

Sheffield Plan

**Statement of Common Ground in respect
of Matters Relating to the Habitat
Regulations Assessment Appropriate
Assessment (HRAAA)**

Sheffield City Council
Peak District National Park Authority

September 2025

1. Introduction

- 1.1 The purpose of this Statement of Common Ground is to set out the agreement reached between Sheffield City Council and the Peak District National Park Authority regarding the Sheffield Plan Habitat Regulations Assessment Appropriate Assessment (HRAAA).

2. Background

- 2.1 Sheffield City Council published a HRAAA in January 2023. This was consulted on alongside the Publication (Regulation 19) Draft Sheffield Plan. The Peak District National Park Authority (PDNPA) did not make any representations on the Draft Plan or the HRAAA at that stage. An Addendum to the HRAAA was published in September 2023 to address concerns raised by Natural England. The HRAAA and Addendum were submitted to the Secretary of State alongside the Publication Draft Sheffield Local Plan (Regulation 22 stage) in September 2023.
- 2.2 A further Addendum to the HRAAA was submitted in April 2024 to address outstanding concerns raised by Natural England.
- 2.3 As part of the Duty to Cooperate, work on a Sheffield Plan Local Authorities Statement of Common Ground continued during 2023 and early 2024. The other local authorities in Sheffield City Region were asked to comment on various drafts of the SoCG and, as part of that process, the PDNPA raised concerns about the conclusions in the HRAAA. These concerns were conveyed to the City Council in an email dated 3rd April 2024.
- 2.4 The PDNPA's primary concern was that the HRAAA underestimated the potential impacts of the Sheffield Plan, specifically the impact that the rise in population linked to housing growth would have on visitor pressure in the Peak Park. The Peak Park's view is that recreational pressure will have an adverse impact on the integrity of the South Pennine Moor Special Area for Conservation (SAC) and Special Protection Area (SPA).
- 2.5 The final version of the Sheffield Plan Local Authorities Statement of Common Ground was published on the Examination website on 2nd May 2024 (EXAM 37). It was, however, not possible to reach agreement with the PDNPA in advance of the SoCG being submitted. Paragraphs 4.8 and 4.9 of the SoCG state that:

4.8 *The Peak District National Park Authority does not agree that the HRAAA provides a satisfactory evidence base to identify likely*

significant effects (3.42 above), as the HRA methodology is flawed and the impacts have been underestimated.

4.9 The Peak District National Park Authority does not agree that the mitigation measures set out to offset recreational pressure (3.44 above) are sufficient. This is on the grounds that there is no evidence that creation of accessible natural green spaces as set out will mitigate the negative effects in respect of additional recreational pressure and wildfire risk on the protected sites in a national park context.

- 2.6 The Council has now published a further update to the Habitat Regulations Assessment (May 2025) which takes into account new evidence on the Peak District National Park's recreational zone of influence and sets out additional mitigation measures¹. It also takes account of the Proposed Additional Site Allocations which the Council consulted on between 29th May and 11th July 2025. The Peak District National Park Authority were consulted as part of that consultation.
- 2.7 This Statement of Common Ground reflects the conclusions in the revised HRAAA and proposes a number of modifications to the Sheffield Plan that both parties agree should be made.

3. Recreational Pressure on the South Pennine Moors SAC, Peak District Dales SAC and Peak District Moors (Pennine Moors Phase1) SPA

- 3.1 In updating the Sheffield Plan Habitat Regulations Assessment Appropriate Assessment (HRAAA), Sheffield City Council acknowledges that, when considering the Sheffield Plan, individually or in combination with other local plans, it cannot be concluded beyond reasonable doubt that the achievement of the conservation objectives for the South Pennine Moors SAC, Peak District Dales SAC and Peak District Moors (Pennine Moors Phase1) SPA would not potentially be undermined due to recreational pressure. Mitigation is therefore considered necessary to avoid an adverse effect on the integrity of the European sites.

