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BY EMAIL

1 July 2020

Diane Holgate, Principal Planning Officer,
Development Management Team
Planning & Development, SCC
Howden House
1 Union Street
Sheffield S1 2SH

Dear Ms Holgate,
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). Storrs Bridge Lane, Sheffield S6 6SX

CPRE South Yorkshire is the local group of CPRE, the countryside charity. Our vision is for a beautiful and thriving countryside, rich in nature and playing a crucial role in our nation's response to the climate emergency. We have c.1500 members and supporters locally, including those of our associated organization, the Friends of the Peak District.

In summary, we object to the grant of outline planning permission. The proposal is for a substantial residential development in a relatively isolated location, not considered suitable for allocation, with a severe lack of active travel options and considerable concern about road traffic impacts. The Council is being asked to determine this on the basis of an outline application in which the 'other considerations' - including potential benefits of the scheme around placemaking and landscape enhancement - are not on the table. This is unacceptable and merits refusal in its own right.

President: [Dame Fiona Reynolds](#)

CPRE South Yorkshire and Friends of the Peak District are run by the Campaign to Protect Rural England, Peak District and South Yorkshire

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There is strong evidence of harm and a distinct lack of evidence of benefit. Indeed the only benefit on offer is the cleaning up of the dereliction on the site and the community engagement process has shown that key local stakeholders, including CPRE, wish to hold out for a solution that we are confident is more comprehensively beneficial to the locality. In short, there is insufficient evidence to show that the scheme is good enough to justify its impacts. In this context, very special circumstances to develop in the Green Belt do not exist.

1. Community engagement

1.1 NPPF paragraphs 39-42 describe the importance of pre-application and front-loading. The applicant's planning statement implies that the stakeholder process which took place in December 2018 and included CPRE was a satisfactory and positive step towards an acceptable scheme. It is abundantly clear that this is not the case: CPRE provided feedback to the applicant in March 2019, and shared this with SCC, raising substantial concerns that have not been addressed. We will supply this shortly as a supplementary document.

1.2 The fierce objections to the current application from the Friends of the Loxley Valley (FoLV), the Loxley Valley Design Group (LVDG) and many local residents are ample evidence that community stakeholders do not see any meaningful evolution of the scheme based on their input at the consultation stage. Indeed, the backtracking from a full application to an outline application goes directly against the collective aspirations (including those of the Council) expressed at the outset of the stakeholder engagement process in 2018.

1.3 The severe limitations of an outline application are highlighted by NPPF para 124, which states *"The creation of high quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is effective engagement between applicants, communities, local planning authorities and other interests throughout the process."*

1.4 CPRE and other stakeholders have made the point throughout that this site is so unique that the acceptability of a scheme cannot realistically be determined without detailed designs, and this is what the community were given to expect in the 2018 stakeholder meeting.

1.5 Further, NPPF para.128 states *"Design quality should be considered throughout the evolution and assessment of individual proposals. Early discussion between applicants, the local planning authority and local community about the design and style of emerging schemes is important for clarifying expectations and reconciling local and commercial interests. Applicants should work closely with those affected by*

their proposals to evolve designs that take account of the views of the community. Applications that can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that cannot".

1.6 We must emphasise again that the application is significantly at odds with the aspirations for the site that were discussed at the initial stakeholder event because an outline application, with all matters reserved except access, gives absolutely no basis for comparison with the community's aspirations or concerns.

2.0 General comments on the application

2.1 Much of our previous response on the pre-application consultation of December 2019 remains valid; this was copied to Council officers but we will shortly submit it again as a supplement to this objection.

2.2 The applicant claims a positive impact on the openness of the Green Belt (GB), and that 10% affordable housing provision also potentially offers a very special circumstance to allow development in the GB. We cannot accept this position: openness is not simply a matter of built footprint, and the provision of 30 affordable homes in a location poorly served by non-car travel modes cannot be considered to be a benefit that could outweigh harm to the GB.

2.3 A bare outline planning application (apart from access, which in itself is not properly detailed) for a sensitive site in open countryside in the GB is inappropriate because it makes assessment of the key planning considerations extremely hard and hypothetical, notwithstanding the applicant's illustrative layout and the four parameter plans attempting to define the proposal for the purpose of assessing its impact. The applicant fails to provide the necessary detail on design, urban form, materials, housing mix, layout etc.

