

## **Sheffield Local Plan Habitats Regulations Assessment- written response from the Peak District National Park Authority (PDNPA)**

It should be noted that all of the evidence below relates to the South Pennine Moors SAC and the Peak District Moors SPA. The Peak District National Park Authority (hereafter “The Authority”) accepts the findings of the HRA report regarding the Peak District Dales SAC.

### **1.9**

#### **How were the Habitats Regulations Assessment Appropriate Assessment (CD18, January 2023) and Sheffield Local Plan Habitats Regulations Assessment Addendum (CD19, August 2023) carried out and was the methodology appropriate?**

The Authority accepts that the HRA report was produced in accordance with advice received from Natural England, in good faith. Nevertheless, we have a number of particular concerns regarding the methodology:

##### **Zone of Influence for Recreation-**

We note that the original ZoI used was 15 km. and that, on Natural England’s revised advice, this was subsequently reduced to 7 km for recreational pressure. The two reasons cited for this change are that “15 km seems excessive compared to other local plans in the region”; and that Bradford Local Plan used 7km for recreational disturbance based on visitor data collected during visitor surveys conducted on the South Pennine Moors in 2013 and 2019, which concluded that the majority of visitors were travelling under 7km. We consider both of these reasons to be insufficient to reduce to ZoI for the following reasons:

- The extent of Zones of Influence is inconsistent. Various Zones of Influence have been cited for other Local Plan HRAs in the area, e.g. Calderdale and Cannock Chase- 15 km; Greater Manchester- 8km; Bradford- 7km; Barnsley- 5km. Further afield, another National Park (the New Forest) has recognized the need for mitigation measures within a 13.8-15km Zone of Influence ([Revised New Forest Mitigation Strategy Master Report.pdf \(wiltshire.gov.uk\)](#)). This inconsistency in itself reflects the fact that a standard approach cannot be taken, as the geographical, social and recreational relationships between different urban centres and their surrounding rural areas varies. The subjective (“seems excessive”) comparison with other Local Plans is therefore somewhat arbitrary, and the reasons for aligning with the Bradford Local Plan rather than the Calderdale Plan, for example, are unclear.
- The applicability to Sheffield of the visitor surveys cited for Bradford, at least considered on their own, is questionable. A 7km ZoI would imply, for example, that residents in Sheffield city centre are unlikely to visit the Peak District to any significant extent; and that even Sheffield residents on the edge of the Peak District (Totley) are unlikely to visit key destinations such as Curbar Edge, Chatsworth, the Upper Derwent Valley, Stanage Edge, Kinder Scout or Mam Tor to any significant extent. From our experience of visitors in the Peak District this

- is clearly not a credible assumption. Other visitor information indicates that Sheffield residents travel further than 7 km. to access the Peak District moors on a regular basis (see evidence provided under Qu. 1.11 below).
- A recent Natural England report ([NEER025 The Influence of Recreational Activity on Upland Ecosystems in the UK: A Review of Evidence - NEER025 \(naturalengland.org.uk\)](#)) found that “*There was strong evidence that highlighted the proximity of upland areas to large residential areas was likely to be a strong influencing factor that increased the level of recreational activity*”, and “*moderate evidence that recreational activity has increased in upland ecosystems over time*”. It also cites the average distance travelled by car to green spaces in England as 10 miles, which exceeds the original 15 km ZoI let alone the reduced 7 km ZoI. Even the most distant proposed development sites in the draft Local Plan fall within 10 miles of the Habitats Sites. Natural England’s advice regarding reduction of the ZoI to 7km does not appear to have taken account of this evidence.
  - A further Natural England report due to be published imminently (*Caals Z., Liley D. and Rush E. (2024). Recreation Use of the South Pennine Moors and Implications for Strategic Housing Growth*) notes that “*the use of the 75th percentile [the distance within which 75% of day-trip or short-visit-from-home visitors travel] has become the standard way to define a zone of influence and reflects the approach used in strategic mitigation strategies around the country. The use of the 75th percentile ensures a zone that encompasses the area where most visitors originate yet excludes some of the areas where people travel large distances and are visiting only very occasionally. Within the zone of influence the assumption is that likely significant effects are triggered by new housing growth and this in turn triggers a need to secure mitigation.*” Use of the 75<sup>th</sup> percentile to define the ZoI is supported by case law ([Reference: APP/X0415/W/22/3308630 \(planninginspectorate.gov.uk\)](#)). Visitor surveys for the South Pennine Moors report found that the 75th percentile distance for the South Pennine Moors SAC/SPA was 24.4km.

