

From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Subject: FW: Sheffield Local Plan Consultation - HRA Appropriate Assessment
Date: 01 March 2023 18:05:37
Attachments: [image001.png](#)
[Sheffield LP review Rg 19 final.pdf](#)
[image002.jpg](#)
[image003.png](#)
[image004.jpg](#)

Another late response!

Simon

[REDACTED]
[REDACTED]
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[REDACTED]
[REDACTED]

what makes sheffield



Description: Description: MYAH sig



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From: [REDACTED] >

Sent: 01 March 2023 14:38

To: Michael Johnson (DEL-Planning) <[REDACTED]@[REDACTED].nt>
<[REDACTED]>

Subject: FW: Sheffield Local Plan Consultation - HRA Appropriate Assessment

Hi

Please see attached Natural England's feedback on the Local Plan and outstanding HRA matters. James has suggested meeting up to discuss once we've had a read through their comments.

[REDACTED]

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From: Hughes, James [REDACTED]
Sent: 28 February 2023 18:04
To: Daniel Hartley [REDACTED]
Subject: RE: Sheffield Local Plan Consultation - HRA Appropriate Assessment

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Hi Dan,

Please see Natural England's response regarding the Publication (Pre-submission) Draft Sheffield Plan 2022.

We would like to thank the local authority in their patience to allow Natural England to respond, I advise once the local authority has had time to read NE's advice we set up a meeting to discuss not only the response but the outstanding HRA matters. It will also give us opportunity to discuss the points you have raised in your email dated 02/02/2023.

NE look forward to future engagement to overcome any issues in order to ensure a sound plan.

Regards

James

James Hughes

Conservation and Planning Lead Adviser

Yorkshire and Northern Lincolnshire Area Team

[REDACTED]



[Natural England: Building partnerships for Nature's recovery](#)

From: [REDACTED]
Sent: 07 February 2023 09:13
To: Hughes, James <[REDACTED]>
Subject: RE: James? FW: Sheffield Local Plan Consultation - HRA Appropriate Assessment

Hi James

My manager has got back to me and confirmed that will be fine, if it would be possible to send through the advice regarding the additional elements of the HRAAA NE required by the 28th February, it would be much appreciated.

Also just to add it would be fine to email through the advice and any comments you may

have on the Sheffield Plan directly to me, as the consultation portal may have completely closed by the 28th, and the advice would just be part of the ongoing Duty to Co-operate working between the Council and Natural England.

Kind regards

Dan

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From: Hughes, James <[REDACTED]>

Sent: 06 February 2023 17:04

To: Daniel Hartley <[REDACTED]>

Subject: RE: James? FW: Sheffield Local Plan Consultation - HRA Appropriate Assessment

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Hi Dan,

Very much appreciated, I look forward to hearing from you.

Regards

James

James Hughes

Conservation and Planning Lead Adviser

Yorkshire and Northern Lincolnshire Area Team

Mob: [REDACTED]



[Natural England: Building partnerships for Nature's recovery](#)

From: [REDACTED] >

Sent: 06 February 2023 15:51

To: Hughes, James <[REDACTED]>

Subject: RE: James? FW: Sheffield Local Plan Consultation - HRA Appropriate Assessment

Hi James

Thanks for getting in touch. I've contacted my manager to ask if it would be ok to let you have an extra week to provide a response. I'll let you know as soon as I hear back from him.

Kind regards

Dan



[REDACTED]

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From: Hughes, James <[REDACTED]>
Sent: 06 February 2023 15:08
To: [REDACTED]
Subject: RE: James? FW: Sheffield Local Plan Consultation - HRA Appropriate Assessment

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Hi Daniel,

We are experiencing high levels of casework and I am personally having to take special leave for personal reasons this week and it will limit the time I have to spend on this consultation.

Would it be possibly to extend the timeframe or pre-draft comment by a one week or so, this will enable me to have the relevant discussions internally.

Regards

James

James Hughes

Conservation and Planning Lead Adviser

Yorkshire and Northern Lincolnshire Area Team

[REDACTED]



[Natural England: Building partnerships for Nature's recovery](#)

From: [REDACTED]
Sent: 19 January 2023 13:00
To: Ash, Merlin <[REDACTED]>
Cc: [REDACTED]
Subject: Sheffield Local Plan Consultation - HRA Appropriate Assessment

Hi Merlin

I hope you're well?

I just wanted to let you know that Sheffield's HRAAA is now complete (subject to the additional requirements previously discussed) and can be viewed on the Draft Local Plan consultation portal. I've attached the link below to the website. The HRAAA is listed under the 'Draft Sheffield Plan Documents' on the right-hand side of the page:

[Draft Local Plan | Have Your Say Sheffield \(engagementhq.com\)](#)

If you have any questions on the HRAAA at this stage, then please get in touch as we would be happy to arrange a meeting to discuss them.

Kind regards

Dan



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Date: 09 February 2023
Our ref: 417348



Simon Vincent
Strategic Planning Service Manager
Planning Service
Sheffield City Council

sheffieldplan@sheffield.gov.uk

Customer Services
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

Dear Mr Vincent,

Planning consultation: Publication (Pre-submission) Draft Sheffield Plan 2022 Consultation pursuant to Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012

Thank you for your consultations on the above dated 09 January 2023.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

There is much to welcome in this plan and we commend your collaborative approach in bringing this plan together. We also thank you for the inclusion of a great many suggestions we made at the earlier stage of this plan in 2020. Natural England particularly supports the position on green infrastructure, biodiversity net gain and the inclusion of climate change throughout in response to the climate emergency. We fully appreciate these additions.