2.4 As stated above, the statement of community involvement (SCI) makes no attempt to respond specifically to any of the public representations made through the various consultations, but the Design and Access Statement does track general responses to the community consultation particularly referring to changes sought: a lower number of homes (up to 300); the proposed bus service through the site; larger landscape buffer along the millpond; and a reduction of development area to the north west of the site to reduce tree loss.

2.5 However after a promising start, community engagement receded and segued into a partial, hurried and minimal pre-application consultation in December and January 2020. We echo and support the comments of the LVDG and the FoLV that community involvement was poorly conceived and executed, resulting in an application that has met with very significant local opposition.

2.6 There is nothing on the Council's website to suggest they have consulted the Peak District National Park Authority, despite this being a major development within 700m

of the Park boundary. NPA officers, in their strong objection letter, have raised the concern that SCC could fail in their legal duty (s.62 of the Environment Act) as a statutory undertaker, unless impacts on the national park are properly considered. We echo this concern and ask SCC to ensure the developer provides sufficient information to judge whether harm would ensue to the PDNP's valued characteristics or setting.

2.7 The application includes many supporting submissions, but the Design and Access Statement (DAS) and Design Code, which the applicant intends would help define the urban form for any permission granted, actually goes no further in fixing any aspect of the development beyond what is defined in the parameter plans. Despite suggestions to the contrary, there is in fact no design code submitted other than the maximum height of building and its extent. The way the DAS reads, it is fairly clear that the applicant has opted in final editing to not constrain urban form in any way beyond height and location of development areas. It is unknown as to what version of the DAS was available, if any, to properly inform the ES preparation and to help understand the design quality and visual impact of the development and thereby the impact on openness of the GB. There is a serious question therefore over the soundness of the LVIA and visual impact assessments.

3.0 The Planning Statement

3.1 The mix of units and emerging masterplan are only illustrative and not for approval. Notwithstanding the submitted parameter plans (required to inform the Environmental Impact Assessment), the detailed fine grain impact of the scheme in its setting remains completely uncertain until such time as reserved matters might be submitted. These would not be by the Applicant but by future house builder/developers who will undoubtedly have their own views and approach on the nature of housing they choose to market, including its design quality, appearance and sustainability standards.

3.2 The Design and Access Statement and Design Code are claimed to fix some aspects of urban form in each 'character area' but, other than specifying maximum eaves heights, do not do so. Masterplanning rhetoric around ensuring appropriate character and place-making is completely undermined by these matters being reserved for future submission. Furthermore, it is hard to understand how the applicant's technical team has been able to properly appraise the visual and other impacts of the proposed development properly in the ES and LVIA without more detail of urban form. As a result, these studies cannot be relied upon and must be revised and resubmitted.

3.3 We have read the representations submitted by the LVDG and the FoLV, who with their intimate local knowledge make it very clear that the site is unsustainable, whether that be by availability of school places, access to daily facilities, public and active travel or other necessary features for development to be termed sustainable. We strongly support and endorse their comments. The idea, posited by the applicant's

planning statement (para 2.26) that the site is in an inherently sustainable location, is laughable. It is a remote location, poorly served by public transport, with cycling and walking options which are only viable for the fittest and most active of people.

4.0 Green Belt planning policy

4.1 We cannot support the applicant's contentions in relation to GB policy, particularly in regard to:

- the status of the Development Plan;
- the weight to be given to affordable housing provision;
- the interpretation of impact on the openness of the GB;
- the status of this previously developed site in relation to NPPF.

4.2 It is clear that Sheffield's draft Local Plan is late, but huge amounts of work have been progressed and proposals are imminent. It is known that recent delays have been in order to re-assess the urban capacity for required new housing, especially looking at city centre sites and other brownfield options, specifically to reduce or remove the requirement for the City to release GB land to meet its housing needs. Sheffield has actually exceeded its annual housing delivery target in recent years without resort to GB change. The City has also rightly undertaken a GB site options appraisal and, if any sites were required, there has been an exhaustive examination to identify sites that are most sustainable, i.e. those directly on the urban edge and with maximum access to services and served by public transport and other necessary infrastructure.