Securing appropriate mitigation measures

- 3.2 Sheffield City Council and the Peak District National Park Authority agree that the May 2025 update to the HRAAA identifies an appropriate range of mitigation measures that are necessary to reduce and manage recreational pressure on

¹ Recreation use of the South Pennine Moors and implications for strategic housing growth (2024), Footprint Ecology

the SACs and SPA. The pressures are linked to population growth within Sheffield arising from proposed development in the Sheffield Plan.

- 3.3 Both parties agree that a Mitigation Delivery Plan will be produced to identify and cost the mitigation measures. A modification is proposed to the supporting text of Policy GS5 of the Sheffield Plan to make this clear (see Appendix 2). The Delivery Plan will cover the measures broadly identified in Appendix 1 of this Statement and in the HRAAA. These measures will be subject to refinement through further discussions between the signatories of this Statement, Natural England and other implementing partners. Sheffield City Council will lead on the preparation of a Mitigation Delivery Plan which will be completed no later than 12 months after the date of adoption of the Sheffield Plan.
- 3.4 Both parties agree that modifications to policies NC15 and T1 of the Sheffield Plan are also necessary to help secure appropriate mitigation measures:
- Modifications to Policy NC15 ‘Creating Open Space in Residential Developments’ should assist in secure the provision of alternative natural greenspace which can help to deflect visitor pressure away from the European sites.
 - Policy T1 ‘Enabling Sustainable Travel’ should identify the need to encourage sustainable travel choices between urban Sheffield and the Peak District
- 3.5 The Mitigation Delivery Plan will include an agreed funding plan to ensure adequate delivery of reasonable mitigation measures, whilst ensuring that the scale of developer contributions are at a level that will not undermine the conclusions of the Whole Plan Viability Assessment (VI01-VI03). A further modification to Policy DC1 in the submitted Sheffield Plan is therefore proposed to make it clear what will be expected of developers (see Appendix 2). Policy GS5 should also include a cross reference to Policy DC1.
- 3.6 It is agreed that there will be no adverse effect on the integrity of the protected sites if the mitigation measures and modifications to the Sheffield Plan set out in this Statement of Common Ground are implemented.

Name	Role	Organisation	Signature & Date
Michael Johnson	Head of Planning	Sheffield City Council	 18th September 2025

Brian Taylor	Head of Planning	Peak District National Park Authority	 17 th September 2025
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APPENDIX 1: Potential Mitigation Measures to Reduce Recreational Pressure on the South Pennine Moors SAC, Peak District Dales SAC and Peak District Moors (Pennine Moors Phase1) SPA

POTENTIAL MEASURES

MITIGATION MEASURE	COMMENTS	POTENTIAL DELIVERY	PRIORITY
Provision of alternative green space	• Main Modification to Policy NC15 promoting the creation/enhancement of accessible natural greenspace that would help deflect visitors away from the SPA/SAC. • SCC to identify and promote Green Spaces capable of providing both “short-duration” and “day visit” that could deflect visitor pressure from the Peak District National Park	SCC	H
Moorland path restoration and maintenance	• Moorland path restoration and maintenance • Path condition assessment, impact appraisal, design and delivery required. • Some known existing problem sites: ○ White Path Moss + Whitestones ○ Burbage + Houndkirk ○ Totley Moss ○ White Edge ○ Clod Hall Moor ○ Stanage Edge ○ Bamford Edge + access paths ○ Higger Tor + Carl Wark ○ Higher Shelf Stones • Capital investment and ongoing maintenance. • Restoration and maintenance should include reinstatement of damage from trampling and erosion to adjoining areas	SMP SCC PDNPA MftF	H
Increased ranger presence on the ground	• Volunteer fire wardens but also a need for increased professional ranger presence to guarantee resource, manage volunteers and carry out work not suited to volunteers (e.g. engagement with a view to enforcement). Provides an effective means of preventing wildfire and controlling disturbance by dogs off leads.	SMP SCC PDNPA National Trust/ RSPB	H
Strategic Fire Management	• Wildfire prevention, mitigation and firefighting strategy.	PD Moorland Group	H