We also recognise that this consultation focuses itself upon a need to preliminarily test the potential for soundness. With this in mind, it is Natural England's advice that the plan in its current guise is unsound or legally compliant for the reasons outlined immediately below. In all cases, we have advised you of the necessary changes that we consider would make the plan sound. NE has adopted a robust precautionary approach within this plan response. In helping to make this plan sound Natural England would be very happy to discuss these further, with a view to agreeing modifications in advance of the Examination, if the council wishes.

- Policy ES5: does not recognise the impacts of aerial emissions on the natural environment and biodiversity. The plan is therefore not consistent with national policy. Further evidence needs to be collected and the Habitats Regulation Assessment should assess potential air quality impacts.
- Policy GS3: Landscape character needs to directly refer to the Peak District National Park (PDNP) Management Plan. The plan is not consistent with national policy. We suggest a simple addition to rectify this.
- Policy GS5: Does not include Ramsar sites as a matter of policy and neglects to include the mitigation hierarchy to determine planning applications impact on biodiversity, we have made additions
- Policy SA2: contains allocations that could impact on Sites of Special Scientific Interest (SSSIs). The plan is therefore not legally compliant or consistent with national policy.

- Policy SA5: contains allocation the would lead to a loss of Best and Most Versatile (BMV) agricultural land. The plan is therefore not legally compliant or consistent with national policy.

Habitats Regulations Assessment (HRA)

Natural England have previously commented on a draft HRAA (see email dated 03/11/2023). Comments made in previous responses have been appended to this document, but it is unclear if comments made in said response (dated 03/11/2023) have been considered as they are not included.

Your appropriate assessment concludes that your authority is able to ascertain that the proposal will not result in adverse effects on the integrity of any of the sites in question.

Having considered your assessment, and the measures proposed to mitigate for any adverse effects, Natural England's advice is that your assessment is not sufficiently rigorous or robust to justify this conclusion and therefore it is not possible to ascertain that the proposal will not result in adverse effects on the integrity of the sites in question.

We advise that the following additional work on the assessment is required to enable it to be sufficiently rigorous and robust [add]. Natural England should be re-consulted once this additional work has been undertaken and the appropriate assessment has been revised.

Natural England have advised the following;

- 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.
- we 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. We also advise that further information is required on how the 15km zone of influence (Zoi) 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.
- We advise that further information should be provided in the main text regarding the assessment of functionally linked land, water quality and water supply impacts. We 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.

In Combination Effects

Natural England 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.

General Comments on Local Plan – Part 1: Vision, Spatial Strategy, Sub-area Policies and

Site allocation

2 Vision, Aims, and Objectives

2.12 Natural England supports objective for an environmentally sustainable city, however we would advise where practicable efforts to 'reduce' current levels pollution of water, air and soil should be made.

Natural England welcomes the emphasis placed on Sheffield as a 'green city' and support the objective to increase biodiversity across the city. However, this should be extended to include the need for policies to facilitate and support the restoration and enhancement of Sheffield's wildlife.

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 Environment Act became law in 2021, the 25 year Environment Plan was published and was last month updated through the Environmental Improvement Plan (EIP). All these place great weight on biodiversity and nature recovery with the apex goal of the EIP being "Improving Nature." In light of this Natural England fully support Objectives for a green city. We have made further comments regarding Biodiversity Net Gain below.

3 Growth Plan and Spatial Strategy

3.5 While we welcome the aspiration 'avoid harm' to, and enhance, Sheffield's distinctive environmental assets and green infrastructure and mitigate any adverse environmental impacts' we feel 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. This is in line with the NPPF paragraph 171 requirement that Plans "*should... take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure: and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries*".

4 Sheffield's Sub-Area Strategy

Policy SA1: Central Sub-Area

In accordance with the paragraph 171 of NPPF, the plan should allocate land for development with the least environmental or amenity value. Natural England expects sufficient evidence to be provided, through the SA and HRA, to justify the site selection process and to ensure sites of least environmental value are selected, e.g., land allocations should avoid designated sites and landscapes and significant areas of best and most versatile agricultural land and should consider the direct and indirect effects of development, including on land outside designated boundaries and within the setting of protected landscapes. Further, outside designated sites and local wildlife sites all allocations should ensure known priority habitats¹ are avoided and ensure that potential allocations supporting permanent grassland are supported by a preliminary botanical assessment to ensure they do not support significant grassland interests (see comments below on priority habitats, ecological networks, and priority and/or legally protected species populations).

5 Topic Policies

Natural England supports the use of the 'Broad Locations for Growth' to identify potentially suitable development sites, however, the local plan needs to be mindful of the potential wildlife and recreational value of some brownfield sites. The NPPF Paragraph 117 in reference to the use of brownfield sites notes in the footnote, "Except where this would conflict with other policies in this Framework, including causing harm to designated sites of importance for biodiversity". A similar safeguard should be incorporated into the local plan, most notably this should include the protection of land classified as open mosaic on previously developed land priority habitat.