4.2 We know from the previous Chief Planning Officer's comments at the community workshop in December 2018 that, at that time, the Council did not consider the site to be suitable for allocation in the Local Plan, which means that the Council fully expected to be able to meet its housing need without recourse to this site. It is our view that the application site is neither needed or at all appropriate for release for housing development. It would be intrusive, damage openness, be remote from services and unsustainable, and be isolated within a sensitive cherished valley landscape.

4.3 Whilst the development is 'predominantly' on previously developed land (PDL), key elements are not. Existing open or treed parts are to be built upon, some of which are on the edge of the site, and others are along public rights of way (PRoW) within the site. This impacts openness. Whilst the NPPF definition of PDL includes the curtilage of developed land, it states that '*it should not be assumed that the whole of the curtilage should be developed*' and '*excludes [...] land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape*'. We consider that the proposal is harmful as it would develop parts which should remain open or are already blended into the landscape.

4.4 Whilst there may be a reduction in footprint (although new roads etc seem to have been excluded from the applicant's calculation of new hard areas), the envelope of built form is pushed wider than existing and will be much more uniform and urbanising by fragmenting the building form, and with the usual garden buildings, enclosures etc. Application drawing URBED 06 clearly shows how the proposed housing areas extend substantially beyond the existing buildings footprint into areas which are far greater than small gaps between buildings or enclosed courtyards. These areas are currently open (in visual terms) and enjoyed as such – be they undeveloped, hard surfaced, or covered with trees. There will be significant impacts of the development on the openness of the site both when viewed within on public routes through it, and beyond when viewed from outside the site (for example, from Acorn Hill to the east).

4.5 Further, building heights (quoted at 9m and 12m to eaves) may in practice be higher and thereby more intrusive than existing across much of the site, once roof structures are included and ground levels are raised. It should be noted that the flood risk assessment recommends floor levels be approximately 1m above existing ground for much of the site to allow for the predicted 100 year plus 30% flood heights.

4.6 Indeed the applicant appears to agree that significant change will occur in claiming the character will become 'vibrant residential' and will include extensive night lighting. This will impact significantly and adversely on the openness of the GB, its functionality and add to the visual impact of development, whilst also encroaching more widely into undeveloped land, as stated above. In all these ways it will be contrary to NPPF paras 134, 143, 144 and 145 and Core Strategy policy CS71. We are clear that, on account of the multiple impacts on openness, the site - despite being previously developed land - does meet the tests in NPPF para.145(g).

4.7 The development does not protect the strategic gap between settlements. It intrudes in such a gap in a fine edge of Pennine valley between Sheffield and several outlying village settlements, and the designated countryside of the Peak District National Park. It has purposely never been designated as a major developed site in the GB.

4.8 The site is not well served by public transport and would not therefore be an appropriate site for GB release in a GB review, under NPPF para.138. It is considered that improved public transport links are unlikely to materialise or be retained for the future, as explained elsewhere. It is clearly not a potentially sustainable edge of urban area site.

4.9 Whilst the proposal provides for limited affordable housing for which there is an identified need, it is overwhelmingly a market housing proposal. It is not considered to meet the NPPF para.145 tests which we hold are intended to facilitate housing schemes which primarily or substantially affordable. It does not meet criterion '(f) *limited affordable housing for local community needs under policies set out in the development plan*', or in view of its very limited quantity, make a material contribution to the need for affordable housing under NPPF para.145(g), bullet 2.

5.0 The housing delivery case

5.1 NPPF para.73 requires LPAs to provide for a 5 year supply of housing sites including buffers. The applicant argues that the proposal meets a shortfall, and is deliverable, suitable, and viable and this ‘should be afforded significant weight in the planning balance exercise’.

5.2 It is acknowledged that Sheffield has been marginally short of supply at times in the past, or just achieving it. However, the City Council have recently confirmed (officer report on 19/01343/FUL, Land off Moorthorpe Way) that they do have the required 5 year supply plus buffer: *‘The Council has recently updated its 5-year housing land supply position adopting the latest guidance. This shows that the Council has a 5.1 year supply.’* The proposal is therefore not needed to meet a shortfall.

