harm to priority species and habitats is fully met. The allocation should require delivery of a minimum 10% biodiversity net gain. Suggests the following amendment to allocation conditions: “Priority habitats including species rich grasslands, woodland, trees and hedgerows should be retained and enhanced. Opportunities for biodiversity enhancement on the site should also be considered at the earliest stage in order to deliver the minimum 10% net gain required”.	No change needed. Submission of an ecological survey in support of a planning application is now required and the provision of Biodiversity Net Gain will be mandatory from January 2024. Natural England agrees with this response to their comments.	Yes
PDSP.006.034	132	Policy SA3 - Northeast Sheffield Sub-Area Site Allocations <i>NES13 Parson Cross Park, Buchanan Road</i>	Unsound	Objects to NES13 due to lack of information provided in Site Allocation. This allocation is registered open greenspace, allocation should be considered in accordance with policy GS1 and should meet the requirement of exception tests. <u>NE comments Dec 2023</u> Natural England notes that this allocation is in registered open greenspace. The allocation should therefore be considered in accordance with policy GS1 and should meet the requirements of the exception test.	No change needed. Submission of an ecological survey in support of a planning application is now required and the provision of Biodiversity Net Gain will be mandatory from January 2024. Proposals would be required to comply with Plan policies. <u>SCC response Jan 2024</u> If a greenfield site is allocated for housing in the Local Plan, Policy GS1 would not apply (i.e. there is no requirement to assess whether it is surplus, replace the open space or compensate for the loss). That is on the basis that the suitability for development has been evaluated as part of the site selection process, so there is no need to look at it again at the planning application stage. Natural England agrees with this response to their comments.	Yes
PDSP.006.035	134	Policy SA3 - Northeast Sheffield Sub-	Unsound	Natural England supports the retention of mature trees along Longley Lane but advise that the NES18 site has potential to	No change needed. Support for the desired for retention of trees on Longley Lane is welcomed.	Yes

Comment Reference	Page	Section	Sound/ Unsound	NE Comments	SCC Consideration/Common Ground	Is matter agreed?
		Area Site Allocations <i>NES18 Land at Longley Hall Road</i>		demonstrate linkages to the wider open greenspace provision at Longley Park and should meet the requirements of policy GS1.	Natural England agrees with this response to their comments.	
PDSP.006.036	137	Policy SA3 - Northeast Sheffield Sub-Area Site Allocations <i>NES23 Land East of Fir View Gardens</i>	Unsound	Objects to NES23 due to lack of information provided in Site Allocation. Advise that this allocation should be considered in accordance with NPPF 179, 180 and Plan policy GS5.	No change needed. Site has planning permission (21/00699/FUL, granted conditionally, August 2021) for twenty dwellings. Natural England agrees with this response to their comments.	Yes
PDSP.006.037	138	Policy SA3 - Northeast Sheffield Sub-Area Site Allocations <i>NES27 Land adjacent to 264 Deerlands Avenue and NES28 Land adjacent to 177 Deerlands Avenue</i>	Unsound	NES27 should be considered in tandem with NES28 to ensure linkages to the accessible woodland to the north and Parson Cross Park to the south are maintained. This allocation is registered open greenspace and should be considered in accordance with Sheffield City Council LP policy GS1 meeting the requirement of exception tests, and policy GS5. <u>NE Comments Dec 2023</u> Natural England notes that this allocation is in registered open greenspace. The allocation should therefore be considered in accordance with policy GS1 and should meet the requirements of the exception test.	No change needed. The sites were granted permission for clearance in April 2003. Connectivity between Parson Cross Park and Tongue Gutter will remain after development with pedestrian links on both sides of Deerlands Avenue adjacent to the western boundary of NES28 and adjacent to the eastern boundary of NES27. The need for additional connectivity will be dealt with at the planning application stage. <u>SCC response Jan 2024</u> If a greenfield site is allocated for housing in the Local Plan, Policy GS1 wouldn't apply (i.e. no requirement to assess whether it is surplus, replace the open space or compensate for the loss). That is on the basis that the suitability for development has been evaluated as part of the site selection process, so there is no need to look at it again at the planning application stage. Natural England agrees with this response to their comments.	Yes
PDSP.006.038	151	Policy SA4 - East Sheffield Sub-Area Site Allocations <i>ES12 Airflow Site</i>	Unsound	The site appears to support lowland deciduous woodland. No information has been provided regarding the existing biodiversity interests on site. Ecological assessment required prior to allocation. The allocation should set out the requirement to deliver a minimum 10% biodiversity net gain. Add an amendment requiring retention and enhancement of priority habitats and enhance biodiversity on site to deliver minimum 10% net gain.	A Preliminary Ecological Appraisal would be required as part of the planning application, as the site contains trees. The Preliminary Ecological Appraisal may identify other surveys needed. A tree survey would also be required. The site would need to deliver a minimum 10% BNG from January 2024 onwards, which would include a site assessment using the BNG metric to determine the baseline condition of the site. Natural England agrees with this response to their comments.	Yes
PDSP.006.039	152	Policy SA4 - East Sheffield Sub-Area Site Allocations <i>ES14 Rear of Davy McKee</i>	Unsound	The site appears to support lowland deciduous woodland. No information has been provided regarding the existing biodiversity interests on site. In order to ensure the requirement for avoiding harm to priority species and habitats is fully met an ecological assessment of the site should be completed prior to its allocation. The allocation should set out the requirement to deliver a minimum 10% biodiversity net gain. Add the following amendment: "Priority habitats including species rich grasslands, woodland, trees and hedgerows should be retained and enhanced. Opportunities for biodiversity enhancement on the site should also be considered at	A Preliminary Ecological Appraisal would be required as part of the planning application. The Preliminary Ecological Appraisal may identify other surveys needed. A tree survey would also be required. The site would need to deliver a minimum 10% BNG from January 2024 onwards, which would include a site assessment using the BNG metric to determine the baseline condition of the site. Natural England agrees with this response to their comments.	Yes

