



Friends of the Loxley Valley

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Comments on planning application 26/00453/FUL

Friends of the Loxley Valley (FoLV) is a community organisation of around 160 members, which strives to care for and protect the Loxley valley's heritage and its countryside. We especially value the river corridor and valley bottom, which form an invaluable green space for people and wildlife, linking the busy urban areas of Hillsborough and Malin Bridge to the beautiful boundary of the Peak District National Park, in the space of just three miles. The Loxley and Sheffield's other rivers on the Peak District fringe are a vital part of the famous "Golden Frame" that gives Sheffield its unique character as The Outdoor City.

The abandoned old factories that form the subject of this planning application sit in the middle of this beautiful valley bottom and in the heart of the city's Green Belt. They are surrounded by mature woodland and a Local Wildlife Site. They are a historical anomaly. Resolving their future will have a critical impact on the character of the valley, its biodiversity and on the wellbeing of residents and visitors for many years to come.

The importance and sensitivity of the site was recognised by The Planning Inspectorate when a previous planning application for 300 dwellings was dismissed on appeal in 2021. In his detailed report, the Planning Inspector Martin Whitehead ruled that the proposed development would cause substantial harm to Green Belt countryside. He also said that the then applicants had not demonstrated that their development would avoid substantial harm to ecology and biodiversity. He cited too the inherent unsustainability of the site because of its remoteness from local services.

FoLV took part in the planning inquiry that led to the Inspector's ruling. We were heartened that he validated many of the points that we presented to him in our arguments. We regard his ruling as a benchmark against which the key characteristics of this new planning application should be judged.

FoLV have met the applicants during their preparation of this new proposal, to be appraised of their outline thinking. Only now do we feel we have the level of information to be able to scrutinise it in meaningful detail. We recognise that the applicants are trying to deliver a more modest development that will be in keeping with this exceptionally sensitive location.

We have shared our careful reading of the many documents associated with this application with our members and sought their views, as well as having conversations with other local people and organisations. We find it necessary to object to the application in its current form because key questions remain unanswered in the documents and there are significant areas

of concern. If the applicants satisfactorily address these aspects, we are open to reconsidering this position.

At the time of writing, we note that detailed objections have been submitted by the South Yorkshire Bat Group and by the Sheffield and Rotherham Wildlife Trust. These objections call into question the adequacy of the ecological assessments submitted by the applicants. They also raise concerns about whether the river corridor and adjacent woodlands will be properly protected. While we do not have the expertise of these organisations, we share their view that appropriate safeguards are paramount. We also note that the Environment Agency has objected to the current scheme and raised a series of issues around flooding, foul drainage and biodiversity.

In FoLV's representation, we identify our areas of concern and set out the key questions that remain unanswered by the current application documents. We do so under five areas of focus:

- Landscape and biodiversity
- Flooding
- River and watercourses
- Travel and transport
- Heritage

To begin we will summarise FoLV's view of the main points of the application

Improvements to previous applications:

- The scheme has fewer dwellings than the previous application and proposes to blend the housing into the environment more sensitively through extensive use of single storey designs, a suggested woodland setting, landscaping, and ecology-led planting.
- The application recognises the need for long term management and stewardship of the natural infrastructure of the site
- The application proposes the introduction of natural hedge boundaries between properties, which would be permeable to wildlife
- The application acknowledges the risk of artificial light pollution, and proposes design mitigations
- The amount of hard standing is significantly reduced from what is currently present.
- Natural flood management and sustainable urban drainage systems are proposed for the site, with the intention of improving water quality and enhancing biodiversity.

