

## **Loxley Valley Township Objection from Friends of the Loxley Valley**

**20/01301/OUT | Hybrid Application for change of use of existing buildings to be retained, altered vehicular access from Loxley Road with secondary public transport access from Rowell Lane and associated works with outline approval (*with all other matters reserved*) for demolition of existing buildings and structures, provision of a residential led mixed-use development that will deliver up to 300 dwellings, reinstatement works, site remediation, green infrastructure, landscaping and associated infrastructure (Amended Description) | Hepworth Properties Ltd East Works Storrs Bridge Lane Sheffield S6 6SX**

Friends of the Loxley Valley is a community group with the aim of caring for the Loxley valley, showcasing its wonderful qualities, and when necessary protecting and defending it. At the time of writing, FOLV had around 98 members.

Furthermore, at the time of writing there were over 700 objections to this application from the local community and interested parties, indicating the strength of community feeling around this inappropriate large scale development in a quiet rural valley bordering the River Loxley. This objection is attempting to reflect the voices of the local community and interested parties and relies heavily on the comments submitted to the planning portal in relation to this application.

The background to our objection is the Sheffield Core Strategy 2009, section 3.4 and in particular points 6 and 7

- Respect the global environment by reducing the city's impact on climate change and by using resources and designing sustainably
- Prize, protect and enhance its natural environment and distinctive heritage and promote high-quality buildings and spaces.

### **Point 1: Outline planning**

An application for outline planning is not acceptable for a development of this size and complexity.

The Peak Park objection noted that, '*We are surprised that the Council are prepared to consider granting outline permission for this significant development* '.

Furthermore, at the stakeholder consultation, and in the public record, it is stated that SCC has previously insisted that the site be dealt with by a full planning application and that any development on this unique site should be worthy of winning awards:

*"In principle, the site is not a suitable housing site, and so the case in favour of developing it – for housing or for any other use – is to secure an appropriate future for the site."*

*"..In this context, Sheffield City Council will not be allocating the site for housing, because to do so would put it into the general supply for housing land, and this would open the door to a generic, volume housebuilder solution that would not be appropriate. Instead, the Council is*

*insisting that the site be dealt with by a full planning application that specifically addresses the problems of sustainability, and so that all the unique considerations of the site can be fully considered. The Council's position is that an application on this site that is worthy of granting permission would also be worthy of winning awards."*

*"URBED did a study of growth potential for Sheffield in 2014, and didn't see this site as fitting that picture; so we can agree that it sits outside the growth strategy for Sheffield, and we can't pretend that it's a **well-connected** site".*

These comments are taken from the workshop report 'Former Hepworths Refractory Site, Loxley: Exploring Sustainable Development Solutions Workshop Report' Thursday, 13 December 2018  
Chair: Rob Murfin, Chief Planning Officer, Sheffield City Council

Applying for outline approval (outline approval **with all other matters reserved**) allows PP to submit an application that highlights potential key environmental aspects, such as community facilities, green spaces, cycle routes, etc., but when the land is sold off as 5 or so separate building plots there are no guarantees that these or any other commitments in the outline documentation will be upheld.

- In a full application, the decision-maker (Council or appeal Inspector) can determine whether this precise scheme is acceptable.
- In an outline application, the decision-maker is asked to determine whether, in principle, an acceptable scheme could come forward featuring the type and quantity of development that they are being asked to approve. There are no guarantees of what the final scheme will look like as these are all reserved matters.

Sections 4.5 to 4.13 of the Supporting Planning Statement make it clear that the "layout" along with "specific mix of units" will be dealt with at the reserved matters stage. This is not good enough for this sensitive location. The absence of precise layout plans means that there is a strong likelihood that other matters such as footpaths, cycleways, and tree plantings will result in a major departure from the current aspirations for the site.

The only meaningful application is a FULL application.

**FOLV think the considerations of the site are so specific that they cannot reasonably be determined through an outline application and that this outline planning application should be rejected for the above reasons.**

#### **Point 2: Availability of land for housing in Sheffield**

In principle, the site is not a suitable housing site, and so the case in favour of developing it – for housing or for any other use – is to secure an appropriate future for the site, not to meet the city's housing need (stated above).

Sheffield can meet its housing need without this site and this site is not necessary to fulfil Sheffield's housing requirement. Sheffield's housing needs are calculated using the Government's National Planning Policy Framework (NPPF).

In the officer's report P4 for the latest refusal of Ash Cottage, 20/00500/FUL, there is reference to the need for the council to demonstrate that it has a 5 year supply of deliverable housing sites.

The 5 year Housing Land Supply Monitoring Report published May 2020 shows that SCC has a 5.1 year supply.

*'In addition to the potential for a policy to be out of date by virtue of inconsistency with the NPPF, para 11 of the NPPF makes specific provision in relation to applications involving the provision of housing and provides that where the Local Planning Authority cannot demonstrate a five year supply of deliverable housing sites with the appropriate buffer the policies which are most important for determining the application will automatically be considered to be out of date. At the current time, the Council can demonstrate a five year supply. The 5-year Housing Land Supply Monitoring Report (published May 2020) sets out the land supply position as at 31 March 2019 and shows a 5.1 year supply of sites, including the appropriate buffer. Consequently the policies that are most important for determining this application are not considered to be out of date. Policies contained with the relevant development plan documents broadly align with guidance contained with the NPPF.'*

*The Housing Delivery Test (HDT) provides a measure, calculated over a 3-year rolling period of net housing delivery compared to the housing requirement. The first Housing Delivery Test results were published in February 2019. These showed Sheffield's delivery was 110%. We estimate that this will be 112% when published. This provides evidence that there is no significant under-delivery in Sheffield. Therefore a 5% buffer to ensure choice and competition on top of the 5 year housing land requirement applies".*

According to this report, 2124 houses per annum are needed for the next five years (total 10,620 houses over five years). The 5% buffer therefore required is an additional 531 houses bringing the total net requirement to 11,151. The number of houses which are actually deliverable in this 5 year time frame exceeds even the 5% buffer. The total number of houses which will be supplied in the next five year period is in fact 11,392.

Sheffield appears to have more land available than needed for the next five years.