Policy BG1: Blue Green Infrastructure

Natural England support this policy. Furthermore, reference could be made to Natural England's Green Infrastructure (GI) Framework. Additional advice is provided below under policy GS1 and

¹ Priority Habitat as identified on Section 41 list of the Natural Environmental and Rural Communities (NERC) Act 2006

General Comments on Local Plan – Part 2: Development Management Policies and Implementation

2 An Environmentally sustainable City – Responding to the Climate emergency

We welcome the reference to tackling climate change here and throughout the local plans policies.

We are aware of the following toolkit designed for local authorities to enhance climate resilience and protect nature, which you might find helpful: [The Nature Recovery and Climate Resilience Playbook - UKGBC - UK Green Building Council](#).

Policy ES2: Renewable energy Generation

Suggest strengthening with, 'where the proposed development has the potential to impact on birds using functionally linked land associated with Habitat sites. Construction and operational impacts on birds using functionally linked land, should be considered in assessing what, if any, potential impacts the proposal may have on Habitat sites.

ES5: Managing Air Quality

3.19 Natural England note the inclusion of ammonia when considering emissions generated by road transport.

Ammonia emissions from road traffic could make a significant difference to nitrogen deposition close to roads. 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 – therefore consideration is needed

(see [https://www.aqconsultants.co.uk/news/february-2020-\(1\)/ammonia-emissions-from-roads-for-assessing-impacts](https://www.aqconsultants.co.uk/news/february-2020-(1)/ammonia-emissions-from-roads-for-assessing-impacts))

There are currently two models which can be used to calculate the ammonia concentration and contribution to total N deposition from road sources. One of these models is publicly available and called CREAM ([Air Quality Consultants - News - Ammonia Emissions from Roads for Assessing Impacts on Nitrogen-Sensitive Habitats \(aqconsultants.co.uk\)](#)) and there is another produced by National Highways.

An assessment based on the best available approach is necessary. The next stage of assessment can then consider uncertainties in the model and site specifics to decide if mitigation needs to be considered.

The policy does not consider air quality impacts on the natural environment, therefore Natural England does not consider the policy to be compliant with paragraph 174e of the National Planning Policy Framework which states:

174e. Planning policies and decisions should contribute to and enhance the natural and local environment by: ... preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans.

Policy GS1: Development in Urban Green Space Zones

Natural England welcome the reference to 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:

- Keep Britain Tidy runs the [Green Flag Award](#) scheme on behalf of Government. Anyone can apply to have their greenspace assessed against the Green Flag Award Quality standard, for payment of a fee. The Award is adaptable to a range of types of greenspace including parks, gardens, social housing, etc.
- The Sensory Trust published 'By All reasonable Means' which sets good practice guidance on providing access to the natural environment for people of all abilities. Although not all areas will be able to provide this (such as some wildlife areas), the aim is to get the majority of areas accessible to all at least in part.
- The Forestry Commission has developed guidelines for [Tree canopy cover](#), to be set for a local area, based on evidence showing that 20% is a good aspiration, depending on the current level.
- The Woodland Trust recommend woodland access standards. Accessible woodland of at least 2 ha should be available with 500 m of new homes and woodland of at least 20 ha within 4 km.

Natural England welcomes 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.

The plan should ensure new green infrastructure and habitat creation is monitored to ensure that it develops in accordance with its stated intention.

Policy GS3: Landscape Character

The protection afforded to the PDNP should be strengthened in line with NPPF 176 'Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks and the Broads. The scale and extent of development within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas

Land within the setting of these areas often makes an important contribution to maintaining their natural beauty, and where poorly located or designed development can do significant harm. This is especially the case where long views from or to the designated landscape are identified as important, or where the landscape character of land within and adjoining the designated area is complementary. Development within the settings of these areas will therefore need sensitive handling that takes these potential impacts into account. All planning proposals within the setting of the PDNP should be subject to Landscape and Visual Impact Assessment (LVIA).

Natural England generally supports the policy. However, for the avoidance of doubt we advise a direct reference to the PDNP Management Plan and the need to consult the PDNP authority on all proposals that are likely to impact its special qualities for which it is designated.

8.15 Natural England supports the recognition of valued landscapes i.e., Peak District National Park (PDNP) however this is not reflected in the policy. For clarity the Landscape character policy should also be expanded to include the major development exception circumstances tests as set out in NPPF paragraph 176.

We recommend that policy should clearly set out the need to protect and enhance the PDNP, as set out in the National Planning Policy Framework (NPPF) paragraph 177. *When considering applications for development within National Parks, the Broads and Areas of Outstanding Natural*

Beauty, permission should be refused for major development² other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of:

- (a) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy.*
- (b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and*
- (c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.*

Consideration for Development Management Policies within the adopted [Part 2 of the local plan or the Peak District National Park \(May 2019\)](#). Should also be given.

Policy GS4: Safeguarding the Best and Most Versatile Agricultural Land

We support this policy and provide further guidance in Annex A

Policy GS5: Development and Biodiversity

Natural England advise the inclusion of Ramsar sites, as a matter of policy, to protection afforded to habitat sites network.

All development proposals should continue to follow the mitigation hierarchy as set in national policy (para 180a of the NPPF 2019), whereby if significant harm resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused.

Natural England strongly supports the requirement to ensure the protection of local sites. Further clarification is needed as to when harm to a local site would be acceptable. We suggest the wording is amended to read:

“For this reason, their protection is important. Development likely to adversely affect a local wildlife site will be refused unless there is no reasonable alternative that would avoid or reduce harm, through locating the proposal elsewhere, or keeping any unavoidable harm to a minimum through design and layout, and the benefits of the proposal at that location clearly outweigh the conservation value of the site and its contribution to the wider ecological network. As a last resort unavoidable harm to local wildlife sites must be fully compensated. 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.