Continuing concerns and questions

- FoLV finds that the application's ambitions are not adequately underpinned by detailed measures in the planning application. There is insufficient evidence of how proposed environmental goals will be achieved. Documents for different elements of the planning application sometimes appear contradictory and several are lacking in detail.
- FoLV considers that the openness and tranquillity of the Green Belt will be substantially affected, though we note the applicant's consultants argue otherwise. Although it is less dense than the previous housing proposal, the proposed development remains adjacent to the river corridor and right along the valley floor in the site.
- Site sustainability remains poor as the location and topography have not changed since the previous application. Most services and amenities are via routes which are too distant, too steep or too heavily trafficked for residents to access by walking. There is no cycling infrastructure in the locality, and routes to Stannington, Hillsborough and the city centre are characterised by hazards such as tram tracks, steep hills and unlit rural roads. The bus service is very limited.
- Improving, enhancing and potentially extending public rights of way is a potential benefit, but the application lacks the necessary detail to properly evaluate this aspect.
- The leasehold restrictions on keeping "*wider natural and habitat focused garden curtilages*" to the river seem difficult to enforce. More clarity is required about how property owners would be prevented from hard enclosing and building on their areas of leasehold land.
- The current tranquillity of the area, which is a key part of the developers' vision, would be compromised by domestic noise, increased traffic and visitor numbers. The larger type dwellings may have 2-3 cars per property. Proposed café, shop, padel court, markets, picnic areas and public car parking will bring more vehicle movements on and off the site. There is inconsistency and lack of detail in the application over the number and location of public squares, markets, picnic areas, etc. We are concerned about commodifying a currently quiet river valley through activities intended to attract significant visitor numbers.
- Artificial light would increase in an area that currently offers dark habitat for nocturnal wildlife. The character of the Loxley valley would inevitably be affected. Artificial light would come from car headlights, street lighting and large glazing facing the river. Design mitigations may help, but there is insufficient detail in the current plans through which to assess this. We are particularly concerned about proposed floodlighting of the padel court.
- The proposed preservation and celebration of the 'river corridor' and the improvement of water quality lack detail. The designation of a 20m buffer zone is vaguely defined, and notional, given that curtilages of dwellings run right up to the river bank.
- Flood protection measures appear to include raising the banks of the Old Wheel dam and head goit with 600mm "freeboards". We are concerned that this would alter the character and appearance of historic water power remains.

FoLV's five areas of focus

1. Landscape and Biodiversity

The 2020 Planning Inspector's report rejected the previous application largely because of its impact on the Green Belt landscape. The Inspector said that the scale and form of the proposed 300 dwelling estate would encroach significantly into sensitive countryside, causing substantial harm. His key comments follow:

"The proposed buildings and roads and other infrastructure that would provide a link between them would result in a continuation of built form in the valley which is not apparent in the current development and would be visually uncharacteristic and conspicuous in the wider landscape. It would be highly visible and would appear as an unacceptable visual encroachment in the surrounding countryside." ...

... "The views of the buildings that would be spread over a greater area, together with the associated increase in activity, parking, traffic on new and widened roads, lighting and domestic gardens with their associated paraphernalia, would significantly increase the impact on openness to such an extent that it would cause substantial harm." ...

"...the residential character of the development would not safeguard the countryside from encroachment. There would be a degree of urbanisation and intensification of activity on the site which would alter its character in a way that would encroach into the countryside."

Thus, the applicants need to demonstrate this time that their proposed development will not cause substantial harm to the openness of the Green Belt, compared to what is currently on the site.

The applicant's case is that the new application is much smaller, lower density, lower profile, and with the 73 dwellings scattered within a woodland environment. They say the proposed site layout and landscape strategy have been carefully developed to ensure the proposed development doesn't cause substantial harm to the openness of the Green Belt or undermine the fundamental aims of Green Belt policy.

Their approach to Green Belt planning policy is set out in section 0.4 of their Planning Design and Access Statement. They say the broad planning context is determined by the National Planning Policy Framework (NPPF), as updated in 2025 *"with the explicit aim of delivering more homes in the Green Belt on previously developed land, in districts where there is an unmet need for housing."*

They cite NPPF paragraph 154, which says development in the Green Belt may be appropriate if it involves the redevelopment of previously developed land and would not cause substantial harm to the openness of the Green Belt.

They argue that the development will not only avoid substantial harm, but that it will *“positively enhance the site for beneficial uses”*. They say key landscape design elements seek to enhance the damaged and low-quality elements of the site. Section Two of the Landscape Strategy Report that forms part of the planning application deals with Green Belt openness in more detail on page 23. It argues that the low-density and low-rise nature of the scheme substantially reduces the scale and visual impact of built form in the valley. It says key landscape features will include priority habitats, blue infrastructure (*water*) corridors, mature trees and woodland belts, plus the retention of important heritage features.