**Therefore, as this proposed development in the Loxley Valley is not necessary to meet the city's housing needs, which can be met for the next five years, FOLV recommend that this application is rejected.**

### **Point 3: Sheffield's Green Infrastructure**

Previous attempts to develop this site have not been progressed, clearly demonstrating the depth of feeling in the local community about the inappropriateness of the site for housing and how this area should be managed and enhanced going forward. There is certainly no local support for a development of 300 houses in this tranquil green valley.

The Loxley valley, as one of Sheffield's main river corridors is a, 'distinctive and valued feature', and is specifically mentioned in **CS73 in the Sheffield Core Strategy** as part of the **Strategic Green Network**. These river corridors should be maintained and where possible enhanced (i.e. not concreted over with 300 houses).

Furthermore, Sheffield is attempting to brand itself as the Outdoor City. This development could put this reputation at risk. The city's reputation was damaged when it began cutting down trees and this development has the potential to further undermine our claim to be an outdoor and green city.

**FOLV would prefer that the potential value of the site as a resource for nature, health and wellbeing, which respects both the heritage and the long term future of this part of the city, is**

**considered rather than housing, which would create an urbanised township in the valley that generates large profits for the developers at the expense of the local community and the green environment.**

#### **Point 4: Air Quality**

The construction of 300 new homes in a semi-rural area that is not adequately equipped with public transport or local amenities within walking distance will increase the traffic on the local roads and in particular will affect the Malin Bridge gyratory – a key egress route from the valley towards Hillsborough and the City Centre.

Increased traffic will lead to a significant reduction in air quality along Loxley Road, Loxley New Road and Holme Lane. This is already a route that has serious air quality problems at peak times. Many schoolchildren walk along this route to Forge Valley School. Adding yet more vehicles from the proposed development will worsen the problem.

The claim by the proposers that their 'Travel Plan measures are likely to benefit local air quality' is disingenuous. Similarly, the claim (7.32) that 'no significant impacts are expected in relation to air quality' simply ignores or dismisses the inevitable impacts on air quality on the route into Hillsborough. (see also Point 7 about transport and site accessibility)

UDP Policy GE22 says that development should be sited so as to prevent or minimise the effect of any pollution on neighbouring land uses or the quality of the environment and people's use of it.

The polluting effects of vehicle exhaust gases are widely acknowledged as a cause and contributory factor in respiratory disease, cardiac problems and cancers. The topography around the already gridlocked areas lends itself to further concentration of these health damaging agents. Valleys converging at Malin Bridge and Hillsborough create pockets of pollution that do not escape easily and are breathed in by local residents who live or work in the lower slopes of the valleys. In non-Covid times the traffic jams feeding into Malin Bridge and Hillsborough stretch for up to a mile and idling cars produce more pollutants than moving vehicles. With over 10% of Sheffield deaths attributed to respiratory and over 25% to cardiovascular causes any addition to this problem is a matter for serious consideration.

The Sheffield Air Quality Action Plan 2015 states:

*'We want to reduce nitrogen dioxide (NO<sub>2</sub>) and fine particle (PM<sub>10</sub>) pollution in Sheffield in order to improve the health of local people; by protecting areas of low air pollution and improving areas where pollution is elevated. We aim to contribute to the reduction of greenhouse gases and assist in the delivery of the City Strategy and the Council's Corporate Plan outcomes.'*

**FOLV therefore recommend that because of the likely increase in air pollution in the Malin Bridge/ Holme Lane area as a result of increased traffic moving to and from the development, this planning application should be rejected.**

## Point 5: Climate Change Obligations

### Planning Policy Context

The application describes relevant local and national policies, including the NPPF which has a section on 'Climate Change, Flooding and Coastal Change'. It makes reference to the flooding policy of this NPPF section, but gives much less consideration to the section that covers NPPF policy on climate mitigation, carbon emissions, and renewable, low carbon and decentralised energy.

Environmental Impact Assessment (EIA) and Environmental Statement (ES).

Schedule 4 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 state that an ES should include '...the impact of the project on climate (for example the nature and magnitude of greenhouse gas emissions) and the vulnerability of the project to climate change...'

[http://www.legislation.gov.uk/uksi/2017/571/pdfs/uksi\\_20170571\\_en.pdf](http://www.legislation.gov.uk/uksi/2017/571/pdfs/uksi_20170571_en.pdf)

Yet there is no mention of climate mitigation in the scope of the EIA and it is not included as such in the ES; sunlight and wind are specifically scoped out of the assessment, effectively ignoring the impact of likely temperature increases or extreme weather events. Vehicular emissions are included in the air quality category, and assessed as negligible in the long term, with provision being made for electric vehicle charging points. There is a provision in the air quality category for '...all gas-fired boilers to meet a minimum standard of 40mgNOx/kWh...' but there is no mention of the fact that the installation of gas boilers in new houses will, in any case, be banned from 2025.

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/810507/NPPF\\_Feb\\_2019\\_print\\_revised.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810507/NPPF_Feb_2019_print_revised.pdf)

Housing currently accounts for 15% of greenhouse gas emissions and the Committee on Climate Change has warned that legally binding climate change targets will not be met without the almost total elimination of these emissions

<https://www.theccc.org.uk/publication/uk-housing-fit-for-the-future/>.

So, any new housing development should demonstrate that it will not contribute to increasing emissions - ideally plans for all future houses should incorporate zero-carbon designs. This application does not do this and as this application is for outline planning permission only there are no guarantees that any housing on the site will have carbon reduction measures. The Sustainability Statement lists various features that may be incorporated in the final design but the actual detailed design features are covered under reserved matters and are therefore not determined.

**Sheffield Council declared a climate emergency in January 2019**, with the objective of the City being zero-carbon by 2030. This application does not inspire confidence that it will fit with that aim.

Page 33 of the Sustainability Statement suggests that the development will comply with emerging changes in building regulations - noted as being a 75% reduction in CO2 emissions by 2025 - but on page 34 it states that the design will achieve only a 31% reduction; page 34 suggests only that some renewable energy will be provided but only for '... a number of properties...' without any indication of how this will affect the total level of emissions.

Page 35 talks of employing sustainable design principles at the master planning stage, yet on other pages the implication is that such matters '...may...' only be incorporated at the final design stage; and the Supporting Planning Statement (SPS) does not include these issues in the list of Masterplan

Key Features (SPS para 4.11) and neither are they covered in the sustainability section of the SPS.