We therefore consider that, for the purposes of the Sheffield Local Plan, the Zone of Influence should extend across the whole of the Sheffield City area (slightly greater than the original 15km but within the 75<sup>th</sup> percentile 24.4 km).

#### Cumulative Impacts-

The HRA Addendum report concludes (para 3.4.2) that an adverse in-combination effect from recreation, when considering housing allocation in neighbouring authorities, cannot be ruled out. Consequently, mitigation is required. However, the HRA Addendum report bases mitigation on a 7 km. ZoI and suggests that other policy proposals for open space will be adequate to offset those effects. The inadequacy of the 7km. ZoI is addressed above, and the inadequacy of mitigation measures is addressed under Q.1.11 below.

## Mitigation-

There is no evidence provided to demonstrate that the proposed mitigation measures are likely to be effective; that they are compatible with other legislation and policy; that they are within Sheffield City Council's control; or that their delivery can be guaranteed.

### **Do they meet the requirements of the Conservation of Habitats and Species Regulations 2017 and reflect relevant case law?**

The HRA Addendum report concludes that "it cannot be concluded that there will not be an adverse effect in-combination from recreation" and that consequently, mitigation measures are required. We consider a number of the proposed mitigation measures to be inadequate and, in some cases, inappropriate and undeliverable. The Authority would therefore welcome a commitment to a fully costed and timetabled Mitigation Delivery Plan with clearly identified mechanisms to fund and implement it.

#### **1.10**

##### **What relevant designated sites were considered?**

As far as the Peak District is concerned, the three following designated sites were considered by the HRA report-

- South Pennine Moors SAC
- Peak District Dales SAC
- Peak District Moors (Pennine Moors Phase 1) SPA

We agree that the appropriate sites have been considered.

##### **What potential impacts of the Plan were factored in? What were the overall conclusions of the HRA documents and how have these conclusions informed the Plan's preparation?**

The potential impacts identified by the HRA report are largely regarded as appropriate. The Authority's main concerns are around the impact of increased recreational pressure on the South Pennine Moors SAC and Peak District Moors SPA, in particular disturbance to breeding birds; increased wildfire risk; and increased path erosion. These have all been considered in the HRA report.

In order to conclude that the proposals will not adversely affect the integrity of the Habitats Sites, we would expect any mitigation measures to be integrated into the Local Plan. The Plan refers to the fact that a Habitats Regulations Assessment has been undertaken (CD1, para 1.43) but does not appear to make any further reference to it. We would expect it to include a commitment to implement the proposed mitigation measures, through reference to an agreed Mitigation Delivery Plan.

## 1.11

### Have any concerns been raised regarding the HRA documents, and what are they?

#### **Adverse Impact**

The Peak District National Park Authority's concerns stem from the proposed provision of 35,530 new homes within Sheffield City over the next 15 years, and the consequent increase in recreational pressure on the moorland SAC and SPA. Based on the existing 232,000 households in 2021 ([Census and Population | Sheffield City Council](#)), this would be a 15.3% increase in households within Sheffield, presumably with a corresponding population increase. Given the close proximity of Sheffield to the South Pennine Moors SAC/Peak District Moors SPA (Figure 1a of the HRA report), this is likely to result in a significant uplift in visitor numbers to the Peak District, including the Habitats Sites, even without in-combination effects from other Local Authority areas. No attempt has been made within the HRA report to estimate the scale of increased recreational pressure; however, the findings of the HRA Addendum report are that in-combination effects with other Local Authority proposals cannot be ruled out, and therefore mitigation measures are required. Based on evidence of visitor behaviour (Appendix 1) we estimate that the proposals may generate around 20,000 additional visits to the Peak District each week, a significant proportion of which are likely to be to the Habitats Sites.

Additional recreational pressure, without appropriate mitigation, will have the following significant impacts:

- Disturbance to breeding birds
- Wildfire risk
- Path erosion and proliferation

For more detail of evidence for these impacts see Appendix 2.