5.4 In any event we do not agree that the site is suitable or that the development would constitute sustainable development as argued elsewhere. The Council is confident that it will continue to meet its housing site supply in imminent Local Plan proposals, having assessed city wide sites repeatedly, including a recent call for sites. Since this site is inherently unsustainable in terms of NPPF policies, it is inconceivable that it will be identified for future housing needs.

6.0 The LVIA and related issues

6.1 The applicant’s ecology etc studies indicate that the proposals would result in ‘increased anthropogenic pressure’. It is our view that the scale of development proposed and its enlarged envelope will contribute significantly to the adverse effect on biodiversity in and around the site. We strongly support the comments of the Sheffield and Rotherham Wildlife Trust (SRWT) and note their concerns at the failure to carry out the necessary preparatory surveys. Much of the site has naturalised over many years and the level of human activity is small and localised to the public footpaths. The site is predominantly quiet and peaceful, at ease with its rural setting. It is dark at night. Creating a large residential development will urbanise much of the site, including introduction of night-time lighting. It will be much busier, with perhaps around 800-plus residents: indeed ‘vibrant’ in the applicant’s words.

6.2 The application studies say *‘Visually the majority of views towards the site are limited to within close proximity due to the valley land form and presence of woodland’*. The site will become ‘primarily residential, vibrant character’ and it is further stated that ‘there would be no adverse significant visual effects as a result of the proposed development’. This is contested on important points of detail under our ES commentary below.

7.0 The Environmental Statement/Design and Access Statement

7.1 The Applicant's Landscape and Visual Impact Assessment (LVIA) is found in the Environmental Statement Summary. It states that the Zone of Theoretical Visibility (ZTV) of a development of 10m height is fairly localised. Their field verification (in winter, with deciduous trees not in leaf) indicates an even smaller zone of visibility – a counter-intuitive result that appears to undermine the veracity of the study. The applicant's assessment claims that, from the point of most potential impacted locations and groups, there is either negligible effect from the completed development or moderate benefits.

7.2 It should be noted that the proposed development is up to 12m in height plus roof structures (unspecified, but we assume around 3m extra height) plus flood mitigation land raising of up to approximately 1m. It appears that potential height of up to around 16m has not been taken into account in the LVIA. This is a serious failing of the, underestimating the ZTV and therefore undermining the assessment's validity. It is clear however that, from local viewpoints around and looking into the site, the development would be much more visible than the existing built form.

7.3 However the applicant's conclusions rely heavily on the mitigation of impacts by their commitment to 'high quality design and landscaping'. However, we know very little about the quality of design or the extent or nature of landscaping, or how long it may take to partially mitigate the substantial proposed tree removal. As these details are not provided at this (outline) stage, there cannot be certainty as to the final visual impact.

7.4 The Design and Access Statement and Design Code, in fact provide no fix to any of the development beyond that in the submitted parameter plans nos 01-04. Whilst the applicant's design team (URBED) have produced an extensive masterplan that hints at character areas, design principles, palettes of materials, new landscaping and urban forms, this is all entirely illustrative. All details of the development apart from access points, land use areas, retained buildings and new build heights are unknown and would be submitted later as reserved matters. These would be largely unconstrained, i.e. in the hands of unknown future developer/house builder purchasers of the site. There is nothing for respondents, interested parties, and local communities to rely on should outline consent be granted. This is not a Local Plan allocated housing site in a residential area where outline applications are easily considered but a highly sensitive GB site, in a fine rural upland valley skirting the Peak District National Park, where a full assessment of the impacts is essential.

7.5 The ES relies on desktop and field assessment and includes photos of views specifically to demonstrate the visual impacts. Unfortunately, several of these are positioned such that they fail to show important impacts from outside the site, or aspects of the development that would be seen from outside, or from public routes within the site. In our opinion, such impacts negate the applicant's conclusions that

there is no harm to openness of the GB or visual intrusion, causing the proposals to conflict with national and local Green Belt planning policy.