This inconsistency and lack of clarity do not provide reassurance either that climate mitigation was central to the development of the Masterplan, or that it will feature adequately in the final design.

Supporting Planning Statement.

Chapter 4 - proposed development - does not discuss carbon emissions or climate mitigation. The only item of relevance in this chapter is a passing reference to land being safeguarded for a potential community hydro-electricity scheme. There is no discussion of sustainable building techniques or zero-carbon housing.

Chapter 5 outlines relevant national and local planning policy. It lists Sheffield UDP policy GE29 (energy conservation), Sheffield Core Strategy policies CS 63, 64,65 (relating to climate change, renewable energy and carbon), but gives absolutely no indication of how - or even if - these policies will be met.

Discussion of the National Planning Policy Statement (NPPF) mentions certain relevant paragraphs, including para 11 which sets out a requirement for development to adhere to an environmental objective that includes '...mitigating ...climate change...including moving to a low carbon economy...', and para 127 which states that developments should function well '...not just for the short term but over the lifetime of the development...': but to re-iterate, there is no discussion of how these considerations will be taken forward.

The NPPF requirement for future proofing development is particularly relevant because the housing envisaged by this application will clearly be in use beyond the 2025 date set by government for the phasing out of gas boilers, the 2030 date set by Sheffield for a zero-carbon Sheffield, and even the 2050 date at which the Government has committed to reaching net-zero carbon emissions. According to the applicant's suggested timetable, some of the housing on this site would not even be built before the first of these target dates in 2025.

**The application therefore, which is a major application given its size and scope is contrary to both the National Planning Policy Framework and the Local Plan for Sheffield and should be rejected.**

NPPF considerations with regard to transport, carbon reduction and impact on the Green Belt

Clause 72 of NPPF states: the supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities, and working with the support of their communities.

The proposals put forward in this application are not well located, designed or supported by infrastructure and facilities and do not have the support of the local community. They would impose great pressure on the local infrastructure.

Clause 103 of NPPF states that the planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health.

The availability of local facilities is outlined in the application but they are at least 1.8 k away and a lack of nearby local facilities will increase the need and incentive for motorised travel, with obvious implications in terms of vehicular emissions.

This development is not sited in a location that can easily be made sustainable.

Green Belt: clause 143 of NPPF states that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.

We cannot see any exceptional circumstances for this application.

Clause 144 of NPPF states that when considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.

We cannot see that this has been considered.

Clause 145 of NPPF identifies buildings that are allowed in the Green Belt by exception only.

Exceptions to this are:

- (a) buildings for agriculture and forestry;
- (b) the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;
- (c) the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;
- (d) the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;
- (e) limited infilling in villages;
- (f) limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites); and
- (g) limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would:  
not have a greater impact on the openness of the Green Belt than the existing development; or  
not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority.

**We do not think this application is sufficiently exceptional to warrant approval and furthermore, we feel that, should it go ahead, it would have an adverse impact on the openness of the Green Belt.**

Although this site is a brown field site it is a previously developed site within the Green Belt and is considered a non-conforming site within the Green Belt on the edge of the Peak District. The Sheffield Development Framework Core Strategy Key Diagram clearly defines this area as green belt land and we suggest that a large scale development of this kind within the Green Belt would be contrary to planning guidance. A development of this size would also contradict the UDP guidelines.

*'So far as it can within its planning powers, the City Council will endeavour to support the protection and management of the special qualities of the National Park'*

Flooding is another issue to be considered. With climate change, 'once in a 100 years' flooding events are becoming much more common and several feet of water on the site. Clause 155 of NPPF states that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.

**The development is not necessary, as discussed under Point 2, and although the proposal talks about flood mitigation we believe that with the changing climate it does present an increased flood risk as it lies within an area at risk of flooding.**

FOLV therefore wish to reiterate our objection to this planning application on the grounds that the application is in direct conflict with the National Planning Policy Framework, Sheffield Development Framework Core Strategy and the UDP in terms of climate change. The proposal would create unsustainable traffic movements, is in an area liable to flooding and would have a detrimental effect on the openness of the Green Belt due to its scale and scope.

Furthermore, if approved, the proposal could create a precedent for this type of scheme and could encourage speculators & developers to buy up run down, long abandoned 'brownfield' sites in greenbelt areas for pure financial gain.

**On the grounds that the documents associated with the application do not give any assurance that the development will mitigate climate change, as required by National Planning Policy Framework (NPPF) paras 8 and 11 and that it appears to contravene local planning policies, FOLV suggest the application should be rejected.**

#### **Point 6: Wrong Size, Wrong Site – not appropriate for the area**

##### **Sheffield Core Strategy Policy CS 23 - Locations for New Housing**

*'New housing development will be concentrated where it would support urban regeneration and make efficient use of land and infrastructure. In the period 2008/09 to 2020/21, the main focus will be on suitable, sustainably located, sites within, or adjoining:*

- a. the main urban area of Sheffield (at least 90% of additional dwellings); and*
- b. the urban area of Stocksbridge/Deepcar.*

*After 2020/21, and before then as opportunities arise, additional housing growth will occur in parts of the city where significant change and regeneration are taking place. This will be primarily in the main urban area of Sheffield (with an emphasis on the Lower Don Valley and North East Urban Area) and Stocksbridge/Deepcar.*

*Outside the urban areas and larger villages, housing development will be limited to that which is consistent with policies for the Green Belt and countryside areas. '*

FOLV suggest that the development is inappropriate for the area and does not meet the above criteria. Furthermore, it does not respond to the area's prevailing character of abundant green infrastructure and open space. In other words, it is not "sympathetic to local character and history".

When rejecting the Ash Cottage application, another property in the Loxley Valley, the Local Planning Authority considered that the proposed development represented an overdevelopment of the site which was not in character with the context and appearance of the area.