Policy GS6: Biodiversity Net Gain

Natural England welcomes and supports the clear objectives set out in the Local Plan which include achievement of a 10% net increase in biodiversity across the city.

It is welcomed to see this objective reflected throughout Sheffield’s Sub-Area Strategy and strategic topic policy **BG1: Blue & Green Infrastructure** and the inclusion of **Policy GS6: Biodiversity Net Gain**, which states a minimum requirement for a 10% biodiversity net gain for all developments where the Biodiversity Metric or Small Sites Metric are applicable. It is noted that the criteria for the use of the small site metric is included within the definitions of Policy GS6. Natural England recommend that it also **be made clear that the small sites metric is not appropriate for use where off-site habitat enhancement is proposed** for development proposals of any size (see small sites guidance).

We advise that that the wording of **Policy GS6** could be **strengthened further to clarify that a 10%**

² [National Planning Policy Framework - 15. Conserving and enhancing the natural environment - Guidance - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/policies/national-planning-policy-framework)

biodiversity net gain must be achieved in all types of biodiversity unit (habitat, river and hedgerow) identified within the on-site baseline. This is to align with both the Chartered Institute of Ecology and Environmental Management (CIEEM) Biodiversity Net Good Practice **Principle 6: Achieve the best outcomes for biodiversity** and **Natural England's User Guide** accompanying the Biodiversity Metric (currently version 3.1).

In particular, there is **minimal reference to BNG and riverine habitat throughout Policy GS6** and its supporting text. In addition to clearly stating an uplift of at least 10% in river units will be required when these are identified on-site, this could be supported by linking to **Policy GS9: Managing Flood Risk** which states new development will be permitted where is set a minimum of 8 metres from a main river or 3 metres from ordinary watercourses. We recommend this section makes explicit reference to situations where applicants will also need to apply the river metric where a proposed development site's red line boundary falls within the riparian zone which is **defined as 10m from the bank top**—e.g., the Biodiversity Metric guidance states:

“The riparian zone is an intrinsic part of the ecological functioning and natural processes occurring in the river. Where the red line boundary of the development encompasses the riparian zone, either whole or in part, but excludes the channel of the watercourse, the rivers and streams metric (including the condition assessment) must be applied. This applies to rivers, streams and canals as the riparian zone is used to calculate its condition. The riparian zone of a ditch is not used to influence condition, therefore would not apply. By applying the river metric in this scenario, information will be required that is outside of the red line boundary (as it includes the banks, channel and bed of the river)”.

Whilst Policy GS6 includes reference to biodiversity off-setting within the forthcoming Local Nature Recovery Strategy, which is welcomed, it is noted that there is no specific reference **to how the strategic significance value in the Biodiversity Metric should be applied**. The Biodiversity Metric applies a higher biodiversity unit score to habitats identified of strategic importance to the local area, further information relating to strategic significance can be found in the Biodiversity Metric 3.1 User Guide Paragraphs 5.16-5.24. As identified within the policy, development should be encouraged to target habitat enhancement where it will have the greatest local benefit and avoid impacts where they will be particularly detrimental to local biodiversity. Therefore, clear guidance should be provided on how all relevant local priorities should be considered in relation to the strategic significance value, for example Habitats of Principal Importance, National Character Area priorities, River Basin Management Plans and Catchment Plans.

Natural England notes that **no mention of activities which may lead to habitat degradation pre-biodiversity net gain assessment has been incorporated** into Policy GS6. It is recommended that the date of the 30th January 2020 (set within Schedule 14 of the Environment Act) be acknowledged in this context, this allows planning authorities to recognise any habitat degradation since 30th January 2020 and to take the earlier habitat state as the biodiversity baseline for the purposes of biodiversity net gain.

It is welcomed that sites with a very low baseline or nil biodiversity value (as measured by the metric) may have to provide a larger percentage BNG to provide a tangible enhancement. We recommend that a **clear local approach for these sites**, which are not exempt from BNG, which currently possess a negligible biodiversity **is outlined**. This could include **setting a small target improvement utilising the metric** via features such as rain gardens, natural SuDS, green roofs or native soft planting around the site or a specific biodiversity unit increase rather than a percentage gain (which can be difficult to quantify in these circumstances). This information could be provided as part of an SPD specific to Biodiversity Net Gain.

It was noted in Natural England's previous consultation response to Sheffield Plan Issues and Options 2020 that Sheffield was a member of the Biodiversity Net Gain Task and Finish Group (Ref: 324284 13th October 2020), with the aim to coordinate and agreed approach to delivering BNG in South Yorkshire. Several neighbouring authorities have or are in the process of developing SPDs or guidance on the local priorities for BNG implementation, and we would encourage a similar commitment from Sheffield to produce an SPD to provide further detailed guidance on BNG. In addition to points made above this could include:

- The use of a map. Mapping biodiversity assets and opportunity areas will ensure compliance with national planning policy and help to clearly demonstrate the relationship between development sites and opportunities for biodiversity net gain.
- Details and guidance on the circumstances a higher percentage than 10%, which is welcomed, may be required.
- Local design codes or guidance for the plan area/specific sites could set out further detail on implementing plan policies for biodiversity net gain and wider Green Infrastructure. For example, Sheffield's Sub-Area Strategy provides a policy approach for each area, reflecting proposed allocations and local priorities. The reference to BNG in several of these sub-area strategies is welcomed, however further detailed guidance on how to achieve habitat or ecosystem service priorities, such as those identified in Sheffield's Local Biodiversity Action Plan or South Yorkshire Combined Natural Capital Opportunities Mapping (CNCOM) could be outlined.
- Links between GS6 and other policies including Sub-Area strategy policies, Policy GS7: Trees, Woodlands and Hedgerows and Policy BG1 are welcomed. However, these could be explored in more detail for example local priorities, design recommendations and incorporation of BNG tools and principles for example the use of the river metric to aid with assessment of the biodiversity benefits of de-culverting as recommended within Policy GS9: Managing Flood Risk. Other policies with connections to BNG could include GS11: Sustainable Drainage Systems, DE3: Public Realm and Landscape Design,

Site allocations

As highlighted above, the reference to Biodiversity Net Gain throughout the Sub-Area Strategy and proposed site allocations is welcomed. As are the conditions requiring the maintenance of specific habitat corridors and delivery of BNG within these on specific site allocations. However, Natural England note that the specific locations of areas with high biodiversity opportunity have not been mapped within the site allocations, or any baseline assessments of existing biodiversity on the site been undertaken to support these. The plan should clearly set out habitats within the site to be protected and whether any off-site provision is likely to be necessary to meet proposed local plan net gain policy and deliver the level of development anticipated within the site.

Further guidance on appropriate or priority habitats to be delivered within site allocations located within specific areas could be detailed within an SPD or Local Design Codes, for example prioritising the incorporation of green roofs and rain gardens in certain urban localities.

Monitoring

It is welcomed that Biodiversity Net Gain is included and highlighted throughout the SA, and that a specific monitoring objective has been included within Section 12 of Part 2 of the Draft Plan to measure the "*Percentage of new developments providing at least 10% Biodiversity Net Gain –annual (Policy GS6)*". We recommend that this is extended to include indicators to demonstrate the amount and type of BNG provided through development. The indicators should be as specific as possible to help build an evidence base to take forward for future reviews of the plan, for example the total number and type of biodiversity units created and a record of on-site and off-site delivery.

Policy GS7: Trees, Woodland and Hedgerows

The policy should be expanded to include reference for all planning applications to conform to Natural England and the Forestry Commission's, "Ancient woodland, ancient trees and veteran trees: protecting them from development" statutory [standing advice](#).

The Forestry Commission has developed guidelines for [Tree canopy cover](#), to be set for a local area, based on evidence showing that 20% is a good aspiration, depending on the current level.

The Woodland Trust recommend [woodland access standards](#). Accessible woodland of at least 2ha should be available with 500m of new homes and woodland of at least 20ha within 4km.

Policy GS11: Sustainable Drainage Systems

Natural England welcome this Policy that requires development ensures flood and surface drainage are properly addressed, and that Sustainable Drainage Systems (SuDS) are designed in accordance with CIRIA C753 SuDs Manual, to be as 'natural' as possible.

It is advised that the policy makes clear that where a development drains to a protected site(s), an additional treatment component (i.e., over and above that required for standard discharges), or other equivalent protection may be required to ensure water quality impacts are avoided.

Where SuDS are proposed serving as mitigation for protected sites, development should ensure that appropriate resources are put in place to ensure their long-term (in perpetuity) monitoring, maintenance/replacement, and funding.

NC15: Creating Open Space in Residential Developments

Natural England support this policy providing the amendments to GS1 and GS6 suggested are implemented.

Annex A: Site allocation Comments

There are number of site allocations that neglect to condition Biodiversity Net Gain, as mentioned above 'minimum requirement' for a 10% biodiversity net gain for all developments.

Policy SA2 - Northwest Sheffield Sub-Area Site Allocations

NSW01 Land and buildings at Penistone Road North

This allocation is within close proximity to Wadsley Fossil Forest SSSI. Natural England notes this allocation has already received planning permission, yet we do not have any record of consultation.

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.

NWS02 Land at Wallace Road

The proposed allocation lies in close proximity Neepsend Railway cutting SSSI, the site supports the best available exposure in the eastern Pennines area of the sequence between the Crawshaw Sandstone Formation and the Norton Coal (lower Westphalian A Carboniferous). It shows a predominantly lacustrine sequence, with abundant non-marine bivalves of the 'Carbonicola lenisulcata' Biozone.

In order to protect the site additional Natural England 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. 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.

NSW04, NSW05, NSW06 and NSW07

Natural England **objects to these allocations**, lack of information

These allocations are in close proximity to Wadsley Fossil Forest SSSI. The included sandstone bed here contains a number of 'in situ' fossil tree stumps, two of which have been exposed for many

years. They are considered to be the best preserved example in the British Isles of trees which were part of the extensive coal forming swamp forests growing some 300 million years ago during the Westphalian (Carboniferous).

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

NWS09 Former Oughtibridge Paper Mill

Natural England **objects to NWS09**, lack of information

Natural England advises that the proposed development should be considered in the context of NPPF paragraph 180 (c)

The scale and location of the development will inevitably result in adverse impacts on the adjacent Green Land Spring which is an area of Ancient Semi Natural woodland.

Further, no information has been provided regarding the existing biodiversity interests on the proposed allocation 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. We suggest this achieved by 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 the earliest stage in order to deliver the minimum 10% net gain required.”