7.6 In fact, the LVIA largely ignores the issue of openness within this Green Belt site. Existing development volumes are largely packed into a modest number of large former industrial buildings with often quite large separation/distances between them, enabling the openness of the rural scene to permeate and flow through the site in many views and when walking through it. The proposed domestic residential layout of housing illustrated for the defined housing areas fragment the volumes into up to 300 blocks which would be tightly packed with little space between, and thereby the overall built envelope of above-ground structures extends the development footprint. Significant open areas at the entrances to the site are lost as are open areas along paths, the millpond and millrace. The effect will be routes becoming much more enclosed than currently (i.e. less open). In addition, where existing derelict buildings are merging into the landscape there will be a brand new, suburban, dynamic and lit environment which will give rise to substantial, adverse impacts on both amenity and openness.

7.6 In terms of specifics, we have examined the applicant's own photos. Whilst it is clear that in some photos there will be benefits from the proposed removal of large unsightly structures, in others the development's adverse impact on openness and environmental and visual quality is either ignored or very much understated.

7.7. Photo 1 is too distant and positioned looking through the Storrs Bridge Lane verge trees (many of which are to be removed). Thus it fails to show the new C3 residential development at Zone A1 which is on the site of a current modern but vandalised single storey block of modest sized industrial units ('C1') which sit in a wider open curtilage which is heavily treed. For reference this will become a 4-storey, extensive, unbroken development plus roof structures on raised land. It is indicated as 'L' shaped, filling more of the plot (including courtyard parking and servicing), and comes up to the presently undeveloped northern site boundary. When viewed from the public footpath along the mill race this current build is set back and small sitting well above the bank. It is hardly visible and does not spoil the rural tranquillity and feel of the path. When re-developed it will dominate the scene and remove numerous screening trees. The tree removal plans also confirm a significant loss of moderate quality trees that line the east side of Storrs Bridge Lane. The detailed highway works required for widening this access are not included in the planning application and so the ultimate effect on this avenue of trees is unknown. We say it will be significantly affected, opening up more views into the development at a key 'entrance' location.

7.8 Photo 2 shows open land and extensive shrubbery/trees to the right where an extensive area of 4-storey housing is proposed. This part of the public footpath will be completely urbanised, including where one might walk up the steps away from the watercourse. Current openness will be entirely lost.

7.9 Photo 3 will have houses all around the viewpoint, thus reducing openness. Photos 11 and 12 will have new houses on currently open land to the right side in both, again reducing openness.

7.10 Photo 18 is angled such that it fails to capture most of the proposed new housing (F1) in an area (right up against the millpond embankment) where there is no current development. Maps of the area show that when the millpond was built, there were some small cottages built here, but long since demolished. The area has naturalised and helps create the tranquil rural character that now exists. The Flood Risk Assessment suggests a minimum 600mm freeboard be maintained here, presumably by either lowering water levels or the suggested 'reinforcing' or raising the banks. The potential need for rebuilding the pond and millrace banks for flood resilience would of course result in significant further tree removal, directly opening up views into the development (as well as on public routes within it) - again reducing openness - and increasing the urbanising effect on the millpond.

7.11 The beauty and openness of this publicly enjoyed valley will be transformed adversely by the proposed development which will also be highly intrusive for users of the public rights of way through the site, as well as in views from the north. In addition, the tree retention plan indicates that the 4 new dwellings here will have rear aspects touching the tree root protection zone and thus likely the tree canopy. These trees will be under clear threat now and in future as they impact occupiers. The remainder of zone F (i.e. F2) is in a currently treed and open area immediately facing the Rowell Lane access and will thus be visible from that approach and beyond. The character of the now naturalised millpond, which is readily visible from the northern edge of the site, will be severely urbanised with houses backing on to it and a main access and bus route metres away along its length to the south.

7.12 Photos 18 and 21 are from Loxley Road. Even at the time of writing (late June), it is apparent that, whilst some large buildings are still in view (perhaps surprisingly), many of the undeveloped parts of the proposed residential areas are also readily visible. The viewpoint allows one to look down into the core of the developed site, where new housing will fill many of these spaces. The clear gaps between development which help openness flow through the site will be lost.

8.0 Traffic and travel issues

8.1 In summary, this development has not been designed around sustainable travel and is too remote for people to walk or cycle to essential services. The proposals for mixed use buildings, a bus service and a travel plan framework, cannot 'make good' the inappropriate location, the unsustainability of which would be further compounded by excessive car parking. When tested against the Transport for New

Homes checklist¹, the development scores as 'poor' for sustainable transport. The outcome would be a car-dependent enclave.