*'The scale and massing of the dwellings would not complement the scale, form and architectural style of surrounding buildings and would leave very little private amenity space for family homes of this size. The development would also lead to the loss of views through to the Loxley Valley to the south which is an important element of the character of this location. The development would be unsympathetic to and adversely detract from the overall character of the street scene. As such the proposed development would be contrary to Policies BE5 a), and H14 a) & c) of the Unitary Development Plan, Policy CS74 a), b) & d) of the Core Strategy; the Loxley Valley Design Statement Planning Guidelines 2.1 (a) and 2.2 (a), and paragraphs 8 c), 122 d), 127 c) and 130 of the National Planning Policy Framework, and these adverse impacts significantly and demonstrably outweigh the benefits of the scheme when assessed against the policies in NPPF as a whole.'*

The Supplementary Planning Statement, 7.17 to 7.19 and 9.18, seeks to minimise the visual effects of the development in relation to the valley's key landscape features. It concludes that "there would be no adverse, significant visual effects...", and it claims that from specific vantage points there would be "negligible visual effects," or "fleeting nature of views." These statements do not appear to be supported by the nature of the development and they also confirm the inappropriateness of an outline application, which "reserves" many of the details which are needed in order to make a meaningful assessment of the effects of the final development.

The proposal also states that some of the buildings could be up to 4 storeys high, ranging from 9 - 12m in height and that there will be a the need for infill to raise the level of the land to prevent flooding. This makes it highly likely that the building will be clearly visible from the surrounding area and from the Peak Park. This will be hugely detrimental to the character of the area.

Paragraph 127 of the NPPF states that developments should add to the quality of the area; are visually attractive as a result of good architecture, layout and landscaping; are sympathetic to the local character and surrounding built environment; establish and maintain a strong sense of place; and optimise the potential of a site and create places that are safe, inclusive and accessible.

**FOLV believe this development would result in significant adverse, visual effects to the green nature of the valley.**

This application does not meet these criteria for sustainable local development, as outline planning means it is not possible to determine whether or not there is good architecture, layout and landscaping that is sympathetic to the local character.

Paragraph 122 of the NPPF identifies that development which makes efficient use of land should be supported taking account of various factors including housing need, viability, availability of infrastructure and scope to promote sustainable travel modes. As is discussed in the next section, FOLV do not think this development meets these criteria.

Paragraph 133 of NPPF states that the government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. The essential characteristics of Green Belts are their openness and their permanence.

Paragraph 136 of NPPF states that once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans.

Paragraph 172 of NPPF states that great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks. 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. The scale and extent of development within these designated areas should be limited. Planning permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest.

An application, 18/02512/FUL, was made by Hillsborough Golf Club to raise land using infill. This was refused, July 2019, because it would have resulted in 22,875 8 cubic metre lorry loads to be delivered to site over 20 months, 6 days a week, 12 hrs a day, Mon to Fri and Sat am, along Loxley Road. The development was considered to constitute inappropriate development in the Green Belt and to be detrimental to the openness of the Green Belt.

*'The proposal does not preserve the openness of the Green Belt, detrimentally affects the visual amenities of the Green Belt, is considered to conflict with the purposes of including land in the Green Belt and gives rise to other harm. No very special circumstances to justify a departure from national planning policy have been demonstrated and the Local Planning Authority therefore consider the development to be contrary to paragraphs 134 c), 143, 144 and 146 of The National Planning Policy Framework, Policy CS71 of the Core Strategy and policy GE1 c) and GE4 of the Unitary Development Plan.'*

**The Hepworth site is immediately adjacent to the Peak District National Park, and the proposal is for a major development that is not an exception and is not in the public interest. It is likely to have adverse impacts on the preservation, enhancement and openness of the Green Belt in a much more dramatic way than the Hillsborough Golf Club development.**

The Peak District National Planning Authority have objected very strongly to this application and the detrimental effect it will have on the landscape bordering the National Park and the Park itself.

This is **not a typical brownfield** site and it has been well documented that sites such as this have a significant role to play in supporting biodiversity. Any plans to develop an area as unique as this should therefore be considered from this standpoint, given the pressures that UK biodiversity and wildlife is currently experiencing and the need for the government to expand tree coverage.

Furthermore, the development of the site would also cause major local disruption during construction for up to 8 years, involving frequent passage of heavy lorries and other vehicles up and

down Loxley Road. Items 10.100 - 10.105 identify the construction nature as a medium risk on nearly all activities. It says that these can be mitigated against but there is no discussion of how this risk can be mitigated to an acceptable level.

Planning Statement 11.78 suggests there would be a "slight adverse impact" for pedestrians and cyclists "due to construction activities, in terms of delay, amenity, fear and intimidation and accidents and safety."

With reference to the earlier rejected planning for Hillsborough Golf Club. Another reason for the rejection was the local disruption

*'The Local Planning Authority consider that HGV vehicle movements to and from the site, as well as plant and equipment and construction vehicles operating within the site during the construction phase of the development, will give rise to unacceptable noise and disturbance owing to the excessive hours of operation proposed. The development will therefore detrimentally affect the amenities and living conditions of residents, particularly those adjoining the application site and those located close to the junction with Long Lane and Loxley Road which will be used by HGV's serving the site during the 20 month construction period. The proposal is therefore contrary to policy GE24 and MW7 parts b) and d) of the adopted Sheffield Unitary Development Plan and paragraph 170 e) and 180 a) of the National Planning Policy Framework.'*

There needs to be a more thorough assessment of local impact. Local minor roads are important for local residents and businesses and there are often few, if any, alternatives. Any interruption or disruption to networks must be fully understood and any concerns alleviated before any permission is granted.

#### **Point 7: Accessibility: Transport, Schools other local facilities**

There are presently approximately 1,828 people living in Loxley, in 753 households. A development of 300 households with an average of 3 people per household will add an extra 900 residents and create a separate township near to Loxley, a small, rural village. This equates to an increase in the population of the Loxley area by almost 50% in a very short space of time and will put pressure on the local infrastructure. The increased pressure on the local infrastructure coupled with the remoteness of the site is another reason why this planning application should be rejected.

Paragraph 8b of the Planning Framework identifies that fostering a well-designed and safe built environment with accessible services is a key part of the social objective of achieving sustainable development.

Paragraph 102 of the NPPF states that transport issues should be considered from the earliest stages of plan-making and development proposals, so that:

- (a) the potential impacts of development on transport networks can be addressed;
- (b) opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised - for example in relation to the scale, location or density of development that can be accommodated;
- (c) opportunities to promote walking, cycling and public transport use are identified and pursued;
- (d) the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account - including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and
- (e) patterns of movement, streets, parking and other transport considerations are integral to the

design of schemes, and contribute to making high quality places.