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				the earliest stage in order to deliver the minimum 10% net gain required.”		
PDSP.006.040	156	Policy SA4 - East Sheffield Sub-Area Site Allocations <i>ES20 Darnall Works</i>	Unsound	No objection to the proposed allocation. However, the site appraisal requirement to meet requirements of policy NC15 is not reflected in conditions appended to the site. Add condition to avoid confusion.	Added condition requiring open space provision in accordance with policy NC15. Natural England agrees with this response to their comments. (See CD31, modification LM6).	Yes
PDSP.006.041	158	Policy SA4 - East Sheffield Sub-Area Site Allocations <i>ES22 Attercliffe Canalside</i>	Unsound	Must be delivered in accordance with Policy GS7.	Submission of an ecological survey in support of a planning application is now a requirement and the provision of Biodiversity Net Gain will be mandatory from January 2024. Policy GS7 will also be considered at planning application stage. Natural England agrees with this response to their comments.	Yes
PDSP.006.042	160	Policy SA4 - East Sheffield Sub-Area Site Allocations <i>ES25 Land to the north of Bawtry Road</i>	Unsound	This allocation is registered open greenspace and should be considered in accordance with policy GS1 and further assessment must be undertaken prior to allocation.	The site is a privately-owned derelict sports ground. A suitability assessment has been undertaken that assessed the loss of open space, stating that it is surplus for the current open space function but may be needed for another function. The site appraisal states that open space should be provided on site in accordance with NC15, and a specific area is defined on the policies map that should be utilised for this purpose. Natural England agrees with this response to their comments.	Yes
PDSP.006.043	161	Policy SA4 - East Sheffield Sub-Area Site Allocations <i>ES27 Land at Kenninghall Drive</i>	Unsound	Subject to amendments this site should be considered in accordance with Policy GS5, and greater consideration given to its potential to impact on Local Wildlife Sites.	The site allocation has a condition attached to require appropriate buffers along the Local Wildlife Site boundary. Natural England agrees with this response to their comments.	Yes
PDSP.006.044	171	Policy SA4 - East Sheffield Sub-Area Site Allocations <i>ES44 Land at Main Road, Ross Street and Whitwell Street</i>	Unsound	Site is within an area of Historic Parkland and would advise further assessment is required in line with NPPF 20 (d).	No change necessary. The site is not within a designated Historic Park. The site also has an existing planning permission and is being built out. Natural England agrees with this response to their comments.	Yes
PDSP.006.045	174	Policy SA4 - East Sheffield Sub-Area Site Allocations <i>ES52 Land Opposite 299 – 315 Main Road Darnall</i>	Unsound	Displaying incorrect post code data. This is within an area of Historic Parkland and would advise further assessment is required in line with NPPF 20 (d).	Minor change necessary to update postcode information. The site is not within a designated Historic Park. Natural England agrees with this response to their comments.	Yes