Landscape Strategy Report Section Three deals with Design Principles. It defines the *“key character zones”* on the site. It sets out detailed palettes for materials and planting schemes. The *“Landscape and Visual Appraisal”* assesses the wider landscape of the valley in terms of its planning status. It assesses the likely visual impact of the proposed development as seen from key viewpoints around the valley. The visual impact is assessed at different stages of the development’s life, e.g. at the point of commencement, and 15 years later. Perhaps unsurprisingly, it concludes that the visual impact of the development would be low, and that it would be minimally visible.

The application makes much of the enhancement of the site, but we have significant concern about the following matters where detail is lacking on delivery, management, monitoring and enforcement.

The management of private woodland gardens

The open woodland nature of the proposed development depends heavily on the distinction between the residents’ freehold *“domestic”* curtilages and their *“wider leasehold natural and habitat focused garden curtilages”*. Throughout their planning of the development, the applicants have told us that this distinction is vital. They say residents will be free to use their *“domestic”* curtilages as they wish, but that their use of their wider leasehold woodland curtilage will be heavily restricted. Page 25 of Landscape Strategy Section Two indicates:

“OWNERSHIP AND MANAGEMENT

The proposed development has been designed to maximise the ecological and habitat value of the site, ensuring integration with the existing natural setting while minimising environmental impact. A key design objective is to preserve and enhance the landscape character through sensitive layout and long-term management and stewardship.

“To support this approach, private domestic curtilages are intentionally limited in extent. The majority of external space associated with individual dwellings will be designated as leasehold, with clearly defined management controls in place. This aligns with local planning policy objectives relating to biodiversity enhancement, landscape protection, and the long-term stewardship of green infrastructure.

“These controls will ensure that natural features are safeguarded and that the landscape-led principles of the scheme are preserved over time. Residents will have the option to manage these wider leasehold areas in accordance with an approved management plan or to appoint a designated private management company to undertake maintenance on their behalf. This approach provides a flexible but robust mechanism to protect the site’s ecological value and visual character.”

There are important questions that arise from this that have yet to be clarified. What are these “clearly defined management controls” and how robust will they be? Who will decide whether to appoint a “designated management company”? If residents decide to build sheds, extensions, solid fences and barbecues on their leasehold areas will either a residents committee or a private management company have the authority to prevent them from doing so? What will prevent residents from purchasing their leaseholds and thereby opting out of these conditions? Given that the valley bottom is without sunlight for several winter months, what is to prevent residents cutting back or removing trees? How will the private ownership of riverside gardens square with the need for a protected wildlife buffer zone? (Please see the objections from the Sheffield and Rotherham Wildlife Trust and from the South Yorkshire Bat Group for more detailed evidence of the importance of this buffer zone.)

FOLV is disappointed that we have not been able to find substantive details of the suggested leasehold conditions in the application.

Should the application be granted, permitted development rights should be removed and there will need to be stringent conditioning and monitoring through Planning Control. This would be needed to prevent the removal of trees, installation of hard fencing and garden buildings and the spread of domestic paraphernalia into the ‘woodland gardens’. It will be important too that the proposed annexes remain associated with the property they serve and cannot be sold separately. In a time of current budget constraints, we are concerned as to the capacity of the planning department to monitor and enforce conditions after the development’s construction.

The amount of public open space on the site, and its management

This is also unclear. The application contains inconsistent references to open spaces.

Page 40 of the Planning Design and Access Statement says:

“Central village squares will serve as focal points for community life, providing space for village markets and a range of small-scale community events. These areas will encourage social interaction and strengthen the sense of place across the site.”

“Open spaces along the River Loxley will be enhanced with riverside parks and picnic areas, creating areas that encourage outdoor activities and promote movement through the site’s natural landscape.”

This is inconsistent with the Spatial Arrangement Plan, on page 26 of Landscape Strategy Section Two. This shows only one area of *“public space provision for the community”*. This is where the shop/bar, padel court and public parking will be based in what is now the yard below Old Wheel dam.