The allocation should require the protection and long-term management of the priority habitats on site, including lowland deciduous woodlands. 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.

Upon amendments suggested above this allocation should be assessed in accordance with GS7

Natural England advises that the proposed developments should both be considered as “major” in the context of NPPF paragraph 177 and so any proposals should be required to meet the policy’s “exceptional circumstances” test. Exceptional circumstances will not exist unless all three criteria (i.e., the national and local need, cost and scope for developing elsewhere, and the environmental effect and scope for moderating it) can be satisfied. Further information is required to demonstrate that the necessary exceptional circumstances exist to justify the proposed allocations.

NWS10 Land at Oughtibridge Lane and Platts Lane

Natural England **objects to NWS10**, lack of information

Natural England advises that the proposed development should be considered in the context of NPPF paragraph 180 (c)

The scale and location of the development will inevitably result in adverse impacts on the adjacent Green Land Spring which is an area of Ancient Semi Natural woodland.

Furthermore, no information has been provided regarding the existing biodiversity interests on the

proposed allocation 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. We suggest this achieved by 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 the earliest stage in order to deliver the minimum 10% net gain required.”

The allocation should require the protection and long-term management of the priority habitats on site, including lowland deciduous woodlands. 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.

Upon amendments suggested above this allocation should be assessed in accordance with GS7

NWS12 Former British Glass Labs

Natural England **objects to NWS12**, lack of information

This policy should be considered in accordance with Sheffield County Council (SCC) Local Plan (LP) Policy GS7

NWS13 Wiggan Farm

Natural England **objects to NWS13**, lack of information

This allocation is in close proximity to Peak District National Park.

Natural England advise an LVIA should be carried out prior to allocation in line with NPPF 176. Furthermore, this allocation should be considered in accordance with SCC LP policy GS3

NWS14 Hillsborough Hand Car Wash Centre

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 also set out the requirement to deliver a minimum 10% biodiversity net gain. We suggest this achieved by 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 the earliest stage in order to deliver the minimum 10% net gain required.”

NWS15 Bamburgh House and 110-136 Cuthbert Bank Road

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 also set out the requirement to deliver a minimum 10% biodiversity net gain. We suggest this achieved by 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 the earliest stage in order to deliver the minimum 10% net gain required.”

NWS18 Sevenfields Lane Play Ground

Natural England **objects to NWS18**, lack of information

This allocation is registered open greenspace, allocation should be considered in accordance with SCC LP policy GS1

NWS23 Former Oughtibridge Paper Mill

Natural England **objects to NWS23**, lack of information

Natural England advises that the proposed development should be considered in the context of NPPF paragraph 180 (c)

Natural England comment on planning proposals (planning ref 16/01169/OUT) for residential accommodation and we accept there are opportunities for enhanced GI to be embedded in design, this should be considered prior to allocation.

Furthermore, cumulative impacts on the PDNP with NWS09 should be considered.

NWS29 Former Sheffield Ski Village

Natural England **objects to NWS29**, lack of information

The allocation is within Neepsend Brickworks SSSI which is designated or its exposure of the Greenmoor Rock Formation, a local variant of the Elland Flags Formation to the north and the Wingfield Flags Formation to the south.

Natural England note the inclusion of further survey work in relation to the local geological site however this does not give the SSSI the appropriate weight afforded as a nationally designated site. However, we welcome the effort to survey the geological interest.

Natural England advise that this allocation should be considered in accordance with NPPF 180 (b) and SCC LP policy GS5

Policy SA3 - Northeast Sheffield Sub-Area Site Allocations

NES04 Gas Works, Newman Road

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 also set out the requirement to deliver a minimum 10% biodiversity net gain. We suggest this achieved by 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 the earliest stage in order to deliver the minimum 10% net gain required.”

NES13 Parson Cross Park, Buchanan Road

Natural England **objects to NES13**, lack of information

This allocation is registered open greenspace, allocation should be considered in accordance with SCC LP policy GS1 and should meet the requirement of exception tests.

NES18 Land at Longley Hall Road

Natural England supports the retention of mature trees along Longley lane however we would advise SCC that this site has potential to demonstrate linkages to the wider open greenspace provision at Longley Park and should meet the requirements of SCC LP policy GS1

NES23 Land East Of Fir View Gardens

Natural England **objects to NES13**, lack of information

Natural England advise that this allocation should be considered in accordance with NPPF 179, 180 and SCC LP policy GS5

NES27 Land adjacent to 264 Deerlands Avenue and NES28 Land adjacent to 177 Deerlands Avenue

These allocations should be considered in tandem to ensure linkages to the accessible woodland to the north and the Parson Cross Park to the south are maintained.

This allocation is registered open greenspace, allocation should be considered in accordance with SCC LP policy GS1 meeting the requirement of exception tests, and GS5

NES30 St. Cuthberts Family Social Club

Religious Grounds are registered open greenspace, allocation should be considered in accordance with SCC LP policy GS1 and should meet the requirement of exception tests.

Policy SA4 - East Sheffield Sub-Area Site Allocations

ES12 Airflow Site

Natural England **objects to ES12**, lack of information

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 also set out the requirement to deliver a minimum 10% biodiversity net gain. We suggest this achieved by 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 the earliest stage in order to deliver the minimum 10% net gain required.”