The Traffic Assessment mentions the availability of Storrs and Dungworth for local amenities. The plans suggest that 2km, rather than more normally used measures of 0.8, 1.2 or 1.6km, is a reasonable distance to expect people to walk. The surgery, pharmacy, pubs, shops, churches, library, primary school etc. are all around 1.9km from the development, which is theoretically walkable or cyclable for the able-bodied but these amenities can only be accessed via narrow, steep unlit lanes and a single track ancient bridge – Rowell Bridge. Travelling on foot or by bike, involves climbing a very steep hill with no footpath or street lights. It would not be safe to walk or cycle up to the local facilities in the dark or in inclement weather conditions. Furthermore, any increases in traffic to and from the development would be unsustainable and dangerous on the narrow local roads.

The NPPF paragraph 109 makes it clear that development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impact on the road network would be severe. FOLV believe that this development will have a severe and unsafe impact on the road network which is not adequate for such a development.

The application makes vague and ill-defined references to “improving” cycle connectivity as a way to mitigate the use of cars. This is at best questionable, largely unachievable, and to some extent undesirable and fraught with dangers.

There is currently no off-road cycle connectivity on or around the site because there are no rights of way that provide lawful access for cycling. To change this would create more problems than it would solve. The site is connected to wider recreational countryside to the west, south and east by small and quiet public footpaths, not bridleways, i.e. these are rights of way that provide access for walkers only, not people on cycles, e-bikes or horseback. They are in the most part naturally surfaced, narrow, uneven, constrained by vegetation, tranquil, secluded and beautiful. These are precisely the qualities that people seek and value when enjoying them as sustainable recreational assets. Opening them up for safe active travel use would necessitate upgrading them to bridleway or byway status, with attendant physical changes that would destroy their character. The applicants provide no evidence that they have consulted local cycling/active travel organisations such as Cycle Sheffield, Sustrans or the Upper Don Trail Trust for advice. If they had, they would have been told that safely combining walking with wheeled and hooved active travel requires much greater width, durable surfacing, clear lines of sight, and, on intensively used functional stretches, some element of lighting and physical separation.

These necessities could perhaps be provided within the site if residents wish to spend their time riding round in circles close to their homes, although even this would probably require intrusive new illuminated cycle bridges across what is currently an unpopulated riverside wildlife haven.

Beyond the site, they are fraught with difficulty as follows:

- The public footpath in the valley bottom running north west from the site towards the Peak District is narrow and borders a small commercial fishery where anglers sit adjacent to the path and regularly place roach poles across it. This situation can be amicably negotiated by walkers. It cannot be safely combined with cycling or, for that matter, horse riding. There has been recent tension between the fishery and cyclists and off-road bikers who have been riding unlawfully on

the footpath, and on others that connect to it. This has resulted in prominent 'no cycling' notices around the fishery. The same considerations apply to the continuation of the valley spine footpath beyond the fishery. The path is narrow, naturally surfaced, and punctuated by a narrow stone goit sluice and a narrow gritstone stile gateway. There is insufficient width to introduce cycling up the valley west of the application site without the risk of injury or annoyance to walkers and anglers seeking countryside tranquillity.

- There are currently four public footpaths leading from the site to the south and the south west. These connect to a wider network of footpaths - not bridleways - eventually connecting to Dungworth, Storrs Carr, Storrs and Beacon Wood. They are all charming, tiny, wooded, secluded, steep, rough and naturally surfaced. In other words, they are totally unsuited to the safe and sustainable combination of walking with wheeled and hooped active travel. For the reasons stated earlier, any attempt to introduce active travel on these paths would destroy the characteristics that make them so special.
- The right of way leading from the site to the east along the valley bottom - towards Rowell Bridge - is also a public footpath, not a bridleway. Although it is in the most part concreted, this is a historic workers' path, not a thoroughfare designed for wheeled transport. It is nowhere near wide enough to safely combine walking with other uses, especially if the applicants are predicating its use as a viable active travel route towards Stannington and the wider city. Again, to widen it and introduce better lines of sight would undermine the tranquillity, vegetative envelopment and immersion in nature that makes it such a special place. This would be even more the case if this path was to be seriously suggested as a round-the-clock active travel commuting route, as this would require the introduction of some element of lighting. This stretch of footpath also borders onto Rowell Lane at a point where there are no roadside pavements and where drivers are distracted by negotiating the hazardous one-way system over Rowell Bridge. This could place cyclists at risk when they emerge onto the road.
- Heading east beyond Rowell Bridge, the valley bottom footpath would become even more problematic as an active travel route for cyclists. The stretch of path between Rowell Lane and Olive Lane is an 'easy access route' surfaced for wheelchairs and bordered by a tapping rail for walkers with visual impairments. In places it is narrow, (so much so that two walkers sometimes struggle to pass each other), with blind bends. It is the most beautiful stretch of riverside footpath in the valley and is valued by local people for its peacefulness and tranquillity. During the recent coronavirus crisis, there have been very real tensions between walkers and cyclists who have been riding there unlawfully, apparently unaware of access restrictions or in some cases openly unwilling to accept them. This has resulted in at least one accident (witnessed by one of our members), in which a walker's dog was run over by a mountain biker, (a fist fight very nearly ensued). We understand there has been a similar incident in the Rivelin valley, when a walker was knocked into the river by a cyclist who should not have been riding on the nature trail. The tensions in the Loxley valley have now resulted in prominent signs being placed on this section by the city council, making it clear that cycling is NOT permitted. We welcome this and would like to see more signage around the valley to inform people of access restrictions, rights and responsibilities

All the above observations are mainly directed at the difficulties associated with off-road cycle access in the immediate proximity of the site. We would now like to turn to issues of cycling connectivity to the wider city as currently built and inhabited.