Again, this raises several important questions: How many village squares will there be? Where will they be and how big? Who is going to organise these *“village markets”* and what exactly are they? How many *“riverside parks and picnic areas”* will there be? Where are they located and how big will they be? How is such activity squared with the biodiversity buffer zone along the riverside? Do they risk commodifying the riverside, drawing high visitor numbers and associated car parking?

Much of this seems to be at odds with the quiet woodland environment that we are told lies at the heart of the management strategy.

Lighting and the floodlit padel court

The visual impact of streetlights, car headlights and other light spillage was one of the concerns in the quotes from the planning Inspector. This time the applicants have suggested a lighting strategy that is set out in section 5.3 of the Planning Design and Access Statement. They say lighting will be low, and that it will be orientated and tilted to mitigate emissions. They say it will be minimised in areas of wildlife sensitivity, where it will also be controlled by presence detectors. The effectiveness of all this hard to ascertain from the level of detail provided as there is no lux mapping of light spill.

On the face of it, the integration of a floodlit padel court into the scheme seems potentially anomalous. When will it be floodlit? How brightly? Who will operate it? Will it be open to off-site visitors? What will be the operating hours? Floodlighting is a significant issue given the current darkness of the site, and its importance as a hunting ground for wildlife such as bats and barn owls. Can any floodlighting be compatible with the wildlife site that surrounds the valley bottom?

Again, we would refer to the detailed evidence on these points that has been submitted in comments from the Wildlife Trust and the Bat Group. We should point out that floodlighting is also a very sensitive issue in the valley because of the far-reaching light pollution from the golf driving range on Myers Lane. This forms a light halo that can be seen from miles away in other parts of the city.

Biodiversity and biodiversity enhancement area

We understand from dialogue with expert colleagues that it is not clear in the application how biodiversity net gain will be achieved.

The application says there will be an area of newly planted woodland and new wetland just north of the Old Wheel head goit and west of Old Wheel dam. A site plan on page 27 of Landscape Strategy Section Two describes it as *“a dedicated biodiversity enhancement area providing the opportunity to improve habitat value, increasing species and structural diversity whilst offsetting biodiversity loss”*.

The Planning Design and Access Statement says the wetlands will include a dedicated nature watch hut which offers residents and the wider community opportunities to engage with local wildlife and biodiversity. This sounds a potentially interesting and beneficial aspect of the plan, but how will delivery be monitored? Where exactly will it be? How big? How will the supply and flow of water to wetlands be controlled and is it intended to reactivate the historic sluice next to the weir? Who will manage and maintain it, and how? How will its effectiveness be evaluated? Should the application be granted, such aspects will need to be conditioned.

The ‘example’ photographs (example of landscape wetlands adjacent to a pond and image of nature-watch hut in wetlands) appear to be of nature reserves and the application does not adequately demonstrate how this would work in terms of a housing development. Encouraging residents and the wider community to engage with local wildlife and biodiversity does not in of itself, mitigate against any losses to habitat and nature arising from the development.

The biodiversity enhancement area is said to be complemented by other new planting schemes to offset the loss of trees that will have to be removed to facilitate site clearance as indicated on page 18 of Landscape Strategy Section Two. It includes

- Individual native and native cultivar tree planting within domestic and wider lease-hold curtilages
- Layers of mixed native planting including trees along the River Loxley corridor
- Areas of mixed native scrub within lease-hold curtilages, along the river corridor and within areas of publicly accessible space

How will site management ensure that the leasehold curtilages retain and maintain such planting?

The current application shows the loss of specific trees, parts of trees and groups of trees but elsewhere other documents on contaminated land still refer to the complete removal of vegetation. Such inconsistency makes the application less convincing.

If the application is granted, planning conditions should be set to ensure retention of trees and a Tree Preservation Order should be implemented across the site.

2. Flooding

The application gives contradictory information about flood risk: the application form indicates that the site is not in a flood zone but the Planning Design and Access Statement states that “the proposed development is at high risk of flooding from fluvial, pluvial and groundwater sources with low to insignificant risk to flooding from all other sources.”