Walking and cycling

8.2 The applicant claims the site is in a sustainable location in close proximity to Loxley and Stannington and that it is well connected to a network of footpaths to access these centres. However, the site is isolated from Stannington (the principle service centre) by topography and the nature of the local lanes which provide access. The roads are awkward to navigate, involve significant ascent, are unlit and are completely unsuitable for safe walking and cycling. Whilst both Loxley and Stannington are shown in the DAS as 'within 2km walking distance of the site', they clearly are not - except as the crow flies. For example, from the main site entrance Google Maps finds that Stannington Post Office is 38 minutes on foot, with a 120m ascent; Loxley Primary School is 26 minutes on foot. There is no lawful off-road cycle access to the development, i.e. bridleways.

8.3 The good practice walking distance to public transport and day-to-day amenities is 400m (5 minutes), with 800m (10 minutes) as the maximum. The isochrones for walking distances (Transport Assessment Plan 4) show the whole estate would be within 10 mins walk of the bus stop, but other services are outside this timed distance (Transport Assessment Table 5.5). The only existing amenities that are within a 10 or 11 minute walk of the site entrance are Langland's Garden Centre and Loxley Nurseries. With the only option of walking unreasonable distances, some up steep hills, on paths or roads that are unsuitable for walking alone or in the dark, residents will use their cars.

8.4 If residents are to choose sustainable travel modes, new development must be designed around walking and cycling from the start. The Design and Access Statement has a single diagram showing pavements for pedestrians and a cyclist sharing road space with cars, whilst the site layout gives little detail (Transport Assessment Plan 2). Off-site, the applicant is only concerned with the provision of walking and cycling routes up Storrs Bridge Lane. The transport aspects of a development cannot be left to 'reserved matters'. They must be integral to, and provide the foundation for, the design of the site, not be add-ons as here; and they must extend off-site to provide attractive and safe walking and cycling routes to day-to-day amenities that people would use.

Mixed use elements

8.5 The proposal includes suggested but undefined mixed use elements, claiming these will provide necessary services for residents within the site. The prospect of achieving on site physical provision of essential local services is considered to be highly unlikely given the 300 dwelling size of the development and the fact that there is insignificant other housing nearby. Convenience shops, cafes, medical services etc

¹ <https://www.transportfornewhomes.org.uk/the-project/checklist-for-new-housing-developments/>

require far greater catchments to be viable. Due to its isolated position and lack of public transport, cycling and walking options, there is no immediate access other than by significant car journey to both daily convenience and higher order goods and services. Therefore the proposals do not constitute a 'sustainable neighbourhood' as concluded by the applicant.

Public transport

8.6 Nor would the proffered bus service offer a lasting viable option.

A regular (15 minute frequency in peak time) bus service No.52A would be routed through the site to provide access to the urban edge of Sheffield and beyond. This is supported by the PTA. Local people already describe the current hourly service as completely unreliable. Bus patronage is regrettably in long term decline (especially in less urban areas), both locally in Sheffield and nationally. The applicant elsewhere refers to the likely growth in home working post COVID-19, claiming that trip generation will be less for cars (and buses) from the development. This cuts both ways. Use of public transport is now not recommended at all except where essential and it seems highly likely that bus patronage will be severely affected now and in the future. Local Authorities' ability to subsidise non-commercial routes outside the core network will also be much reduced due to increasing financial pressures. It is inconceivable that this remote site with 300 dwellings will be well served in the long term by high frequency public transport. In the Zurich city-region, the regional transport body ensures an hourly service for settlements above 300 people; only large dense settlements receive a service every 15 minutes².