The applicants argue that the site is within walking and cycling distance of shops and other facilities at Stannington. Perhaps so for the reckless and superhuman! Most sane mortals would not attempt the journey on two feet or two wheels. The only on-road cycling connection is via Spout Lane. This is steep, narrow, with tight blind bends, no segregated cycle lane (and no space for one), no street lighting, and prone to ice in winter. It is simply not suitable for safe cycling. The only off-road alternative is the historic Spoon Lane bridleway. The bridleway itself is steep and narrow, with blind bends and a very loose surface that can easily dismount an unwary cyclist. Even specialist mountain and gravel bikes have to be held cautiously on the brakes for most of the descent, and cyclists have to (or should!) stop and wait for walkers or horse riders to pass if they encounter them. The bridleway is simply not suitable for safe daily active travel use, and again to make it so would destroy the historic characteristics that make it so special. Also, to reach the bridleway in the first place involves a steep, indirect deviation up Storrs Lane, which is another narrow unlit country lane prone to icing in winter.

All the above leaves Loxley Road as the only viable arterial cycling route between the site and the city. Between the site and Loxley, the road is mostly derestricted, without a cycle lane and with no space to create one. The road is used intensively by recreational cyclists, whose numbers have rocketed since the Tour de France, and even more so during the recent pandemic crisis. Cyclists already have to contend with motorists overtaking them at excessive speed often when there is little room to do so. Problems would be made worse by a busy road junction at the top of Storrs Bridge Lane, which sits just beyond a blind brow on the city side. Motorists accessing the new township would misjudge the speed of accelerating cyclists and would cut across them to turn left, placing the cyclists at risk. The same would apply to motorists pulling out of the Storrs Bridge Lane junction - the potential for them to misjudge the speed of approaching cyclists and pull across them would be unacceptably high. These dangers could arguably be mitigated by installing traffic lights or a roundabout, but such measures would constitute further urbanisation of the beautiful national park fringe and would diminish the openness of the Green Belt.

From Long Lane east, the problems intensify. On-street parking means Loxley Road is effectively one-way in many places. The recent boom in intensive cycle use has resulted in motorists becoming impatient with cyclists and attempting to overtake them when there is simply not enough space to do so. It is already obvious that Loxley Road needs properly designed infrastructure to make active travel safe.

From Hollowmoor Road onwards, the problems for cyclists become even worse. The supposed cycle route via Watersmeet Road, Thoresby Road and onwards is little used because it is slow, indirect, hard to find and hilly. This means cyclists have to negotiate the hazardous and polluted Malin Bridge one-way system and then navigate their way over and past the tram tracks at Malin Bridge and along Holme Lane. Numerous cyclists have been dismounted and injured on the tram tracks at Malin Bridge. This place has been logged and highlighted by Cycle Sheffield as one of the worst accident blackspots for cyclists in the whole city.

All these problems and dangers would be exacerbated by the increased traffic generated by this proposed new development. It is ironic to say the least that the applicants have promoted safe family cycling in their intensive sponsored Facebook advertising. Nothing could be further from the truth! Given the prominence devoted to cycling and active travel by the applicants, this should not be regarded as a marginal issue. We would urge the planning authority not to approve this application without very detailed consultation with relevant active travel experts. We would suggest these should include, at the very least, Cycle Sheffield, Sustrans, Cycling UK, The Sheffield City Region Active Travel Commissioner and the Upper Don Trail Trust.

It is clear that the site is not located for easy travel by foot or by bike and that the existing transport networks would be put under increased pressure from the development. This would be detrimental to the local environment in terms of pollution from increased vehicle emissions and congestion due to the increased traffic movements.

Section 7.11.5 specifically states "for the purposes of this traffic impact analysis it has been requested by the highway's officers at SCC that 59% of development traffic travel through the Malin Bridge Gyratory during the peak periods."

The transport assessment Section 11.10 talks about an increase of 31 to 45% of traffic suggesting that this is not substantial, but this does not consider **any other developments in the area** – there is currently a new Lidl store being built in Stannington just before the Malin Bridge gyratory, and this will further increase traffic to the area.

Regarding increased traffic flows, Section 7.6.5 specifically states "for the purpose of this analysis, no development traffic has been assigned to Rowell Lane or Long Lane, this provides a robust assessment of the junctions located in the study area as these provide alternative routes to destinations such as Stannington and Oughtibridge."

The report appears to be concerned only with traffic flows at Malin Bridge and the immediately surrounding roads ignores the fact that traffic will also access local amenities via Rowell Lane.

To mitigate the effects of traffic, the proposal talks about expanding the 52A bus route to 4 buses per hour. However the 52A does not go to Stannington where the local amenities are located. There are also well documented problems with the reliability of the current 52A service.

The lack of local infrastructure, inadequate public transport and the remoteness of the site means new residents will be car dependent and the plans recognise this by stating that many houses will have parking for 2 cars. This increase in traffic will have a profound effect on local congestion and air quality – see point 4.

The Sheffield Hallam MP Olivia Blake, has registered her concerns regarding the impact of the development on public services, stating that without significant investment in infrastructure, Loxley cannot take another 300 houses.

There will also be pressure on local schools:

*Primary schools:*

Stannington Infant – over-subscribed by 60  
Loxley Primary by 17  
Malin Bridge by 32

*Secondary schools:*

Bradfield – over-subscribed by 37  
Forge Valley by 35

Planning Statement Table 11.10 Residual Effects Summary is limited and inaccurate as the disruption and severance cited only considers commuters through the valley, not the extent to which it is used both recreationally and by those who work and live within it. Furthermore, the lack of genuine infrastructure proposed will not stimulate the local economy. A commuter community, dependent on travelling to work or to shop is in danger of creating a "car-dependent enclave of executive homes".

**FOLV therefore suggest that this application is rejected due to its relatively remote location and lack of suitable infrastructure.**

**Point 8: Natural landscape/ecology/biodiversity**

Policy GE11 of the UDP seeks to protect and enhance the natural environment ensuring that the design, siting and landscaping of development respects and promotes nature conservation and includes measures to reduce any potentially harmful effects of development.

Policy GE13 also seeks to ensure that development affecting areas of natural history interest and local nature sites should, wherever possible, be sited and designed so as to protect and enhance the most important features.

**FOLV hopes that that the planning committee take specific account of Chapter 15 of the NPPF- Conserving and Enhancing the Natural environment when considering this application.**

The transport assessment in section 11.60 recommends widening of Storrs Bridge Lane, as the major egress point, however this will impact on a number of category B trees that would be removed. To address climate change it is important we maintain and expand tree cover. FOLV would be opposed to the loss of these mature trees and their replacement with saplings.