Comment Reference	Page	Section	Sound/ Unsound	NE Comments	SCC Consideration/Common Ground	Is matter agreed?
PDSP.006.046	177	Policy SA4 – Southeast Sheffield Sub-Area Site Allocations <i>SES03 Land to the east of Eckington Way</i>	Unsound	Natural England holds Agricultural Land Classification (ALC) data specific to this site and can confirm it is classified partly as grade 2 and mostly 3b.	It is recognised that a small part of site SES03 is grade 2 quality agricultural land. However, there is a pressing need to identify land for the allocated uses and the need for this outweighs the need to protect this small area of best and most versatile agricultural land. Given that the information on the agricultural land classification has been provided (and has been considered), the first condition on the conditions of development should be deleted. Natural England agrees with this response to their comments.	Yes
PDSP.006.047	177	Policy SA4 – Southeast Sheffield Sub-Area Site Allocations <i>SES04 Mosborough Wood Business Park</i>	Unsound	Natural England objects to SES04, further information required. This allocation is within close proximity to Moss Valley Site of Special Scientific Interest (SSSI). Without further detail Natural England's is unable to comment on this allocation and its associated planning application, however there is potential for large non-residential developments to have an impact on water supply mechanisms to SSSIs. Natural England advise further hydrological investigation is required to avoid significant harm to protected species/habitats in accordance with both national and local policy. <u>NE comments Dec 2023</u> Natural England note that the water supply IRZ for Moss Valley SSSI may be triggered by this allocation. Where total net additional gross internal floorspace following development is 1,000m² or more, further hydrological investigation is required in order to avoid impacts to the designated site.	An addendum to the Habitat Regulations Assessment Appropriate Assessment (HRAAA) is being prepared to assess whether there will be any Likely Significant Effects (LSEs) arising from any in combination effects with other Local Authorities development plans. If any LSE's are evident then the addendum will identify how they can be avoided or mitigated. Functionally Linked Land, Water Quality and Water Resources & Supply will be included within the scope of the HRAAA. <u>SCC response Jan 2024</u> The linear shaped Moss Valley SSSI is located in the valley bottom of the eastern half of the wider Moss Valley. The SSSI runs on a west – east alignment. The nearest watercourse is The Moss which runs along the length of the SSSI but originates at the west end of the wider Moss Valley approx. 2.5km east of the SSSI. A number of streams run into The Moss from the valley sides to the north and south of the valley bottom. The Moss then runs into the River Rother approximately 900m to the east of the SSSI. Site allocation SES04 is located approximately 1.2km to the northeast of the SSSI. The Short Brook runs along the north boundary of the site and joins the River Rother approx. 800m to the east of SES04. It generally runs parallel to The Moss in the next valley north of Moss Valley. The watercourses are not connected. Site SES04 lies downstream of the SSSI in terms of location along the River Rother. Given these circumstances and the distance between them the Council considers that site SES04 will not have a negative impact on the water supply mechanisms to the SSSI. Natural England agrees with this response to their comments.	Yes
PDSP.006.048	184	Policy SA4 – Southeast Sheffield Sub-Area Site Allocations <i>SES13 Land to the east of Jaunty Road</i>	Unsound	Natural England objects to SES13, further information required. This policy must meet the requirements of GS5 once amended. Where local sites would be lost, or permanently reduced in extent or quality, then compensation will require the provision and safeguarding of replacement alternative sites suitable for the creation of habitats of a similar character and quality and of sufficient size.	The site is considered suitable for the allocated uses and has been subject to a site selection methodology. Further planning conditions will be given consideration at a detailed planning application stage if required. The Council considers that this site can be delivered. There are no overriding constraints to its development. Ecological corridors, habitat connectivity and the need for and type of replacement open space will be assessed in detail as part of any planning application.	Yes.