Traffic and cars

8.7 The traffic impacts that would be generated by the development are unacceptable. New residential development generates on average between 5 and 7 additional vehicle movements per dwelling per day, so 300 dwellings would create around 1,500 to 2,100 new trips per day. The transport assessment forecasts appear low and, in our opinion, underestimate post-development traffic impacts for a location remote from day-to-day amenities. Increased flows of between 25% and 31% on the B6077 east of Storrs Bridge would create a significant increase of road danger and intimidation and would deter pedestrians and cyclists from using the route. Other routes also experience increases of traffic - 11% on Rodney Hill/Ben Lane, which are residential streets, with two schools and with cars parked on pavements. The impact on Rowell Lane has not been assessed despite this being a rat run for drivers avoiding the Malin Bridge gyratory. The B6077 also links into a network of lanes that provides tranquil access to National Park landscapes. However, trips to the west of the development have been ignored, along with the National Park Authority's policies for modal shift away from car use with good connectivity between modes, demand management and low carbon initiatives.

8.8 The impact of the development on the Malin Bridge gyratory is dismissed as insignificant (Transport Assessment 7.11). One does not need a traffic assessment to

² Taylor I. and Sloman L. (2016) Building a world-class bus system for Britain.

refute this. Traffic on the gyratory and on the A6101 towards Hillsborough is already at a standstill during peak hours. Adding yet more traffic would increase congestion, air pollution (the development lies within the AQMA for NO₂ and PM₁₀ on the western side of the city) and rat running on unsuitable residential streets to avoid the traffic jams.

8.9 There has been no attempt to demand manage use of the car. The proposal is for access for 649 cars (2 spaces/each 2 bedroomed dwelling, 1/flat and 1 visitor space/4 dwellings). Omitting the 75 spaces for visitors gives 574 parking spaces for 300 dwellings or 1.9 spaces/dwelling. This provision is far too high. New development must start from the premise that travel by bus, walking or cycling would prevail as the modes of choice and provide 1 space or less per dwelling, with space for a car club (see Core Strategy policy CS53 Management of demand for travel).

8.10 The increased traffic flows that would be generated by the development are unacceptable. Transport is the one sector that has failed to meet its carbon budgets, with the sector's emissions at the same level in 2016 as they were in 1990³. Surface transport is the largest-emitting sector in the UK, accounting for 23% of UK emissions⁴ with cars accounting for the majority of them. The Sheffield City Region Mayor aims to reduce travel demand by 25% by 2030 and to reduce car miles by 25%.⁵ This is the most up to date policy and requires a more radical response to climate change than Sheffield's 2009 Core Strategy Policy CS63. In this context car traffic must be reduced.

9.0 Conclusions

The proposal is:

- **contrary to national and local Green Belt policy, harms openness, is visually intrusive, extends the built areas beyond the currently existing and thus encroaches on countryside. Whilst development at the site has the potential, in principle, to meet key Green Belt policy tests, this proposal does not;**
- **openness is adversely impacted from views both outside the site and in the wider setting and also, significantly, from public views within the site on public rights of way, which the application fails to take into account or even assess;**
- **not sufficient, with respect to affordable housing, to be so material as to allow an exception to GB policy;**
- **not specifically targeting a local affordable housing need;**
- **not sustainable development, as the site is remote and isolated from the necessary services and infrastructure;**

³ 2016 UK Greenhouse Gas Emissions Final figures, BEIS, 2018, Table 6


⁴ Net Zero Technical Report Committee on Climate Change, May 2019, Figure 5.1

⁵ SCR: Net Zero The Mayors MCA Climate Emergency Response Framework Jan 2020

- not well served by public transport or likely to be viable for walking or cycling trips. It does not promote sustainable transport (as per the NPPF) as the public transport proposals are flawed;
- inappropriate as the site is not allocated for housing nor needed for housing delivery;
- unacceptable as the Design and Access Statement and Design Code fixes nothing beyond the parameter Plans (location of housing, access points, and heights); this means the outline application cannot be assessed properly and should therefore be refused;
- contrary to local and national policies on nature conservation and biodiversity. The proposals will substantially urbanise the site and be out of character with the quiet and biodiversely rich rural character that now exists.

We trust these comments are of use. Please contact us if you need any clarifications or further information.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Andy Tickle', written over a horizontal line.

Andy Tickle
Head of Campaigns

Cc: Olivia Blake MP
Ward Councillors: David Baker, Penny Baker, Vickie Priestly
Bradfield Parish Council
Friends of the Loxley Valley
Sheffield and Rotherham Wildlife Trust
Peak District National Park Authority

President: [Dame Fiona Reynolds](#)

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