Flood mitigation is proposed through installing permeable pavements, bio retention systems and SuDs (sustainable urban drainage system) basins and swales. All housing will have 600mm elevation for flood defence. The community hall will have 600mm internal elevation. The Mill Leat and Mill Pond will have 600mm freeboards to raise bank levels, about which we have concern in terms of the site’s heritage. We note too the Environment Agency objection with regard to the lack of an adequate flood risk assessment given that the application uses modelling prepared for the previous planning application.

The current planning application proposes Packaged Sewage Treatment systems, but we see that the EA object to using privately owned package treatment systems within 30 m of a foul sewer, indicating that they are unlikely to grant a permit.

3. River and watercourses

The application recognises that “*Watercourses are a key feature in the valley’s ecosystem*”, and that “*The River Loxley and associated water features are integral to the valley’s landscape and ecology*.” It also notes that “*The site benefits from existing strong layers of blue infrastructure including the River Loxley and the mill pond. Together, alongside the green infrastructure, these are a key priority habitat corridor, forming the backbone of the proposed development site*.” The Landscape Strategy suggests “*a unique opportunity to enhance local habitats, increase biodiversity, reduce flood risk, and improve water quality*.”

It says that improvements to the river corridor will include “*selective thinning of trees and vegetation, additional targeted planting of native species, and water quality improvements following remediation*” as well as “*waterside habitat improvements to the river corridor and millpond including reed beds, marginal/aquatic planting and nesting provision*.”

The planning application describes “*an area identified as being at high risk of flooding from fluvial, pluvial and groundwater sources*”. Planning application documents propose an

integrated SuDS network *"including attenuation features, drainage ditches and permeable paving."* They assert that *"Swales and ponds will also be landscaped to create natural habitats. New marshlands to be landscaped with referral to ecology's recommendation to increase the biodiversity on site. 10m buffer zone on either side of the river to be retained where deemed possible to reduce the impact of the existing biodiversity in river corridor."* Elsewhere it is described as a *"River corridor buffer zone for aquatic wildlife."*

The valuing of the watercourses and the proposed use of SuDs and approaches to 'slowing the flow' are positive, as is the articulation of intended water quality improvement.

Concerns and questions regarding river and watercourses

The 10m buffer zone each side of the river is not clearly defined. On the site plan dotted lines roughly identify a 20m river corridor, implemented *"where deemed possible"*. The landscape strategy says *"the river corridor, will be preserved and celebrated"* but there is little detail in the submitted documents as to what this means in practice. How will any buffer zone operate when properties' curtilage runs right to the river?

Given that the housing would bring a concentration of domestic animals into this area and into the river which are likely treated with worm/flea/tick insecticides, this will pose significant risks to aquatic wildlife in the waterways. Pet animals will bring predation.

The application claims water quality will be improved following remediation – but there is not much detail as to the ways this is defined. The Flood Risk Assessment & Drainage Strategy says: *"Water quality has been assessed in line with the CIRIA simple index approach, as detailed in Section 8.10 and the site is considered to adequately deal with the worst-case anticipated pollutant levels."*

The application says that the River Loxley is not currently significantly impacted by contamination from the site, but the site remediation and enabling works strategy it offers dates to the previous scheme. We have not found further groundwater analysis or refining of the assessment.

Toxic leachates on site are identified in the environmental reports. There is no detail on protection and monitoring scheme for water quality during construction or afterwards and what strategies would be in place to address problems arising. We are not confident from the application that the river will be adequately protected.

To mitigate flood risk *"through the development lifetime and ensure there is sufficient conveyance of water through the river and associated structures it is recommended that river walls, channels, bridges and culverts within the site are cleared of silt and debris and are regularly inspected and maintained as required."*

How would this programme of work affect the biodiversity of river habitats and fish spawning grounds, as well as nesting and foraging water birds?

This area of the River Loxley is predominantly dark. Whilst some strategies are described to manage light pollution on the site, the plan drawings show large glazing and gardens facing the river along much of the development, which will not be so well controlled. As previously

mentioned, the proposed padel court is proposed to be floodlit, which seems counter to the mitigation of lighting. The river corridor is identified in the application documents as a key area for bats feeding and artificial light can be extremely disturbing for foraging bats.