ES14 Rear of Davy McKee

Natural England **objects to ES14**, lack of information

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 also set out the requirement to deliver a minimum 10% biodiversity net gain. We suggest this achieved by 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 the earliest stage in order to deliver the minimum 10% net gain required.”

ES20 Darnall works

Natural England has no objection to this proposed allocation however we note the detailed site appraisal states this allocation must meet the requirements of NC15, however this is not reflected in the conditions appended to the development. Natural England advise development condition must reflect the sites appraisal to avoid confusion.

ES22 Attercliffe Canalside

Must be delivered in accordance with SCC LP policy GS7

ES25 Land to the north of Bawtry Road

Natural England **objects to ES25**, further information required

This allocation is registered open greenspace and should be considered in accordance with SCC LP policy GS1 and further assessment must be undertaken prior to allocation.

ES27 Land at Kenninghall Drive

Subject to amendments this policy should be considered in accordance with Policy GS5 and greater consideration for its potential to impact on Local Wildlife Sites.

ES44 Land at Main Road Ross Street and Whitwell Street

Natural England does not object to this allocation, however we note this is within an area Historic Parkland and would advise further assessment is required in line with NPPF 20 (d) *conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.*

ES52 Land Opposite 299 To 315 Main Road Darnall Sheffield S9 5HN

Displaying incorrect post code data. As displayed on Sheffield Plan Policies Map, this is within an area Historic Parkland and would advise further assessment is required in line with NPPF 20 (d)

Policy SA5 - Southeast Sheffield Sub-Area Site Allocations

SES03 Land to the east off Eckington Way

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. The link below will take the local authority to the associated report and maps.

<http://publications.naturalengland.org.uk/publication/6544434875858944>

SES04 Mosborough Wood Business Park

Natural England **objects to SES04**, further information required

This allocation is within close proximity to Moss Valley 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

SES13 Land to the east of Jaunty Avenue

Natural England **objects to SES13**, further information required

This policy must meet the requirements of GS5 once amended. As advised above '*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*'.

SES15 Woodhouse East

Natural England **objects to SES28**, does not meet requirements of NPPF 174 and does not provide enough evidence to meet the requirements of SCC LP Policy GS4.

Natural England notes this allocation will lead to a loss of BMV agricultural land class 2 and 3a. The information provided with the allocation does not demonstrate that the exceptions tests within GS4 have been met.

Policy SA6 - South Sheffield Sub-Area Site Allocations

SS17 Former Norton Aerodrome

Natural England **objects to SS17**, further information required

The proposed allocation is in close proximity to Moss Valley Meadows SSSI. Further assessment is required to ensure this development does not negatively impact the notified features.

Policy SA7 - Southwest Sheffield Sub-Area Site Allocations

SWS14 Tupton Cliffe And Lodge

Natural England **objects to SWS14**, lack of information

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 also set out the requirement to deliver a minimum 10% biodiversity net gain. We suggest this achieved by 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 the earliest stage in order to deliver the minimum 10% net gain required."

Duty to cooperate

Natural England is identified as a relevant body with regard to the Duty to Cooperate Position

Statement (December 2022). We welcome the opportunity to work with you on strategic cross boundary matters in preparing your Local Plan.

For any queries relating to the specific advice in this letter only please contact James Hughes on [REDACTED] For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Yours sincerely,

James Hughes
Lead Advisor Sustainable Development
Yorkshire and Northern Lincolnshire

Annex A

Green Infrastructure Framework

The development of the National Framework of Green Infrastructure Standards, a commitment in the Government's 25 Year Environment Plan, aims to green our towns and cities for health and wellbeing, nature, climate resilience and prosperity, and to address inequalities in access to greenspace, especially in urban areas.

The National GI Standards Framework seeks to support a greater and more effective delivery and stewardship of Green Infrastructure. It provides evidence-based advice on how to design, deliver and manage green infrastructure to best benefit from its multiple outcomes. With a need for good Green Infrastructure that is aspirational and directly addresses the ecological, climatic, health, and socioeconomic emergencies that we face, The National GI Standards Framework will help planners, developers, parks managers, communities and wider stakeholders understand how that need can be met.

This new Framework of Green Infrastructure Standards has been produced to advise local authorities and other stakeholders about including green infrastructure in new housing developments, and to enhance the quality of existing green spaces and greening neighbourhoods. These can bring benefits to access and recreation, and increase wildlife, improve air quality, provide cooler areas during heatwaves and reduce the likelihood of flooding. The new online Green Infrastructure Mapping Tool which aims to support Local Planning Authorities in incorporating Green Infrastructure into local plan making. It brings together data from over 40 individual environmental and socio-economic datasets, to create an evidence resource about the Green Infrastructure (GI) assets in England. National Framework of Green Infrastructure (GI) Standards are available for use to support local authorities in refreshing their local plans. These are the GI Principles, that underpin the whole Framework, and the GI Mapping tool – a baseline of GI across England with multiple data sets and analyses that assist in planning GI provision strategically at different scales, and targeting investment where it is most needed.

You will be aware that Natural England recently launched GI standards to accompany the GI principles and mapping tool.

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 [Green Infrastructure Mapping Database - Beta Version 1.1](#) 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 health risks such as urban heat stress, noise pollution, flooding, and poor air quality.
- SuDS should reflect [Green Infrastructure Principle Why 4](#) - GI reduces flood risk, improves water quality and natural filtration, helps maintain the natural water cycle and sustainable drainage at local and catchment scales, reducing pressures on the water environment and infrastructure, bringing amenity, biodiversity, economic and other benefits. SuDs should be integrated and linked to green infrastructure beyond the site boundaries.