It is noted that according to the notes there are ancient and veteran trees on site. In Para 175 of the NPPF such trees are afforded protection akin to that given to listed buildings. Moreover, any threat to them and the land around them from development can only be permitted for "wholly exceptional reasons". It explains such reasons would be Nationally Significant Infrastructure Projects. This development is not such a project.

When the Tyndall Centre reported to the Council after its historic Declaration of a Climate Emergency it recommended a HIGH ambition with regard to tree planting, forestry yield improvements and forestry management. Keeping sites that are left for nature are generally healthier and more diverse.

The proposed site layout will result in the loss of mature trees from this highly sensitive location. The relevant Policies GE8, GE15 and BE18 require the retention of the existing landscape/trees and therefore the proposed site layout and development parameter plans will need to be revised in order to comply with this.

Whilst a number of 'mitigations' are proposed within the submission it is not clear how this development, at the proposed scale meets the requirement of Natural England's Bio Diversity Metric 2.0 to achieve a 'Net Gain' in biodiversity, especially given that there appears to be limited or no support for an ecologically sensitive approach or incorporating innovative green building design as part of this application.

Other considerations include concerns that the housing density will be too great to create a "green corridor" for wildlife

**We consider that on this basis that the application/proposed development fails to comply with the following planning policy requirements:**

- Regulation 18 of the EIA Regulations 2017 and the provision of sufficient information within the Environmental Statement.
- ODPM Circular 06/2005 and the consideration of protected species required by Paragraphs 98 and 99.
- Paragraph 170 of the National Planning Policy Framework 2019, with respect to minimising impacts on and providing net gains for biodiversity.
- Paragraph 170 of the National Planning Policy Framework 2019, with respect to establishing coherent ecological networks.
- Paragraph 175 of the National Planning Policy Framework 2019, with respect to the avoidance of significant harm to biodiversity.
- Sheffield Unitary Development Plan Policy GE10, with respect to the protection and enhancement of Sheffield's green network.
- Sheffield Unitary Development Plan Policy GE11, with respect to the protection and enhancement of Sheffield's natural environment.

The Magic Map and the Environmental Statement ("ES") submitted with the application show that the site includes a number of habitats of principle importance for priority species. The proposal will result in loss of mature trees and encroachment onto the natural buffer between the brownfield land and the pond, causing a loss of habitat for priority species.

It is clear that the valley is home to many different wildlife species including foxes, badgers, owls, deer, protected bats and a wide variety of birds. The Bat and Barn Owl survey identified that the site is home to roosts and nests for both bats and barn owls in the buildings and surrounding woodland. This is without being able to access all buildings suggesting that there could be a greater number of bats and owls, some of which protected. The bat loss mitigation plan includes the construction of two "bat lofts". However the Urbed Illustrative Masterplan does not include these. The designated Easterly building number 4 shows a "retained building for mixed uses with flexibility including a new homeworking community hub". The designated Westerly building number 5 is

shown as a "having a range of uses including bike hire, GP Surgery and a restaurant". Neither of these would seem to be conducive to housing a bat loft.

The current application that involves a proposed eight year build phase on top of significant and unavoidable habitat destruction can therefore only lead to a significant impact on local biodiversity, existing ecosystems and wildlife. Increased traffic in the area and the construction of the new township will have a detrimental effect on the natural habitat. The demolition activities will destroy roosting sites.

- Size of naturalised buffer to existing path/pond: The relevant Green Network/Lakes, Ponds and Dams Policies identify the need to retain and enhance the existing green network/pond setting. However, the proposed masterplan appears to show a loss of the existing naturalised buffer between them and the previously developed land to the north of the site. The proposed plans should therefore be amended to retain this existing buffer. Any reduction to the naturalised feel of the footpath will result in a loss of the recreational value of this route.

Additionally, the Ecology section of the ES also states that a required mitigation measure is the provision of an adequate buffer between the pond and the proposed development.

Since the current proposals do not meet this requirement, any idea that this footpath would be a trail along which the valley wildlife could move is likely to be optimistic.

- Obtrusive lighting and light spillage onto the adjoining woodland has the potential to affect existing habitats and contribute to a decline in biodiversity, therefore, the proposed lighting scheme for the site should be designed to avoid species impact.

### **Impact on bird life**

- 1) There has been an overall decline in the all-species bird index of 11% in the last 45 years though sub-populations like farmland and woodland birds have seen more significant declines of up to 50%. Although the causes of these declines are multi-factorial, environmental and landscape changes are a key factor (DEFRA, 2019),.
- 2) Loxley Valley has an existing diverse population of resident woodland, wetland and farmland birds, reflecting its current mixture of woodland, wetland and farmland landscape. It is also an important breeding area for nesting migrant birds as well as a feeding point for passage migrants. This development proposal threatens local birdlife, a key component of essential bio-diversity. Siriwardena, Cooke & Sutherland (2012) demonstrated that overall landscape factors not only have the greatest impact on overall bird presence, but that adjacent landscape features such as tree cover and urban developments impact presence across all bird populations. This strongly suggests that this development will not only threaten those bird species on the site, but will also impact the farmland and woodland birds throughout the Valley.
- 3) As well as being a key component of essential biodiversity, a diverse bird population has a positive impact on the wellbeing of the local human population (Cox et al, 2017). This development therefore not only threatens to impact not only the local wildlife ecosystem, but also the existing local human residents.

### **(References**

Cox, D.T.C., Shanahan, D.F., Hudson, H.L., Plummer, K.E., Siriwardena, G.M., Fuller, R.A., Anderson, K. Hancock, S., and Gaston. K.J. (2017). Doses of Neighborhood Nature: The Benefits for Mental Health of Living with Nature. *BioScience* 67: 147–155.

DEFRA (2019). *Wild Bird Populations in the UK, 1970-2018*. [online]. Available at: <https://www.gov.uk/government/statistics/wild-bird-populations-in-the-uk>

Siriwardena, G.M., Cooke, I.R., and Sutherland, W.J. (2012). Landscape, Cropping and Field Boundary Influences on Bird Abundance. *Ecography* 35: 162–173, 2012

The Executive Summary states “Due consideration should be made with respect to the mill pond / reservoir in the north east sector, the integrity of the walls / dam structure will need to be confirmed. Some of the documentation suggests that works will be required to remove this feature in part with subsequent replacement by an engineered lined pond. So there is lack of clarity about what will happen to the pond and there has been no consideration of the environmental impact of the changes to the pond, whether that is replacement or reinforcement.