4. Travel/Transport

At the previous planning inquiry, the Planning Inspector's report stated that the site is *"remote from most necessary services and facilities and that the topography and distances from local services would make it unlikely that future residents of the proposed development would walk or cycle to such services. Furthermore, the use of the existing bus services would be unattractive, given the relative location of the bus stops from the site, the infrequency of services and the time that it would take to access necessary local services"*. In summary: *"Its location is not sustainable"*.

Is the situation any different when applied to a development of 73 houses as opposed to a development of 300 houses? Will residents in the proposed development be most of their travel by foot/bike/bus or by privately owned cars?

There is also a proposal for a local shop (as part of the community hub) selling essential goods (presumably to encourage as much 'local shopping by foot' as possible). However, this was proposed in the previous application when the Planning Inspector questioned its viability in a community of 300 properties. The proposal to include a café (as part of the community hub and for which very little detail is provided) would probably lead to an increase in visitor traffic.

The application makes many references to improving, enhancing and potentially extending the public rights of way running through the site. But improvement and enhancement are subjective notions. What does it mean? Rerouting these rights? Better surfaces? Vegetation management? More detail is needed.

The only document that shows Public Rights of Ways (PROW) marked is in 'Landscape Strategy Report Section 2', 'Site Plan as Proposed Pedestrian and Vehicular Route', drawing (08) 118 revision B. The document shows existing rights of ways and proposed path diversions. However, some of these require further consideration to make them accessible routes as per the stated aims of the application. See more below.

The 'Transport Assessment' document states *'Pedestrian and cycle access will be provided between the two development parcels to provide connectivity between the two areas and reducing walking/cycling distances.'* (Page 30, Section 6.19). Following a site visit this can only be achieved by designating the current public footpath BRA/53 as a public bridleway from the western most part of the site to the new access road to the eastern part of the site past Old Wheel farm. This would also require works to connect the bottom of the Storrs Bridge Lane to the current footpath, BRA/53, as there are currently steps down to the footpath which would make it inaccessible to anyone other than fully mobile pedestrians. There is an old hard surfaced access track that bypasses the steps that could be reinstated to provide an accessible route that does not impact the proposed site plans.

FoLV's understanding is that Storrs Bridge Lane is an 'Unadopted Public Highway' so all users have rights of way. However, the new access road past Old Wheel farm is a private road with no public right of way. Given this will be the primary means for the community to access the facilities such as the cafe, shop and padel court, this would have to be designated as a public bridleway or above to confer access rights.

As the continuation of public footpath eastwards from the new access road to its junction with Rowell Lane at Rowell Bridge is wide and surfaced it is an obvious means to access the countryside to the south of the site. Designating this as a public bridleway would make it possible for residents and the community to access the site by all means of non-motorised transport.

The line of the current rights of way and a permanent diversion of a section of BRA/53 would now be on road or pavement. Given the stated aim of providing cycle access, this should be on LTN/20 compliant infrastructure where possible.

With respect to the permanent diversion of footpath BRA/56, at the eastern end of the site this would necessitate three 'right angled' turns very close to each other, which is not good practice. From the plan there is a clear option to provide a straighter diversion that would not impact on the property curtilage.

The 'Historic Environment Desk-Based Assessment' states: '*The proposed development includes for the retention of, and enhancements to, the public footpath network within the Site.*' and '*improved access*'. FoLV have not found any details of what these enhancements would be.

Any improvements or enhancements to rights of way should also require the provision of commuted funds from the developer for future maintenance of the PROWs for a reasonable amount of time.

Rowell Lane currently has a 60mph speed limit. The planning application proposes mitigation measures to improve sightlines and surfaces at the entrance to the new access road from Rowell Lane. But there is no consideration of changes to the speed limit or measures to slow traffic down. Traffic measurements show average speeds of 47.6mph around the junction of the access road. Serious consideration should be given to a 40mph limit from Loxley Road to past the houses south of Rowell bridge. This would provide added safety to both pedestrians and road users, and it could encourage active travel.