#### **Mitigation-**

We regard a number of the proposed mitigation measures to be inappropriate, ineffective, conflicting with other policies, outside SCC's control and/or unclear how they would be delivered. For more detailed comments on the proposed mitigation measures see Appendix 3.

The Authority is of the view that adequate mitigation measures can be identified, but that further consideration of appropriate mitigation measures and clarity re how they would be delivered is required, in liaison with partners. We would welcome the opportunity to collaborate with Sheffield City Council to jointly resolve these concerns. We would regard three potential mitigation measures as of particular importance:

- Provision of alternative recreational space away from the National Park/Habitats Sites. This should include both very local provision of urban green space likely to provide for short-duration visits, and also more extensive green space (e.g. country parks) to make alternative provision for "countryside" rather than urban green space visits. The HRA Addendum report suggests that adequate provision has already been made within the draft Local Plan (policies NC1 and NC15), but

the extent to which this might reduce potential visits to the Habitats Sites within the Peak District has not been identified.

- Path restoration and maintenance. Whilst there is limited empirical data on path condition, the experience of our ranger service is that there has been a significant increase in the erosion, spread and proliferation of paths (rights of way, concession paths and desire lines on Open Access land) associated with an increase in and changes in the pattern of recreational pressure in the National Park following Covid/lockdown. In addition to controlling erosion, evidence from surfacing of the Pennine Way ([Testing the effects of recreational disturbance on two upland breeding waders - PEARCE-HIGGINS - 2007 - Ibis - Wiley Online Library](#)) has shown that provision of a well-surfaced route, which avoids lateral spread of people to avoid eroded areas, can be effective in reducing disturbance to, and increasing populations of, breeding moorland birds such as Golden Plover.
- Increased provision of ranger presence on the ground. Our experience suggests that this one of the most effective methods of influencing visitor behavior, and is of particular importance in preventing wildfire and controlling disturbance by dogs off leads.

The Authority would therefore wish to see the provision of a fully costed and timetabled Mitigation Delivery Plan, with identification of funding mechanisms and responsibilities for implementation.

## **How would the Council respond to these concerns?**

### **1.12**

#### **How and when has Natural England been involved in the HRA process and have their concerns been satisfactorily resolved?**

We understand that Natural England were approached for, and provided, advice on the HRA methodology and were consulted on the draft HRA. Notwithstanding this, we have concerns about the adequacy, appropriateness and deliverability of mitigation measures in the absence of a Mitigation Delivery Plan, and the Zone of Influence over which mitigation measures should be considered.

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PEAK DISTRICT NATIONAL PARK AUTHORITY  
20 MAY 2024

## **APPENDIX 1- APPROXIMATE ESTIMATION OF LIKELY INCREASE IN VISITOR NUMBERS TO THE SOUTH PENNINE MOORS SAC/PEAK DISTRICT MOORS SPA.**

Policy SP1 (Overall Growth Plan) in Part 1 of the draft Plan (Core Document CD01) cites a figure of “35,530 new homes by 2039” which, based on the existing 232,000 households in 2021 ([Census and Population | Sheffield City Council](#)) represents a **15.3% increase in households in Sheffield**. Assuming occupancy rates are the same as currently (population of Sheffield in 2021 = 556,500 people ([Sheffield population change, Census 2021 – ONS](#))), this represents a **population increase of 85,144 people**.

65% of adults in England report taking visits to the natural environment at least once a week. 36% of these visits were taken to the countryside ([Volume and value of tourism | State of the Park Report \(peakdistrict.gov.uk\)](#)). An additional population of 85,144 people in Sheffield is therefore likely to generate a minimum of (85,144 x 65% =) 55,344 visits to the natural environment each week, of which 19,923 (36%) are likely to be to the countryside. *Caals et al (2024)* found that there was 1 dog for every 7 people visiting the South Pennine Moors (= at least 2,846 additional dog visits per week), of which 16% (=455) were off lead.