In support of our objection we refer again to the refusal to grant permission to Hillsborough Golf Club for lack of information about the ecological impact, 18/02512/FUL.

*‘Insufficient information has been submitted to determine the ecological effects of the development. In the absence of such information the Local Planning Authority cannot be satisfied that the proposed development would not have a detrimental impact on habitats and species, including protected species within and adjoining the site. The development is therefore contrary to Policy GE11 of the Unitary Development Plan, CS74 of the Core Strategy and paragraphs 170 a) and d), 175 a) and d) of the National Planning Policy Framework.’*

**FOLV recommend that the application to develop the Hepworth site is rejected because of the impact on the natural environment and local wildlife. We feel the applicant has not demonstrated a measurable biodiversity net gain, as suggested in the documentation.**

#### **Point 9: Flooding**

The area in which these additional dwellings are proposed is a flood plain. The National Flood Risk indicator number SYK309265, Storrs Bridge Lane (S6 6XX ), identifies this area as a High Risk Flooding area.

The Environment Agencies Flood Risk Map for Planning shows that the site falls within Risk Zones 2 or 3(highest risk) and the planning application will therefore need to show that there are no sequentially preferable sites in flood risk terms.

The flood risk report included within the application is based on 2015 data - since then we have had several significant periods of flooding down the Loxley Valley, most recently being in November 2019 when the river reached it's highest recorded levels at Rowell bridge, just down stream from the proposed development. The majority of the proposed dwellings are within flood zones 2 & 3 indicating that they are at significant risk of flooding with higher than normal water levels.

As outlined in the planning application, in order to consider building residential units within flood zones 2 and 3 there must be a sequential test carried out. If the sequential test is met, then a flood risk exemption test must be done.

According to the submitted 'Flood Risk Sequential and Exception Tests for Proposed Residential-led Development' document, the sequential test has been met because other sites for the development were considered and discounted, and there was nowhere else for this development to be built other than on an area which has flood zones 1, 2 and 3 within it. The flood sequential & exception test conclusion shows that there is no guarantee that flooding will not occur and the mitigation measures are not guaranteed to be implemented by whomever the house builder is, as the proposal of SuDs needs to be managed by an overriding developer. This presents a huge risk and could affect the ability of home owners to insure their properties.

Following on from the sequential test, a site specific flood risk assessment should be carried out. We note from table 10.4 of the Drainage and Flood Risk document that the fluvial model submission to the Environment Agency is ongoing. We also note that there are some suggested mitigations for the flood risk.

The NPPF (para 163) seeks to ensure that development does not give rise to increased flood risks elsewhere and that the most vulnerable development is located in areas at the lowest risk of flooding. However, the effects of the flood mitigation measures further down river in Hillsborough do not appear to have been considered.

Furthermore, the Dale Dyke Dam history raises questions as to the wisdom of 300 new houses directly below a succession of four Victorian reservoirs, Strines, Dale Dyke, Agden and Damflask. The Loxley Valley and the area around Rowell Bridge through to Malin Bridge is already designated as a flood risk locality.

**FOLV recommend rejection of this application because we should not be building on flood plains when we are facing increased severe weather events driven by climate change.**

#### **Point 10: Heritage**

Planning Statement 15.51

Here it is stated that the name Rowell derives from the medieval word 'hweol', meaning water wheel. This suggests that the history of this valley goes back a long way, likewise the neighbouring Rivelin valley and nearby villages.

This development could have made innovative use of the site's industrial heritage-reusing existing buildings would both reduce carbon emissions and tie the development into the history of the site-but instead this proposal diminishes any former sense of place.

The Dale Dyke Dam disaster had a huge effect on the Loxley Valley and its history. Very little has been made of this in the Application and the old Rowell packhorse Bridge and track to the east of the site are unmentioned. (BRA60F/60D)

#### **Point 11: Affordable housing**

Although the planning documents suggest that it will be a mixed development with a variety of different housing, from older persons accommodation to "affordable" housing, as this is only an Outline planning application, there is no guarantee that any of the final development will be affordable. Furthermore, the location of the site suggests that the houses will command a premium value given their location. The developer will want to recover their expenditure on demolition and

remedial work and this would suggest that to achieve the highest profit on the development an enclave of executive homes in a rural location, would be the likely outcome.

This would be contrary to sustainable development and a failure to integrate affordable housing (para 8, 122 and 123 of National Planning Policy CS26 and CS40 and GAH5 CIL and Planning obligation).

## Conclusion

At a local level, Policy CS74 of the Core Strategy identifies that high-quality development will be expected, which respects, take advantage of and enhances the distinctive features of the city, its districts and neighbourhoods, including: the topography, landforms, river corridors, Green Network, important habitats, waterways, woodlands, other natural features and open spaces.

Policy GE11 of the UDP seeks to protect and enhance the natural environment ensuring that the design, siting and landscaping of development respects and promotes nature conservation and includes measures to reduce any potentially harmful effects of development.

Policy GE13 also seeks to ensure that development affecting areas of natural history interest and local nature sites should, wherever possible, be sited and designed so as to protect and enhance the most important features.

**It is clear that the proposed site is not designated or should ever be designated for volume housing and this planning application is in direct conflict with both the National Planning Policy Framework and the local plan core strategy.**

**It is the opinion of FOLV that the proposal does not enrich the Sheffield City Region, enable people and goods to move conveniently, reduce the city's impact on climate change or protect its natural environment. It does not enhance the distinctive features of the Loxley Valley and Friends of the Loxley Valley therefore recommend that the Sheffield Council reject this application.**

**We strongly feel that this development is of a scale that would be detrimental to both existing communities and to the beauty of Green Belt land that abuts the National Park. It is also possible that if allowed, other developers will see this as a green light to develop the whole valley down to Malin Bridge.**

### *Disclaimer*

*This report was created by volunteers from Friends of Loxley Valley based on comments from local residents. We apologise if there any errors, omission or misrepresentations.*