

Date: 21 June 2024



BY EMAIL ONLY

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

T 0300 060 3900

Dear Inspector,

Natural England's submission in lieu of attendance at Sheffield Local Plan Matter 1 Hearing on 25th June 2024.

Natural England will not be attending the Sheffield Local Plan Matter 1 Hearing on 25th June 2024. Please see below for our comments regarding the key points listed in the agenda under item 5.

Disagreement between the Council and Natural England on whether it has been clearly demonstrated that mitigation measures to reduce traffic levels and pollution impacts are deliverable (as set out in row 1 of the table in the Statement of Common Ground between the Council and Natural England April 2024)

Natural England has recently provided the Council with an updated position regarding air quality, dated 07 June 2024. This is detailed below:

Natural England has previously provided advice based on the results shown in Table 7 of the submitted Habitats Regulations Assessment Addendum, which demonstrates there is an exceedance of 1% of the critical loads for ammonia and nitrogen deposition. In Table 6 it is also demonstrated that for these pollutants there is an existing exceedance of the critical load/level based on the existing background. It should be noted that for NOx the current background levels are not in exceedance of the critical level, and the plan alone would not lead to an exceedance.

However based on Table 4, if the number of predicted traffic movements are considered against Natural England's guidance [NEA001](#), where it is considered that 1% PC is approximately equal to 1000 AADT, instead of the DMRB guidance, then LSE from the plan alone can be ruled out. The information in Appendix 2 suggests an assumption has been applied of equal weighting for both 1m and all increments up to 200m at all points on the assessed roads. Therefore, the pollution input from 1000 AADT would be less significant than this data is suggesting as most of the roads have some distance separation between the actual road and the designated habitat. We would advise the number of traffic movements is instead considered against the Natural England guidance.

However, if this approach is undertaken, further consideration of whether there are other plans/projects that may act in combination with the Sheffield LP may be required. It should be considered whether there is potential for >1000 AADT movements with other plans or projects. We note there has been an assessment of the impacts in combination with Derbyshire Dales, but other plans have been ruled out as air quality impacts were found to have no LSE in those plans. Natural England highlights, however, that the in-combination requirement makes sure that the effects of

numerous proposals, which alone would not result in a significant effect, are assessed to determine whether their combined effect would be significant enough to require more detailed assessment. If this is addressed through the calculation of 'East bound traffic' in Table 4 this should be clarified.

Following provision of this information, if there is still deemed to be exceedances in the significance threshold, then consideration of whether there is overlap in air emissions and the sensitive habitat features can be undertaken to demonstrate the potential extent of impacts.

The requirement for mitigation can be reconsidered once this information has been provided.

Concerns raised by the Peak District National Park Authority on the HRA methodology

Natural England does not currently have any set guidance under which a "set" ZOI distance must be imposed. As such, it is down to the respective Local Planning Authorities to set out what they feel is most appropriate, depending on their respective population figures and distance from the Peak District, using relevant evidence as part of their justification for their respective HRAs. Natural England refers to the signed Statement of Common Ground, dated 18 April 2024, for our more detailed comments regarding the approach to recreational pressure for Sheffield Local Plan.

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.

If you have any queries relating to the advice in this letter, please contact me at

[REDACTED]

Yours faithfully

Elen Squires
Yorkshire and Northern Lincolnshire Area Team
Natural England