Whilst some of these countryside visits will be to other destinations, we suggest that this **approximate minimum figure of an additional 20,000 visits per week to, or in close proximity to, the Habitats Sites (accompanied by around 2,800 dogs of which 450 are likely to be off lead)** is not unreasonable given:

- The extreme proximity of parts of the Habitats Sites to urban Sheffield. Sheffield City has particularly strong recreational links with the Peak District. For many Sheffield residents the moorlands of the South Pennine Moors SAC/Peak District Moors SPA are the nearest area of extensive open countryside ( $\frac{1}{3}$  of Sheffield City’s boundary lies within the Peak District National Park).
- The high landscape quality and attractiveness of the Habitats Sites. The special qualities of the National Park in itself attracts visitors from adjacent urban centres.
- The moorlands of the SPA/SAC also offer the best, and in some cases the only, local opportunities for more active forms of recreation (such as climbing or mountain biking) for Sheffield residents.
- The “Outdoor City” branding of Sheffield, e.g. [The Outdoor City \(welcometosheffield.co.uk\)](#), which particularly promotes access to the Peak District (e.g. “with the Peak District National Park for a back garden”).
- The likelihood of greater proportions of the Sheffield population visiting the countryside than the national average, given the “Outdoor City” branding and proximity of high-quality countryside and National Park.
- The figures are for people visiting the countryside at least once a week. Some of these are, in fact, likely to take multiple visits per week (e.g. *Caals et al.* noted 12% of dog walkers in the South Pennine Moors SPA/SAC were daily visitors).
- The fact that the volume of visits to the Peak District are increasing over time, e.g. an increase of 19% of visitor days between 2009 and 2019 ([Volume and value of tourism | State of the Park Report \(peakdistrict.gov.uk\)](#)).

- The significant increase in visitor pressure and changes in visitor patterns since the Covid lockdown. Whilst objective data on visitor pressure post-lockdown is not yet available, the widely held view amongst the National Park Authority's Ranger Service is that there is increasing recreational activity and a wider dispersal, especially post COVID; that active recreation (walking, mountain biking, trespass camping etc.) has grown substantially (with consequent heavy use of rights of way and desire lines, and mountain bike routes being created in new locations), and that this active recreation has become much more dispersed across the park. This is particularly noticeable on land on the east side of the park, adjacent to Sheffield. These are locations that the rangers perceive to be highly visited by the population of Sheffield.
- Notably, among all local authorities, Sheffield boasts the largest population of visitors to the Peak District National Park, as evidenced by information collected through partnerships with entities like the Chatsworth Estate.
- Visitor surveys (2005, 2015) conducted in the Peak District National Park (PDNP) reveal that 90% of visitors come from locations within a one-hour car journey of the national park boundary. While the total visitor volume is challenging to quantify precisely, we estimate that approximately 10% of all parkwide visits to the PDNP originate from Sheffield. This proportion increases significantly in the Dark Peak character area (within which the South Pennine Moors SAC and the Peak District Moors SPA lie), where roughly 1 in 4 visits can be attributed to Sheffield residents. Moreover, data indicates that the Dark Peak receives a high percentage of frequent and repeat visits—20% of visitors access the area weekly, and nearly one third visit monthly.
- The HRA report cites a figure of 74% of visitors to the north west Peak District being from outside the Yorkshire and Humber area. This gives the misleading impression that only a small proportion of visitors to the Habitats Sites come from Sheffield. In practice this figure is not unexpected as the NW Peak District is in much closer proximity to Greater Manchester, whereas a large proportion of the Habitats Sites is in fact much closer to Sheffield.



## **APPENDIX 2- EVIDENCE FOR THE IMPACT OF RECREATIONAL ACTIVITIES ON UPLAND SITES**

- Disturbance to breeding birds- Studies on the Pennine Way ([Testing the effects of recreational disturbance on two upland breeding waders - PEARCE-HIGGINS - 2007 - Ibis - Wiley Online Library](#)) have shown that braiding of paths and lateral spread of visitors increases disturbance to breeding birds. This lateral spread has a negative impact on the numbers of breeding birds, including the SPA species Golden Plover.
- Wildfire risk- Evidence from the Peak District shows a clear correlation between visitor numbers and wildfire risk- [Introduction \(moorsforthefuture.org.uk\)](#) “The model successfully predicted the most fire-prone months and days, especially April-May and July-August and spring bank holidays, reflecting the interplay between visitor numbers and the changing flammability of moorland vegetation. A typical British bank holiday is almost five times more perilous than seven days of dry weather (McMorrow et al., in review)”. “More fires are reported at weekends and bank holidays, reflecting the impact of recreation activity” “It is apparent some factors contribute more fire risk than others, especially the influx of visitors to the area as proxied by the day of the week and occurrence of bank holidays. It is human impact, rather than meteorological pressure that emerges as the main villain of the peace [sic].” ([Forecasting the outbreak of moorland wildfires in the English Peak District - ScienceDirect](#)).
- Erosion- Little empirical data on path condition is available; however, experience from the National Park Authority’s Ranger Service is that there has been a significant increase in recreational activity since Covid/lockdown, more widely dispersed recreational pressure, and an increase in active recreation. This has resulted in a deteriorating condition of many paths (rights of way, concession paths and desire lines on Open Access land) resulting in erosion or damage to SAC habitat features such as Upland Dry Heath and Blanket Bog.