Comment Reference	Page	Section	Sound/ Unsound	NE Comments	SCC Consideration/Common Ground	Is matter agreed?
					Natural England agrees with this response to their comments.	
No	185	Policy SA4 – Southeast Sheffield Sub-Area Site Allocations <i>SES28 Woodhouse East</i>	Unsound	NE objects to SES28 , does not meet requirements of NPPF 174 and does not provide enough evidence to meet the requirements of SCC Local Plan Policy GS4. NE notes this allocation will lead to a loss of Best and Most Versatile agricultural land Class 2 and 3a. The information provided with the allocation does not demonstrate that the exceptions tests within GS4 have been met.	The site is considered suitable for the allocated uses and has been subject to a site selection methodology. Further planning conditions will be given consideration at a detailed planning application stage if required. The Council considers that this site can be delivered. There are no overriding constraints to its development. Ecological corridors, habitat connectivity and the need for and type of replacement open space will be assessed in detail as part of any planning application. Natural England agrees with this response to their comments.	Yes.
PDSP.006.050	200	Policy SA6 – South Sheffield Sub-Area Site Allocations <i>SS17 Former Norton Aerodrome</i>	Unsound	Further information required; the proposed allocation is in close proximity to Moss Valley Meadows Site of Scientific Interest. Further assessment is required to ensure this development does not negatively impact the notified features.	It is recognised that the site of the former Norton Aerodrome is in close proximity to Moss Valley Meadows SSSI. Full account of this will be taken through masterplanning the site and via any future planning application process to ensure that the SSSI - which lies outside the site boundary - is not adversely affected. Natural England agrees with this response to their comments.	Yes.
PDSP.006.051	208	Policy SA6 – Southwest Sheffield Sub-Area Site Allocations <i>SWS14 Tipton Cliffe and Lodge</i>	Unsound	No information has been provided regarding the existing biodiversity interests on site. In order to ensure the requirement for avoiding harm to priority species and habitats is fully met an ecological assessment of the site should be completed prior to its allocation. The allocation should also set out the requirement to deliver a minimum 10% biodiversity net gain.	Site has existing planning permission and any ecological requirements would have been agreed at the planning application stage. An additional condition should be added regarding ecological corridors and biodiversity net gain in case of any further or amended developments were proposed on the site. The same amendment is proposed to adjoining site SWS08. Natural England agrees with this response to their comments.	Yes.

Appendix 2

Sheffield Plan Proposed Additional Site Allocations (May 2025)

Natural England Comments and SCC Response - [Sheffield Plan - proposed additional site allocations | Have Your Say Sheffield](#)

Natural England Comment	SCC Response	Agreed Position for SoCG
Sustainability Appraisal (SA) and Habitats Regulations Assessment (HRA) Natural England advises that site selection must be informed by the relevant environmental assessments. These are: • Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment: it should be clear how this has informed and provided justification for the sites selected for allocation assessed against reasonable alternatives. Recommendations and findings from the assessments should also be used to inform mitigation measures and design principles for the allocated sites. • Habitats Regulations Assessment (HRA): mitigation and avoidance measures identified through the HRA should be secured through policies in the Plan. Where mitigation or avoidance is not possible the site should not be allocated	The Council has updated both the Sustainability Appraisal (as part of the Integrated Impact Assessment) and the Habitat Regulations Assessment – they have informed the selection of the proposed additional site allocations. Both documents were available on the ‘Have Your Say’ consultation portal. The SA (Appendix J) includes appraisals of the 102 sites that were considered at this stage in the process (together with all the other non-Green Belt sites that were assessed previously). The topic paper on the Selection of Sites for Green Belt Release includes detailed suitability assessments for the Green Belt sites and explains how, in reaching a recommended list of sites for Green Belt release, the results of the SA have been considered alongside the impacts on the purposes of Green Belts and planning appraisals of the sites. The HRA Appropriate Assessment concludes that no adverse effect on the integrity of the European sites will arise from the policies and allocations proposed within the Sheffield Plan. This is because: (a) Air quality impacts can be excluded on the basis that the traffic model did not predict increases in traffic volumes or patterns which would result in either an increase of >1000 cars/LGV Annual Average Daily Traffic (AADT) or 200 HGV/buses AADT on the affected road network. The traffic model included potential increases arising from neighbouring Local Plans and therefore is an in-combination assessment of potential effects. (b) Loss of functionally linked land was excluded on the basis that the proposed new allocation sites all meet one or more of the criteria for exclusion from constituting effective functional habitat for the lifecycle of any species associated with the European sites, as developed and applied in previous HRA of the Sheffield Plan. (c) The potential for increased recreational pressure to give rise to Likely Significant Effects could not be ruled out and has been considered through the AA. Mitigation measures developed in consultation with PDNPA (see Table 1 in the HRAAA Update) are sufficiently developed to enable a robust conclusion that the Sheffield Plan will not have an adverse effect on the integrity of European sites.	Common ground agreed.
SES29 - Handsworth Hall Farm, Land at Finchwell Road, S13 9AS Natural England advise that Agricultural Land Classification surveys should be required at planning application stage for this allocation, to determine whether the land is best and most versatile agricultural land, and to ensure that the development is consistent with Policy GS4.	The proposed allocation includes a condition which states that: <i>Agricultural land surveys required at planning application stage to determine whether the land is Grade 3a and ensure that development is consistent with policy GS4.</i>	Common ground agreed.