Loxley Road between the junction of Rowell Lane and Storrs Bridge Lane is a 'National Speed Limit' carriageway from approximately 400 metres to the west of the junction of Rowell Lane. It is therefore a 60mph zone at the junction of Storrs Bridge Lane. The planning application proposes mitigation measures regarding sightlines at the junction. This would need to take into account the Tree Preservation Order in place on the trees lining Storrs Bridge Lane. Extending the 40mph restriction to the west of this junction would be beneficial for the reasons stated above.

The previous application provided for an enhanced bus service for a period of five years using Section 106 money. This application makes no mention of this, and the smaller development would seem to have less capacity to leverage better public transport.

If the application is granted, the movement of materials on and off-site during construction, will require strict conditions to determine the number of lorry trips and hours during which this will take place. There are major issues in the valley relating to the transport of inert waste used in construction at the golf driving range on Myers Lane.

5. Heritage

FoLV felt that the heritage assessment produced as part of the previous planning application was characterised by oversights and omissions. It failed to adequately assess the water power remains on the site, dealing superficially with what was there, and suggesting there was unlikely to be anything of archaeological significance.

Since the previous application, FoLV and other local organisations have secured the local listing of the valley's water power heritage assets on the South Yorkshire Local Heritage List. In April 2026 we placed new signage along the valley from Rowell Bridge to Malin Bridge to celebrate our water power heritage.

The heritage elements of the new planning application

The heritage and historic significance of the proposed development site is assessed in a 115-page "Historic Environment Desk-Based Assessment". This report is thorough, detailed and comprehensive, in comparison to the previous application.

We recognise its conclusions as reprised on page 20:

"Overall, though the scheme results in some loss of significance for heritage assets of low, or local, value, it also offers up clear heritage public benefits, relating to the enhancement and interpretation of features within the Site."

From FoLV's perspective, the planning application seems to preserve and protect the history and heritage on and around the site that we have fought hard to protect.

There is, however, one major concern. Earlier in this report, in the section on Flooding, we have cited a proposal in the planning application to install "freeboards" along the Old Wheel goit, and on the banks of Old Wheel dam. This would be to raise their level by 600mm as a flood defence. On the face of it, this would heavily alter their appearance and could compromise historic features. It is difficult to see how this squares with a commitment to preserve and enhance water power heritage.

We note too that the Environment Agency's objection to the current application makes a series of requirements which, if implemented, would also have significant impact on the water power heritage of the Loxley valley. Balancing the natural and historic aspects of Sheffield's

rivers is the subject of work being undertaken by a sub-group from Sheffield Waterways Strategy Group which includes key stakeholders including the EA, Don Catchment Rivers Trust, South Yorkshire Archaeology Service and the city's river friends groups such as FoLV. Its involvement should be sought in any reworked proposals.

Conclusion

FoLV now urges the applicants to provide the necessary level of detail in those areas where it is currently lacking and to address the inconsistencies which reduce our confidence in the delivery of a high-quality scheme. From our discussions with the developer, we had expected that the application – as it is a full application, rather than an outline – would contain all the key evidence from which we could understand how the key sensitivities of this location would be safeguarded. We had previously shared feedback with them as to the areas of the scheme where further mitigation might be needed and where additional care and attention was required. It is disappointing that the clear aspirations they have repeatedly articulated for an exemplary development are not backed up in the application documents by detailed information as to its delivery. If the concerns we have raised throughout this representation can be fully mitigated in improvements to the application, we would consider withdrawing our current objection.

If finally granted, the application should have strict conditioning to prevent changes to the substance of the application design. Any permission granted should remove permitted development rights to prevent the spread of further building and Tree Preservation Orders should be used to enforce the retention of trees within domestic curtilages.

The site remains in the Green Belt and has not been designated for housing in the Sheffield Local Plan. At the Planning Inquiry, the Inspector made clear that it is an unsustainable location for volume housing and that it is a site whose development could cause substantial harm to the openness of the Green Belt. The developers have asserted that they want to produce an exceptional scheme that befits this special place, protects the natural environment and recognises its cultural history. It is incumbent upon them that the application they submit provides evidence of how exactly they can deliver this.