### **APPENDIX 3- COMMENTS ON PROPOSED MITIGATION MEASURES**

<b>PROPOSED MITIGATION</b>	<b>COMMENTS</b>
Signage and information boards	Increased or enhanced signage may play a role alongside other measures, but our experience is that its impact is often limited and the HRA report offers no evidence of its impact. Excessive signage also conflicts with the special qualities of wildness and naturalness of the moorlands of the National Park.
Allocated car parking provision and introduce penalties for parking elsewhere	Experience suggests that the provision of car parking increases overall capacity and visitor numbers. Whilst regularizing parking may help resolve other issues, it is unclear how it would significantly mitigate impacts on the Habitats Sites features, and could in fact increase impacts. Rationalising car parking <u>may</u> have a role, but needs much fuller strategic consideration. Car parking provision within moorland areas of the National Park may conflict with landscape objectives and existing planning policy and may be outside Sheffield City Council's control.
Provision of dog waste and litter bins	Potentially helpful but minor impact, and provision may conflict with landscape.
Monitoring plant disease and isolating contaminated areas	Potentially helpful but minor impact.
Monitoring and controlling invasive species	Potentially helpful but minor impact.
Provision of fire information boards	Comments as for signage above.
Allocated areas for BBQ including sand buckets/fire extinguishers (where appropriate) introduction of penalties for people using bbqs outside allocated areas	Potentially useful but might increase rather than decrease fire risk. We would like to explore this as an option with Sheffield City Council. Potential conflicts with landscape objectives and existing planning policies, and largely outside Sheffield City Council's control.
Recruitment of volunteer fire wardens	Potentially useful and significant but reliance on volunteers may not be guaranteed, responsibility for managing volunteers is not identified and use of

	<p>volunteers may not be appropriate where enforcement is required. We consider this would only be effective alongside an increase in professional rangers on the ground.</p>
<p>The use of a tariff applied to residential and employment developments within 15 km of the Habitats Sites</p>	<p>We regard the adequate resourcing of mitigation measures to be an essential requirement. We would therefore welcome discussion with Sheffield City Council about mechanisms to fund capital and ongoing costs of mitigation. The provisions within Policy DC1 (the Community Infrastructure Levy (CIL) and other developer contributions) may be adequate in this regard, as long as its applicability to Habitats Sites mitigation is recognized.</p>
<p>Fencing known bird nesting areas</p>	<p>We regard this as wholly impractical- for example, a 2018 survey recorded 522 pairs of Golden Plover within the SPA (<a href="#">Peak-District-Moorland-Breeding-Bird-Survey-Report-2018,-Revised-2021.pdf</a> (<a href="#">moorsforthefuture.org.uk</a>)) and territories are likely to change from year to year. It would also be in significant conflict with landscape and access objectives, policies and potentially legislation.</p>
<p>Provision of alternative green space (LP policies NC1 and NC15)</p>	<p>These measures are particularly welcome. The HRA Addendum report proposes a minor addition to the wording of the explanatory text for Policy NC15 (which we note has yet to be added) to make it clear that for sites within 7 km of the SPA/SAC, priority should be given to the creation and enhancement of accessible natural greenspace within the relevant catchment that would help deflect visitors away from the SPA/SAC. We welcome this proposal with the caveat that it should apply to development throughout the Local Plan area, not just within 7 km of the SPA/SAC, in line with our comments on the Zone of</p>

	<p>Influence. We would also welcome cross-reference to the provision of Green Space identified on the Sheffield Plan Policies Map, to ensure there is adequate allocation to limit any increase in recreational pressure on the Habitats Sites.</p>
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