MITIGATION MEASURE	COMMENTS	POTENTIAL DELIVERY	PRIORITY
		PDNPA MftF NE	
Sustainable transport options	Main modification to Policy T1 proposed to highlight need to improve sustainable travel choices between urban Sheffield and the Peak District	SCC	M
Signage and information boards (including Fire Information Boards)	- Limited evidence of the positive impact of signage. To ensure robust communication this is considered a necessary measure. - Needs to avoid potential conflict with Natural Zone qualities. - Implement in line with “Peak District Proud” messaging.	SCC PDNPA NT/RSPB LAF	M
Provision of off-site information	- Co-ordination of messaging. - Opportunity to promote responsible visiting through “Outdoor City” branding - Include managing social media	SCC PDNPA NT/RSPB SMP	M
Management of car parking	Review whether management of car parking provision/deterrence in different locations could help mitigate recreational impacts on the SPA/SAC.	SCC PDNPA NT/RSPB SMP	M
Allocated areas for BBQ including sand buckets/fire extinguishers (where appropriate) introduction of penalties for people using BBQs outside allocated areas	- Assess the impact of BBQ site provision - Potential conflicts with landscape objectives and existing planning policies, and largely outside Sheffield City Council’s control. - Strategic assessment of risks and opportunities required- some evidence provision is counterproductive. - Resourcing of infrastructure and personnel required.	Peak District Moorland Group FOG SMP	M
Monitoring plant disease and isolating contaminated areas	Potentially helpful but may have a minor impact.	Natural England? Landowners	L

MITIGATION MEASURE	COMMENTS	POTENTIAL DELIVERY	PRIORITY
Monitoring and controlling invasive species	Potentially helpful but likely to have a minor impact.	Natural England? Landowners	L
Provision of dog waste and litter bins	- Potential conflict with landscape. - Adequate servicing unlikely. “Take home” messaging favoured via signage and off-site information.	N/A	N/A

APPENDIX 2: Further Proposed Modifications to the Sheffield Plan

Proposed Main Modifications to Policy T1

In the ‘National and Regional Level’ section, add an additional bullet point:

- Encourage sustainable travel choices between urban Sheffield and the Peak District National Park

Proposed Main Modifications to Policy NC15 (these modifications replace modifications SV38 and SV41 previously proposed by the Council in CD31)

In the supporting text, at the end of paragraph 4.50 insert new sentence:

‘The provision of new accessible natural greenspace within the Sheffield planning authority area can help to deflect recreational pressure away from the designated European habitat sites (Special Areas for Conservation and Special Protection Areas) in the Peak District National Park (see Policy GS5).

At the end of the Policy, insert:

Wherever possible, opportunities should be taken to create or enhance accessible natural greenspace where it can help divert visitor pressure away from the South Pennine Moors SAC, Peak District Dales SAC and Peak District Moors (Pennine Moors Phase1) SPA (see Policy GS5).’

In the definitions section, after the definition of ‘Minimum quantity’ insert additional definition:

*“For ‘**accessible natural greenspace**’ – see Policy GS1.”*

In the definitions section, after the words *‘**inclusive and dementia friendly design**’* insert *‘**Special Protection Areas**’ and **Special Areas of Conservation**.*

Proposed Main Modification to Policy GS5

After paragraph 8.22, insert a new paragraph:

The Habitat Regulations Assessment concluded that the development proposed in the Sheffield Plan will lead to additional population growth that is likely to cause increased recreational pressure that could adversely affect the South Pennine Moors SAC, Peak District Dales SAC and Peak District Moors (Pennine Moors Phase1) SPA. The Council will therefore work with the Peak District

National Park Authority and Natural England to produce a Mitigation Delivery Plan. Development will be required to make a proportionate contribution towards the mitigation identified in Mitigation Delivery Plan in accordance with Policy DC1.

Proposed Modification to Policy DC1

Add:

Developments comprising 10 or more new dwellings will be required to make a proportionate contribution towards mitigation measures to offset potential adverse impact on the South Pennine Moors SAC, Peak District Dales SAC and Peak District Moors (Pennine Moors Phase1) SPA.