Natural England Comment	SCC Response	Agreed Position for SoCG
SS19 - Land to the south of White Lane, S12 3HS Proposed housing allocation SS19 is in close proximity to Moss Valley Meadows Site of Special Scientific Interest (SSSI) and Moss Valley SSSI. This allocation will need to be considered in your authority's SA. Your assessment should consider the following, where appropriate: • Potential water quality impacts. Natural England note that the proposed allocation is hydrologically connected to Moss Valley SSSI.	As noted above, the proposed allocation has been considered through the SA and HRAAA. The HRA Appropriate Assessment concludes that the loss of functionally linked land can be excluded on the basis that the proposed new allocation site meets one or more of the criteria for exclusion from constituting effective functional habitat for the lifecycle of any species associated with the European sites, as developed and applied in previous HRA of the Sheffield Plan. In this case, the site is within 25m of a settlement boundary. The proposed allocation also includes a condition which states that: <i>The watercourse through the site (Robin Brook) and an appropriate buffer to it will be protected from development.</i>	Common ground agreed.
SWS18 - Land between Lodge Moor Road and Redmires Conduit, S10 4LZ Proposed housing allocation SWS18 is in close proximity to the South Pennine Moors Special Area of Conservation (SAC), the Peak District Moors (South Pennine Moors Phase 1) Special Protection Area (SPA) and the Eastern Peak District Moors SSSI. This allocation will need to be considered in your authority's HRA and SA. Your assessment should consider the following, where appropriate: • Potential air quality impacts. • Potential impacts to Peak District Moors (South Pennine Moors Phase 1) SPA and Eastern Peak District Moors SSSI qualifying bird species. • Potential recreational pressure impacts.	As noted above, the proposed allocation has been considered through the SA and HRAAA. The HRAAA concludes that that no adverse effect on the integrity of the European sites will arise from the policies and allocations proposed within the Sheffield Plan. The reasons for this are set out above.	Common ground agreed.
SWS19 - Land to the north of Parkers Lane, S17 3DP Proposed housing allocation SWS18 is in close proximity to the South Pennine Moors SAC, the Peak District Moors (South Pennine Moors Phase 1) SPA, the Eastern Peak District Moors SSSI, and Totley Wood SSSI. This allocation will need to be considered in your authority's HRA and SA. Your assessment should consider the following, where appropriate: • Potential air quality impacts.	As noted above, the proposed allocation has been considered through the SA and HRAAA. The HRAAA concludes that that no adverse effect on the integrity of the European sites will arise from the policies and allocations proposed within the Sheffield Plan. The reasons for this are set out above. We do not consider that the Parkers Lane site is hydrologically linked to the Totley Wood SSSI. The proposed allocated site is on the western side of the Sheaf Valley and the SSSI is in an elevated position on the eastern side of the River. SWS19 is also nearly 2km away from the SSSI. The Limb Brook tributary also joins the River Sheaf downstream of much of the SSSI. The River Sheaf at this point is also the main river draining everything from Mickley Lane round to Ringinglow Road including the areas of Totley and Dore, so proportionately the site forms an extremely small part of this	Common ground agreed.

Natural England Comment	SCC Response	Agreed Position for SoCG
• Potential impacts to Peak District Moors (South Pennine Moors Phase 1) SPA and Eastern Peak District Moors SSSI qualifying bird species. • Potential recreational pressure impacts. • Potential water quality impacts to Totley Wood SSSI. Natural England note that the proposed allocation is hydrologically connected to Totley Wood SSSI.	much wider catchment area. Any surface water discharge from the potential development site would have adequate water quality SuDs measures to comply with National Standards for SuDs.	
NES39 – Land at Wheel Lane and Middleton Lane, S35 8PU	While we acknowledge that Natural England did not comment on the site, we are aware that a condition regarding the Agricultural Land Classification was omitted and needs to be included. We propose to include the following condition as per- SES29 Handsworth Hall Farm: <i>Agricultural land surveys required at planning application stage to determine whether the land is Grade 3a and ensure that development is consistent with policy GS4.</i>	Common ground agreed.
CH05 - Land to the east of Chapeltown Road, S35 9ZX	While we acknowledge that Natural England did not comment on the site, we are aware that a condition regarding the Agricultural Land Classification was omitted and needs to be included. We propose to include the following condition as per- SES29 Handsworth Hall Farm: <i>Agricultural land surveys required at planning application stage to determine whether the land is Grade 3a and ensure that development is consistent with policy GS4.</i>	Common ground agreed.
CH04 - Hesley Wood, north of Cowley Hill, S35 2YH	While we acknowledge that Natural England did not comment on the site, we just wanted to clarify that while the site falls within an area classed as Grade 3 on the Yorkshire and Humber Agricultural Land Classification map, the land is a former coal spoil heap and doesn't affect any agricultural land.	Common ground agreed.