Soil and Agricultural Land Quality

1. The Local Plan should give appropriate weight to the roles performed by the area's soils. These should be valued as a finite multi-functional resource which underpin our wellbeing and prosperity. Decisions about development should take full account of the impact on soils, their intrinsic character and the sustainability of the many ecosystem services they deliver.
2. The [25 Year Environment Plan](#) (25YEP) sets out government action to help the natural world regain and retain good health, including highlighting the need to:
 - protect the best agricultural land
 - put a value on natural capital, including healthy soil
 - ensure all soils are managed sustainably by 2030

- restore and protect peatland
3. Soil is a finite resource which plays an essential role within sustainable ecosystems, performing an array of functions supporting a range of ecosystem services, including storage of carbon and water, the infiltration and transport of water, nutrient cycling, a buffer against pollution and provision of food. In order to safeguard soil resources as part of the overall sustainability of the development, it is important that the soil resource is able to retain as many of its important functions as possible. This can be achieved through careful soil management and appropriate, beneficial soil re-use, with consideration on how any adverse impacts on soils can be avoided or minimised.
 4. The conservation and sustainable management of soils is reflected in the [National Planning Policy Framework](#) (NPPF), particularly in paragraph 174. When planning authorities are considering land use change, the permanency of the impact on soils is an important consideration. Particular care over planned changes to the most potentially productive soil is needed, for the ecosystem services it supports including its role in agriculture and food production.
 5. Plan policies should therefore take account of the impact on land and soil resources and the wide range of vital functions (ecosystem services) they provide in line with paragraph 174 of the NPPF.

Soil Plan Policies

- We strongly advise that at a minimum, the plan includes core policies for:
 - the protection of best and most versatile (BMV) agricultural land (Grades 1, 2 and 3a in the Agricultural Land Classification (ALC)); and
 - for the protection of and sustainable management of soils as a resource for the future.
 - Areas of poorer quality land (ALC grades 3b, 4, 5) should be preferred to areas of higher quality land (grades 1, 2 and 3a).
 - Recognise that development has an irreversible adverse impact on the finite national and local stock of BMV land.
 - Conforms to NPPF and Planning Practice Guidance (Natural Environment and Minerals).
 - Requires detailed ALC surveys to support plan allocations and for subsequent planning applications (for all sites larger than 5 ha). ALC surveys to support plan allocations and for subsequent planning applications for smaller sites (1 – 5 ha) would be welcomed.
 - Recognise that development (soil sealing) has a major and usually irreversible adverse impact on soils.
 - Soils of high environmental value (e.g., wetland and carbon stores such as peatland, low nutrient soils; or soils of high environmental value in the local context) should also be considered as part of ecological connectivity (Nature Recovery Network / Green Infrastructure).
 - Requires soil handling and sustainable soil management strategies based on a detailed assessment of the soil resource based on best practice guidance (for all sites larger than 5 ha), ideally as part of the planning application process for major sites to help inform master-planning, and to safeguard the continued delivery of ecosystem services through careful soil management and appropriate, beneficial soil re-use. Soil handling and sustainable soil management strategies for smaller sites (1 – 5 ha) would be welcomed.
 - Reference should be made to Defra's Construction Code of Practice for the Sustainable Use of Soils on Construction Sites
 - In addition, for minerals and other temporary forms of development, plans for reinstatement, restoration and aftercare will be required (or for solar, a commitment to do so if the operational life is in decades); normally this will be return to the former land quality (ALC grade)
 - Refers to soils issues within relevant policy areas such as renewable energy, climate change, green infrastructure and biodiversity net gain, flood schemes, managed realignment, development design and landscaping.

Agricultural land Quality

6. To assist in understanding agricultural land quality within the plan area and to safeguard BMV agricultural land in line with the NPPF, strategic scale ALC Maps are available. Natural England also has an archive of more detailed ALC surveys for selected locations. Both these types of data can be supplied digitally free of charge by contacting Natural England. Some of this data is also available on the [magic](#) website. The planning authority should ensure that sufficient site specific ALC survey data is available to inform decision making. For example, where no reliable or sufficiently detailed information is available, it would be reasonable to expect developers to commission a new ALC survey, for any sites they wish to put forward for consideration in the Local Plan
7. General mapped information on soil types is available as 'Soilscapes' on the [magic](#) website. Additional information regarding obtaining soil data can be found on the [LandIS](#).

Sustainable Soil Management during construction

8. Sustainable soil management should aim to minimise risks to the ecosystem services which soils provide, through provision of suitable soil handling and management advice. The planning authority should ensure that sufficient site-specific soil survey data is available to inform decision making. To include, for example, assessment of suitability of soil properties for type of landscaping and planting proposed to inform beneficial re-use, appropriate soil management, and drainage, where required.
6. Further guidance for protecting soils (irrespective of their ALC grading) both during and following development is available in Defra's [Construction Code of Practice for the Sustainable Use of Soils on Construction Sites](#), to assist the construction sector in the better protection of the soil resources with which they work, and in doing so minimise the risk of environmental harm such as excessive run-off and flooding. The aim is to achieve positive outcomes such as cost savings, successful landscaping and enhanced amenity whilst maintaining a healthy natural environment, and we would advise that the Code be referred to where relevant in the development plan.